



**Comann nam Pàrant (Dùn Èideann is Lodainn)
Written Deputation to Education, Children and Families Committee
Monday 24 January 2022 at 10am**

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Comann nam Pàrant (Dùn Èideann is Lodainn) represents families across Edinburgh and the Lothians. We campaign for the development of Gaelic Medium Education by liaising with families, listening to their concerns, amplifying their voices and advocating on their behalf.

We take the time to consult with GME families, gather their views and reflect these in all our communication with the City of Edinburgh Council. In the past year, we have shared with the Council survey reports, given written and verbal deputations, outlined significant concerns in ongoing correspondence and raised key questions in meetings. All of these provide rich, detailed, essential information which we share openly with the Council to inform their decision-making on proposals for a new GME high school for Edinburgh.

In light of ongoing discussions with the Scottish Government, the late changes to the most recent proposals and the overall complexity of the changes, Comann nam Pàrant has consistently asked the Council to engage meaningfully with the GME community they serve before proceeding to the statutory phase of consultation. The Council has instead chosen to publish a proposal without undertaking any of the informal engagement they assured parents would take place in December 2021 and to push ahead with a statutory consultation which appears to have little support from the families most affected by the proposals.

Discussions with the Scottish Government on their potential financial support for a GME high school have not been fully explored by the Council and, as such, do not form part of the proposal. Comann nam Pàrant has highlighted repeatedly that the Council must take the actions required and allow reasonable time for these discussions to reach a conclusion before proceeding to any statutory consultation.

As it stands, the Council are seeking to proceed to statutory consultation with a proposal that contains considerable changes, such as the inclusion of a GME secondary facility on the existing Castlebrae High School site in Craigmillar, proposals for changes to primary level provision and a new pupil placement policy which would impact families in Edinburgh and the Lothians. The quality of our children's education and the growth of the Gaelic language is what is central to these changes, both of which are at risk if these proposals do not deliver a successful outcome on those measures.

We ask that you:

- Vote against starting the statutory consultation
- Fully explore financial support available from Scottish Government
- Engage with GME families and undertake an informal consultation in order to address their questions and concerns

Scottish Government and former Royal Victoria Hospital site

In August 2021, the Council met with the Cabinet Secretary and, following this, the Council decided to examine the Royal Victoria Hospital site. Such collaboration between the Scottish Government and City of Edinburgh Council was very welcome, particularly given the SNP's

manifesto commitment to a centrally-located school and a general presumption against co-location.

In a letter to Cabinet Secretary on 24 November, the Council asked ‘whether the Scottish Government [was] willing to make the former Royal Victoria Hospital site and the extra funding required to deliver a GME secondary school at that location available to the Council.’¹

On 14 November, Cabinet Secretary wrote to the Council noting that ‘it would be premature for the Scottish Government to indicate any financial commitment to one particular option in advance of a [feasibility] study being carried out.’ and ‘that significant questions remain both about the cost, viability and availability of the Royal Victoria site in the timescales needed. These are important questions and again the proposal of a feasibility study would provide the necessary clarity on this and other options and would assist with decision making.’²

Comann nam Pàrant agreed with this suggestion. The Council, however, responded to the letter stating that ‘[the Scottish Government] are not in a position - even in principle - to provide extra funding to build a new Gaelic secondary school.’ and went on to say that ‘consequently, it is not possible to include the Victoria site in our Statutory Consultation. We are therefore left with the two options to put to the Gaelic parents. The co-located option at Liberton and stand-alone option at Craigmillar.’

Comann nam Pàrant disagreed with this interpretation. The Cabinet Secretary had, in fact, stated that without a feasibility study, the Scottish Government is not in a position to comment on financial commitment. She had not stated that the Scottish Government would be unable to provide financial support, only that this cannot be confirmed until a feasibility study is carried out first.

The Council’s proposal states that ‘the Scottish Government have not confirmed they can make the former Royal Victoria Hospital site available to the Council.’ It is therefore not included in the proposal. The Council has taken the decision to discount an option without first undertaking the suggested feasibility study, an option which had the potential to align not only with the Scottish Government’s manifesto commitment of a ‘stand-alone centrally-located school’ but, crucially, to the priorities and criteria underpinning parents’ ambitions for GME.

In our most recent survey, carried out in December 2021, parents urged the Council to diligently and fully explore the support from the Scottish Government to deliver what is best for GME in Edinburgh and the Lothians. We believe that until the options as promised in the SNP Manifesto are fully explored and exhausted there should be no statutory consultation on the development of GME in Edinburgh, especially any proposals which are counter to that proposed by the Scottish Government.

Finance

The Scottish Government already provides capital and revenue funding to the City of Edinburgh Council for the growth of GME. In terms of Government support for a new GME high school, the Council notes that ‘approval of the required additional capital and revenue funding would be required to be established by Council as part of future budget processes.’ and ‘This would include collaboration with the Scottish Government to develop the business plan for delivery and operation of the new GME infrastructure required across the city in the

¹ [City of Edinburgh Council letter to Shirley Anne Somerville, 24 November 2021](#)

² [Letter from Cabinet Secretary to City of Edinburgh Council, 14 December 2021](#)

longer term.' **It is not clear whether either of the options in the proposal are financially viable without this.**

In their letter to Cabinet Secretary on 24 November 2021, the Council stated 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.' We ask again that the Council can provide information on their budgeting for the development of GME in Edinburgh and the Lothians, and whether they have included the cost of a GME high school at all within their own budget or if a new school is **entirely dependent on financial support from the Scottish Government.**

Given the apparent need to collaborate financially with the Scottish Government on any site allocated for GME in Edinburgh, it is not clear why the Council have opted to terminate negotiations with the Scottish Government rather than collaborating with a partner who has made a specific manifesto commitment to the development of GME in Edinburgh.

Establishment of GME primary teaching units / Early Years GME Provision for Edinburgh and the Lothians

We welcome the Council's proposal to create **additional GME primary provision** in the west and south-east of Edinburgh and that the intention is for this to come onstream as soon as **August 2023**. Additional GME provision in areas of Edinburgh other than the north of the city, where Bun-sgoil Taobh na Pàirce is located, could certainly encourage growth in GME by making it accessible to a much wider range of families and reducing the burden of daily travel to Bun-sgoil Taobh na Pàirce.

Additional GME primary provision would have the further, eventual benefit of creating **additional streams** of GME students who would transfer to a **thriving GME high school**, enabling young GME students to meet new people, embrace new ideas and broaden their horizons at this hugely important time in their lives. One of the current constraints of GME in Edinburgh is that the opportunity to mix with **Gaelic-speaking peers**, other than the group that have spent their entire early years and primary school careers together, is limited.

However, we have several concerns regarding aspects of this proposal. We are disappointed that the Council have proposed that the additional primary provision will comprise GME teaching **units**, at least initially, rather than full GME primary schools. We believe that this is short-sighted and **lacks ambition** for GME in Edinburgh. It is acknowledged that an **immersion model** of GME is most successful and this is extremely difficult to achieve in a school where the working language of the school is English, particularly in the initial years after opening, when the number of GME pupils is likely to be low. Indeed, as the Council itself states: '**Despite huge efforts from all concerned, it is very difficult to fully develop a Gaelic Medium Education culture within a much larger English medium school**'.

This would also create a **two-tier system** of GME education in Edinburgh - **primary units** are unlikely to attract families to GME, whereas **schools provide confidence**, which saw the **roll double** with the opening of Bun-sgoil Taobh na Pàirce. It is likely that families with older siblings at Bun-sgoil Taobh na Pàirce would choose to have younger siblings attend the same school and would be permitted to do so under the Council's proposed placing policy on the creation of three geographic catchments for GME in Edinburgh as per Schedule 4.6.

Clas 1 applications for the new GME primary provision opening in August 2023 would need to be submitted in just over nine months (November 2022). Although we have advocated for additional GME primary provision for some time, we feel that without

significant engagement with the communities in which the new provision is to be located, it will be difficult to publicise the availability and potential benefits of choosing GME and it may be that take up of the provision may be slow, due to a lack of awareness among families local to the proposed new provision. Crucially, without **detailed plans for Cròileagan and early years provision** aligned to the new primary provision, neither of which are contained in the Council's proposals, it could be many years before sustainable growth is achieved, if at all. **It was two full years before Bun-sgoil Taobh na Pàirce opened that Cròileagan began operating on a weekly basis in Leith, alongside a major publicity campaign highlighting the future establishment of GME in the area and the benefits of a bilingual education.**

Considering the challenges involved in recruiting and retaining GME teachers in Edinburgh, we are concerned that a position as a **sole GME teacher** in a new GME teaching unit may not attract many candidates, especially since there are many, potentially more attractive, roles available for GME teachers across the country. **There is no detailed plan for how the new GME primary provision would be staffed.**

Establishment of three geographical catchments for GME in Edinburgh

We welcome the vision in the proposals which seeks to expand primary provision across the city by the establishment of geographic catchments for GME. We can see that this offers opportunities for less travel for young people in primary school and may increase take up across the Lothians.

It is unclear, however, what **strategic assessment** of the proposed catchments has been carried out, nor the **rationale** behind the establishment of these boundaries. For instance, **a child living by the Royal Commonwealth Pool would be expected to attend Bun-sgoil Taobh na Pàirce, at a distance of 2.7 miles (and would thus be eligible for free home-to-school transport) rather than the proposed GME unit at Prestonfield Primary School, at a distance of 1 mile.**

In addition, the proportion of the school age population located within the boundaries of the proposed catchments appears **inconsistent** with the proposed volume of GME provision. The "north" catchment represents approximately 35% of the school age population and contains the two-stream Bun-sgoil Taobh na Pàirce, whereas the west catchment represents approximately 40% of the population but is proposed to contain a one-stream GME primary unit, which, in turn, is the same level of provision planned for the south-east catchment, which represents just approximately 25% of the population.

We ask that the Council provide greater detail and explanation on the strategic assessment and rationale underpinning the proposed primary catchments.

Introduction of a placement policy

There is currently **no** pupil placement policy in place for GME in Edinburgh. As such, all children living in Edinburgh and the Lothians whose parents choose GME are allocated a primary school place at Edinburgh's stand-alone GME primary school, Bunsgoil Taobh na Pàirce and can transfer to James Gillespie's High School (JGHS) for secondary GME provision. There is currently no policy on the **maximum number** of children that can be accepted into a **Clas 1** intake at Bun-sgoil Taobh na Pàirce. Children who **do not speak Gaelic** can join Bun-sgoil Taobh na Pàirce before **the end of Clas 2**. Children who **do speak Gaelic** (whether or not they have attended GME elsewhere) can join Bun-sgoil Taobh na Pàirce **at any point** from Clas 1 to Clas 7.

We are concerned that the Council proposes to introduce a pupil placement policy for GME in Edinburgh as provided in Schedule 4.17 - 4.19, which could have a significant detrimental impact on the growth of GME and, indeed, on individual learners who are already attending Bun-sgoil Taobh na Pàirce.

The Council's report **does not contain figures** to demonstrate what level of applications to GME would be considered to “exceed the number of places available”, nor does the report specify when the proposed placing policy would take effect, although we assume it would coincide with the creation of the catchments aligned to the opening of the proposed new GME teaching units in the west and south east of Edinburgh. Nevertheless, we are concerned that the proposed policy will serve as a **disincentive** to families to choose GME for their children, due to **uncertainty** as to whether they would be allocated a Clas 1 place until just **five months prior to starting primary school**. This would also cause associated uncertainty as to whether a family should make the necessary sacrifices to engage with early years GME without knowing whether their very young child, or indeed any subsequent siblings, will be allocated a place in Clas 1.

We also question the **stipulation** in Schedule 4.19, whereby pupils would need to “evidence **full attendance** at a GME primary provision in from primary one to primary seven” in order to receive a place within secondary GME. While this is likely to apply to the majority of pupils transferring to a GME high school in Edinburgh, it is currently the policy that children can join GME anytime before the end of Clas 2. It would also discriminate against families (particularly Gaelic-speaking families e.g. **potential GME teachers**) who have moved to Edinburgh during their child's primary school career but who had not been able to access primary GME provision in their previous location, serving as a disincentive to Gaelic-speaking families to moving to Edinburgh.

There are a number of pupils already attending Bun-sgoil Taobh na Pàirce who would not be eligible to transfer to GME secondary provision if the proposed policy is introduced as described in the Council's report.

Out of catchment requests

We are also concerned that the Council proposes to introduce a pupil placement policy for GME in Edinburgh as provided in Schedule 4.20-4.21, which deals with **families who are resident outside Edinburgh**. The Councils report states that “While the existing provision at Bun-sgoil Taobh na Pàirce currently provides access to pupils from other Lothian authorities, due to the legacy of the Lothian Regional Council, there is no official policy associated with this arrangement.” As Comann nam Pàrant have stated previously, this is **erroneous**, as continued usage of this policy means it is *de facto* a City of Edinburgh Council policy.

There are currently 52 children attending GME who are not resident in Edinburgh (15 in secondary and 38 in primary - figures from May 2021), almost all of whom live in either East Lothian, West Lothian or Midlothian. GME is arguably a bigger commitment for these families than those who live in Edinburgh, due to the distances involved. It is understood that there is no GME provision in any of these other local authorities and that there has been **no engagement** (informal or otherwise) with either the current **out of catchment GME families** or their **local authorities** regarding either the proposed changes, nor any plans for their own local GME provision.

We are concerned that the proposed placing policy will serve as a **disincentive** for out-of-catchment families to choose GME for their children, due to **uncertainty** as to whether or not they would be allocated a Clas 1 place until **just five months prior to starting Clas 1**. This would also cause associated uncertainty as to whether the family should make the necessary sacrifices to **engage with early years GME**, at a sizeable distance from home (if

they can even access a place in GME early years provision) without knowing whether their very young child, or indeed any subsequent **siblings**, will be allocated a place in Clas 1.

We are also concerned that the proposed placing policy would act as a disincentive for out of catchment families to chose GME for their children due to item 4.21 in the report, which indicates that a placing request would be required in order to be allocated a place in GME secondary provision. These applications are completed in **November of Clas 7** and the child would not know if he/she had been allocated a GME secondary place, along with their Edinburgh-resident classmates, until the **March of Clas 7**. We believe that this is **unacceptable**, both on the grounds of the impact on a child's well-being and since there would be no other GME provision available to that child.

In short, rather than encouraging the growth and development of GME in Edinburgh, we are concerned that the proposed placing policy would have the effect of **capping numbers of GME pupils**, causing **uncertainty for would-be GME families** and **discriminating** against families who have moved to Edinburgh or the Lothians during the child's primary school career, and may well speak Gaelic, but who have not been able to access primary GME provision at their previous location.

Secondary provision: Liberton and Castlebrae

Liberton option

The Council states that their preferred option is a "co-located" GME high school at the site of the replacement Liberton High School. Indeed their intention is that 'by the time this statutory consultation is concluded, a **planning application will have been submitted** for the construction of a dedicated GME secondary facility on the Liberton site.'

The Council states that the schools would share only sports and dining facilities, on a timetabled basis. However, **no plan of the site has been provided** with the report, despite the quite advanced design stage that would be expected for a proposal that is soon to be the subject of a planning permission application. It is therefore unclear where each of the two high schools (GME and EME) and potentially a GME primary school would be located on the site. There is also no indication of how each facility would be accessed.

It is also unclear how much of the structures proposed for the site have already been designed, nor how this design would need to change if the Liberton option for a GME high school was progressed after the consultation. In our last written deputation, we noted that from the Wave4 schools update that community engagement has already taken place and subsequently informed the strategic brief for the architects to develop the design of the Liberton High School rebuild. The Council's proposal does not outline how, or indeed whether, such engagement might be undertaken with the GME families that the Council hopes will be part of this community. Given that the schools will share some of their facilities, we would expect such progression to run in parallel with the timeline for a GME high school. The Council's sequencing appears to prioritise deliverability over engagement.

Castlebrae option

Castlebrae as an option for a stand-alone GME high school was presented to parents attending a meeting in person at Taobh na Pàirce in 2019. Shortly afterwards, this option was dismissed by the Council as not being suitable due to the negative financial implications of using this site for an educational facility and the lack of funds the Council could access. By January 2020, the only option given to parents was Liberton and a co-located school. The informal consultation held November/December 2020 offered only one option in the proposal: a co-located school with Liberton.

In December 2021 a stand-alone school at Castlebrae was included as a potential consultation option, (alongside the potential consultation option of a stand-alone school at the former Royal Victoria Hospital site). Parents and interested parties have been given no opportunity for an informal consultation on this new addition. It is impossible for parents to make an informed choice without the opportunity to ask questions, before they are asked to respond to a proposed statutory consultation as to whether this is an favourable option.

It is not clear from the consultation document how the two options provided in the consultation document differ and of the detail given in Appendix 4 which would apply to the both options. **Without clarity and detail of the individual offer provided by both options, parents are unable to make a well-informed and considered response to the proposed consultation, relying on generalised statements which may not necessarily be deliverable in both settings.**

Curriculum

Since 2019/20, GME pupils at JGHS are classed together for their registration classes and have all classes (except for Maths, where they are streamed by ability alongside EME students) with their GME peers. This is to permit timetabling of GME students together for subjects that can currently be delivered through Gaelic at JGHS.

S1 and S2 form the Broad General Education (BGE) phase at JGHS, during which pupils attend a wide range of subjects e.g. Maths, English, **Gaelic, History, Geography, Modern Studies, Science, Art**, Home Economics, Personal and Social Education, Craft Design and Technology, Business Studies, Religious and Moral Education, a modern language (French or Spanish), Music and **Drama and Media**. The subjects highlighted in bold are the ones that are currently taught through Gaelic to S1s and S2s, although this varies depending on the availability of Gaelic speaking staff, timetabling etc. All students also have weekly Key Adult time and, for GME students, efforts are made to ensure that their Key Adult is a Gaelic-speaker. For GME students in JGHS S1 and S2, Gaelic is considered to be their Language 2 (3 periods per week) and French or Spanish is considered to be their Language 3, despite having already started this in Clas 5 (one period per week). By contrast, EME students have 3 periods per week of French or Spanish (whichever language they started in P5) and one period per week of a new language (German or Mandarin).

When the students move up to S3, they choose the courses that they will study for their **National 4/5 qualifications**. The examinations take place at the **end of S4**. At JGHS, students choose **eight** subjects at this level. All students at JGHS are required to take Maths, English, at least one language, at least one science and at least one social science. GME pupils are **required to take Gaelic** as one of their eight subjects. GME students who choose History or Modern Studies can opt to study this in a class that is taught through the medium of Gaelic (but with English-language resources, assignments and examinations) or in an English-language class. At this stage, apart from their timetabled Gaelic language subjects, GME students are classed with their EME counterparts.

In S5, students select which subjects they will study for their Higher qualifications. A typical number of Highers in S5 is four or five. GME students can choose **Higher Gaelic**. There is no expectation or obligation for GME students at this stage to choose Gaelic and there are no other subjects delivered through the medium of Gaelic in S5. In S6 students may choose to study for Advanced Higher qualifications, or further Higher qualifications, or a combination of both. GME students can choose to study **Advanced Higher Gaelic** (although this has been outsourced to Edinburgh College for 2021/22, due to a lack of available staff at JGHS). Again, there is no expectation or obligation for GME students at this stage to choose Gaelic and there are no other subjects delivered through the medium of Gaelic in S6.

The Council has provided some information about the proposed curriculum that would operate at a new GME high school, including a aspirations to increase the number of subjects taught through Gaelic, including examination courses and to develop the GME high school as a **centre for excellence for languages**, both of which we broadly welcome.

However, the remainder of the information provided does not address many of the specific questions that parents have about the curriculum, how it would be delivered and how that would differ depending on which site was chosen for the new GME high school. For example, the proposals do not specify what **subjects** would be taught as part of the broad general education phase and how any **initial gaps in staffing** at the GME high school (due to small initial numbers) would be filled.

The Council states: 'The rationale and design of the curriculum – over-arching across the whole campus would provide a much greater variety of skills and knowledge to support the developing Secondary GME curriculum across the BGE and into the senior phase, giving access to a variety of courses and flexible, progressive pathways.' This unfortunately **does not answer** whether if, for example, there was no Maths teacher initially employed at the new GME school, whether GME BGE (and, eventually, beyond) pupils would be taught in **their own GME school, alongside their GME classmates**, or whether the GME pupils would be distributed among the year group of another high school to be taught Maths. This is a question that has been repeatedly asked and we feel that it has not been sufficiently addressed, even in these latest proposals. This gives the – perhaps unfounded – impression to families that the Council intend to deliver such subjects, even in the BGE phase, in a way that would not be favourable to parents, and that the Council are unwilling to provide that level of detail.

A further specific question on the topic of curriculum that has been raised by parents but remains unaddressed in these most recent proposals is whether the new GME high school would operate a '2+2+2' model, as is the case in JGHS, whereby students are able to study **eight** subjects at National 4 or 5 level, or a '3+3' model, which would permit fewer subjects to be studied at that level. This is particularly important for GME pupils, since they have **three compulsory subjects** English, Maths and Gaelic and if the number of National 5 subjects that they would be able to study at a new GME high school is reduced, this **narrows their subject choice options** considerably. Again, that this question has not been specifically addressed in the proposals leads to the impression that the Council plan to follow a model that would permit fewer subjects to be studied at National 5 level but are unwilling to make that transparent to parents.

Without this level of detail and transparency it is impossible for parents to adequately assess the merits of the proposals, nor how they might provide an educational benefit, compared to the current GME secondary provision at JGHS/Darroch, nor, indeed, their local EME provision.

The Role of the Darroch Annexe

From August 2022, subject to the completion of the Darroch Annexe refurbishment, the intention is that JGHS GME S1 and S2 students (along with some EME S5 and S6 students) will attend most of their classes at Darroch.

It is understood that there are two reasons for this: (i) the main JGHS campus at Warrender Park Road has insufficient **capacity** for the entire JGHS school roll, which comprises students from five primary schools, including Bun-sgoil Taobh na Pàirce and, as such, JGHS has secured the agreement of the Council to use the Darroch Annexe as additional capacity for its students and (ii) the **Scottish Government** have provided Gaelic-specific funding towards the cost of the refurbishment of Darroch, with the intention that it be used for GME.

However, **it is more recently understood that if secondary GME is relocated as the Council proposes, the Darroch Annexe will continue to be used by JGHS until its roll reduces to a level that can be accommodated at the main campus alone.** It is unclear precisely how and when this decision on the role of Darroch was made and its implications regarding the Scottish Government Gaelic-specific funding, nor the fate of Darroch once the JGHS roll becomes manageable at the main campus. Previous proposals had included the use of Darroch as a stand-alone GME primary school.

It is understood that **timetabling** for the 2022/23 GME S1 and S2 cohort will be developed over the coming months. It is not currently clear which **subjects** will be delivered at Darroch nor which **staff** will be based there full time, but it is understood that the intention is that the GME curriculum and the GME staff team will be developed and strengthened in preparation for GME to move to a new location in 2025, 2026 or 2027. It is understood that additional **funding** has been agreed in order to cover (some) of the additional costs involved in running a school across two sites and that this funding will be **targeted** towards the recruitment of GME staff, which we very much welcome.

Further **information** about the use of the Darroch Annexe can be found in this [presentation](#) that was shown to current Clas 7 and S1 parents in October/November 2021, during a Bun-sgoil Taobh na Pàirce Parent Council meeting. **We seek greater clarity on the planning and decisions regarding the future use of the Darroch Annexe.**

Recruitment and retention of teaching staff

Recruitment and retention of staff able to teach in GME was raised as a significant concern in our recent parental survey and in Comann nam Pàrant's previous communications with the council. These concerns focused on the ability of the Council to deliver sufficient staffing for a GME High School: training and finding new teachers, immersion, curriculum choices, number of teachers, confidence in the level of Gaelic of the teaching staff, and queries around where these new teachers will come from.

We acknowledge there is a section in Appendix 4 on 'Leadership' and we welcome the commitment to recruiting a senior leadership team during the transition phase and the details on the mentoring, coaching and professional reviews that the team will have in place. We also appreciate the commitment in paragraph four that training for all staff will be provided and that staff will work towards the Edinburgh Gaelic Teachers Charter.

However, given the important role the development of a teaching team will play in any expansion of offer, we are disappointed by the lack of detail within the consultation document as to how any recruitment and retention of staff will be undertaken. A number of general statements are made throughout the consultation document to 'increased number of teaching professionals', and 'the expanded GME team'. Yet the document **fails to provide any detailed plan** as to how the council will approach the development of a GME teaching team for either primary or secondary school.

In terms of the planning for the growth of GME secondary staff, the Council states that 'this has already started due to the expansion of GME provision at James Gillespie's High School.' However, figures provided by the Council this month (January 2022) show that the number of staff employed at the JGHS, who were delivering subjects through Gaelic at the beginning of the academic year in **August 2020** was **nine**, but this had fallen to just **six** by **August 2021** (not full time equivalent (FTE) figures), due to the departure of the former curriculum lead and two other full time, fluent Gaelic-speaking members of staff. Indeed, the proportion of the S1/S2 curriculum delivered through Gaelic delivered at JGHS has unfortunately declined between these two dates.

Parents are questioning how the Council will provide enough teachers across three primary schools/units and a high school when there are already issues around training and recruitment with one fully-immersive GME primary school and a part-time Gaelic timetable at high school, which does not have the capacity to deliver Advanced Higher Gaelic without the support from Edinburgh College.

It is also unclear which of the current Gaelic-speaking staff would be expected to transfer to any new GME secondary location, considering that some have mainly EME responsibilities at JGHS, but we understand that it would not be the full current contingent.

We welcome the Council's statements in Schedule 3.2: "Within Edinburgh's Gaelic Medium Education Improvement Plan, careful consideration will be given to the recruitment, development and enhancement of a staff team able to support a full, rich curriculum suited to the needs of the school community" and Schedule 6.3 "Planning for the growth of secondary staff has already started due to the expansion of GME provision at JGHS."

However, we are concerned that, considering the **challenges** involved in the recruitment and retention of GME staff in Edinburgh, as often noted by the Council themselves, and the recent significant **decline** in the number of staff teaching through Gaelic at JGHS, that the **two years** between the end of the proposed consultation and the potential opening of a new GME high school will be **insufficient** to achieve this. Indeed, the impression is given in the Council's report that the **Edinburgh's Gaelic Medium Education Improvement Plan has yet to be created**.

We therefore seek greater clarity from the Council as to how their ambitions for staffing a GME high school might be realised and ask them to provide tangible plans for the recruitment and retention of staff.

Community

Comann nam Pàrant welcomes the intention that the new school will provide the base for Iomairtean Offices and Capital Gaelic Development Officer and the Council recognises the key work they do to support Gaelic language and culture in the city and the support they give to the Gaelic community.

However, the points on 'community' largely focus on the school and its learners, with the Council referring to 'working within the Curriculum to improve learners' experiences' and 'fostering a strong identity as a GME learning community', rather than considering wider Gaelic community outwith the school. In terms of locations, parents seek evidence for how each of these would support a **community purpose which is specific to Gaelic**.

'Connecting with Communities' is one of the Council's themes which the Council states will 'continue to be addressed through a detailed engagement process with learners, their families and school staff to ensure the growth of GME in Edinburgh is successful.' However, the commitment to communities as a key theme would be better evidenced were engagement to take place **prior to the statutory consultation** rather than after the process. As already mentioned, the Council's proposal contains new information on which the Gaelic community has not been given the opportunity to engage with through an informal consultation, thus removing the opportunity for the Council to reflect **the needs and ambitions of the community** in its proposal.

Timescales

Our most recent survey results show that parents believe that the issues of local elections and of rising rolls at JGHS had an **unnecessary and unjustifiable impact** on the

timescales for a GME high school. We have already highlighted to the Council on several occasions that the timelines for a new GME high school should be based on **ensuring the best outcome for the pupils** this new school will serve and that rising rolls at James Gillespie's should be separate from this discussion.

Despite this, the Council's proposal references rising rolls again. Indeed, Appendix 3 notes 'possible rising rolls accommodation pressures need to be addressed' in a table which only includes intake from GME primary schools and not from any other feeder primary. Presenting information in this way **misrepresents the issue**. The pupil numbers at JGHS are projected to be greater than the capacity of its main campus whether or not GME remains at JGHS in the medium term, hence the requirement for JGHS to access the Darroch Annexe from August 2022. Given that the capacity of Darroch is well in excess of the number of GME pupils at JGHS, the **rising rolls issue should not be a determining factor** in the timeline for the opening of a new GME high school.

Engagement

In their update on Gaelic Medium Education Statutory Consultation on 7 December³, the Council noted that they intended to 'carry out further informal engagement with school communities on the education implications of these options during the remainder of December 2021. Except for one meeting with Comann nam Pàrant and the Chairs of Bunscoil Taobh na Pàirce Parent Council and James Gillespie's Parent Council, the Council has not undertaken any wider engagement with GME families.

Such engagement is crucial; indeed, the Council itself notes that 'partnerships that reflect and strengthen our shared vision, values and aims, including those with parents, are vital to the success of GME.' Engagement is particularly important given the re-introduction of Castlebrae as a potential site, an option which was not fully explored by the Council in previous proposals and thus did not form part of the Council's informal consultation in December 2020.

In our most recent survey of families, **engagement** with and **listening** to parents, including the building up of **trust** from the parent body, was the second most common theme to emerge when parents were asked what other information they would like to see included in any consultation (informal or statutory) on GME secondary school provision in Edinburgh. GME voices were felt to be key to the consultation and assurance was sought that the Council would not push through an option which does not have support from the GME community.

In addition, our survey results there was the need for the statutory consultation itself to allow for full participation, for example through an inclusive approach with questions designed to enable people to answer them and to feel listened to. We note from the Council that 'an easy-to-read summary document of the proposals including a glossary of key terms will also be prepared and made available during the consultation'. However, such provision should have been included in the current proposal given that this is the first-time parents have seen the new information contained within. For some parents, this lack of provision creates a barrier to accessing key information and, therefore, reduces the opportunity to engage.

Comann nam Pàrant would also like to urge the Council, again, to consider the new academic year which started in August 2021 and brought with it new children and their families who have just begun their journey in GME. As such, there are now new GME

³ [Update from City of Edinburgh Council on Gaelic Medium Education Statutory Consultation Full Committee](#)

families which need to be consulted. They too deserve to be fully informed prior to any statutory consultation taking place.

In short, the Council has not established, maintained or developed engagement with parents on the latest proposal. We encourage the Council to engage with families in a meaningful way to ensure the process is as authentic and inclusive as possible.

December survey results

An **informal consultation** on proposals for GME secondary provision was undertaken by the Council in **December 2020**. The **Outcomes Report** for the Informal Consultation was published in **March 2021**, and demonstrates some **progress** towards the ambitions of GME families that came out of the informal consultation. However, many parents were concerned that questions that they had submitted to the informal consultation remained **unaddressed**, despite the Council's **promise** that all questions would be answered.

The proposals that the Council now intends to consult formally on are the Council are **substantially different** to the proposals contained in the December 2020 informal consultation and the March 2021 outcomes report, yet **no further informal consultation** with GME families has been undertaken, despite the Council's **promise** to do so in December 2021.

In order to understand and **represent the views of GME families** and the areas in which they felt that the Council's proposals continued to require further detail, Comann nam Pàrant carried out a detailed survey of the GME parent body in December 2021. The full report on the survey is included in the Appendix to this deputation.

The survey received **125 individual responses**, incorporating almost every current GME year group. Year groups that would be **most affected** by the proposals, ie C3, C4 and C5, were particularly **well-represented**.

Across each of **12 topics** relating to the proposals, a **majority** of respondents indicated that they required further information about 11 of the 12 topics. **81%** of respondents indicated that they require further information on the topic of **Curriculum**. The topics with the next highest proportion of respondents indicating a requirement for further information were **Location (76%)**, **Timescales (73%)**, **Staffing (70%)** and **Transitions (69%)**. The results of this survey reinforce the assertion that significant unanswered concerns remain, preventing families in GME from engaging meaningfully with the Council's proposals.

The overarching message from parents is the need for the Council to take time to adequately develop their plans for GME, to properly consider the significant issues that are being raised and to address these comprehensively. In addition, parents look for much greater engagement from the Council. They seek a proposal which is informed by the needs of the GME community it seeks to serve. The conclusion Comann nam Pàrant reaches from the responses to the survey is that a clear and demonstrable educational benefit for children in GME has yet to be presented.

We consider that this provides the most up to date assessment of the detailed views of GME families, bearing in mind that the most recent public (online) meeting for GME families held by the Council was in December 2020 and that its proposals have evolved significantly since then.

January 2022 Survey

Given that the Council's proposals were published just **72 hours** before the **deadline** for submission of written deputations, we have not been able to seek detailed contributions from GME families as to their impressions of these. However, we have initiated a **short survey** with just two questions, to which we have asked parents to respond. The survey will be open until noon on Sunday, 23 January so that we can present the results as part of our **verbal deputation** to the Committee meeting on Monday 24, January. However, at time of writing (11am Friday, 21 January) the survey has received **177 individual responses** and we include these **interim** survey results here for illustrative purposes only.

Question 1. Based on the proposals in the Council's report, do you think that the Education, Children and Families committee should approve a statutory consultation commencing on 31 January 2021?

Yes	9.6%
No	80.23%
Unsure	10.17%

Question 2. On the basis of the information you have received to date, how confident are you that the Council's proposals will lead to the delivery of a GME high school that will meet the needs of your child(ren)? (5=very confident, 1=not at all confident)

5	3.37%
4	1.69%
3	6.74%
2	23.6%
1	64.61%

Conclusion

As evident in this deputation, there are significant concerns from GME parents and the wider community regarding the Council's decision to seek to proceed to statutory consultation on a GME high school at this time.

The Scottish Government has expressed support for a stand-alone, centrally-located GME secondary school. However, this has not been allowed to be seriously and fully explored by the premature conclusions of the Council who have chosen not to undertake the Cabinet Secretary's suggested feasibility which would have allowed the Government to assess potential financial support. We call on the Council to collaborate with the Scottish Government in realising the ambitions set out by the SNP in 2021.

The unreasonable timescales set by the Council do not allow for the necessary informal consultation with families. This must be allowed to take place in order to have a proposal which fully reflects the needs of the people it seeks to serve. GME families have the right to be fully informed and given the opportunity to reflect, ask questions and seek clarification on the proposed options for GME secondary education. As elected representatives and officials involved in this process have themselves repeatedly stated, parental engagement is of paramount importance.

This deputation has highlighted specific areas of concern in relation to all aspects of the proposals - early years provision, primary school provision and their associated geographic catchments, the proposed pupil placing policy and the proposals for secondary GME provision (irrespective of whether the option for a co-located or stand-alone school were to be progressed). We ask that the Council address these areas of concern prior to any

statutory consultation in order to show a genuine commitment to sustainable, holistic development of GME in Edinburgh. We ask you to take an approach which meaningfully engages with the GME families who would be impacted by the proposals.

Throughout our surveys, written deputations, letters and meetings, we have demonstrated to the Council that GME families do not feel informed or listened to, nor do they believe that the Council's proposals meet their needs, nor do they wish the Council to proceed to statutory consultation. We have repeatedly highlighted that parental support is crucial to securing a successful outcome to the statutory consultation. We reiterate this now: proceeding without the backing of those most affected by the proposals creates substantial and unacceptable risk. Should the consultation fail, the development of a dedicated GME high school will be halted for five years. We urge the Council to fully acknowledge this and to act in the best interests of GME families, their children and the community. We therefore strongly advise the Council to vote against proceeding to statutory consultation.