Submission from Comann nam Pàrant (Nàiseanta)

EDUCATION BILL 2015
CALL FOR WRITTEN SUBMISSIONS

This response from Comann nam Pàrant (Nàiseanta) will be limited to the provisions made for Gaelic in the Bill.

In 2004 in response to the consultation on the Gaelic Bill CnP (N) said:

‘Although the Bill as proposed will permit Bòrd na Gàidhlig to advise on the provision of Gaelic education, it does not give any parental rights to Gaelic medium education, nor does it include the important areas of pre-school, community or higher and further education. There will not be a significant rise in the demand from parents for Gaelic education until they can be assured that they are committing their children to a system of education that is legally established as part of the Scottish education system and given the same support as accorded English medium education.’

We do not feel that the proposals in the current Education Bill provide the ‘parental right’ to Gaelic medium education that we expressed as above and for which we have been campaigning over a prolonged period.

We ask that the provisions of this Bill be amended to include the right of parents to Gaelic Medium Education in accordance with Comunn na Gàidhlig’s Equal Status recommendations in 1999; that is ‘Education Authorities make provision for Gaelic Medium Education at every level at which reasonable demand exists’.

Q10. The Guidance prepared by Bòrd na Gàidhlig on how GME should operate is an opportunity to realise a standardisation of provision throughout Scotland. The current variation in quality of provision between local authority areas is unacceptable to parents. As we do not yet have detail on the content of the Guidance, Comann nam Pàrant would expect the opportunity to comment on this Guidance at a future date. We hope that the recent ‘Advice on Gaelic Education’ published by Education Scotland in February will inform part of the Guidance.

Parents are expressing concern as to which body will have a regulatory function in ensuring implementation of the Guidance once the Bill is passed.

We have a 3-18 curriculum in Scotland therefore it would be appropriate if parents were able to request GME for their children from the age of 3. However, children are able to access P1 GME without nursery Gaelic medium, so parents should not be prevented from requesting GMPE for children who have not had GM nursery provision.

Parental requests should be for GME Gaelic medium education) not GMPE (Gaelic medium primary education) as currently referred to in the Bill. Children need continuity of provision through to secondary in order to achieve fluency. If there is not this progression through to secondary children’s language development either halts at age 11 or regresses.
Q11. In our view one the most effective means of promotion from local authorities would be for them to include Gaelic medium education as an integral part of their ‘normal’ activities. For example, all Local Authority Early Years Strategies should include support for Gaelic pre-school, all Family Information Services should include information on GME. Local authorities can also raise awareness of Gaelic medium provision through a variety of promotional activities. This may also involve on occasions contacting parents on an individual basis, for example, by sending letters to pre-school parents informing them of the availability of GME, such is done by Highland Council.

Q12. We welcome provision in the Bill of a process for Local Authorities that would be followed on receipt of a request for GME. This process should be accessible and easy to understand. Each local authority should identify an official as a contact for parents who are interested in, or have issues regarding, GME within their authority. Local authorities must ensure that their employees are aware and supportive of Gaelic language initiatives. Parents should not have to deal with officials who have little or no knowledge or interest in Gaelic medium education.

During the ‘assessment process’ local authorities must follow the guidance issued with the Bill. They should be required to seek advice from BnaG, especially regarding cost implications and teacher recruitment, if considering refusing a request because of any point under subsection (7). The assessment process should be open, accountable and involve the parents. Parents should have the right to appeal a decision that refuses GME provision and any such appeal should be above local authority level.

Gaelic Medium Education has always been reliant on committed parents who have been willing to spend time and effort to lobby their councils for GME provision. However, if we are looking for substantial expansion in GME – and this is the aim under current Scottish Government legislation – it does not seem reasonable to expect one parent to take responsibility for making a request to a local authority for GME in their area. Nor does it seem reasonable to expect that a particular parent might take responsibility for collating information on potential interest from other families, as might impinge on data protection issues. We believe that there should be a clearer role in this process for Gaelic organisations.

Although Gaelic medium provision has developed mainly in response to ‘parental demand’ over the past 30 years, that demand was very often created by the activities of the Gaelic pre-school organisation at that time, Comhairle nan Sgoiltean Àraich. This organisation had a network of local development officers who were actively promoting Gaelic medium education and providing encouragement and support for parents with the process of requesting GME. The presence of similar organisational support will be fundamental if we are to achieve growth in GME. We also need a national organisation to identify areas of potential development and provide a more cohesive national strategy for future growth of GME.

We accept that ‘reasonable demand’ may be difficult to quantify and welcome guidelines in the Bill but we feel that 5 children per annum, particularly in some rural
areas, will be an unreasonable minimum and that there should be some flexibility on this.

Subsection 3(a) details the organisations that should be consulted as part of the assessment process. As a significant stakeholder in Gaelic medium education, we believe that Comann nam Pàrant (Nàiseanta) should also have an input to this process to ensure that the views of Gaelic medium parents are adequately represented.

Q13. Education Guidance issued under the Standards in Scotland’s Schools Act 2000 already provides local authorities with guidance on the provision and promotion of Gaelic that they should be undertaking. This Guidance from 2000 states that the following should feature in authority policy statements and annual reporting:

- Promotion of Gaelic medium education
- Entitlement to Gaelic medium education
- Provision of Gaelic education on basis of reasonable demand
- Measures to support Gaelic pupils and teachers
- Improving Gaelic education at pre-school, primary and secondary
- Ensuring good quality resources are available for Gaelic education

Comann nam Pàrant is concerned that local authorities have not adhered to the guidance issued under the Standards in Scotland’s Act 2000 and that they will also be able to disregard this new legislation. Regulation and ensuring implementation of the Bill and associated guidance is concerning as it is not clear to us who will have this role and the powers to carry out this function.

Q14. There will not be a significant rise in the demand from parents for Gaelic education until they can be assured that they are committing their children to a system of education that is legally established as part of the Scottish education system and given the same support as accorded English medium education. Parents need to know that their children will be supported throughout their education, 3-18. It is not clear to us that the Bill will provide security in provision for those parents currently in the Gaelic medium system if, for example, a local authority decides to withdraw either GME provision itself or perhaps withdraw support for transport to such provision. Parents are also extremely concerned regarding the current difficulties that some schools are facing with recruitment and retention of high quality Gaelic medium teachers.

Generally parents with children currently in GME are more concerned with maintaining and improving standards in GME than they are with growth in numbers.

If the Bill is to help deliver growth in GME there also needs to be:

1. Increased funding for GME
2. Radical action to meet demand for teachers
3. Increased support for children with additional learning needs in order to ensure inclusion in GME
Currently most of the growth in numbers in GME is in dedicated Gaelic schools. There should be provision in the Bill for parents who wish to request a dedicated Gaelic school in their area rather than provision through a Gaelic department within an English medium school. Parents and local authorities would benefit from guidance on when the transition to a dedicated school is desirable and what process should be followed.

Q15. The local authority may have budgetary concerns in implementing these new duties and it is therefore imperative that Specific Grant Funding continues to be available to support growth in GME. However, we do need to move on from the misconception that GME is inherently more expensive than EME (which is not the case) and local authorities should also be funding GME from their education budgets. Local authorities must not be allowed to use ‘additional cost’ in delivering GME as a reason to refuse parental requests for GME. Local authority Specific Grant spend should be monitored and more of an emphasis put on funding new developments in GME.

In summary, the Gaelic Language Act 2005 places a requirement on Bòrd na Gàidhlig to produce a National Gaelic Language Plan every 5 years. The most recent plan for 2012-17 states ‘The purpose of this Plan is straightforward; it is to secure an increase in the number of people learning, speaking and using Gaelic in Scotland.’ An increase in the number of children in GME is seen as crucial in creating new speakers of Gaelic and, with a clear demand from parents for GME, local authorities should not be permitted to put any obstacles in place which inhibits the aim of this legislation.

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