

Bòrd na Sgoile / School Board
Bunsgoil Crois na Cìse / Tollcross Primary School
Drochaid an Fhuarain / Fountainbridge
DÙN ÈIDEANN / EDINBURGH
EH3 9QC

10 An t-Samhain 2006 / 10 November 2006

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A Mhgr Morgan chòir / Dear Mr Morgan,

**CONSULTATION RESPONSE:
DREACHD PLANA NÀISEANTA NA GÀIDHLIG / DRAFT NATIONAL
GAELIC PLAN &
DREACHD STIÙIRIDH AIR PLANAICHEAN GÀIDHLIG / DRAFT
GUIDANCE ON LANGUAGE PLANS**

1. I am writing on behalf of the School Board of Tollcross Primary School (“the Board”) and am pleased to submit comments on your draft of Bòrd na Gàidhlig’s (“BnaG”) first National Plan for Gaelic, the National Gaelic Education Strategy and the accompanying draft Guidance on Language Plans. The key elements of this response have been discussed with representatives of Comann nam Pàrant Dhùn Èideann agus Lodainn (“CnamP”), and with others involved within the wider Gaelic community in Edinburgh. The Board is happy for this response to be made public.

Background and Introduction

2. As you will be aware, Bunsgoil Crois na Cìse/Tollcross Primary School provides Gaelic-medium education (“GME”), including nursery provision, for the whole of the Edinburgh and Lothians area. There are currently 98 pupils (P1 to P7) within the GME unit at the school, with a steady growth in intake having occurred in recent years. This growth is projected to continue. There are currently 34 children attending the GME nursery. The school also services an ethnically (and linguistically) diverse mainstream catchment.

3. The Board is justifiably proud of the school’s record of success, across both GME and mainstream provision, and notes that this strong performance has been widely acknowledged, including by HMIE.

4. In relation to GME provision, the school has an impressive record of achievement not merely in relation to academic attainment, but in terms of supplementary indicators such as the involvement of GME children in wider community initiatives and a high degree of parental satisfaction and commitment.

5. In addition to its record in delivering GME over almost two decades, the school has had some recent experience in delivering Gaelic Language in Primary Schools (“GLPS”) to more senior pupils in mainstream education, as part of a wider initiative taking place across Edinburgh.

6. The school, in conjunction with CnamP, has also been attempting to support parents who wish to acquire and develop knowledge of Gaelic. This has, for example, included the provision of classes for adult learners (eg a course based on Ùlpan principles, delivered by Deiseal Earranta on behalf of CnamP) and the establishment of an Ionad Goireasan Phàrant/Parents’ Resource Base within the school.

7. As a consequence, the Board is keen to collaborate in the development of better-integrated and accessible provision for learners of Gaelic (including both older children and adults/parents), in order to cater for demand from those who have been unable (for whatever reason) to benefit from access to GME.

8. However, in the view of the Board, it is essential that such new provision for learners is developed *in addition to*, rather as a substitute for, a much-needed general expansion of GME provision at pre-school, primary and secondary levels. This is an important principle, which is implicit in the draft Plan, but which requires (in a world in which there are many competing demands on resources) to be stated explicitly.

General Comments on draft Plana Nàiseanta

9. The Board welcomes BnaG’s acknowledgement of the fundamental importance of GME in the draft Plan and fully supports the package of proposed measures developed by BnaG in order to deliver “accelerated growth in pupil numbers across the continuum of GME” (p45).

10. We would also wholeheartedly endorse the recent statements by the Chair of BnaG that “GME has been one of the success stories of Scottish education”, and that “We would not be where we are in Gaelic were it not for the success of GME”.

11. In general, the draft Plan appears capable, when finalised, of providing the vision and structure which are essential if Gaelic education is to be developed and extended. The objective stated for the subsidiary National Gaelic Education Strategy – “to expand ... momentum of growth, increase the number of Gaelic speakers and provide strategic, co-ordinated guidance on the development of Gaelic education” (p43) - represents a very helpful statement of intent. In general terms, therefore, the Board is content to endorse the Plan and to put on record its support for the vision mapped out by BnaG.

12. The Board does note, however, that the Plan, Strategy and Guidance are complex documents. This is in part because the policy issues and underlying concepts (such as language planning) are themselves complex and in part because considerable thought has clearly gone into the vision which BnaG has developed. More could, however, be done in the final version to make the documents more immediately accessible. For example, a summary guide to the structure and key goals/actions would be helpful, clarifying how the various Aims, Targets, Outcomes, Themes, Priorities and Tasks in the documents relate to each other and to the overall vision being pursued.

13. It is also arguable that the Plan represents rather more of a national strategic framework than a detailed plan for action. Whilst there are indeed targets specified, outcomes identified, priorities set and key tasks listed, much of what is said remains essentially aspirational. In short, the Plan, Strategy and Guidance very helpfully identify much of what needs to be done, but provide rather less information about how these tasks will be undertaken in practice. A clear focus on practical implementation will now be required. Greater use should, incidentally, be made of SMART objectives, when setting targets and evaluating progress.

14. These observations in no way detract from our overall support for the initiatives which BnaG is promoting or imply any lack of recognition for the considerable efforts which have gone into creating what is, without question, a detailed and sophisticated piece of work.

15. However, the practical experience of the Board is that a fair degree of support already exists for Gaelic and Gaelic education. This is true for example amongst parents, teaching staff, key local authority officials and the many volunteers who work to deliver initiatives ranging from improved awareness of GME to classes for adult learners. But what is all too often lacking are appropriate support and co-ordination mechanisms, together with the financial, staffing and other resources necessary to ensure that such initiatives are as fully effective as they should be.

16. Thus, to take one example from within the National Gaelic Education Strategy, the Board would be very keen to see provision for Gaelic wraparound care. It is unclear, however, how this might in reality be developed and resourced. To our knowledge, CnamP is not currently in a position to take on such a developmental role. The school would certainly find the task extremely challenging, and we believe it unlikely that the local authority would currently be willing to take action, not at least without additional resource being provided from an external source. Against that background, we would be keen to establish how key tasks of this kind might in practice be taken forward.

Key Challenges

17. Such criticisms aside, the Board is heartened that the draft Plan acknowledges the existence of a range of key challenges facing Gaelic and welcomes the identification of key areas for future action.

18. In order to address such challenges, the Board would wish to see BnaG making full use of its powers:

- to promote GME at pre-school, primary and secondary level;
- to provide guidance to education authorities in respect of GME; and
- to fund and promote methods of acquiring Gaelic outside the formal educational system.

19. We would also wish to see clear guidance from BnaG on the function and delivery of initiatives for learners. This should include definition of the outputs (and levels of attainment) which such programmes should deliver in order to satisfactorily support extended language use and the stabilisation/growth in numbers of fluent speakers.

20. This is particularly important in relation to the encouragement and promotion of properly structured GLPS and Gaelic Learners in Secondary School (“GLSS”) programmes. The goal here must be to deliver forms of provision which meet the requirements of parents, children and the wider Gaelic community, not least in relation to continuity, levels of proficiency attained and access to opportunities to obtain formal qualifications or pursue career options. It is not clear at present that existing initiatives meet these criteria.

21. In view of the Board’s particular interest in educational and related provision, we are especially conscious of the following challenges:

Geographical Breadth of Provision

- We welcome acknowledgement in the Plan of the impact of demographic change and the presence of significant numbers of Gaelic speakers, and potential Gaelic speakers, outwith traditional “heartland” areas (p6).
- This underlines the importance of delivering high quality GME provision, services for learners and wider community initiatives across Scotland as a whole, not least in areas where no current provision exists. We note that these areas include those parts of the Lothians, Fife and Borders which are beyond reasonable daily travelling distance from Tollcross.

Addressing Weaknesses in Current Provision

- The continued existence in relation to GME of “difficulties in the system” (p6) is a significant challenge. A particular pressing concern in Edinburgh is the absence of continuity of GME provision into secondary education.
- Given the record of achievement of GME at primary level, and the fact that a primary GME unit has existed in Edinburgh for almost two decades, this lack of secondary provision is inexcusable. It is, moreover, a failing which continues to generate considerable parental dissatisfaction. The emphasis given by BnaG to continuity of provision and on expansion at secondary level is therefore extremely welcome, but needs to be reflected in practical action.

Awareness and Opportunities for Participation

- We see a pressing need to expand awareness of Gaelic and to offer improved opportunities for participation in GME. Again it is a matter of significant regret that GME in Edinburgh has not been promoted as consistently or pro-actively as it should, despite its long-term record of success.
- The Board appreciates the practical resourcing challenges (including in particular the current shortage of qualified teaching staff) which would inevitably result from more general awareness of GME as an educational option. However, we see this as an argument for properly managed expansion, not as a justification for maintaining low levels of awareness.
- As a consequence, we welcome the emphasis now being placed by BnaG on the need for education authorities to ensure that all parents (and potential parents) are aware of GME as one of a number of educational options.
- There is an important related requirement to secure equality of access to GME on the same basis as for mainstream educational provision – ie factors such as socio-economic background or disability should not be allowed to artificially restrict opportunities to participate.

- The existence, in practice, of such constraints is a significant concern for the Board. Particular difficulties include not only lack of awareness, but also the serious practical challenges associated with issues such as school transport and drop-off/pick-up arrangements, particularly where children and parents have to travel long distances to attend school. This is compounded by the absence of any alternative GME provision in Edinburgh and the Lothians for children and parents for whom long-distance daily travel to Tollcross is simply not a practicable or affordable option.
- Again, we would welcome greater attention by all parties to ensuring that access is genuinely “available without condition to all who request it”, in line with undertakings given to the Council of Europe by the UK Government. It is important for BnaG to remain alert to questions of equality of access and to ensure that practical barriers to participation are removed.

Information and Research

- There is currently a relative absence of research and data to inform forward planning by education authorities, schools, parents and other interested parties in relation to GME and the needs of learners.
- This includes, for example, basic data about awareness of GME as an educational option, as well as in relation to levels of actual and potential demand for GME and other provision. These data are essential in informing sensible decisions about future managed growth in Gaelic education.
- We therefore welcome the recognition that “language planning can only be truly effective if based on a planned programme of research and survey” (p10). Important aspects of this should be carried out by both BnaG and individual local authorities, within a national research framework. This is consistent with the desire of most public authorities to found policy development and service delivery on objective data.

Breadth of Linguistic Experience

- Formal education is, inevitably, constrained in its capacity to provide access to the full spectrum of language use and registers which should be available to a fluent adult speaker. The Board therefore welcomes the manner in which the Plan links progress in education with progress in other key action areas, including the need to promote language use and vitality in a wider environment - at home, in the community and at work.
- We would point out that, for schoolchildren, a large part of the day-to-day environment which can be understood as “work” and “community” is represented by the classroom and non-classroom (eg. playground, meals, assembly, sport, after-school clubs etc) aspects of school. It is important that the Plan, Strategy and Guidance promote and support enhancement of a fully-rounded language experience, by encouraging use of Gaelic in all aspects of daily life.

Support for Parents

- Learning support for parents is currently weak. This impacts heavily on those who have limited or no Gaelic. Whilst the school and CnamP have undertaken a number of initiatives to try to address parental requirements, a more structured and properly-resourced package of measures is essential.

- In particular, we would highlight the importance of provision for adult learning, including the potential for this to make linkages to the school curriculum, thereby giving parents greater capacity to support their children in activities such as homework.
- Improved advice to parents on the educational strengths of GME as a model would be helpful, since the decision to enrol children in what is still frequently seen as an “experimental” form of education can be an intimidating experience. Greater clarity on questions such as the need for prior exposure to Gaelic at pre-school level or in the home, together with advice on providing effective parental support as children progress through school, would be particularly helpful. In the experience of the Board, children from non-Gaelic speaking homes do indeed make an extremely successful transition into GME, without a requirement for significant prior exposure to Gaelic. Nonetheless, it is natural for parents to have concerns about potential impacts on educational attainment. These need to be addressed.

Support for Teachers and Availability of Teaching Materials

- Important advances have been made in recent years in relation to the quality and availability of both teaching support materials (eg through the work of Stòrlann) and of professional development support. We very much welcome the continued emphasis on these areas within the Plan and the National Gaelic Education Strategy.
- The attention given in the Plan to addressing the critical shortage of qualified GME teaching staff, combined with recognition of the importance of providing GME teachers with attractive professional and career development opportunities, is very welcome. This is an area in which further *urgent* action is required.

Application of Best Practice

- Acknowledgement of the importance of sharing experience and learning from best practice in language planning and service development, both across Scotland and internationally, is essential. It is apparent that a number of exciting and important GME initiatives have been occurring in recent years in Scotland. Considerable expertise in relation to minority language education and community development also exists in other places, most obviously in Wales and Ireland.
- It is therefore important that education authorities across Scotland learn from and apply models of best practice, with BnaG having an essential role to play (in conjunction with professional bodies and academic institutions) in promoting such interchange and the application of best practice.

Draft Plana Nàiseanta - Specific Consultation Questions

22. The Board is happy to supplement the general comments made above by responding to the questions specifically posed in the consultation paper.

Is the vision of the draft Plan one in which you can share?

23. Yes. The vision of an expanding and dynamic Gaelic community, comprising both learners and native speakers is entirely appropriate and realistic.

24. Achievement of this vision would be considerably assisted by a clearer acknowledgement of the large number of individuals who already exist as “affiliated” members of the Gaelic community (eg semi-proficient learners, native speakers who have lost proficiency and those who have no command, but who wish to learn). In the context of the school, there is obvious potential for growth, by capitalising on the commitment and engagement which already exists amongst non- and partial-Gaelic speaking parents. We would welcome recognition by BnaG of the importance of providing language acquisition and development opportunities geared to the needs of this key constituency.

25. The principle that Gaelic should be recognised as a national asset, without entailing diminution in status or support for other languages is entirely proper. The Board would also strongly endorse the recognition by BnaG of the richness of Scotland’s culturally-diverse heritage. Indeed, our own experience at Tollcross means that the Board is particularly conscious of the multi-cultural and multi-lingual nature of modern Scottish society. This is true not merely of the mainstream intake to the school, but also of children participating in GME.

26. Overall, it is the view of the Board that a multicultural society, which feels at ease with ethnic and linguistic diversity, will be a society within which Gaelic and the Gaelic community can prosper. Similarly, the manner in which society treats its indigenous minorities - including the extent to which past discrimination and injustices are acknowledged and redressed - is indicative of our cultural and political maturity as a society, and of our capacity to accommodate the needs of more recent, non-indigenous minorities. Emergence of the principle of “equal respect” is a welcome consequence of moves to secure the status and future survival of Gaelic. In the school environment the Board would hope that all children, parents and teachers feel that their diverse cultural and linguistic identities are properly respected.

27. Against this background we would note that a particularly careful balance must be struck in relation to the expansion of GLPS provision. The Plan rightly notes both the need to promote greater general awareness of, and access to, Gaelic, and the importance of enabling Gaelic to develop as the language of *choice* for an ever increasing number of Scots.

28. It is clearly important to ensure that primary school children across Scotland encounter Gaelic as part of the cultural and linguistic heritage of the country in which they live. Opportunities to learn Gaelic, and the teaching of other modern languages, also provide an introduction to models of language learning encountered in secondary and tertiary education. This approach has had particular relevance at Tollcross, where Gaelic has been taught to mainstream pupils in an environment where it is a living language with obvious practical day-to-day application.

29. Nonetheless, the existence of other legitimate community aspirations, and the potential for tensions to arise, should not be overlooked, at least in a primary (as opposed to secondary) education context where there is limited scope to address questions of choice. Again, the Board would be keen to establish a much clearer understanding of the overall purposes and outputs envisaged for GLPS.

In the light of your response to the above question, are the proposed sectoral projects essential to the meeting of the action area aims for 2012? If not, why not?

30. In general, yes. In particular, we would agree that it would be wholly insufficient to address education in isolation, without reference to other key contexts for language use (such as home, community, culture) or without tackling the challenge of status.

31. It is of course a truism that any language will prosper if there is perceived to be a benefit in speaking it, and a mechanism exists to acquire proficiency. The draft Plan goes some way towards addressing the question of benefit (largely focussing on heritage, identity and community benefits, with educational attainment as an attraction, together with increasing potential for straightforward economic reward).

32. We would welcome further attention to this aspect to language planning. This improved understanding should then inform the development of corresponding practical mechanisms geared to satisfying immediate demands for language learning amongst those (such as many GME, and indeed other, parents) who already see a benefit in Gaelic but currently lack the practical means to acquire the language.

33. In this context it is worth noting that we have been very favourably impressed by the potential of Deiseal Earranta's Ùlpan initiative to deliver desperately needed learning opportunities. The Board would urge BnaG to look further at the potential offered by this model, and to do so as a matter of urgency.

34. On points of detail, we would:

- draw attention to the dangers of over-reliance on census data in measuring performance. Under *Vitality* the aim for 2012 properly relates to numbers of *fluent* Gaelic speakers. This is not however the same as the 2011 Census target, which makes no reference to the question of proficiency.
- note that more could be done to project achievable levels of growth for the future, bearing in mind the existence of identifiable constituencies (eg GME and GLPS/GLSS parents), the emergence of new delivery models (eg Ùlpan) and the availability of models for language growth and community development derived from experience in other minority language situations.

Are the outcomes for the twenty themes and the priorities for tackling them correctly outlined and prioritised? If not, why not?

35. Again, in general, yes. In terms of the educational requirements of Gaelic, the Plan is correct in identifying the necessity of action under the themes Early Years, School Years, Tertiary and Lifelong Learning and Education Resources. As the Plan suggests, securing the availability of sufficient staffing and resources to support future growth is of critical importance. This is rightly flagged as a theme in its own right.

36. In relation to resourcing, we note the very welcome move to 3 year funding for Specific Grant. This will be important in enabling (and encouraging) longer-term planning by local authorities. The use of clear funding criteria is also important. However, we have important concerns about the practical consequences of increased pressure to mainstream funding arrangements for essential support mechanisms such as school transport. It is vital that changes in this area are not allowed to impact adversely on children and parents or to restrict opportunities to participate in GME.

37. It also remains fundamentally important to guarantee continuity of provision, so that there is satisfactory educational progression, through transition from pre-school to primary to secondary stages of GME. Similar considerations apply to older children who begin to access Gaelic via GLPS but who require continuity of provision within the later years of primary and into secondary. The necessity of planning for growth (and for anticipating the feed-through of increased demand across the continuum of educational provision) should receive greater emphasis.

38. The Board has already noted that the highest priority in terms of resource allocation for Gaelic must be attached to GME provision and to ensuring that access is genuinely open to all who require it. As the Plan itself acknowledges (p25) GME is the “most efficient means of language acquisition”. The concern does exist however that some education authorities may perceive other mechanisms (such as GLPS) as a means of making cheaper, or perhaps even tokenistic, provision for Gaelic, thereby diverting resources away from the core requirement to expand and improve GME.

39. Clearly this will not happen in more progressive authorities, where the requirement to deliver both GME and a coherent route to fluency for older learners in mainstream schools is well understood. However, BnaG should guard against the possibility that the wording of the Plan may provide scope for evasion should difficult resourcing decisions require to be made.

40. The significance of support services and facilities, such as Gaelic wraparound care, in broadening linguistic experience requires to be emphasised. Whilst there is recognition of this in the National Gaelic Education Strategy, its significance should also be acknowledged in relation to Early Years and School Years priorities in both the Plan and the guidance on individual Language Plans.

In the light of your response to the above question, what projects do you view as being essential to implementing these priorities (examples are offered in Appendix I)?

41. The Plan suggests a number of relatively sophisticated and advanced projects in Appendix I. These include, for example, a “national network for delivery of GME professional support services”. The Board would not wish to detract from the significance of such initiatives, but believes that current priority requirements are arguably much more basic and immediate.

42. The most basic requirement of all is to secure a straightforward increase in the availability, and public awareness, of GME (and of properly structured GLPS/GLSS provision). Sadly, even in Edinburgh – despite its record of high quality delivery of GME at primary level – there is still no satisfactory continuation of GME into secondary education. Nor have adequate efforts been undertaken by City of Edinburgh Council to properly raise awareness of GME as an educational option.

43. Against that background, the Board would urge BnaG to rigorously prioritise all projects and initiatives and not to embark prematurely on sophisticated development work when basic provision still does not exist across much of the country.

And are the right organisations identified as being the primary players in implementing these priorities?

44. In general, yes. The Plan identifies a wide range of providers and facilitators, including both statutory and voluntary bodies. Many of these organisations are already actively promoting and developing Gaelic provision and have already demonstrated their capacity to mobilise a great deal of expertise and commitment in support of Gaelic.

45. Implementation of the Plan will however make further significant demands on all players. A major practical constraint therefore is the extent to which voluntary bodies, in particular, are in a position to undertake further work without additional resources and support.

46. This is particularly true for five key voluntary bodies identified in the Plan – CnamP, Comunn na Gàidhlig, CNSA, CLI and Fèisean nan Gàidheal – all of whom have a fundamentally important contribution to make. Capacity building, and additional resources and support, will be essential if the Gaelic community itself is to play a principal role in implementing the Plan and building a secure future for Gaelic.

If you are responding on behalf of an organisation, how do you see yourselves contributing to the success of the National Plan?

47. The Board will actively contribute to the success of the National Plan through its work in representing the views and interests of the whole school community, including both GME and mainstream pupils, parents and teachers.

48. As such, the Board will be looking to work closely with other key players, such as CnamP, City of Edinburgh Council and wider community interests. In particular, the Board and the school will be looking to promote the extension and improvement of GME, GLPS/GLSS and extra-curricular services and opportunities, as part of a commitment to general enhancement of quality and provision across all areas of educational delivery (both Gaelic and mainstream) at Tollcross.

49. The Board very much welcomes the fact that BnaG has identified City of Edinburgh Council as a public authority which will be required to produce a Gaelic Language Plan.

Draft Guidance on Gaelic Language Plans – General Comments

50. In addition to its comments on the draft Plana Nàiseanta, the Board wishes to make a number of observations in relation to the draft Guidance.

- The requirement to apply national and international best practice (p5) is an important principle which should be generally reflected in the Guidance (and elsewhere), including in relation to educational provision.
- In relation to “equal respect” (p8) it is evident that the treatment accorded to Gaelic will be context-specific and that it will take time for a consensus to emerge on what is appropriate in different situations. However the clear statement that public authorities are expected to respond “as generously and

supportively as possible” gives community interests a strong basis for negotiation. We would also note here that it is a fundamental principle of the European Charter for Regional or Minority Languages that the ability of members of a minority to use the principal language of the state does not justify the refusal by public authorities to provide services in the minority language.

- We are concerned that some of the discussion of geography and thresholds in the Guidance could be misapplied by authorities which remain resistant to the need to support and promote Gaelic. For example, the references to “the local concentration of Gaelic users” being an important factor and to “a significant proportion of the local population” (p9) should not be allowed to disadvantage Gaelic communities in locations where they form a proportionately small component of a larger non-Gaelic speaking population. This could, in theory, impact on the interests of communities in, say, Glasgow or Edinburgh, despite their considerable significance as a proportion of the Gaelic speaking population of Scotland as a whole. In essence, there should be greater recognition that, in a modern and increasingly mobile society, Gaelic needs to be supported at a national scale and not simply in its traditional heartlands.
- In a similar vein, we would be very concerned at the potential for misinterpretation of the statement (under “Education Functions” on p19) that GME should be introduced as standard provision “where 40% of the local population” has a Gaelic language skill. This is a threshold which will be met in relatively few localities. We understand that this statement is intended to mean that GME should be the educational norm in Gaelic heartland areas, *not* that it should be considered unnecessary or unusual in other areas.
- Given the highly successful experience we have had with GME at Tollcross, we see a strong argument for requiring GME to be made available - as standard provision - in at least one location in all education authority areas, unless it is evident that parental demand genuinely does not exist. Certainly, in our view, it is a matter of considerable regret that children and parents in many parts of Scotland, including some of Scotland’s most important cities and towns, do not have any access to GME, or indeed any other Gaelic education options. In this sense, thresholds may have legitimate relevance, for example, in relation to the breadth of coverage or number of GME units within an education authority area. But it would be extremely unfortunate if the application of inappropriate thresholds were used to justify the complete absence of GME provision.
- On a related point, we note that there is no general expectation in the Guidance that public authorities (or BnaG) should make concrete efforts to quantify actual and potential demand for Gaelic services in their area. Nor is it clear that decisions (including in relation to future growth) should have regard to empirical evidence. This is an omission which should be addressed.
- We would, moreover, note that reliance purely on census data in applying thresholds cannot adequately reflect the aspirations of, and genuine demand for GME provision from, non-Gaelic speaking parents (including those whose

lack of Gaelic is a direct consequence of recent failure in intergenerational transmission). This has proven to be an important constituency in Edinburgh and is likely also to be important elsewhere in Scotland.

- References to “cost-effective provision within a reasonable travelling distance” raise concerns for similar reasons. There are very few people within the Gaelic community who wish to make unreasonable or extreme demands and it is understood that there will in practice be thresholds below which full-scale GME provision may not be deliverable. However, it is unhelpful to provide public authorities with too easy a means of evading the need for service delivery in challenging situations. In particular, the absence of any clear definition of what is “sustainable”, “cost-effective” and “reasonable” places parents at a considerable disadvantage vis-à-vis public authorities when seeking provision of new services. This is a matter which BnaG must address, either by adjusting the wording on p19 or through supplementary guidance.
- The absence of references to wraparound care and extra-curricular activity (whether under “Social and Health Functions”, “Education Functions” or “Culture Functions”) is an important omission, particularly in view of the identified need to embed Gaelic education within a wider “whole-life” language experience.
- The emphasis on promotion of the benefits of GME in the Guidance is very welcome. In the experience of the Board, GME delivers significant benefits, including to children who have no prior knowledge of the language. We believe strongly that opportunities to participate - by choice - in this educational model should be available to as wide a constituency as possible.

Conclusion

51. The Board is grateful to BnaG for the considerable work which it has undertaken in developing and publishing the draft Plana Nàiseanta, National Gaelic Education Strategy and draft Guidance.

52. It will be clear from the comments made in this consultation response that (subject to the various comments set out above) the Board:

- very much endorses the vision set out by BnaG in the consultation; and
- is happy to support BnaG in carrying forward and promoting the range of projects and actions identified in the Plan, Strategy and Guidance.

53. I hope that this response is of assistance to BnaG. I am of course happy to provide clarification on any matter, should it be required. Copies of this response have been sent, for information, to CnamP and to City of Edinburgh Council

Leis gach dùrachd,

Duncan Isles

DUNCAN ISLES

Ball Bòrd na Sgoile / School Board Member

Bunsgoil Crois na Cise / Tollcross Primary School