
Report To:	Education & Communities Committee	Date:	5 September 2023
Report By:	Ruth Binks Corporate Director Education, Communities & Organisational Development	Report No:	EDUCOM/38/23/MR
Contact Officer:	Michael Roach Head of Education	Contact No:	01475 712850
Subject:	Secondary Gaelic Education in Inverclyde – Consultation on Catchment Area for GME Provision at Inverclyde Academy		

1.0 PURPOSE AND SUMMARY

- 1.1 For Decision For Information/Noting
- 1.2 This report is a follow up to a committee report presented at a special Education and Communities Committee meeting on 27 March 2023 where approval was given to officers to develop a proposal for establishing an offer of Gaelic Secondary Education provision for the academic year beginning August 2024 within Inverclyde Academy.
- 1.3 As well as this it was agreed that the final proposal for statutory consultation be brought back to the Education and Communities Committee.

2.0 RECOMMENDATIONS

- 2.1 The Education and Communities Committee is asked to:
- approve the proposal for establishing an offer of Gaelic Secondary Education provision for the academic year beginning August 2024 within Inverclyde Academy, and;
 - approve the final proposal for statutory consultation back to the Education and Communities Committee.

Ruth Binks
Corporate Director
Education, Communities & Organisational Development

3.0 BACKGROUND AND CONTEXT

- 3.1 Whinhill Primary school has a very strong and well-respected Gaelic primary provision and nursery class. Pupils from the school wishing to continue Gaelic into secondary education currently put a placing request into Glasgow Gaelic school. Currently (as of June 2023) there are 12 children attending Glasgow Gaelic School from Inverclyde and there are 35 children attending Whinhill Primary School Gaelic provision.
- 3.2 Initially, for the academic year 2020/21 Glasgow Gaelic School turned down the placing requests from Inverclyde, although subsequently the council accepted them. For academic years 2021/22 and 2022/23 Glasgow Gaelic School accepted all placing requests. As Glasgow Gaelic school continues to expand it is highly likely that the school will not be able to accommodate placing requests in the future.
- 3.3 It is considered essential through the National Gaelic Language Plan that where Gaelic primary education is provided, that there will be the opportunity to continue onto secondary education. This could be in partnership with another authority, as has previously been the case albeit through placing requests with Glasgow. In the event that the Glasgow Gaelic School decline places, the expectation of the National Plan is that Inverclyde would identify alternative provision.
- 3.4 In November 2021 the Education and Communities Committee agreed that officers continue to explore options for Gaelic medium secondary education for pupils currently attending Whinhill Primary School in the immediate future, medium and longer term. This was in response to the Glasgow Gaelic school reaching capacity and being unlikely to accept pupils from Inverclyde in the future.
- 3.5 In January 2022 the Education and Communities Committee agreed that officers undertake a statutory consultation on the identification of a catchment area for primary Gaelic provision. The Committee also approved the immediate creation of a Gaelic Advisory Group in relation to considering options for medium and longer-term Gaelic provision but did not approve the option for secondary education in Inverclyde for the immediate term.
- 3.6 In March 2023 at a special meeting of the Education & Communities Committee, a report was tabled that outlined the outcome of an options appraisals process that had been carried out and the subsequent recommendations from the Advisory Group, which was to progress with a Secondary GME provision at Inverclyde Academy from 2024.
- 3.7 There has been no need to establish any GME provision from August 2023 as P7 pupils at Whinhill GME were granted placing requests to the Glasgow Gaelic School. No other requests or admission applications for secondary GME have been received for any other pupils at this stage.
- 3.8 There is no requirement to carry out a statutory consultation to establish a GME secondary provision within Inverclyde Academy, however there is a requirement to carry out a statutory consultation for the delineation of a catchment area for this provision.

4.0 PROPOSALS

- 4.1 The formal consultation document at Appendix 1 outlines the process of the consultation as well as a summary of the proposed provision. The consultation will be undertaken under the terms of the Schools (Consultation) (Scotland) Act 2010 as amended. The consultation requires to run for 30 school days and will start on Tuesday 2nd October and will end on Friday 10th November 2023. Written representations must be received by this date in order to be taken into account.

- 4.2 The proposal is that a catchment area is established for Gaelic medium secondary education. The catchment area would cover the whole of the Inverclyde local authority area.
- 4.3 Any pupil who wishes to pursue Gaelic medium education at Inverclyde Academy would live in the catchment area if they live in Inverclyde. If they live over two miles from the school they will be entitled to transport in accordance with Inverclyde Council Transport Policy.
- 4.4 Inverclyde Academy is a non-denominational secondary school and pupils who attend will be deemed to have chosen a non-denominational education.

5.0 IMPLICATIONS

- 5.1 The table below shows whether risks and implications apply if the recommendation(s) is(are) agreed:

SUBJECT	YES	NO
Financial	X	
Legal/Risk		X
Human Resources	X	
Strategic (Partnership Plan/Council Plan)	X	
Equalities, Fairer Scotland Duty & Children/Young People's Rights & Wellbeing	X	
Environmental & Sustainability		X
Data Protection		X

5.2 Finance

The cost of one class teacher has been factored into the current staffing model i.e. a post has been ringfenced.

If the catchment is delineated as above, then the council will incur transport costs for pupils who currently attend Whinhill GME and indicate they wish to continue to S1 GME at Inverclyde Academy. Given that this is an unknown number an approximate figure is added for the initial year but this will increase as more pupils enrol.

The Gaelic Specific Grant which we apply for annually is offered under the Gaelic Language Education (Scotland) Regulations 1986. Through the scheme, funding is available for up to 75% of the cost towards delivery of Gaelic education. If successful in our grant bid, it is expected that Inverclyde Education Services would plan for mainstreaming of these costs into central budgets no later than five years from commencement of funding.

One off Costs

Cost Centre	Budget Heading	Budget Years	Proposed Spend this Report	Virement From	Other Comments
N/A					

Annually Recurring Costs/ (Savings)

Cost Centre	Budget Heading	With Effect from	Annual Net Impact	Virement From (If Applicable)	Other Comments
Teaching staff, admin costs	Various	Aug 24	£75,000		These are the initial costs of secondary Gaelic provision based on one teacher, resources and admin costs. This will be funded from within the Secondary Education budget i.e. a teaching post has been ringfenced for GME beginning in Aug 24 and potentially through grant income as above.
Transport	Approximate Transport Costs	Aug 24	£7K		

5.3 Legal/Risk

N/A.

5.4 Human Resources

As above a new teacher for the GME provision will need to be recruited for August 2024. Ongoing support for the Senior Leadership team to support this teacher into post as well as establishing the initial set up of the provision will be provided from the GME team at Whinhill as well as Education Scotland and Bord na Gaidhlig.

5.5 Strategic

This report helps deliver Council Plan Theme 1 Outcome: People – Our young people have the best start in life through high quality support and education. As well as this the provision outlined in the consultation documentation advances and support the council 22-27 Gaelic Plan.

5.6 Equalities, Fairer Scotland Duty & Children/Young People

(a) Equalities

This report has been considered under the Corporate Equalities Impact Assessment (EqIA) process with the following outcome:

X	YES – Assessed as relevant and an EqIA is required, a copy of which will be placed on the Council's website: https://www.inverclyde.gov.uk/council-and-government/equality-impact-assessments
	NO – This report does not introduce a new policy, function or strategy or recommend a substantive change to an existing policy, function or strategy. Therefore, assessed as not relevant and no EqIA is required.

(b) Fairer Scotland Duty

Has there been active consideration of how this report's recommendations reduce inequalities of outcome?

X	YES – A written statement showing how this report’s recommendations reduce inequalities of outcome caused by socio-economic disadvantage has been completed.
	NO – Assessed as not relevant under the Fairer Scotland Duty.

(c) Children and Young People

Has a Children’s Rights and Wellbeing Impact Assessment been carried out?

X	YES – Assessed as relevant and a CRWIA is required.
	NO – Assessed as not relevant as this report does not involve a new policy, function or strategy or recommends a substantive change to an existing policy, function or strategy which will have an impact on children’s rights.

5.7 Environmental/Sustainability

Has a Strategic Environmental Assessment been carried out?

	YES – assessed as relevant and a Strategic Environmental Assessment is required.
X	NO – This report does not propose or seek approval for a plan, policy, programme, strategy or document which is like to have significant environmental effects, if implemented.

5.8 Data Protection

Has a Data Protection Impact Assessment been carried out?

	YES – This report involves data processing which may result in a high risk to the rights and freedoms of individuals.
X	NO – Assessed as not relevant as this report does not involve data processing which may result in a high risk to the rights and freedoms of individuals.

6.0 CONSULTATION

6.1 As in Appendix 1 a formal consultation will be undertaken under the terms of the Schools (Consultation) (Scotland) Act 2010 as amended.

7.0 BACKGROUND PAPERS

7.1 N/A.

Education Services***Seirbheis an Fhoghlaim*****Establishment of a catchment area for secondary Gaelic provision
in Inverclyde Academy in Inverclyde*****A' stèidheachadh sgìre-sgoile airson foghlam bun-sgoile tro
mheadhan na Gàidhlig aig Bun-sgoil Chnoc a' Chonaisg ann an
Inbhir Chluaidh.*****Consultation Proposal Document*****Sgrìobhainn co-chomhairleachaidh***

We are looking for your views on our proposal to establish a catchment area for secondary Gaelic provision in Inverclyde. Currently primary Gaelic medium is offered at Whinhill Primary School, with a clearly defined catchment area. However as of yet there is no secondary GME provision with an established catchment area for Gaelic and pupils attend by means of a placing request.

The proposal is to establish a delineated catchment area that covers the whole of the Inverclyde Council area for Gaelic secondary provision in Inverclyde Academy due to open in August 2024. This means that every pupil who chooses Gaelic medium education for secondary school who lives within the Inverclyde boundary but further than two miles from Inverclyde Academy will be entitled to free transport. This proposal is only for secondary education. A catchment area and related transport policy already exists for primary GME provision at Whinhill Primary School but does not apply to early years education.

Tha sinn a' sireadh ur beachdan air sgìre-sgoile a stèidheachadh airson solar foghlaim tro mheadhan na Gàidhlig ann an Inbhir Chluaidh. An-dràsta tha sinn a' tabhann foghlam tro mheadhan na Gàidhlig aig Bun-sgoil Chnoc a' Chonaisg, ach chan eil sgìre-sgoile ann airson Gàidhlig, agus bidh sgoilearan a' frithealadh na Gàidhlig a-rèir iartasan sgoile.

Tha sinn a' moladh sgìre-sgoile airson Foghlam tro Mheadhan na Gàidhlig aig Bun-sgoil Chnoc a' Chonaisg a ghabhas a-steach sgìre Inbhir Chluaidh air fad. Tha seo a' ciallachadh gum faigh a h-uile sgoilear a thaghas foghlam bun-sgoile tro Mheadhan na Gàidhlig, a tha a' fuireach còir is mìle air falbh bho Bun-sgoil Chnoc a' Chonaisg, còmhdaile saor an-asgaidh. 'S ann airson foghlam bun-sgoile a tha seo a-mhàin.

Closing date for responses on this consultation will be:

5pm on Friday 10th November 2023

There will be 2 public meetings held on:

Wednesday 25th October 2023 at Inverclyde Academy, 6:30 pm

If you wish to attend in person, please log your interest by calling 01475 712850 and press option 5. An operator will take your details and advise on the details of the event.

Wednesday 1st November 2023 at Whinhill Primary School, 6:30 pm

If you wish to attend in person, please log your interest by calling 01475 712850 and press option 5. An operator will take your details and advise on the details of the event.

This document has been issued by Inverclyde Council for consultation under the terms of the Schools (Consultation) (Scotland) Act 2010.
If you need this information in another language or format, please contact us to discuss how we can best meet your needs. Phone: (01475) 712853.

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Appendices (Pgs 9 – 12)

- 1. Consultation response form**

1.0 BACKGROUND TO THE PROPOSAL

- 1.1 The Education and Communities Committee meeting of 27 March 2023 approved that officers develop a proposal for establishing an offer of Gaelic Secondary Education provision for the academic year beginning August 2024 within Inverclyde Academy and bring the final proposal for statutory consultation back to the Education and Communities Committee.

A statutory consultation is not required to establish a GME provision such as that being proposed at Inverclyde Academy however a statutory consultation is required to delineate the catchment area for this provision.

2.0 PROPOSED CHANGES

- 2.1 The proposal is that a catchment area is established for Gaelic medium secondary education. The catchment area would cover the whole of the Inverclyde local authority area.
- 2.2 Any pupil who wishes to pursue Gaelic medium education at Inverclyde Academy would live in the catchment area if they live in Inverclyde. If they live over 2 miles from the school they will be entitled to transport in accordance with Inverclyde Council Transport Policy.
- 2.3 Inverclyde Academy is a non-denominational secondary school and pupils who attend will be deemed to have chosen a non-denominational education.

3.0 THE CONSULTATION PROCESS

- 3.1 The formal consultation on the proposal within this document will be undertaken under the terms of the Schools (Consultation) (Scotland) Act 2010 as amended. The consultation requires to run for 30 school days and will start on Tuesday 2nd October and will end on Friday 10th November 2023. Written representations must be received by this date in order to be taken into account.
- 3.2 All secondary schools will be affected by this proposal.
- 3.3 **Public Meeting**

There will be 2 public meetings held on:

Wednesday 25th October 2023 at Inverclyde Academy, 6:30 pm

Wednesday 1st November 2023 at Whinhill Primary School, 6:30 pm

The meetings will provide those in attendance with an opportunity to:

- Hear about the proposal
- Ask questions about the proposal
- Express views about the proposal

A note will be taken of the views expressed during the public meeting and of any questions asked. In addition to the public meeting, written representations including online responses will be able to be made during the consultation period.

3.4 Who will be consulted?

Statutory consultees:

- The Parent Council of affected schools
- The parents/carers of the pupils at the affected schools
- Parents whose children are expected to attend the affected schools within 2 years of publication of the proposal document
- Pupils (where they are considered to be of suitable age and maturity)
- Council employees at the affected schools
- Trade Union representatives
- Church representatives
- Bord na Gaidhlig
- Community Councils

Other stakeholders who will be contacted:

- Education Scotland
- Elected Members
- Local Members of Parliament and local members of Scottish Parliament
- General Public (Inverclyde)

Consultees will be informed that in order for their views to be taken into account, they must complete and submit a copy of the Consultation Response Form. Interested parties are invited to respond to the proposal by making an online submission using the link:

www.inverclyde.gov.uk/yoursay

Alternatively, written submissions should be made using the form attached at the end of this document no later than Friday 10th November 2023.

Accessing the proposal document

The steps listed below have been taken to ensure that the proposal document is widely available.

- Notice of the proposal and of publication of this proposal document has been placed in the Greenock Telegraph to engage with the general community
- The proposal document has been published on the Inverclyde Council website: www.inverclyde.gov.uk/yoursay
- This document can be made available in alternative forms or translated by contacting Education Services on (01475) 712853
- The proposal document will also be available for inspection at all educational establishments, Council Customer Contact Centre and libraries

Pupil consultation will take place through representatives of Pupil Councils.

4.0 Involvement of Education Scotland

The Council will provide the proposal document to Education Scotland at the start of the consultation period. When the consultation period has ended, Inverclyde Council will collate all of the written and oral representations. Thereafter, the following information will be provided to Education Scotland:

- A copy of relevant written representations made to Inverclyde Council on the proposal (or summary of them if agreed within Education Scotland)

- A summary of oral representations made at the public meetings
- Other relevant documentation, as far as is practicable

Education Scotland will prepare a report on the educational aspects of the proposal taking account of the above, the Educational Benefits Statement contained in this proposal document and in so far that Education Scotland considers them relevant, any written representations made directly to them. Education Scotland may also visit the schools affected by the proposal and make reasonable inquiries of persons there and of such other persons as they consider appropriate. Education Scotland require to send their report to Inverclyde Council no later than 3 weeks (or longer if agreed with Inverclyde Council) after having received the information from Inverclyde Council.

5.0 Consultation Report

After receiving Education Scotland's report, Inverclyde Council will review the proposal taking account of relevant written representations received during the consultation period, oral representations made during the public meeting and Education Scotland's report. Inverclyde Council will then prepare and publish a consultation report which will include a recommendation on the proposal.

Inverclyde Council will notify on the publication of the consultation report, which will be made available on Inverclyde Council's website, in schools and at Inverclyde Council's Customer Contact Centre.

The consultation report will be published 3 weeks before it is formally considered by Inverclyde Council.

6.0 Inaccuracies or omissions

Where inaccuracies or omissions are discovered within this proposal document, Inverclyde Council will determine whether relevant information has been omitted or, if there has been an inaccuracy. Appropriate action will then be taken by Inverclyde Council which may include issuing corrections, issuing a corrected proposal document or an extension of the consultation period. In any of these events all relevant consultees (and where applicable the notifier(s) of any omissions or inaccuracies) and Education Scotland will be advised of the appropriate action. Notifiers of any omissions or inaccuracies will also be given the opportunity to make representations if they disagree with Inverclyde Council's determination of and any action on the matter, which may result in Inverclyde Council making a further determination / decision on the matter.

7.0 IMPLEMENTATION DATE FOR THE PROPOSAL

- 7.1 It is expected that the proposal, if accepted, would be implemented from the start of term August 2024.

8.0 EDUCATIONAL BENEFITS – ASSESSMENT OF THE LIKELY EFFECTS OF THE PROPOSAL

- 8.1 Inverclyde Council is firmly committed to delivering a high-quality education provision in learning environments fit for learning and teaching in the 21st century. Environments that nurture ambition and aspirations, improve attainment and achievement, and create and widen opportunities for all children and young people to achieve their full potential and move into positive and sustained destinations when they leave school. Inverclyde Council also demonstrates its strong belief in the value of education through financial investment to allow full implementation of Curriculum for Excellence and Getting it Right for Every Child (GIRFEC) and supporting programmes and activities that focus on removing barriers to learning and closing the attainment gap.

- 8.2 Inverclyde Council is committed to the promotion of Gaelic. The Council recognises the importance of Gaelic to our national culture and heritage and as such, is delighted to present our second Gaelic Language Plan 2023/28. As a Council, we are committed to supporting Gaelic and will seek to further promote its development within Inverclyde over the life of this plan.

Through the implementation of this Plan, we aim to support the delivery of the National Gaelic Language Plan 2018-23 and meet our responsibilities under the Gaelic Language (Scotland) Act 2005.

Our long-term vision is to nurture Gaelic within Inverclyde to ensure a supportive environment, recognising the importance and value of the language. Governance of the Plan will therefore be provided by the Corporate Equalities Group which will help to ensure that this work is mainstreamed within all services and promote Council wide ownership of its delivery.

- 8.3 All Inverclyde schools remain open to all pupils and will continue to have an inclusive and respectful ethos which helps every pupil to achieve their best. The establishment of a catchment area for Gaelic medium secondary education means that pupils who wish to pursue Gaelic medium education will not have to submit a placing request. This is of an educational benefit to the pupils because they can be assured a place at the school rather than requesting a placing request.
- 8.4 Inverclyde Council has well established Gaelic Medium Education provision within Whinhill Primary. There is primary provision and a nursery class. Currently pupils who wish to continue Gaelic in secondary education make a placing request to the Glasgow Gaelic School. There is a high demand for places within the Glasgow Gaelic School, due to the expansion of Gaelic Medium provision within the city. As a result, placing requests may not be granted in the future, as was initially the case for the academic year 2020/21.
- 8.5 The Council undertook a statutory consultation in 2022 to establish the catchment area for the Primary Gaelic Medium provision in Whinhill Primary; this is now the whole of Inverclyde Council. Transport is provided in line with the Council's School Transport Policy for children, who are eligible. This ensures equality of access to Gaelic Medium Education for all children in Inverclyde. This may result in an increase in the number of children attending the Primary GME provision within Whinhill Primary as this option becomes more widely known and accessible to parents.
- 8.6 The approved Gaelic Plan for Inverclyde Council 2023-28 has the high-level aim of Increasing Learning in Gaelic; in relation to Secondary Gaelic Provision, it states: *Explore opportunities, in partnership with Bòrd na Gàidhlig and with neighbouring authorities, within the first 18 months of the plan and make appropriate recommendations and if necessary, take applicable steps to develop Gaelic Medium Education provision at secondary level within the Inverclyde Council area.*
- 8.7 The provision of secondary Gaelic Medium Education has been developed over time. GME provision within a secondary school is the most common provision of Gaelic Medium Education in the secondary sector in Central Scotland.
- 8.8 As is the case within other GME provisions located in a secondary school, only some subjects are delivered through the medium of Gaelic. Pupils will be able to progress and develop their Gaelic language skills. The Gaelic Medium provision will provide the opportunity to promote and develop the Gaelic Language across and out with the school.
- 8.9 Pupils will be able to progress and develop their Gaelic language skills, with the aim being to deliver a sufficient proportion of the curriculum through the medium of Gaelic at the secondary stages to enable young people to continue to develop their fluency in Gaelic through immersion. The exact curriculum delivery model will only be determined once a suitable teaching candidate has been appointed to post. This is due to not knowing if a suitable candidate will be able to teach Gaelic as

well as a second or even third subject. However, it has to be sufficiently substantial to impact on young people's fluency.

- 8.10 Establishing Secondary GME provision within Inverclyde Academy would provide opportunities for collaboration across and out with the West Partnership to develop the provision in the short, medium and long term. Provision of professional learning for staff, through a collaborative approach, would develop the knowledge and skills of staff, including senior leaders, to understand and fully develop an inclusive ethos to ensure that Gaelic has equal status with English in the school environment.
- 8.11 Establishing Secondary GME provision within Inverclyde Academy would comply with the legislative requirements, which places a duty on authorities to promote and support Gaelic Medium Education, as far as is reasonably practicable.

9.0 RESPONDING TO THE PROPOSAL

- 9.1 Section 3 of this document provides details on how to access a copy of the proposal document.
- 9.2 Interested parties are invited to respond to the proposal by making an online submission using the link:
www.inverclyde.gov.uk/yoursay

Alternatively, written submissions should be made using the form attached at the end of this document no later than Friday 10th November 2023.

Education Services

Establishment of catchment areas for secondary Gaelic provision in Inverclyde

CONSULTATION RESPONSE FORM

Please use this form to let us know what you think about this proposal

The closing date for responses is **Friday 10th November 2023**.

This form should be returned to:

Education Services
Wallace Place
Greenock
PA15 1JB

We are looking for your views on our proposal to establish a catchment area for secondary Gaelic provision in Inverclyde. Currently primary Gaelic medium is offered at Whinhill Primary School, with a clearly defined catchment area. However as of yet there is no secondary GME provision with an established catchment area for Gaelic and pupils attend by means of a placing request.

The proposal is to establish a delineated catchment area that covers the whole of the Inverclyde Council area for Gaelic secondary provision in Inverclyde Academy due to open in August 2024. This means that every pupil who chooses Gaelic medium education for secondary school who lives within the Inverclyde boundary but further than 2 miles from Inverclyde Academy will be entitled to free transport. This proposal is only for secondary education. A catchment area and related transport policy already exists for primary GME provision at Whinhill Primary School but does not apply to early years education.

Q1 Do you agree with the establishment of a catchment area for secondary Gaelic provision in Inverclyde?

Yes No Undecided

This box gives an opportunity to explain the reason for your response.

Q2 Do you agree that the catchment area for Gaelic medium for Inverclyde Academy should be the whole of the local authority area?

Yes No Undecided

This box gives an opportunity to explain the reason for your response.

Q3 Do you agree that free transport should be provided for those who live within Inverclyde but further than two miles by acceptable walking route from the school?

Yes No Undecided

This box gives an opportunity to explain the reason for your response.

In order to validate your response to this proposal please provide your details:
(this section must be completed in order for your views to be taken into account)

Name

Address

Q6 I am responding in my capacity as a *(please indicate by selecting the appropriate answer below)*

- | | |
|---------------------------------------------|--------------------------|
| Parent/carer of a child at primary school | <input type="checkbox"/> |
| Parent/carer of a child at secondary school | <input type="checkbox"/> |
| Parent/carer of a child in nursery | <input type="checkbox"/> |
| Parent Council member (primary school) | <input type="checkbox"/> |
| Parent Council member (secondary school) | <input type="checkbox"/> |
| Member of staff at primary school | <input type="checkbox"/> |
| Member of staff at secondary school | <input type="checkbox"/> |
| Church representative | <input type="checkbox"/> |
| Elected Member | <input type="checkbox"/> |
| Trade Union | <input type="checkbox"/> |
| Member of the public | <input type="checkbox"/> |
| Member of Community Council | <input type="checkbox"/> |
| Bord na Gaidhlig | <input type="checkbox"/> |

Other group (please specify)

Handling your response – Please note that:

We will use the information you provide for the purpose of this consultation, including statistical and analytical purposes.

We will pass a full copy of your response to Education Scotland, or a summary of it if agreed with them.

We are subject to the provisions of the Freedom of Information (Scotland) Act 2002 and therefore would have to consider any request made under the Act for information relating to written responses/records or oral representations made to us relating to this consultation.

Thank you for taking the time to respond.

If you would like to make any comment on the proposal, or suggest an alternative option for consideration please do so in the space below: