

Deputations

Education, Children and Families Committee

10.00 am Tuesday, 20th September, 2022

Dean of Guild Court Room - City Chambers

Deputations

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Agenda Annex

CITY OF EDINBURGH COUNCIL

EDUCATION, CHILDREN & FAMILIES COMMITTEE

20 SEPTEMBER 2022

DEPUTATION REQUESTS

Subject	Deputation
3.1 In relation to Item 7.4 – Gaelic Medium Education (GME) Update	Comann nam Pàrant Written Submission Only
3.2 In relation to Item 7.7 – Early Years Partner Provider – Hourly Rate for Funded Early Learning and Childcare	National Day Nursery Association Edinburgh Network Verbal & Written Submission
3.3 In relation to Item 7.7 – Early Years Partner Provider – Hourly Rate for Funded Early Learning and Childcare	Scottish Private Nursery Association Verbal & Written Submission
3.4 In relation to Item 9.1 – Motion by Councillor Louise Young – St Margaret’s Primary – Catchment Review	St Margaret’s RC Primary Parent Council Verbal Submission Only



**Comann nam Pàrant (Dùn Èideann is Lodainn)
Written Deputation to Education, Children and Families Committee
Tuesday 20 September 2022 at 10am**

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

CNPDE would like to thank the City of Edinburgh Council for the most recent report on Gaelic Medium Education (GME). This brief deputation covers the key sections of the latest update and looks towards the vibrant future of GME in Edinburgh and the Lothians.

While this deputation concerns item 7.4, CNPDE would like to first recognise item 7.1 on your agenda today, Standards & Quality Report and Education Improvement Plan, and celebrate the appointment of Donna MacIver as Depute Head Teacher for GME at James Gillespie's High School (JGHS). This is a significant step and we welcome this commitment to establishing the necessary leadership for GME in the high school. Such investment in people, coupled with the recent capital investments in Bun-sgoil Taobh na Pàirce in enhancing the learning environment and community purpose, builds confidence in the Council's ongoing commitment to the growth of GME in Edinburgh. Mòran taing dha na h-oifigearan.

Update on potential sites

We note the information on Castlebrae detailed in items 4.1 and 4.2, as well as the breakdown of details on the five additional sites and the clarification of discussions with stakeholders as to availability listed in 4.8.

Mitigation measures regarding Liberton

With regards to the mitigation measures for Liberton, we would like to highlight the Council's note that 'irrespective of where a new GME secondary school was established the issues with ensuring immersion would be present.' While we appreciate that there are current issues, such as teacher shortage, that would impact immersion, we remind the Council that immersion issues overall would potentially be exacerbated by a co-located school.

Improvement to the breadth and quality of Gaelic immersion should be at the heart of establishing any GME school. A requirement of the Schools (Consultation) (Scotland) Act 2010 is to demonstrate what educational benefit will be achieved by any proposal, it is difficult to see what will be different in respect of Gaelic immersion in the co-located model proposed by the Council when compared to the status quo at JGHS.

While the objective of any GME school should be one of maximising immersion, parents are pragmatic and understand that there are practical limits to the level of immersion due to, for example, the number of subjects offered by the national curriculum through Gaelic. However, 4.6 appears to place limits on such a goal from the outset by asserting that a dependency on an English-medium school is a requirement. We are concerned that this approach will not create the conditions to maximise the immersion opportunity.

We also note 6.2 in the report and are concerned by the implication regarding revenue budget and the impacts this may have on staffing. We seek a commitment from the Council to provide ongoing reporting on staffing levels for GME at JGHS, and that these are shared regularly with this Committee, so that it is clear that staffing capacity is increasing at a rate that can meet the need at JGHS and also then properly support a new GME secondary.

We would contest the claim in 4.3 of the report that "details on public transport links to Liberton High School" have been previously provided. Such detail is absent from the informal

consultation documents and what is presented in this report does not represent a level of assessment that was anticipated. For example, no comparative assessment is presented to demonstrate the level of change in journey times. Also, as stated in 4.4 walking time has been omitted and there is no information regarding what time of day this estimate was generated for.

While the offer of shuttle buses in 4.5, between Bun-sgoil Taobh na Pàirce and Liberton High School is an acknowledgment that travel time will be an issue and provides a supportive measure, this proposed solution does not address the problem for many children. The particular issues of a school which has a city-wide catchment where students gather from across all parts of Edinburgh reinforces the importance of centrality and good public transport links. We request that future reports contain greater detail regarding travel impacts and how this interacts with educational benefits.

Key decision making milestones and financial impact

With reference to the key decision-making milestones, the report states that there is 'no budget in the Capital Programme to deliver a GME secondary school'. We ask that there be clarification as to how a GME secondary school would be financed.

We note under financial impact that the Council has retained the possibility of capping the number of pupils entering GME. However, access to GME should remain available for all families and we would expect GME primary provision to be part of the Council's financial plans and part of their plans for the development of GME overall. This is not only because these pupils have a right to be taught in Gaelic but also because the increase of pupils at primary levels then bolsters a GME secondary. We would also seek clarification as to how and if specific actions for GME secondary and primary provision might be incorporated into multi-year strategies such as City Plan 2030.

Additional key points

We welcome the decision of the committee in March to gather more information. However, we are aware that families in GME still face a significant degree of uncertainty in terms of the educational pathway for their children.

For example, 5.4 references potential solutions which families will find concerning such as placement policies or redrawing of catchments. In our March deputation, we reminded the Council of previous proposals to cap numbers or to review catchments. Here we noted that: *'In 2010, the Council's proposal to cap the number of pupils able to access GME was met with significant objection from parents and was subsequently withdrawn. In 2016 the Council proposed restricting the number of pupils going to JGHS based on their distance from the school, disproportionately affecting Gaelic pupils, denying access to GME for some, and splitting the small GME cohort across different secondary schools. This proposal was also withdrawn following campaigning by Comann nam Pàrant and legal intervention by Bòrd na Gàidhlig.'*

It is important that GME children receive parity of esteem and the same assurances of certainty of educational pathway as their EME counterparts. We believe it is reasonable that families with children in GME at primary should have clarity on where they will attend secondary school. We ask the Council to consider this basic need shared by all families and provide an assurance to those with children at Bun-sgoil Taobh na Pàirce of their secondary school placement approach from P1. There should be no catchment review of GME pupils at secondary level until a guaranteed, sustainable, long term alternative for secondary school provision is available.

The expansion of James Gillespie's into the Darroch Annexe, and the increased ability to develop an enhanced GME immersion environment here, offers a strong medium-term solution which establishes a setting where a viable future GME secondary school community can be nurtured pending a future consultation.

We hope that the Council will engage with all of the JGHS feeder primaries and address the capacity issues holistically. When considering capacity solutions in general we would ask that the Council continues to work in partnership with the Scottish Government to derive maximum value from the existing £4m investment from the Gaelic Schools Capital Fund and seek further funding to enhance GME immersive environments such as Darroch.

Next steps

We support the next steps 5.1 - 5.3 and we look forward to achieving cross-party agreement to ensure the implementation of these recommendations.

We highlight in particular 5.1 to "Continue engagement with the GME Community". We ask for clear commitments to support this recommendation in terms of how this engagement will be structured and how this will lead to a shared vision and goals for the delivery of a GME Secondary School and expansion of GME from 0-18 years. Comann nam Pàrant would be happy to work with the Council in supporting meetings and information sessions.

We would also welcome commitments to the establishment of a Short Life Working Group, including parental representation. This would enable a collaborative approach between all partners, allow for greater understanding of how GME in Edinburgh is part of the broader national approach, and create the opportunity for greater rates of progress in realising our shared ambitions. Such a working group could draw on the experiences of those involved in the successful development of GME in Glasgow. Overall, we are keen to move towards establishing the parameters of the project so that we have a framework within which we can all work together, that allows for constructive discussions to flourish and for progress to be made.

We thank the Council for this update, welcome all new members of the Education, Children and Families Committee, and look forward to increased collaboration in supporting the development of GME in Edinburgh and the Lothians.



Scotland
National Day Nurseries Association

*Brighter thinking
for early years

NDNA Edinburgh Network - Deputation to City of Edinburgh Council

PVI - Financial Sustainability

1.1 Introduction

National Day Nurseries Association (NDNA) Edinburgh network, representing 84 nurseries in the city of Edinburgh area, would like to raise concerns around the sustainable rate proposed by City of Edinburgh Council.

1.2 Early Years Partner Provider - Hourly Rate for Funded Early Learning and Childcare

The following are the proposed hourly rate increases for funded early learning and childcare as reported in the Education, Children and Families. We have broken down the details into funding for 3 – 4-year-olds, under 3's and the meal allowance. We have also included the City of Edinburgh Council response to an FOI investigation carried out by NDNA Scotland for your information (appendix 1 and appendix 2).

1.2.1 3- and 4-year old's

The report indicates that the hourly rates will increase to £6.03 from £5.42 for 3- and 4-year-olds (1.1.1). This represents an increase of 11%. It should be noted that the rate of £5.42 was increased in 2021 from the rate of £5.31 which was set in 2016, an increase of 11p or 2.1% over a period of 5 years. In the same period The Real Living Wage has increased by 18.2% and inflation (RPI) has risen by 29%.

The report states (point 4) that this review comprised of three elements:

- 1) Price Survey.
- 2) Inflation and RLW.
- 3) Ipsos Mori cost collection survey.

The highest namely inflation and RLW of £6.03 was chosen.

We reviewed, with members, the price survey (appendix 1 of the council report), which was taken using 31 March 22 information and after making appropriate corrections (Appendix 2 below) arrived at a rate of £5.88 (report £5.79). The revised rate with inflation applied is £6.47 and based on the methodology used in the report this is the rate that should be proposed in the report.

Under point 2.2.2 “Funding Follows the Child” it is stated that local authorities are required to set an hourly rate that is paid to funded providers and that this rate should enable payment of the Real Living Wage at £9.90 per hour. We are concerned, given the scale of underfunding shown above about how private nursery providers can achieve this.

The policy guidance Funding Follows the Child and the National Standard sets out that the statutory amount of funded early year learning and childcare is made available for each eligible child, this would suggest that funding should be provided equally among local authority, private and voluntary settings, yet Local Authority settings are paying salaries that are up to 30% above the level that can be afforded by the private sector. This would suggest that the local authority level of funding is much higher than the rate paid to PVI settings, meaning the amount each child receives is dependent on where the child is accessing ELC.

We would also like to raise the point that if the funding rate is only reviewed every three years, then this will not take account of increases in costs such as inflation, real living wage and food costs. We would like to suggest that this is either reviewed annually or is automatically increased yearly to take account of those annual increases in costs.

1.2.2 Under 3's

This section will consider the hourly rate for children under 3 which has been proposed as £6.48 (1.1.2)

This rate of £6.48 is 45p or 7% more than that for over 3's, yet 2-year-old places require 22% more floor space and accrue 60% more staff costs. In point 4.13 the report states that the survey of prices conducted in April 2022 suggests that the average rate of pay for children under 3 was £0.45 higher than that of children over 3. We would suggest that this is not possible in our experience. This rate represents significant underfunding for this age group. We would be interested in understanding how this figure was reached.

Point 4.4 of the report, states that the hourly rate of £5.42 was reviewed. This does not consider that this rate is the result of an inadequate increase 2.01% over a period of 5 years and is not sufficient.

1.2.3 Meal Provision

This current review sees lunch provision increase from £3.00 to £3.10 per meal (1.1.3). This represents an increase of 3.3% while food inflation is currently at 10%. We would like to understand how council facilitates funding the gap between 3.3% and 10%.

1.3 Conclusions and proposals

The report confirms that the hourly rate of £5.42 for 3- and 4-year-olds was reviewed (Point 4.4) and revised at £6.03 for the coming year. This does not consider that this rate is the result of an inadequate increase 2.01% over a period of 5 years and is not sufficient.

In conclusion, the rate increase which is built on a figure that remained static (and did not keep pace with rising costs such as inflation) from 2016 to 2021 falls short of both inflation and living wage increases whilst the increase proposed for meal provision is over two thirds short of food inflation. NDNA's FOI investigation (appendix 1) identifies a range of rates across local authorities for example West Lothian Council have agreed £6.80, whilst the Borders Council

have agreed £6.21 back dated to 1st August 2021 both of which significantly higher than the proposed rate for Edinburgh. We know there is an approximate 9% difference between the proportion of funded hours delivered by PVI providers (41.3%) compared with the proportion of the ELC budget (32.2%) allocated to deliver that.

In the interest of transparency and equality, it would be useful to know what the City of Edinburgh Council’s position on that difference and the reasons why a larger proportion of funding is allocated to non- partner providers.

NDNA Edinburgh network thank you for the opportunity to speak to the council about the sustainable funding rate for delivery of the 1140 hours in partnership with the City of Edinburgh Council. We are committed to providing high quality ELC for the children and families who choose to take their funded hours with us, in order to do this, it is essential that an appropriate sustainable funding rate is provided which covers the cost of delivery that high quality ELC.

We would like to urge the council to consider these proposals:

1. The hourly funding rate and meals need to either be reviewed yearly or should automatically increase annually to reflect rising costs such as inflation and the real living wage.
2. The rate should increase based on current fees paid by parents rather than on a predetermined rate (currently £5.42)
3. Eligible 2’s funding needs to reflect the significantly higher staffing, space, and operational costs. (22% more floor space and accrue 60% more staff costs)
4. To support and enable parental choice Funding for statutory 1140 hours places should follow the child equally, irrespective of type of provision parents choose.

Appendix 1

NDNA Scotland FOI Investigation – Sustainable rates (Edinburgh figures)

2 Year olds	3-5 year olds	Meal Allowance included (Y/N)	Meal Allowance (£)	Milk/ Healthy Snack (£)
£5.42 (current rate)	£5.42 (current rate)	N	£3.00	£0.58

Appendix 2

NDNA Scotland FOI Investigation – Percentage spends of ELC budget (Edinburgh figures)

What percentage of 1140 hours delivery is through partner providers (excluding local authority settings) from Aug '21-Mar '22?	What percentage of ELC budget is (including 600/1140 hours) used to fund partner providers (excluding local authority settings) from Aug '21 - Mar '22?	What was your combined ELC budget (600/1140) for 2021/22?	What percentage of ELC budget for 2021/22 was spent on capital expenditure?	What percentage of ELC budget for 2021/22 was spent on training and support for partner providers?
40.3% (Aug-Dec '21), 41.9% (Jan-Mar '22) & 41.6% (Apr-Jun '22) AVG 41.3%	32.20%	£74,600,000	12.80%	32.4%. This will include costs included per Q2 plus training. Email rec'd stating '% ' might be incorrect - council will look into this and get back to me.

Overall summary figures for whole of Scotland

On average councils reported that almost a third (30.2%) of their ELC delivery was through partner providers, rather than via council-maintained nurseries, based on those who responded. However, they only spent an average of just over a fifth (21.5%) of their ELC budgets on these partner places. The average gap between the proportion of delivery and the allocation of budget was 8.1%.

More than nine in ten local authorities responding (91.3%) admitted that the proportion of funded childcare places in partner settings was higher than the share of the budget used to pay for them. But in some areas, the difference was significantly higher with East Lothian reporting a 16.5% gap, South Lanarkshire a difference of 15.4% and Moray 14.2%.

[Press Release](#)

Appendix 2

Corrections to the Price survey

- Out of date information updated
- Missing information included
- Multiple setting amalgamated as one line in survey (which distorts the average price arrived at) separated

From: Mark Egelstaff [REDACTED]

Sent: 09 September 2022 11:31

To: Committee Services [REDACTED]

Cc: CEO - ScottishPNA [REDACTED]

Subject: Deputation request

Good morning

On behalf of Sharon Fairley, CEO of the Scottish Private Nursery Association, we would like to request a deputation to the meeting of the Education, Children and Families Committee due to be held at 10:00am on Tuesday, 13 September.

We would like to raise some comments regarding agenda item 7.7 - [Early Years Partner Provider - Hourly Rate for Funded Early Learning and Childcare](#).

In support of our request, we offer the following points for consideration:

- While SPNA appreciate the proposed uplift in the rate, it doesn't undo years of underfunding, nor does it recognise the true cost of providing care.
- None of the methods used, including that of the Ipsos Mori review, provide an accurate representation of the costs of provision of 1140 hours.
- All nurseries raise funds through other areas of their operation to subsidise their 1140 hours provision. Therefore, looking at just 1140 hours doesn't give an accurate reflection.
- As recognised by COSLA, and noted by the Scottish Parliament, Council nurseries have a significantly lower cost base than PVI nurseries.
- Council also needs to recognise the PVI nursery sector within the City of Edinburgh provides more than just 1140 hours; it provides the vast majority of care for children who are outwith the 1140 hour programme.
- The low rate of funding for 1140 hours is putting the provision of all services at risk.
- We will certainly support Council if the issue is that they are not receiving enough funding from SG. However, no matter the cause of the low rate of funding, there is a significant risk of nursery closures or massive rate hikes which will have the impact either on families not being able to afford to send their children to nursery, or the nurseries just not being open.
- This will have a significant impact across the community which will require more services being provided by Council.

We understand that NDNA (the National Day Nursery Association) will also be requesting a deputation. Should both our requests be accepted, we would like to ask if NDNA be allowed to talk first, and we will follow.

Please don't hesitate to contact me for any further information or with any questions or comments.

Best regards,
Mark Egelstaff
Communications Consultant

