31st March 2021

To whom it may concern.

I write to you today on behalf of Firpark Parent Council and their Parent Forum.

We have spent the last six weeks looking at the proposal to relocate Clydeview School to the Cathedral Campus, taking over the existing Daisy Park Centre. We have attended both public meetings, submitted questions to the consultation email address provided and read all available information that North Lanarkshire Council have given us, we have also spoken with our Parent Forum and Parent councils of both Clydeview and Cathedral to gather as much information as we can.

We as a parent council agreed to look at this with no predetermined views and to be open minded throughout this process. On the face of it we support the intent of the proposal because as parents of ASN children we felt that every child should be given the same opportunities to access the correct facilities in order to reach their full potential, both educationally and socially. However, we do have some concerns regarding the handling of the process and the implementation and logistics of the proposal, we have detailed a list of these concerns below.

**Consultation Timeline**

We were disappointed in North Lanarkshire’s handling of setting out a timeframe for the consultation process. Parents were issued an email from NLC education on the 5th of February with a link to the Education and Families Report from 24th of November. Within the document there was an Indictive Timeline which we have attached (appendix 1). This set out a timeframe with consultation events to take place on the 7th of December with parents and schools affected and would run until the 1st April thus giving parents just over 16 weeks, the decision was then made to shorten this to 6 weeks. We are well aware that 6 weeks is the minimum timeframe allowed to be given but when you take into consideration the fact that consultation on this proposal was shortened to 6 weeks and then put in front of parents alongside two Town Hub proposals and a proposal to move secondary schools to a 4 day week, it strikes us as not only unfair but may come across to some as having been designed to divide attention. The original timeline would have given parents time to consider all information on the above proposals.

Our chair attends ASN Chair meetings with NLC and it had been suggested that this group would be a key part of the consultation process. Was this supposed to cover the pre-consultation that is referenced in the Schools (Consultation)(Scotland) Act 2010 if so this was not the case and if not then who exactly did NLC consult before issuing the paper to parents?

We feel that by reducing the time and not having a pre-consultation North Lanarkshire have left parents at a disadvantage. We refer to our letter dated on the 25th of March. (appendix 2).

**Understated Designation**

Throughout the process, Firpark has been given the wrong designation in terms of how the proposal affects us.

schedule 1 of the Schools (Consultation)(Scotland) Act 2010 11. *Meaning of expressions used in this schedule.*

(1) In this Act, a reference to any school that is affected by a proposal is to—

(a)every school which the proposal directly concerns, and

(b)any other school which would be significantly affected in consequence of the proposal (if implemented).

The parents of Firpark Primary fall under both of these categories due to the shared headship and the shared facilities outlined in the proposal and should therefore have been designated as an affected party.

The response form on the consultation does not list Firpark as an affected party, thus giving us the designation of interested party and stripping us of our rights to be consulted as a parent council of one of the affected schools. We have been invited to public meetings like all parents and citizens of the surrounding area but nothing else.

**Proposal**

We have grave concerns over the shared headship part of the proposal and ultimately what this would mean for our school.

We wrote a letter (Appendix 3) regarding inaccuracies and omissions and sent it via the consultation email address on the 3rd of March and again on the 10th of march. It took over 3 weeks and some chasing up from the parent council to even get confirmation of receipt of this letter and we have yet to receive any real response. Section 3.2 of the Schools (Consultation)(Scotland) Act 2010 – statutory guidance states

“*Concerns about inaccuracies and omissions from proposal papers frequently arise and, where these are significant, can undermine confidence in any part of a proposal. It is important that authorities act quickly and openly to consider these and, if necessary, to correct information*.”

The above guidance was in no way adhered to in any way. On a recent phone call from inclusion it was pointed out to us that the council are not obligated to respond to every query, however given that one of the particular inaccuracies we were questioning was whether or not this was clydeview moving on to our campus or an expansion of Firpark primary, conflicting scenarios that somehow both get mentioned in one proposal, you could forgive us for thinking that this might be something the council would like to address.

Section 3 paragraph 3.3 reasons for this proposal are: (4) states

“*The demand for ASN placements has far outweighed the available capacity and the demand for placements for session 2019/20 has again been extremely high. This has resulted in capacity pressure across the sector but primarily in Clydeview. The current Clydeview building does not lend itself structurally or environmentally to meet the increasing numbers of pupils with severe and complex needs. By expanding Firpark Primary to include the Daisy Park Centre and relocating the pupils from Clydeview School to the Firpark campus would alleviate these pressures but also improve the experiences and outcomes for children and young people who attend there*.”

 The wording of this implies that this move in some way increases the available placements for ASN children within the area, this in itself is an outright lie or at very least a creative misrepresentation of fact, as evidenced by the publication of the FAQ’s in which you clearly state

*“The school roll is currently 38 pupils and we do not anticipate that will change.”*

 When the combined capacity of the two schools is remaining the exact same, exactly how are you “alleviating pressure” on the demand for ASN placements?

Although it does not directly affect firpark under the current proposal, some of our parents that are familiar with the daisy park building itself have concerns over the size of the interior of the building and the rooms therein. We have parents who having been inside are struggling to see just how the council plans to fit everything they are proposing when taking equipment etc into account and how suitable for the needs of the clydeview children they are going to be. We are aware that the questions surrounding natural light have been answered but a lot of our parents are still concerned that “specialist lighting” is a poor substitute for natural light and cant help feel that the rights of the clydeview children aren’t being properly met.

**Education Benefits Statement**

Parents of Firpark are unable to see any benefits for our children within this statement. Any benefits to the children that are spoken of in this proposal are things that our children already have within our current setup. We submitted questions from our parent survey on the 19th of March via email “Parents wish to know what benefits of the proposal would benefit the children if this move was implemented” at date of letter this has still yet to be answered. We raised this again at the follow up meeting on the 29th march and were again given a list of ways in which this would benefit the clydeview children without any mention whatsoever of any benefits to firpark children. It was suggested that one area our school would see benefit would be from the opportunity to work alongside another school, again this is something we already have with cathedral. It was also suggested that another benefit would be staff progression, we have nothing against staff members getting opportunity to improve but again this did not answer the question we asked which was “how will it benefit the children”

**Community Impact**

This will have an impact on families of Firpark who attend the Daisy Park Centre on Thursdays with the Community Learning Development Officer who supports our school. Parents we have spoken to informed us that they regularly attend such things as Solihill, Seasons for growth and mother and baby massage to name but a few. Access to these resources have been a massive help to these parents not just for the knowledge they gained but also for the social aspect, getting to know other parents and making time for their own wellbeing. They were able to attend both morning and afternoon courses as they could walk round to the school in time to pick up the children. Parents have concerns that they may not be able to continue with these services if the proposal goes ahead due to the barriers that come with having to travel elsewhere to attend the courses and still be back in time for collecting children from school, that’s if these courses can even be located elsewhere at all. This was also raised again at the follow up meeting on the 29th and once again we received a very detailed response to a question that was not asked, when a firpark parent and local resident raised the concerns of the community centre services, the representatives only seemed interested in informing us on the plans for continued access to the football parks, football parks were never mentioned in any of our questions but we would assume the financial gain tied to these are why these are of more concern to the council than classes in the centre.

**Implications of the Proposal**

We have concerns surrounding the transport and traffic this will bring to the Cathedral campus. We have spoken to our fellow parent council at Cathedral Primary and feel that the response given is far too vague. As joint parent councils we had previously already contacted North Lanarkshire in regard to the concerns we have as parents around the safety of all the children in the campus and the surrounding streets and that’s with the current model of two schools, we have grave concerns over the effect of adding a third school to the mix when the ongoing issue has yet to be resolved.

We feel that North Lanarkshire were very vague on the breakdown of £300,000 + savings. This raises concerns around what exactly both schools will end up losing to accumulate this volume of savings.

Some parents have concerns over the outside play area and the timetabling around this. The worry being that there isn’t space for all kids to be out at the same time, therefore leading to children being in the playground whilst others are in class. Where this becomes an issue for some parents is that with the windows of firpark classrooms facing on to the designated play area there are concerns over the distraction it would cause having children out playing whilst the children are in class.

**Conclusion**

As a parent council we have taken the time to read the HMIe report that is referenced in the introduction of the paper and we have spoken with parents of Clydeview to get a sense of how this could impact our school and children. We still feel that a number of questions around the proposal were never properly answered but our main concern remains the shared headship, specifically our concern is who would be running the school. We understand that this would be conducted through an HR process and on that basis alone the parents of Firpark would not be able to support this proposal, as previously stated we support the intent of the proposal however the betterment of one set of children should not come at the cost of another and we wholeheartedly believe that any proposal that has the potential to cost Firpark their current Headteacher and/or leadership team is a risk not worth taking as this would be detrimental in the extreme to our children. Whilst we are happy that the council is looking to rectify a situation whereby an ASN school is not functioning the way it should, we passionately believe that decimating a successful school to do so is counterintuitive.

We understand that an expansion is not the proposal that is being implemented, however with it being mentioned in the paper and NLC’s failure to clarify the reason for this, we thought it prudent to consider it as an option and look into the implications of this scenario and find out our parent forums thoughts on it because as we have already stated we are openminded to change and in full support of equity in education.

If North Lanarkshire had proposed an expansion of Firpark Primary but not as a shared headship. With the current headship running the school. Most of our parents had said they could see where this was beneficial to both children of Clydeview and Firpark primary. It would have made sense to us for Firpark to become a moderate to complex needs school and that this would have been more in line with creating an equitable service for children with severe and complex needs within the area as our current leadership team would then have more freedom and opportunity to potentially integrate the two where possible and beneficial, this would provide better chances to develop the friendships etc that were spoken of between the children if they were all one school.

With an expansion the parents of Firpark would still have had concerns over the transport and suitability of the building etc but would have had the confidence in our current leadership teams ability to resolve these issues and alleviate these concerns, our parents would have been more on board with an expansion proposal as it not only gives the equity and opportunity to the children of clydeview but would also have had clear benefits to the children of Firpark, something that is sorely lacking in the current proposal.

In conclusion, as the parent council representing the parents and children of Firpark Primary School we cannot support the proposal in its current format.

Kind Regards

Fiona Graham

Firpark Parent Council Chair & Parent Council



Appendix 2

25/3/2021

To whom it may concern.

I write to you today regarding the proposal to relocate Clydeview School to the Cathedral Campus, taking over the existing Daisy Park, specifically I would like to raise concerns with the current time frame of the consultation process and lack of parental engagement therein.

Under the Scottish Schools (Parental engagement) Act 2006 we have the right as a parent council to ascertain the views of members of the parent forum on such matters deemed to be of interest or concern to the parent forum. The act also says that we can collate these views and report them to the education authority.

The Schools (Consultation)(Scotland) Act 2010 section 21 references the (Parental engagement) Act and states, “authorities are required to give advice and information when a parent council reasonably requests it from them on any matter” The Schools (Consultation) Act in section 31 also states, “ The authority is required to consult the Parent Council of any affected School” and goes on to say “It is important that the authority works with parents from the outset of a proposal to answer their concerns and provide the information they seek”. I feel, on this occasion and on this matter, that NLC have downplayed the importance of these guidelines and been conservative in the extreme with their application of them.

Our Parent Council have not been approached by anyone from the consultation process, we have only been asked like all other parents to attend the public meeting. We had two ASN Chairs meetings scheduled with NLC during this consultation period, both of which were cancelled thus preventing us from raising any questions or seeking answers.

As a Parent Council we have submitted letters and emails via the consultation email address in which we raised concerns we had around inaccuracies within the document, these were sent on the 3rd of March and we have yet to receive so much as a confirmation of receipt let alone a reply. The Parents of Firpark are being asked to consult on a proposal, the exact details of which are yet to be made clear to us. The paper states that there will be a FAQ document, and this will be updated throughout the consultation process. This was never opened and is still not on the website with a week to go before closure of the consultation.

The public meeting in our eyes was supposed to help clarify the proposal and put our concerns at ease, but instead parents left feeling more anxious and having no clarity at all, just even more unanswered questions. The meeting turned into what we felt was a staff meeting causing some of our parents not to even ask any questions in the chat box. We were told that all the questions that were asked and missed would be issued to everyone along with new drawings of the proposal that had been requested. When I asked about the FAQ document, I was told that the aim was to have this done along with email responses and the questions and comments from the public meeting to be published by the 19th of March. Yet again we are now beyond this date and parents still have no answers.

NLC have now decided to add a Follow up meeting two days before closure of the consultation. First of all, how can anyone be expected to prepare for a follow up meeting whilst still awaiting feedback and requested information from the first meeting, this would suggest either underhandedness in the sense that the council want to keep affected parties at an informational disadvantage or simple incompetence and lack of professionalism, neither of which are something you would want or expect from local council. Secondly, I would also ask you to consider the fact that after this meeting we have a mere 48 hours to convey any new information back to our parent forum, get their views on it, collate these views, and respond accordingly if need be, all of which is our right as a parent council. We would ask that in light of this NLC would give some serious consideration into extending the timeframe of the consultation.

We feel that the rights of our parent council and those of our parent forum are being overlooked here and we would like to know why? If this is supposed to be a parental consultation, then I would suggest NLC give some consideration to what constitutes as two-way communication as so far the majority of this consultation has consisted of us asking questions and requesting information and NLC ignoring those questions and requests.

We have always believed that when the school, the parent council/forum and NLC can all get on the same page with something it can make any venture or transition smoother and more successful which is ultimately always better for our children, however we feel that on this occasion NLC seem to be determined to keep us at arm’s length and a lot of our parents are beginning to wonder why.

Kind Regards

Fiona Graham

Firpark Chairperson

Appendix 3

3 March 2021

To whom it may concern,

I write to you today on behalf of my fellow Parent Council Members and Parent Forum of Firpark Primary regarding the Clydeview consultation paper.

After reading the paper and discussing it at length, as a Parent Council representing one of the “interested parties” we feel that we must raise concerns we have in regards to inaccuracies and omissions that we have found within the paper itself.

The Schools (Scotland) (Consultation) Act 2010 says that it is important to be clear what type of proposal is being made and goes on to say that it is essential for authorities to seek and achieve high standards both in the information that underpins school consultations and in the consultation documents that are published. We would suggest that North Lanarkshire Council have failed to achieve this.

The Consultation Paper in section 1.2 states:

“*It is therefore proposed that Clydeview be moved to the Cathedral Campus, taking over the existing Daisy Park Centre and become part of a shared headship arrangement with Firpark Primary.”*

This line is used again in section 3.1 however in section 3.3 (4) the paper then states:

*“*The current Clydeview building does not lend itself structurally or environmentally to meet the increasing numbers of pupils with severe and complex needs. By expanding Firpark Primary to include the Daisy Park Centre and relocating the pupils from Clydeview School to the Firpark campus”

One of these statements would appear to suggest that clydeview will remain a separate entity, albeit one that would share a campus and headship with Firpark, the other statement however appears to suggest that Firpark will be expanding, clydeview will cease to exist and their pupils become part of Firpark. We feel there are distinct enough differences in these two scenarios that could indeed change how some parents would view the proposal, the latter statement would in fact change our school from an interested party to an affected party. We would ask you to consider the confusion that these discrepancies may cause to any party interested or affected.

Having also read the aforementioned Schools Act 2010 we would suggest that the former statement alludes to a relocation whereas the latter statement is more suggestive of a closure and relocation which the proposal would appear to claim is not the case, if viewed in a sceptical manner it could read to some that the proposal has been made intentionally vague in an attempt to make a closure and relocation appear simply as a relocation in order to skip phase 1.

The schools Act 2010 by our understanding exists in part to guide local authorities in how to set a consultation paper. After reading both documents it is our opinion that North Lanarkshire have not covered all “the factors to cover in the proposal paper” section of the Act.

 In section 3.3 (4) the paper says “The demand for ASN placements has far outweighed the available capacity and the demand for placements for session 2019/20 has again been extremely high. This has resulted in capacity pressure across the sector but primarily in Clydeview” and then states further in the paragraph that the proposal “would alleviate these pressures but also improve the experiences and outcomes for children and young people who attend there.”

Again, we feel this has been left intentionally vague, the proposal appears to suggest the reason for the move is to alleviate pressures on capacity, if this is indeed the case why have any and all details pertaining to the capacity been omitted from the consultation paper?

North Lanarkshire council’s decision not to include any further information on this, such as the previous capacity, how this proposal changes that and what the eventual capacity will be, has led to some of our parents wondering if there will be any improvement to the capacity at all. As things stand Firpark have a capacity for 120 children and it is our understanding that clydeview can currently house on average 40 children, this gives the two schools a combined capacity of 160 children, the consultation paper gives no indication how much if any this will rise should the proposal go ahead. We feel that leaving these details out makes it impossible for any interested or affected party to gain any sort of accurate assessment on whether or not the proposal will benefit the ASN sector and the families therein in the way that the paper would suggest, if there is no substantial gain in terms of capacity what is the real reason for the proposal?

We as parents have tried our utmost to look at these proposals with an open mind, but this is no easy task when the paper we were given has so many key details omitted and the little information that has been given is vague and full of inconsistencies.

We ask if this information can be clarified as a matter of urgency in line with the Scottish School (parental involvement) Act 2006, which clearly states that authorities are required to provide information when a parent council reasonably requests it from them on any matter. The Public Meeting is on the 9th and all questions need to be sent two days in advance, with there being only one meeting and no follow ups with Parent Councils we need to make sure that any questions we submit are representative of the views of our entire parent forum and the level of omissions and inconsistencies in this paper deny our parents the ability to have an informed enough opinion to know what they want to ask.

Kind Regards
Fiona Graham

Chairperson