

Comann nam Pàrant
Dhùn Èideann & Lodainn
c/o Tollcross Primary School
Fountainbridge
EDINBURGH EH3 9QG

9 November 2006

Peadar Morgan
Stiùiriche Planadh Cànan
Bòrd na Gàidhlig
Darach
Fèith nan Clach
Inbhir Nis IV2 7PA

A Mhgr Morgan chòir,

Consultation response from Comann nam Pàrant Dhùn Èideann agus Lodainn on the draft national plan for Gaelic, and the draft guidance on language plan

I am writing on behalf of Comann nam Pàrant Dhùn Èideann agus Lodainn to express our views to Bòrd na Gàidhlig on both the draft national plan for Gaelic, and the draft guidance on language plans. We are happy for our response to be made public.

We thank the Bòrd for undertaking this immense challenge. We share the desire of the Bòrd to see a secure future for Gaelic – one in which Gaelic is spoken and otherwise used – more naturally, more often, by more people, in more situations – and is valued by our nation.

Although we agree in general with the level of aspiration expressed in the drafts, we have a number of major concerns regarding these, as follows. We urge the Bòrd to act to address these in the ways we suggest, or by making equivalent changes to the drafts and through other available means.

We hope our criticisms will be seen as constructive, and will be taken together with our acknowledgment of the many positive aspects of the drafts, for which we commend the Bòrd.

Although we are a group representing the interests of parents of children in Gaelic-medium education, all aspects of the drafts affect our children's future, and we do not confine our comments to measures relating to education.

1. We have found that it is extremely difficult, for the layperson at least, to understand the likely consequences of the drafts.

As currently written, the plan and guidance are therefore likely to be less than inspirational in the years to come.

The response to this consultation is also likely to be skewed, and we are certain that it will be unrepresentative of the true level of interest among ordinary people.

Undoubtedly, the drafts contain many, many good ideas and principles. However, many of our parents, who are in general very well-informed about the challenges facing Gaelic today, have struggled to understand what changes the drafts seek to bring about to address these challenges.

While we understand that there are reasons for keeping options open, we feel strongly that there is a need for much greater clarity as to what the plans will do to tackle the key challenges.

Such clarity is essential to inspire the Gaelic-speaking world with confidence that, at last, the right action will be taken. Without this confidence, many Gaels are unlikely to commit to the vision.

The substantial content of the drafts is divided among a great number of different major sections, subsections, complex categorisations, lists and appendices, making it extremely difficult and time-consuming to track down proposed measures, or to assess their relative weight in comparison to measures described elsewhere.

In addition, much of the document is written in a coded style that may be clear to the Bòrd, but is counterintuitive for the majority of readers. As just one example, in certain sections (for example the Education Functions section on page 19 of the draft guidance), the term *Gaelic education* appears to be used specifically to mean provision of Gaelic as a school language subject to learners, and not Gaelic-medium education.

Elsewhere the intention in using the term *Gaelic education* is much less clear. For example, the aim for 2012 for the whole action area of education is *to expand the provision and uptake of Gaelic education at all levels*. The section contains references both to Gaelic-medium education and to the teaching of Gaelic as a school subject.

In a number of cases this ambiguity has significant implications for what is actually being proposed. For example, on page 44 of the draft plan, one of the key tasks is to *provide up-to-date parental guidance & information on Gaelic education*.

Measures that might address our concerns

We realise that it may be difficult to alter the drafts radically at this stage. Therefore we ask the Bòrd to commit to publishing a separate, clear guide to how, specifically, the plans will act to address the major challenges facing Gaelic:

- The current rate of mother-tongue transmission is not capable of sustaining the language.
- Gaelic-medium education, although experiencing growth, is woefully underdeveloped.
- Gaelic is increasingly no longer the community language in the Gaelic heartlands.
- There is a suffocating shortage of language opportunities whether in the workplace, through community-based activities, or accessible via the media.
- Effective adult learning is still highly inaccessible almost everywhere.
- The national perception of Gaelic as a valued asset is underexplored and underdeveloped.

We would ask the Bòrd, on having made such a guide available, to seriously consider inviting the public to comment once again.

We also feel it imperative, wherever there are ambiguities of meaning in the plan and guidance, that these be clarified as a matter of urgency.

2. We are very concerned at the lack of planned action to address the major difficulties preventing Gaelic-medium education from producing a sufficient number of fully fluent speakers.

There is a good deal of aspirational content reinforcing the assertion (made on p24 of the draft national plan) that *the three essential ingredients for the maintenance of the language have been recognised as Gaelic as a mother tongue, Gaelic in the community, and Gaelic-medium education.*

However, we feel that the sentiment does not translate into sufficient measures in the guidance. Specifically we see little to address the two factors we believe are preventing Gaelic-medium education from producing sufficient numbers of fully rounded Gaelic-speakers:

- The very low provision at secondary level, meaning that most children do not progress in fluency beyond age 11 or 12, and in fact, we see the evidence that most lose fluency, even within Gaelic-speaking families, and even within the core Gaelic areas, and
- The lack of accessibility to Gaelic-medium education across the country, keeping numbers from rising sufficiently rapidly.

Secondary provision

Although the intention to *increase the number and incidence of secondary subjects* is plainly stated in the plans and translates to equivalent wording in the guidance, there is little detail of how this will be done, beyond providing more secondary teachers qualified and able to teach these subjects in Gaelic – for which there are detailed proposals for action.

It is our experience that, although teacher availability is a factor, the greatest obstacle to developing Gaelic-medium at secondary is the extreme difficulty in timetabling, staffing and accommodating Gaelic-medium classes within large English-medium secondary schools with many competing demands. It is disappointing that the drafts do not address this.

Accessibility

Gaelic-medium education is the only solution to ensuring sufficient numbers of fully fluent speakers, particularly since the correlation between the rate of mother-tongue transmission and access to Gaelic-medium education is evident.

Furthermore it is clear that Gaelic-medium education, as the way to boost the number of speakers, must be rapidly developed throughout the country if it is to succeed. Less than

one-third of young Gaelic speakers aged 15–44 live in parishes with more than 20% of speakers, and this proportion is declining.

Outwith the core areas, mother-tongue transmission rates are low, and uptake of Gaelic-medium education is dependent on accessibility. In general this is low, with the result that there are insufficient numbers.

It is also evident that children proceeding through Gaelic-medium education from non-Gaelic-speaking families typically acquire as great a fluency as those from Gaelic-speaking families.

In order that there will be enough young people who speak Gaelic sufficiently fluently to sustain Gaelic transmission in the future, every effort must be made now to expand access to Gaelic-medium education as widely as practicable, and both to Gaelic-speaking families, and non-Gaelic-speaking families.

Therefore it is particularly disappointing that the draft guidance specifies that demand will be encouraged on the basis of the significance of Gaelic locally.

In addition, we are aware of a great deal of dissatisfaction among parents in relation to existing means of expressing interest in Gaelic-medium, and how demand, and potential demand is assessed.

Targets

Given the crucial role that Gaelic-medium numbers have in securing the future of Gaelic as a language with vitality, it is extremely disheartening that the plan contains no standard against which to measure success in this area.

The target specified for 2011 for education aims for an increase in the number of 15-24 year-olds able to speak Gaelic from 1.0% to 1.2%. All children who will be in this age range in 2011 are already beyond the age when they can enrol in Gaelic-medium education, so this is a measure which cannot be influenced by action on Gaelic-medium education.

Measures that might address our concerns

We urge the Bòrd to include measures in the plan and guidance to bring about the following:

- An action plan that tackles the implementation difficulties in providing Gaelic-medium education at secondary level and looks at new models for overcoming these based on successful implementations nationally
- Basic research into uptake, and projected demand for Gaelic-medium education across all regions and among families with different backgrounds in relation to Gaelic
- An action plan tackling all manner of restrictions to access to Gaelic-medium education, including difficulties caused by travelling distances, childcare, and

wraparound care at nursery age, lack of promotional information, and lack of support in other areas

- Gaelic-medium education parental involvement in national policy decision making
- Emphasis on Gaelic-medium education as the main mechanism for encouraging mother-tongue transmission, and as one of the main methods of promoting the use of Gaelic in daily life in young people

We also:

- Challenge the written-request measure as the only measure for demand for Gaelic-medium education and urge the Bòrd to include action to establish a more representative means to assess demand and potential demand.
- Stress the predictability of language planning through the known costs and benefits – in terms of increased numbers of fully language-familiar fluent speakers of – accelerating the development of Gaelic-medium education
- Demand targets for the national plan that measure the number of children in Gaelic-medium education and in particularly the number in secondary Gaelic-medium education.

3. We are highly concerned that the drafts fail to provide a mechanism for the Bòrd to monitor and report on overall national progress towards fulfilling the undertakings of the Charter for Regional or Minority Languages

The Gaelic Act hands to the Bòrd the function of monitoring and reporting to the Scottish Ministers on the implementation of the European Charter.

The current proposal is that the Bòrd will base this monitoring and reporting solely on:

- Progress achieved by other organisations it has contracted
- Progress in implementing language plans by the public bodies it has required to produce these
- Progress made by voluntary partners and bodies working voluntarily towards the general aims of the plan

Basing monitoring and reporting solely on the basis of progress by these organisations is tantamount to shirking the responsibility placed on the Bòrd by law.

This responsibility for overall national monitoring resides with the Bòrd whether or not there is a mechanism for it described in the plan, but failure to describe such a mechanism does not inspire confidence that the Bòrd is serious about fulfilling its responsibility in this regard.

One of the major specific criticisms levelled at the UK by the Council of Europe was the absence of a mechanism to monitor and report on progress on education.

Measures that must be included in the plan

We demand that the Bòrd includes within the plan a mechanism for monitoring the overall national progress towards fulfilling the major undertakings of the Charter.

We also demand that the Bòrd pledges to report on this annually to the Scottish Ministers, with a view to making it clear to Ministers where as a nation we are still failing to live up to our undertakings.

The last report by the Council of Europe on the UK's implementation of the Charter was highly critical, specifying the areas of education and the absence of a Gaelic-language television channel as particular failings. The UK's failure to make progress with respect to Scottish Gaelic was very evident in comparison to Welsh and to Irish in Northern Ireland.

The UK government's ratification of the Charter specifically elected to pledge, among other things, to make education in Gaelic available at pre-school, primary and secondary level without condition.

We demand that the plan proposes to monitor, in quantitative terms, the overall degree of national fulfilment of this particular pledge independent of progress made by any individual group or groups, taking into consideration our concerns on the current underdevelopment of Gaelic-medium education nationally, as detailed in point 2 above.

4. We are disappointed at the lack of any evidence that the Bòrd wishes to see a co-ordinated research program to better direct its efforts and the national implementation of the plan. We are concerned that there is no expert group on language transmission.

At this moment Gaelic is so very fragile that it would clearly be irresponsible to undertake to reverse its decline without the best knowledge available on the likely effectiveness of measures proposed. Yet, much of the basic research remains to be done.

Aspirations in the plan relating to research are generally confined to consideration of current language use. Although this is valuable, many fundamental questions need to be asked in other areas, particularly those having a bearing on language transmission and learning.

Measures that might address our concerns:

The Bòrd must ensure that there is a co-ordinated research programme into language transmission, acquisition and use (both drawing on experience elsewhere and researching the particular situation in Scotland), and we strongly urge the Bòrd to include provision for this in the national plan.

The plan should aim to establish a competent body to oversee this, whose functions would include making recommendations to research grant-awarding bodies, to the Bòrd and to Ministers, and making regular public reports on current thinking available.

There is a ready-made forum for such a body (or in the absence of such a body, the Bòrd) to engage with experts and concerned lay people in the biennial Rannsachadh na Gàidhlig conference. We urge the Bòrd to include proposals for such a mechanism in the plan.

5. We are concerned that there is no mention of a national framework for adult learning.

Current provision for adult learners is patchy, with little structure. This has the effect of deterring many who might otherwise become competent in the language.

The situation will become particularly acute if plans to introduce Gaelic as a language subject in more schools results in a great many school-leavers with some knowledge of Gaelic but few practical options to develop towards full functional competence.

In addition, it is difficult for parents of children in Gaelic-medium education who are semi-fluent or learning to progress in current circumstances, and therefore the opportunities for promoting mother-tongue transmission and community and family use are often wasted.

Measures that might address our concerns:

We strongly urge the Bòrd to embrace a national initiative such as the Ùlpan initiative within the plan and guidance.

Ùlpan in particular represents a ready-made opportunity for the Bòrd to buy into. It is properly researched, and is being developed on the basis of the success of the Wlpan courses that made fluent Welsh accessible to many in Wales. It is also founded on a sound business principle that has the potential to both make structured classes widely available throughout the country, and to make teaching a financially sound option for many.

We believe Ùlpan is currently the only option on which to build a national framework, but would be pleased to see other initiatives such as the Gàidhlig san Dachaigh programme supported within such a framework.

We urge the Bòrd to empower Clì Gàidhlig to play a key role in implementing this framework.

6. We are concerned that there is no mechanism for encouraging private sector buy-in.

Engagement with private-sector activities accounts for a major part of the lives of most people, and therefore there is a great potential benefit in addressing this area specifically.

Although there is no power for the Bòrd to instruct private-sector organisations to produce language plans, this is the only respect in which private concerns differ from the public sector.

Measures that might address our concerns

The plan should seek to provide information, promotional material and common resources to businesses and public bodies alike.

The plan should provide help nationwide to new businesses that promote and use Gaelic, and provide Gaelic opportunities. This might well be in partnership with existing national enterprise support bodies.

Specific areas where national co-ordinated private-sector development would be highly beneficial should be identified. Suggestions would be Gaelic-language childcare, adult education, and events and promotion services.

We urge the Bòrd to include these measures within the plan as a means towards the general aim of normalisation of Gaelic, where the language prospers through economic benefits of its use.

7. We are concerned at the lack of a co-ordinated promotion and marketing function identified with the drafts.

The image of Gaelic nationally is of key importance, but there is no provision for a national strategy on marketing the perception of Gaelic or of Gaelic services. In addition there is no provision for groups and authorities to tap into central expertise in promotion and marketing.

The desired outcome relating to the theme of prestige is *maintenance of positive Scottish public opinion support for Gaelic policies and measures*. Although positive public opinion is a reality, we see aiming for the status quo as far short of ensuring equal respect for Gaelic.

What we see as missing from the aim for prestige is an increase in ownership among the general public stemming from greater visibility for Gaelic, and also recognition that centuries of institutional undervaluing of Gaelic has left some speakers holding the language in less high regard than it deserves.

Measures that might address our concerns:

The plan should seek to provide access to co-ordinated support resources for promotion and awareness-raising to all groups involved in furthering the aims of the plan.

It should also provide for the setting up of a national group to promote and market Gaelic as a priceless asset to the nation, and Gaelic-language as a valuable skill to possess.

The group should also concern itself with determining the most effective ways to raise the image of Gaelic through increased Gaelic signage, Gaelic heard in public places and other means. It should also research and implement ways of increasing the pride that Gaelic speakers of all ages take in their language.

Such a group should additionally be enabled to liaise with education authorities to improve teaching about Gaelic culture, society history and arts in English-medium lessons.

8. We would like to see more guidance on provision of language opportunities.

While frequent reference is made in the plan to the importance of communities, and of families within communities, to the future of Gaelic, there are few measures within the plan which suggest ways of providing necessary support to enable these communities and for Gaelic use to be normalised within them.

'On the ground' hands-on community Gaelic development is very thin or patchy and always has been.

Current media provision is also concentrated in certain areas.

In general, teenagers and young adults have far fewer opportunities to use their Gaelic than other age groups, which is damaging.

Measures that might address our concerns

The plan and guidance need to embrace a radical re-think with regard to bolstering grass-roots Gaelic development at community level – in the traditional heartland areas, also in cities where significant numbers of Gaelic speakers now live and work, and indeed anywhere else where this is a realistic proposal.

The drafts should recognise the key role of Scotland's capital city in particular, and other major centres of population. These are not only the areas of Scotland that bring together more resident fluent Gaelic speakers within a short distance of each other than elsewhere, they are also centres where many Gaels find themselves on frequent occasions. These centres could have a much more vibrant role in securing Gaelic community involvement, and in raising the profile of Gaelic nationally. The Bòrd should commit within the plan and guidance to taking a more pro-active role in making this happen, in partnership with other relevant organisations.

We would in general like to see more co-ordinated guidance on providing Gaelic-language opportunities through targeted provision, based on local Gaelic communities, Gaelic-related interest groups, and on-line Gaelic communities.

We would particularly like to see the plans stressing the importance of provision for families, and for teenagers and young adults.

We would also like to see more to promote the development of opportunities in the printed media where there is currently no real alternative to English, such as weekly or daily Gaelic press, possibly in liaison with the broadcast companies who relay this information via television and radio. There is also a role for further development of on-line resources.

9. We are worried that many public authorities and other groups will also have difficulty in understanding the intention of the documents, and their efforts may therefore be ineffectively guided and uncoordinated.

Currently, in most areas, such as education, provision of language opportunities, promotion of Gaelic and Gaelic services etc., local efforts often duplicate those elsewhere, and generally involve a lengthy learning curve.

The guidance should but in our view does not provide clear enough guidance to attempt to ensure all action is co-ordinated.

Measures that might address our concerns:

In all areas where action is required, the plan should stress the need for co-ordinated efforts, making resources available to ensure that communication and consultation among the key groups involved can take place.

The plan should stress the need to evaluate and disseminate information on best practice.

10. We are disappointed that the guidance stresses the need for measures to be taken in proportion to the number of speakers, without any counterbalancing weight given to the need for action throughout the country.

Over the years, requests for greater support for Gaelic have very often been met with refusals on the basis that the proportion of Gaelic speakers is too low to merit it, even when the effects of such support would clearly boost the number of fluent speakers, and the vitality of the language.

It is therefore disappointing that the guidance allows for the choice of measures to be guided by the significance of Gaelic locally, a phrase we consider may easily be interpreted to refer to the proportion of the population only.

Measures that might address our concerns:

The plan and the guidance need to stress the need for action everywhere if there are to be sufficient numbers of fluent speakers in generations to come.

It should also clarify that significance of Gaelic locally may result from a number of factors, including the number of potential new Gaelic speakers, and the actual number of speakers within a single accessible area.

We are excited that the Gaelic world will soon have a national language plan, with other plans to follow. For the first time there are many reasons to be optimistic about the future of Gaelic.

We hope our response will be helpful in delivering a national plan and guidance on language plans that will be effective and efficient in securing a bright future for Gaelic.

Yours sincerely,

Iain MacDhòmhnaill,
Convenor,
Comann nan Pàrant Dhùn Èideann agus Lodainn