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A charaid chòir,

Plana Nàiseanta na Gàidhlig – Co-chomhairle Phoblach

Here follows my response to the public consultation on the draft Gaelic Language Plan:

- First, I would like to congratulate Bòrd na Gàidhlig on preparing this draft of the first ever Gaelic Language Plan for Scotland. Without doubt this document is an important milestone in the development of the language, representing as it does, the first holistic Gaelic policy for Scotland.
- I welcome that, at long last, we are able in Scotland, to apply the principles and practices of language planning and anticipate that content and strategic direction of the Plan will provide a framework for the implementation, delivery, and therefore, resources of future interventions relating to the language.
- I feel that the Draft Guidance is well thought out and contains sound suggestions for implementation, but I leave to the organisations who are to implement the Guidance to respond on that.

GENERAL POINTS

- I believe it is of crucial importance that we have a clear policy for Gaelic in Scotland, but the Plan needs to be more than rhetoric – it needs to have **clear delivery mechanisms, targets, and monitoring**. I feel that the Plan is currently very weak on all three areas. I will return to this later.
- Implementation of the Plan needs **resourcing**. Whilst I understand that the implementation of the Plan is in partnership with a variety of other bodies, it is difficult to respond to the appropriateness of the priorities, or their weighting, if there is no indication of the resources which are available. I would welcome a section in the plan which addressed resource issues.

- I understand that the Plan is to be reviewed five years after its adoption – and presumably once the results of the 2011 census are available in 2012. However, I have little conception from its reading as to the **time-scales** under which the Plan is operating – are the priorities long-term objectives?
- It would seem to me that many are long term objectives, and for which there will be no measurable outcomes in five years time. As such, I think it would make more sense should the Plan be structured in terms of short-term goals (which are realistic and achievable within the 5 year period, and which are measurable) and longer term targets. Within the Plan itself, it acknowledges the time-lag between intervention and impact. This should be taken in to account.
- I am not in favour of the 2011 Census targets. I feel that it would be disastrous for the Plan (and by implication Bòrd na Gàidhlig) to be judged against the 2011 census – particularly given that it is likely that many of the targets will not be met, and any successes are unlikely to be attributable to the actions of the Plan, Bòrd na Gàidhlig, and it's partners.
- The Plan contains some references, within (desired) outcomes to having impact at the *national* level. Otherwise the issue of **geography** is not considered. I believe however, that the Plan needs to contain within it, some measures and commitment to **safeguarding the Gaelic 'heartland'** in particular. I think this is essential should the vision for an expanding core of mother-tongue speakers, be achieved.
- The role of the **private sector** in contributing towards the aims of the draft Plan are not sufficiently stated. Although the Act does not legislate for intervention in the private sector, this should not stop the Bòrd and it's partners from seeking to influence the private sector and to work with SMEs through a range of schemes.
- I feel that many of the goals of the Plan fall not only to the range of partner organisations involved in Gaelic development, or in sectors such as education and the arts, but are the responsibility of the **Scottish Executive and all its departments**. For example improved awareness of, and access to information on, Gaelic in regional local and national life would benefit from changes in the national school curriculum. I would like to see more on how Bòrd na Gàidhlig will be working with government departments in the Plans' implementation.
- I don't feel that the 'Education' theme and the **Education Strategy** are well linked, and it isn't obvious as to how they relate to one another. This also applies to areas in the Education Strategy such as Corpus Planning.

THE STRUCTURE OF THE PLAN

- The Plan is structured via five action areas. I **support** the choice of **action areas**, and in general, the themes under each action.
- There is **insufficient explanation** of what the purpose of each section, and clarification on the terminology used.

- Second, I do not think that it makes sense to specify ‘outcomes’ when there are no measures specified in order to monitor whether these outcomes are achieved.
 - Third, I do not understand what the priorities *are* and how they should be interpreted. Are these priorities for intervention? Are they general objectives? Is the density of typescript supposed to indicate the weighting accorded to each priority? And how do these priorities translate into actions, mechanisms, implementation? It would seem to me that some priorities are specific actions, whereas others are very general objectives.
 - Fourth, I do not understand what is meant by ‘sectoral project’ – is this the one project to which the Bòrd is committing to deliver (in partnership)? They are absolutely huge in statement and in ambition, but there is no detail.
- **I do not support** the identification of one single **aim** per action area, and one measurable **target**. This is particularly the case when the measurable target does not adequately address the aim itself. Rather, each theme should commence with an aim, followed by clear actions, followed by intended outcomes and targets.
 - As it stands, the main substance of the plan, vis-à-vis the action area and their related themes, is a list of laudable objectives for which there are **no real tasks or actions** prescribed (with the exception of the appended National Education Strategy). Whilst there will be reasons for adopting this superficial level of planning, such as due to the plethora of partners that will be involved in its implementation, I feel that as it stands, this structure gives **insufficient detail** and will lead to **partial implementation**.
 - To be effective, I believe that the Plan requires clear aims and objectives, intended actions, anticipated outputs and impacts and long-term outcomes. I don’t feel it makes sense to specify outcomes and targets, when there are no specific actions.

RESEARCH AND MONITORING

- Any strategy or policy needs to be under-pinned by good evidence – such evidence is clearly lacking here. One of the implications of this, is **insufficient baseline data** from which to measure the success or otherwise of the Plan. I believe several of the targets are inappropriate for measurement against the aim as a consequence of relying on Census data.
- I believe this *urgently* needs to be addressed through a commitment from Bòrd na Gàidhlig to implement a regular **Gaelic Language Use Survey** which can complement the Census data for monitoring purposes.
- That is not to say that a range of other research, as outlined in page 10, is not required. It is absolutely essential for evidence-based policy development and unfortunately, a lack of this evidence weakens this plan. I would, therefore, like to see a **section on research** (as a separate issue from monitoring of the Plan) within the main body of the Plan.

- Following on from the above section on the Structure of the Plan, I believe the plan needs a **greater level of detail** in terms of actions, and therefore, in terms of measurable impacts.
- In terms of **monitoring**, I welcome the commitment to monitoring contracts to ensure outcomes are achieved. I very much hope this extends to the range of bodies which Bòrd na Gàidhlig will directly fund, and that such contracts contain the detail which is lacking within this plan in terms of objectives, intended outcomes and impacts, measurable targets, and outcomes. I believe it is essential that the organisations such as *Comunn na Gàidhlig*, *Clì Gàidhlig* and *Comhairle nan Sgoiltean Àraich* are evaluated to ensure that the limited resources for Gaelic are spent effectively.

PRESENTATION

- Can a summary of the plan be presented which includes the Vision, Mission, Language Planning, Monitoring, Research, but then for each Action, summarises the Aim, Target, Sectoral Project, and individual Themes? A three-four page summary would be useful, using a table format for the themes.

VISION

- I share the vision of the draft Plan. I don't believe, however, that the draft Plan in its current form – with a weakness on implementation and delivery – is fit to meet this vision.

LANGUAGE PLANNING

- It is useful that language planning, and its four elements, is defined here. I think an explanation of the proceeding chapters may be helpful here to clarify the purpose of the 'Actions' and the terminology used e.g. priorities, outcomes etc. Feel that a separate heading on research should be created as stated above.

ACTION AREAS

VITALITY

- **Aims:** not convinced it is good practice to have two aims here, when there are only singular aims elsewhere.
- **Target:** the census data on cannot measure fluency. As such, is it an appropriate measurement given the aim? Think the target of 50% is very ambitious given the short, five-year timescale. As with all targets, think they are unsuitable and believe that establishing a new Gaelic Language Use Survey would enable objectives to be measured, and for appropriate timescales to be used (not dictated by the Census).

- **Sectoral Project:** believe this is a range of sizeable projects, rather than a singular project. Each language domain would require a different piece of research; different types of dissemination; and differing strategies. Feel that this ‘project’ alone requires significant research (e.g. we have no data pertaining to language use in the home, in the community outwith the Western Isles, and currently none in the workplace) which merits being included in a separate research section. At the same time, strategies are required for acquisition and use and these are covered elsewhere in the plan.

Home:

- As above, feel there is no point having an **objective** unless it can be measured – we have no knowledge of the baseline figure, and there are no provisions within the plan for gathering new data that can monitor this outcome.
- Critical awareness of strategies for transmission need to be underpinned by good evidence based, for example, on good practice elsewhere, guidance on methods, on-going support for families and so forth. Despite the work of CNSA it would seem to me that none of this information is readily available or accessible across the nation for parents. Never mind increasing availability of resources, but develop quality resources and produce better advice and information.
- Feel that the **Primary Players** need to be extended to University/Research Institutes that can gather good evidence, and information on best practice from elsewhere. Also should this include Health Authorities who could have a role in terms of raising awareness at early stages of pregnancy, for example, and local authorities who should have a role in disseminating such information to prospective and existing parents of children in GME.

Community:

- If the Plan is seeking to influence general community development initiatives, then I believe the HIE network should be involved.

Workplace:

- Believe that the priorities are rather vague here, based on promotion rather than action. On the other hand, believe there should be something here about promoting institutional capacity – an ethos of tolerance and encouragement of bilingualism in the work place, for example, recognition of Gaelic as a skill and asset for the company/organisation – this maybe relates to the action “enable greater use of Gaelic in the workplace”.

STATUS

Aim: I think the aim is appropriate.

Target: I do not believe that this target, and proxy indicator, reflects language status

Sectoral Project: I think, as per the sectoral project under vitality, this is a massive undertaking and as such, needs to be fleshed out considerably. Again, what is a sectoral project, who has the responsibility of implementing it? I would support the implementation of community language plans – outwith the areas in the Western Isles which are forming their own – but believe community language plans need adequate funding for development, and then for delivery. Concerned that this will result in the responsibility for implementation and success will fall to the community and voluntary sector which is already rather weak, and lacking in capacity, in areas such as Wester Ross and North West Sutherland.

Prestige:

- Again, the outcome needs to be measurable in some form – commitment to undertaking this research should be included in the Plan.
- I believe that this outcome is only one outcome from the range of priorities specified - for example, the main priority regarding life choice (and I'm not sure whether this would be better stated as “promote Gaelic as a life choice” rather than promote interest is entirely unrelated.
- I think that language prestige is also related to position of Gaelic in the labour market and that reference should be made to this.

Awareness:

- From which survey will the results regarding knowledge of Gaelic be derived?

Support:

- I don't feel this fourth theme is necessary, and duplicates with other areas of the Plan. Although it is neat to have 'four themes' per 'action', they need to be absolutely essential and add value and I don't feel this is the case here.

EDUCATION

Aim: In education we have statistics and these should be used to develop measurable aims.

Target: this target does not reflect the overall 'action' which encompasses all areas of education (pre-school, school, tertiary and life-long). Again, feel there should be more specific targets, e.g. per theme. The target could be related to the number of pupils in Gaelic medium education at different levels, in so far as the data is available.

Sectoral project: this is not so much a project, but an aim.

General Content: don't feel this section addresses adequately, the rates of language attrition between pre-school, primary, secondary and tertiary level. I am also concerned that here (and perhaps elsewhere in the Plan) are priorities which the Bòrd is unable to have any influence over – for example, under tertiary and lifelong learning, the main priority is to “expand and resource appropriately the provision and uptake of tertiary Gaelic immersion courses” . This is a laudable aim, but it requires

serious buy in from civil servants and politicians - and the recent example of Inverness College shows how pie in the sky this action is.

CULTURE

Target: once more, don't feel this is a laudable target or measure, and is entirely meaningless.

General content: Whilst it would be fantastic to – for example - expand the publishing and production capacity of Gaelic language products and media, such expansion will not be self-financing and **requires public support**. I think somewhere it should outline the case for supporting what would otherwise (in majority language markets) be commercially viable enterprises.

Primary players: I think HIE Network, given their role in strengthening communities and their culture and sport team at HIE HQ, should be mentioned here under all themes

COMMUNICATIONS

Aim: I support this aim

Target: again, feel it's an entirely inappropriate proxy indicator.

General content: I wonder if the development of Gaelic language technology resources merits a theme here- for example, in relation to bilingual data retrieval, machine translation, voice recognition systems, word-processors, spell-checkers, internet browsers, IT manuals and so forth.

Content access:

- Feel this theme is unnecessary and repeats priorities elsewhere.

Interactivity:

- Feel that there needs to be involvement of the commercial sector here as a partner, but also in terms of the priorities. For example, should there be specific actions related to Gaelic e-commerce etc.

POSSIBLE PROJECTS

- In general, I support the potential projects outlined in Appendix 1 but they only meet a very small proportion of the priorities.
- The first key emphasis – priority- I believe should be on language transmission on the home which although affected by a whole range of factors, needs to be actively promoted using information and support.
- I think the second key emphasis needs to be the provision of a Gaelic Language facility (not just a national course, but *delivery* of the course), that is capable of

quickly bringing adults (including professionals in public sector, non-professionals, new comers to a Gaelic speaking area and so forth) to at least conversational fluency in a short period – I think this is essential and should be a priority to provide the capacity for bilingual public service provision, to avoid ‘exclusion’ of people from prospective employment in say the Western Isles, and to enable the learners of Gaelic to become fluent without having to leave their current work positions for a minimum of one year.

- To return to my point about geographical priorities, I believe that such a language facility is absolutely essential in the Western Isles and should be an absolute priority.

I hope that some of the above points can be considered along with all other responses which you receive.

Le dùrachdan,

Marsaili NicLeòid