

10 November 2006

A chàirdean

## **RESPONSE TO CONSULTATION**

I attach my comments in relation to the draft National Plan for Gaelic, National Gaelic Education Strategy and Guidance on Gaelic Language Plans.

For ease of reference, these comments relate directly to the texts of the three draft documents, although I recognise that the final versions may end up taking a rather different shape.

I consent to these comments being made public. I hope they will be useful to you as you finalise these important documents.

Leis gach deagh dhùrachd

Wilson McLeod

**COMMENTS ON DRAFT NATIONAL PLAN FOR GAELIC  
WILSON McLEOD  
EDINBURGH, 10 NOVEMBER 2006**

- 5 It is not correct to say that ‘the Census has shown a steady and unbroken decline in numbers of speakers’. The rate of decline has not been ‘steady’ but has varied at different times; most importantly, the rate of decline slowed considerably between 1991 and 2001 (as noted in the second paragraph on this page). Nor has the decline been ‘unbroken’, as the figure recorded for 1971 was higher than that for 1961 (although the explanation for this is probably methodological rather than substantive) and the relative rate of decline has varied at different times.
- 6 The word ‘even’ in the phrase ‘improved continuity in provision at second [*sic*] and even post-secondary levels’ should be deleted. The implication that further and higher education is a peripheral issue is undesirable.

Conceptualising Gaelic language use in terms of ‘desire’ on the part of Gaelic speakers is not a particularly helpful approach. It is more helpful to present matters in more conventional usage planning terms, e.g. empowering Gaelic speakers to take advantage of available opportunities to use the language, and institutionalising and normalising Gaelic language use in particular domains and settings.

In the second column, the reference to ‘the involvement of the Gaelic community, Gaelic organisations and Government’ is very surprising, given that the principal mechanism of the Gaelic Language Act is the development of Gaelic language plans by individual public bodies. At the very least, public bodies should be added to this list. Ideally, private for-profit and non-profit bodies should be added given their crucial role in ‘national’ life, even though the Bòrd’s formal powers in relation to such bodies are limited indeed.

The second paragraph in the right-hand column contains a small but telling error: the Bòrd is empowered (under section 9 of the Act) to provide ‘guidance in relation to the provision of Gaelic education’ (as defined in section 10(1) of the Act) and not merely in relation to Gaelic-*medium* education, as suggested here. Throughout the National Plan and the National Gaelic Education Strategy there is an overwhelming and at times seemingly exclusive emphasis on Gaelic-medium education, to the apparent exclusion of other forms of Gaelic education (including education ‘about’ Gaelic as enumerated in section 10(1)(b), which is of no small importance).

Further to this point, the list of bodies identified at the end of this paragraph should be expanded to include further education institutions, higher education institutions and all providers of community education.

- 7 With regard to the second paragraph, it is of course correct to say that the Bòrd is not empowered to require private and voluntary bodies to prepare Gaelic language plans and that it can do no more than provide advice and support. However, this paragraph (and indeed the draft Plan as a whole) do not convey any sense of how proactive the Bòrd will be in reaching out to private and voluntary bodies and affirmatively encouraging them to take action, as opposed to reactively waiting to be approached. It is a matter of considerable concern that the Bòrd does not appear adequately resourced

even to carry forward the effective development and implementation of public bodies' plans, so that there will be little time or resource to address private and voluntary bodies. Such an outcome would be seriously negative in relation to the effectiveness of any genuinely 'National' Plan.

- 8 The point made in the fifth text box here, establishing the principle of 'no diminution', is critical and should be pressed home strongly in all aspects of the Bòrd's work. In this respect, the disturbingly negative submission by Edinburgh City Council, which sets forth a zero-sum view of language provision and even indicates plans to cut back on provision for Gaelic, is entirely unacceptable and the Bòrd should make absolutely clear that such an approach is to be rejected.
- 9 The second paragraph in the right-hand column sets out one of the key deficiencies of the draft Plan, 'that the list of primary players shown . . . is . . . [not] a guarantee of participation by those named'. Unless the specific bodies identified in the Plan give their acceptance to the Plan and take ownership thereof, it is difficult to see how the Plan can possibly be effective. There is no evidence that such steps are being taken, although it is not easy to propose an effective mechanism for doing so. Nevertheless, there is a very significant risk that key public bodies will claim not to be bound in any sense by the terms of the Plan and will expressly reject its terms. The fact that only 7 of Scotland's 32 local authorities had submitted a response to this consultation as of the day before its closure suggests a very low level of engagement by these important bodies.
- 10 The definition of corpus planning ('standardising a language which is popular, used and useful') is distinctly odd. A broader and more conventional definition should be given.

The action areas for research should be supplemented with a reference to research on the implementation of the Act and comparative 'best practice' with regard to the institutional development of minority languages. The reference to 'Gaelic-medium education' would be better as 'Gaelic language acquisition and Gaelic education'.

The phrase 'societal reform' at the end of the last paragraph is somewhat unusual; perhaps 'social change' might be substituted or added here.

- 12 The target chosen with regard to intergenerational transmission seems arbitrary and problematic. Given that the 2011 census will be conducted in only 53 months' time, significant steps will already need to have been taken towards the improvement of the rate of transmission. It is hard to see what the drivers of such a change would be, either in terms of concrete evidence of social change among parents of young children in Gaelic-speaking areas, or a significant increase in proportions of children in Gaelic-speaking areas sending their children to Gaelic-medium preschool or school education. If the Bòrd is unable to show that there is already real movement that makes this target realistically achievable, a different target should probably be selected.

The definition of 'Reversing Language Shift' here is technically incorrect. Achievement of intergenerational mother-tongue transmission is a critical step in the RLS process, but it by no means guarantees full-scale RLS.

The phrase ‘standardise registers’ here is technically incorrect. It is not possible to ‘standardise’ a register (i.e. ‘a set of features of speech or writing characteristic of a particular type of linguistic activity or a particular group engaging in it’: *Oxford Concise Dictionary of Linguistics*).

- 13 The discussion of ‘Community’ here is unduly vague and places excessive emphasis on matters such as public services and signage. The emphasis here should be on ensuring that Gaelic is used in community interaction, whether this be through structured interactions through groups of one kind or another, to informal interaction in sporting and recreational activities and the panoply of non-work activities. The Welsh *Mentrau Iaith* could be a useful model here.

With regard to ‘Workplace’, the term ‘oral’ should be substituted for ‘verbal’.

Something should be added to the definitions of ‘Gaelic-essential’ and ‘Gaelic-desirable’ posts to indicate that it is recommended that such posts be increased in number and range. The point of supplying these definitions here is currently not clear.

It is not strictly accurate to think in terms of Gaelic speakers ‘keeping abreast of developments in language use and style’; instead of such a top-down approach, it may well be necessary, and is in many ways preferable, to empower Gaelic speakers to take charge of the development of Gaelic as a living language. This is particularly the case in the workplace, where highly specific, even unique, terminology is needed to describe the distinct structures and processes of individual organisations. The word ‘literacy’ in the final sentence of this section might also be deleted, as oral ability is also at issue here (e.g. a Gaelic speaker deprived of a Gaelic-medium education might well find it difficult to give an oral presentation relating to her work as well as a written one).

With regard to ‘Corpus Development’, the meaning of the term ‘popularly’ in the second line is not clear. The first sentence of the second paragraph adds to the difficulty: what is the distinction between ‘popular’ and ‘is used’? In general, this section is not user-friendly and it is unlikely that many readers without a detailed knowledge of linguistics or language planning would understand it clearly.

- 14 The list of ‘Primary Players’ is confined to Gaelic organisations. For these strategies to be effective, appropriate health and social services, together with local authorities, must become involved. Such involvement would be critical if there is to be a Scottish version of the successful Welsh ‘Project Twf’.

- 15 The ‘Outcome’ here seems unduly narrow. Vitality should be expressed in increased use of Gaelic in community life among *all* age groups.

While it is important to develop ‘Gaelic-medium community activities’, it is also important to increase the number and range of bilingual activities, and generally to reduce the number and range of all-English activities in Gaelic areas by ensuring that as many activities as possible have at least some Gaelic element or dimension to them. There is often a dynamic in Gaelic areas by which a (very) small number of activities are all-Gaelic or bilingual but a wall-to-wall English dynamic is the accepted norm for

the great majority of community organisations and activities. Changing this dynamic — and de-legitimising English monolingualism — will be essential to the normalisation of bilingualism.

The goal of ensuring that ‘general community development initiatives are designed and implemented to have a positive impact on Gaelic’ is laudable but will require a fundamental change in attitudes and working practices, even in strongly Gaelic areas. (Note that it is not clear whether this objective only applies to areas where Gaelic is reasonably strong; it would be controversial if applied to other parts of Scotland). It is not clear from the draft what kind of measures are contemplated to work such a fundamental change.

It is not at all clear what ‘emergent forms of Gaelic-medium community’ consist of.

Laudable though the objective is, it is not clear what steps are contemplated to ‘increase interaction between fluent speakers and learners’.

- 17 It is not clear what ‘formal application of Gaelic in . . . public discourse’ might consist of.

The University Departments of Celtic and the UHI Millennium Institute network (or at least Sabhal Mòr Ostaig and Lews Castle College) should be added to the list of ‘Primary Players’.

- 18 As with the target chosen with regard to intergenerational transmission (p. 12), the 2.0% figure given in relation to the proportion of the population with a knowledge of Gaelic seems problematic, especially given that the proportion of the population actually speaking Gaelic is predicted to fall from 1.2% to 1.0% between 2001 and 2011 (as set out on p. 12). Achieving the target with regard to overall ‘Gaelic knowledge’ will require that an additional 0.4% of the Scottish population (some 20,000 people) become able to read, write or understand (but not speak) Gaelic. Given that the 2011 census will be conducted in only 53 months’ time, significant measures would be needed to achieve such a result. The steps noted in the Plan do not seem capable of producing such a transformation.

The discussion on this page over-emphasises ‘prestige’ and ‘attitudes’; functionality is a more useful focus.

- 19 The phrase ‘life choice’, while useful in many respects, does appear to echo the much more common phrase ‘lifestyle choice’, as if using Gaelic as one’s main language might be compared to a predilection for watching large amounts of television, or participating in particular kinds of sporting activities. Such associations are to be avoided.
- 20 The Act does not, of course, apply to Crown bodies and other UK-wide organisations. Particular emphasis should be placed here on the importance of working with arms of Westminster government (e.g. Department for Work and Pensions) in relation to ‘promoting the spirit of’ the Act.

- 22 In relation to language ‘Awareness’, it is critical to engage the mainstream of the schools system in this regard. This is the only genuinely effective mechanism for systematic society-wide dissemination of accurate information about Gaelic. A ‘Language Awareness’ course of the kind recommended by Professor Joe Lo Bianco in his important report *Language and Literacy Policy in Scotland* (2001) be developed as a matter of priority.
- 23 With regard to support, NHS Trusts should be added to the list of ‘Primary Players’.
- 24 It is not clear that the numerical target chosen is achievable given current trajectories. The Bòrd should make sure that this target is both realistic and meaningful.
- 25 The final sentence in the first paragraph under ‘School Years’ should be re-written slightly; ‘Gaelic learning’ should not be presented as if Gaelic-medium education does not involve ‘Gaelic learning’. Presumably the reference here is to ‘Gaelic as a subject’. With regard to ‘Tertiary & Lifelong Learning’, it is astonishing that universities and other HE/FE institutions are not mentioned in this section, given their important role. With regard to immersion courses, not enough emphasis is placed on the problem of finance; under-funding has been a key factor leading to withdrawal of existing courses and dissuading students from embarking on such courses.

The discussion of staff training under ‘Education Resources’ fails to mention a key issue: the need to develop Gaelic courses for in-post, trained teachers through some kind of sabbatical scheme. This is analytically different both from providing additional training for fluent speakers moving from English-medium to Gaelic-medium and to courses for new entrants to the teaching provision. Sabbatical schemes may be expensive, but such a step is urgently needed if the GM sector is to grow significantly.

- 27 The ‘Outcome’ here is rather vague: how ‘accelerated’ is the ‘accelerated growth’ contemplated? 1% faster? 50% faster?

The same problem arises with the first Priority. What degree of expansion in GME/Gaelic learning is contemplated, to what extent are the number and incidence of secondary subjects to ‘increase’, and so on? The promotion of dedicated Gaelic-medium schools should be a key priority year and a formulation along the lines of ‘wherever possible’ might be appropriate.

- 28 The designated ‘Outcome’ here is insufficiently specific. The extent of the ‘growth’ is neither quantified nor qualified with an adjective. In addition, all aspects of Gaelic education, including but not limited to language learning should be included here, and not only Gaelic-medium education.

The main priority, to ‘expand . . . the provision and uptake of tertiary Gaelic immersion courses’ should be modified with an appropriate adverb such as ‘significantly’.

The reference to ‘tertiary vocational training through the medium of Gaelic’ is of great importance and deserves greater weight. Given the extent to which Gaelic has now declined, it may be relatively difficult to implement this objective, even at institutions such as Lews Castle College. Great damage has been done by the failure to take such

steps from the 1960s onwards. (As a general matter, the Bòrd should be mindful in all aspects of the Plan to try to avoid and reverse any sense in which Gaelic has become ‘academicised’, although of course this does not mean failing to give proper attention and funding to appropriate academic and intellectual initiatives).

The omission of universities (including but not limited to university Celtic Departments) from the list of ‘Primary Players’ here is incomprehensible and unacceptable.

- 29 With regard to the third ‘Priority’ here, it is not clear what ‘fast-track’ means; proper language acquisition necessarily takes a considerable amount of time, and there should be no pressure to try to deem students adequately prepared either for reasons of expense or for reasons of expediency relating to the need to increase teacher numbers. Second, it is crucial that any such scheme be extended to *existing* and not *merely* prospective teachers, with appropriate funding being provided (see comments in relation to page 25, above).
- 30 The designated numerical target seems arbitrary. Are there structures and/or definite plans in place to bring about an increase of the extent designated within the time available? (Presumably the term ‘activity’ here is intended to mean ‘ability’? It is disconcerting that this error has been carried over into the Gaelic translation, where *gnìomhachd* is given instead of *comas*).
- 31 With regard to ‘Cultural Activity’, the reification of Gaelic is very odd in the phrase ‘Gaelic must continue to develop publishing and production activities within its own control’. Might ‘the Gaelic community’ be substituted?

The discussion in relation to ‘The Arts’ is useful but additional emphasis should be placed on the importance of conducting such activities through the medium of Gaelic. Many Gaelic singers and other artists make little active use of Gaelic when engaging with their audiences. ‘Providing engagement with the language for non-speakers’ is an important goal, but should not simply consist of using English uncritically. The Bòrd’s strategy in relation to the funding and development of the Gaelic arts should be guided by this overarching principle.

The discussion in relation to ‘Heritage’ and the importance to communicating this to the Gaelic community through Gaelic is useful. It is important to recognise, however, that many of the *comainn eachdraidh* and organisations like the Islands Book Trust make extensive, arguably undue, use of English in their work, especially in their printed materials. The Bòrd should work actively to promote the use of Gaelic in this area.

The discussion of ‘Sport & Recreation’ would benefit from a stronger focus on youth. A large proportion of participants in organised sports are young people. Developing the role of Gaelic in this sector can be an important reinforcement for Gaelic-medium education and for increasing the role of Gaelic in young people’s lives more generally.

The ‘Sectoral Project’ designated here is not ideal. The emphasis should be on fundamental principles in funding and advising a diversity of projects, not a flashy, and very likely ephemeral, ‘marketing and promotion strategy’.

- 32 The proposal to ‘expand the range of Gaelic leisure reading’ is very vague.
- 33 The final priority here is very important, though difficult to implement. While it is important to promote specifically Gaelic arts events, it is also crucial for the Bòrd to ensure that as many ‘mainstream’ arts events as possible incorporate a Gaelic dimension, so that it organisers and audiences come to perceive a Gaelic aspect as a normal and indeed essential feature of any event.
- 34 The priorities here are appropriate. In particular, the Bòrd should work to ensure that Gaelic is included whenever information is given in more than one language. It is bizarre and almost shameful that so many tourist facilities in Scotland provide information in several languages yet fail to include Gaelic. The Bòrd should work to ‘delegitimise’ this practice.
- 35 The Scottish Football Association, Scottish Premier League and Scottish Rugby Union should be added to the list of ‘Primary Players’.
- 36 As elsewhere, it is not clear that this numerical target is realistically achievable. Have appropriate measures been put in place, or will appropriate measures be put in place, within the short time before the next Census that will be sufficient to bring about the projected increase?
- 37 The last sentence in the first paragraph relating to ‘Content Access’ is impenetrable and should be re-written. In particular, it is not clear why a digital service offers particular benefits in relation to ‘language transmission, association and loyalty, among young people in particular’. The term ‘language . . . association’ used here is not clear, and nor is the term ‘Gaelic-mediated environment’ in the following sentence.
- 38 With regard to ‘Print Media’, the various ‘Priorities’ should be modified by appropriate adjectives or adverbs to indicate the relative scale of change sought. ‘Inreas[ing] the availability and consumption of Gaelic print media’ by 1%, for example, is not a useful goal.

It is not at all clear what strategies are envisioned with regard to the third ‘Priority’ in relation to ‘non-Gaelic writing in the wider print media’.

Appropriate providers in the HE/FE sector should be added to the list of ‘Primary Players’ in relation to the final ‘Priority’, i.e. training in writing and editing.

- 39 With regard to ‘Broadcasting Distribution’, there seems to be a lacuna between the designated ‘Outcome’ and the bold ‘Priority’. The ‘Outcome’ proposes ‘universal access’ to a 24/7 Gaelic digital service, while the ‘Priority’ speaks only in terms of ‘availability’. If interpreted reductively, the ‘Outcome’ has already been achieved, in that the BBC Craoladh nan Gàidheal website, including podcasts and programme downloads, is already available worldwide on a 24/7 basis. Since it is obvious that Gaelic television broadcasts will never be available worldwide on a 24/7 basis, it is important to specify more precisely what is envisioned with regard to television, specifically with regard to the following:

- will the proposed new television channel operate on a digital terrestrial basis from the start, or only via satellite? The latter option would be short-sighted in the extreme, given that less than one-third of viewers (according to OFCOM data for the end of 2005) have access to satellite, while the imminent switch-off of the analogue signal has meant a rapidly increased uptake of digital terrestrial technology.
- given the designated outcome of ‘universal access’, will the proposed new television channel be available throughout Scotland? in other parts of the UK? beyond the UK?
- how many hours a day of Gaelic programming will be broadcast, in the short, medium and long terms? How do these figures relate to the designated outcome of 24/7 provision?

The presentation here is generally somewhat vague in relation to ‘platform’ distinctions, and in particular does not separate out television and radio. Expansion of the Radio nan Gaidheal service to 24/7 seems readily achievable (for example, the Irish counterpart service Raidió na Gaeltachta now offers this), even if a 24/7 television service seems very difficult to bring about even in the medium or long term. The Plan should also make clear that Radio nan Gaidheal must be made available everywhere in Scotland, in light of the ongoing foot-dragging by the BBC in this respect.

- 40 With regard to the second designated ‘Priority’, an appropriate adverb should be added to convey the extent to which ‘the daily broadcast of original Gaelic material’ is to ‘increase’.

**COMMENTS ON DRAFT NATIONAL GAELIC EDUCATION STRATEGY**  
**WILSON McLEOD**  
**EDINBURGH, 10 NOVEMBER 2006**

42 The introductory discussion here is overly positive, to the extent of overlooking inconvenient facts. First, it is somewhat misleading to describe Gaelic-medium education (GME) as ‘rapidly developing’, given that the rate of expansion since the 1990s has been very limited (compared, for example, to the rate of growth seen in Northern Ireland during this period), partly due to the authorities’ reluctance to put adequate teacher-training systems in place and partly to the lack of energy in promoting Gaelic education on the part of most local authorities (18 of whom make no such provision in any of their schools). Second, while it is arguable that the Scottish *Executive* Education Department has been consistently supportive of Gaelic education, the pre-devolution Education Department plainly was not, at least in relation to secondary education. Considerable damage was done — both with regard to parent confidence in relation to choices relating to their children’s primary schooling as well as to the development of GM secondary education — by the 1994 HMI report which declared that expansion of GME at secondary level was ‘neither feasible nor desirable’.

44 The list of ‘Providers & Facilitators’ should be supplemented to include pertinent Health Boards, other relevant arms of the NHS and other social services. This would be essential if there is to be a Scottish version of the successful Welsh ‘Project Twf’. Note that the parallel list in relation to Gaelic-Medium Education on p. 45 does include such bodies.

As discussed above in relation to the National Plan, it is essential that the Bòrd put in place an effective mechanism to ensure the active agreement and engagement of all bodies identified in the National Gaelic Education Strategy.

45 The structure here does not give an adequate sense of relative priorities. Most importantly, it does not place sufficient emphasis on the development of ‘dedicated GME schools’. Significantly increasing the number of such schools should be a key priority of the Bòrd as it works with education authorities to develop their language plans. There is growing evidence that the ‘unit’ system is not working well enough.

Note also in this connection that the related section under ‘Impact’, recommending a ‘strategically planned programme for the expansion of dedicated GME schools’ is problematic in at least two respects. First, the term ‘strategically planned’ is not clear but has an ominous ring to it (reminiscent of the American term ‘all deliberate speed’, used to justify a go-slow, softly-softly approach to the desegregation of schools), suggesting bureaucratic lethargy rather than forthright and energetic action. Second, the phrase ‘expansion of dedicated GME schools’ could be interpreted as referring to promoting the growth of already-existing schools. It would better to add the phrase ‘establishment and’ here.

In general, there is an unaccountable variability in the use of adjectives in relation to the bullet points under impact. Some have strong adjectives, some a weaker adjective and some none at all (‘*continued growth* in numbers of children in pre-school GME’, ‘*an increase in* . . . Gaelic childcare facilities’, ‘*significant increase* in the range &

quality of GME teaching materials’, ‘*accelerated growth* in pupil numbers across the spectrum of GME’, ‘*the expansion of dedicated GME schools*’, ‘*recorded increase* in the number of secondary teachers’, ‘*increased uptake* of subjects’). This suggests that extremely modest improvements might be contemplated in some areas, which would be most inappropriate. Strong formulations should be given in all cases here.

- 46 A similar problem with adjectives arises in connection with ‘Language Acquisition’. It would be better to strengthen the bullet point (under ‘Key Tasks’) ‘to extend provision for Gaelic learners in primary schools and & associated secondary schools’, e.g. by adding the word ‘significantly’. It would also better to delete the term ‘associated’, as this might suggest that expansion should apply only to secondary schools that are ‘fed’ by primary schools that teach Gaelic. The Bòrd should be working to ensure that in the future all secondary schools in Scotland should make some arrangements to allow pupils to learn Gaelic. The under-supply of current provision (only three secondary schools in Scotland’s four largest cities) is extreme.

A stronger formulation than ‘continued’ should be given in relation to the bullet point (under ‘Impact’) for ‘Continued increases in the numbers of pupils opting to study Gaelic’.

Significantly greater emphasis should be placed on the retraining of teachers to move from English-medium to Gaelic-medium. The existing ‘Streap’ scheme may be useful, but should be expanded considerably (so that the current wording, ‘support the development of . . .’). More important, however, sabbatical schemes should be put in place to allow for Gaelic language acquisition by trained teachers and not merely courses for teachers who are already fluent but need specialist training in relation to Gaelic-medium teaching. Such courses have been immensely successful in the Basque Country and, on a smaller scale, in Wales. Finance-based resistance from the Scottish Executive will obviously need to be overcome if this goal is to be achieved, but no strategy that relies solely on the recruitment of people who can already speak Gaelic fluently, whether they be school leavers or university graduates entering the teaching profession or current teachers moving to the GM side, can succeed in producing significant increases in teacher supply. To this end, the wording ‘sustained number of teachers transferring to GME annually’ should be strengthened. After all, this sustained number might be one or two per year, which is manifestly inadequate to meet the basic objective stated at the top of this page, to ensure ‘that enough pupils study Gaelic to . . . ensure the future sustainability of Gaelic as a living language’.

Note that there is a structural issue in relation to this section and the next, ‘Teacher Recruitment & Supply’: several of the points listed in relation to ‘Language Acquisition’ would seem logically to belong to ‘Teacher Recruitment & Supply’.

- 47 The suggestion ‘to introduce fast-track immersion & literacy learning for prospective teachers’ is very useful, but there are at least two issues. First, it is not clear what ‘fast-track’ means; proper language acquisition necessarily takes a considerable amount of time, and there should be no pressure to try to deem students adequately prepared either for reasons of expense or for reasons of expediency relating to the need to increase teacher numbers. Second, any such scheme should be extended to *existing* and not merely *prospective* teachers, for the reasons explained above (in relation to ‘Language Acquisition’).

The phrase ‘sustained increase’ in relation to teacher numbers should be strengthened. A consistent net increase of one or two per year would represent a ‘sustained increase’, but this would be hardly be adequate.

With regard to probationer teachers, it would be useful to know how ‘Gaelic priority areas’ would be determined. More generally, measures should be put in place to prevent leakage, i.e. to ensure that newly qualified teachers who are able to teach through Gaelic in fact do so, and do not drift into the English-medium sector.

48 With regard to ‘Teacher Education’, it would be useful to specify the nature of the recommendations in the GTCS report that are at issue. Crucially, a dedicated training course for Gaelic-medium teachers should be set up as soon as possible. The current mechanism is plainly inadequate.

49 The section concerning ‘Tertiary Education’ is very thin. The recommendations are very vague, and no sense of scale is given: no adjectives or adverbs describe how significant these various goals and outcomes are to be. ‘Continued growth in numbers of students in tertiary GME’ should be changed to ‘Significant growth . . .’ A similar statement should also be given in relation to students ‘studying Gaelic at tertiary level’; GME is not a catch-all term in this context. The reference to ‘new & relevant courses’ is worrisome, as ‘relevant’ has long been a code-word for dumbing-down; is there a suggestion that some courses currently offered are actually ‘irrelevant’?

The omission of the University Celtic Departments and the Board of Celtic Studies from the list of ‘Providers & Facilitators’ is frankly astonishing and should certainly be rectified.

No reference is made to student funding. There has been a recurring problem that Gaelic students do not have funded opportunities to spend time in a Gaelic area (or doing Gaelic immersion courses) while on their university courses. This has led to an ongoing problem of students not achieving fluency by the time they graduate. University Gaelic students are an exceptionally valuable resource for the future development of Gaelic and it is crucial that they are given appropriate assistance. The Bòrd, the Scottish Funding Council and the Scottish Executive should put an appropriate scheme in place as a matter of urgency.

There is no reference to encouraging post-graduate study in relation to Gaelic. This is most disappointing, especially in light of the lack of emphasis in the Strategy on research relating to Gaelic education. Again, dedicated funding is the key issue here. Each year, excellent students do not pursue post-graduate study in Gaelic for financial reasons. This is a serious lost opportunity.

50 There are also significant omissions from the section on ‘Lifelong Learning’. First, all providers of community education, including but not limited to local authorities, should be identified as ‘Providers & Facilitators’. Second, building on ‘the development of a progressive learning pathway’, there needs to be an appropriate system of tutor training for lifelong learning, instead of the haphazard system now in place. Third, there should be stronger emphasis on ensuring availability of provision on as wide a basis as possible. The current ‘Key Tasks’ are unduly vague.

- 51 The reference to ‘heightened awareness & appreciation of multilingualism’ is a commendable goal but no sense is given of what steps are to be taken to achieve this end. It might also be useful to specify the importance of Gaelic in particular, e.g. ‘heightened awareness & appreciation of Gaelic language and culture and of multilingualism in general’.
- 52 The section on ‘Corpus Development’ is rather thin, although this is not primarily an education issue. New mechanisms and structures are needed here, ideally in the form of a Gaelic Academy.
- 56 It is astonishing that the National Gaelic Education Strategy does not include a major section on Research. There is a serious dearth of research on Gaelic education (not limited to Gaelic-medium education; cf. comments in relation to p. 10 of the National Plan). We have very little solid information on a broad range of important questions, and such research as has been done requires continual updating. Questions range from the purely educational to the sociolinguistic:
- how do young children acquire Gaelic in immersion settings? what are the specific developmental needs of L1 Gaelic speakers?
  - how well do children in GME perform at different stages of their education? (The 1999 Johnstone report was hardly the last word on this key subject!)
  - how well do children retain their Gaelic after leaving GME, or after leaving school entirely?
  - what is the impact of GME on the language attitudes and practices of the children going through it, before and after they leave it?
  - why do some Gaelic-speaking parents not send their children to GME even though it is available?
  - what are the factors that lead non-Gaelic-speaking parents to send their children to GME?
  - what are the factors that motivate adults to learn Gaelic?
  - what are the most effective methods for teaching Gaelic to adults?

These are only a few of the key questions. Appropriate funding should be put in place for post-graduate and post-doctoral students working on such topics, and it might well be appropriate to establish a dedicated research centre on Gaelic education, perhaps tied to a University Celtic Department or to an existing provider of Gaelic-medium teacher training such as the University of Strathclyde or the University of Aberdeen.

**COMMENTS ON DRAFT GUIDANCE ON GAELIC LANGUAGE PLANS**  
**WILSON McLEOD**  
**EDINBURGH, 10 NOVEMBER 2006**

- 8 The definition of equal respect is not entirely clear, although a more precise formulation is difficult given the deliberate obscurity of the phrase ‘equal respect’ that was chosen for the legislation. The draft gives some guidance as to what public bodies should do when they make Gaelic-medium services available but also gives a more general suggestion that ‘public authorities are expected to respond to Gaelic users as generously and supportively as possible’. Presumably this instruction to be generous and supportive applies even when the ‘bottom line’ is that the public body does not in fact make services of the kind sought available through the medium of Gaelic and is in effect, communicating to Gaelic-speaking service users that they must use English. Does this simply suggest that public bodies should use more solicitous language and more apologetic formulae when they force Gaelic speakers to use English? In what way could such an approach be said to demonstrate ‘equal respect’ for Gaelic? A clearer statement here would be desirable.

The paragraph in relation to circumstances in which Gaelic and English are ‘presented in parallel’ is very unclear. First, this particular phrase is obscure. Does it refer to published documents in which Gaelic and English text are presented on the same page, Gaelic in one column and English in the other? Does it have a wider meaning?

Second, the meaning of the phrase ‘basis of equality’ is not entirely clear. This wording of course echoes the operative formula of the Welsh Language Act 1993, but this significance (and the perceived difference between ‘equal respect’ and ‘basis of equality’) should be spelled out.

Third, does the suggestion that the Welsh-style ‘basis of equality’ approach then apply to any matter discussed in the publication in question? If so, this requirement is potentially extremely broad in its impact. If these obligations are triggered simply by the layout of documents, would there not be an incentive to choose another format for bilingual documents, or indeed to avoid producing bilingual documents at all in relation to matters that might involve wide-ranging obligations if the ‘basis of equality’ principle were triggered?

Fourth, the suggestion that ‘Gaelic will be accepted by the public authority’ is to be connected or, of perhaps even limited to, circumstances in which ‘Gaelic and English are presented in parallel’ is very problematic. Surely all public bodies preparing schemes should make arrangements to ‘accept’ Gaelic, e.g. in written and electronic correspondence, even if they do not ‘present [Gaelic and English] in parallel’?

- 10 The reference to ‘equal respect’ in connection with non-fluent Gaelic learners is unclear. What obligations or approaches are contemplated here?

The explanation that public bodies should not limit Gaelic provision to one function might be highlighted more strongly. Certain bodies (e.g. Edinburgh City Council) find it difficult to conceptualise Gaelic as having anything to do with anything beyond education and the arts. This point is especially important given the Act’s clear

command in section 10(4) that a public body's plan must encompass both 'functions relating to its internal processes' as well as the provision of services to the public.

- 12 The last sentence on the page is of critical importance and should be stated more strongly, such as by the use of a highlighting phrase such as 'In particular . . . ' or 'It is important to emphasise that . . . ' The phrase 'failure to meet demand' might be better phrased as 'failure to provide a service through the medium of Gaelic'; 'meet demand' might suggest that sufficient capacity might be put in place to deal with some service users through Gaelic while turning away others because of overload. All public bodies should put in place structures to meet any actual demand. Finally, the reference to 'the adult client' here might be construed as suggesting that bilingual children could be denied Gaelic-medium services. This is particularly problematic in relation to health and social services, where the pertinent public bodies should be developing the offer of Gaelic-medium services to all service users.

- 14 The suggestion that 'it is expected that every Gaelic plan will address in some way each of the headings set out below' might be clarified by adding the phrase 'and sub-headings'. At the moment it is not entirely clear whether there is one heading on p. 15 ('Communication') or seven ('Communication', 'Face to Face', 'Telephone', 'Mail & Email', 'Forms', 'Public Relations' and 'Publicity'). The latter interpretation clearly seems preferable.

The last sentence in the first column is not clear. Is there to be a national minimum threshold with the possibility of increasing provision in areas where Gaelic is stronger, or is there also to be a possibility of dropping below the national norm in certain areas? The former approach seems more sensible, but the current wording leaves the second possibility open.

- 15 In relation to 'Mail & Email', the phrase 'without ad hoc translation of supporting documents' is not at all clear. In relation to circulars, bilingual documents should be preferred over separate Gaelic and English documents (a point addressed in more detail below).

The second bullet point under 'Forms' is unclear. What does 'other' differentiated from? Is the idea that most or some forms should be bilingual (the 'norm' referred to in the first bullet point) but not 'others'?

In relation to 'Gaelic versions of press releases', it should be indicated that such versions should be systematically prepared. The current wording allows the interpretation that Gaelic versions should be distributed to Gaelic organisations and media but that such versions will only be prepared in isolated circumstances (such as matters perceived to be of special 'Gaelic' interest).

In relation to 'Publicity', the second bullet point in relation to encouraging uptake of Gaelic provision is very general. Is it possible to be more specific as to the kinds of measures contemplated or recommended?

At several points on this page reference is made to having 'Gaelic-speaking staff' or 'Gaelic speakers' made available. The modifier 'qualified' or 'suitable' should be added here, to avoid putting Gaelic-speaking staff (possibly of junior rank) under

unreasonable pressure by being required to undertake duties or responsibilities for which they may not have been properly trained or remunerated.

- 16 With reference to ‘Printed Material’, there should be a preference for bilingual production of leaflets and not Gaelic versions, for two reasons. First, giving Gaelic speakers access to the English text will probably encourage them to look at the Gaelic and develop the practice of associating public services with Gaelic. This is particularly important given perceived problems in understanding the terminology and register of Gaelic used in official documents. Having separate Gaelic versions ‘available’ may also give rise to problems of poor distribution and a dynamic of the English version as the norm and the Gaelic version available only upon special request (a dynamic which will inevitably depress demand for Gaelic). Second, bilingual versions increase the visibility and status of Gaelic among the English-monoglot population, who would probably be unaware of the existence of a separate Gaelic leaflet.

With regard to websites, there should be a strong presumption that the basic structure of the website should be bilingual, although it would clearly not be realistic to have all content systematically bilingual in most instances. The current structure of this section seems inverted, suggesting that tokenistic or minimal measures would be the norm and significant bilingualisation exceptional. It should be noted that bilingual websites are significantly cheaper to produce than bilingual hard-copy publications, so there might generally be higher expectations in this area.

- 17 The section in relation to ‘Public Meetings’ is poorly drafted. In particular, it does not clarify the key issue, which is facilitating Gaelic speakers to use Gaelic. The phrase ‘principle [*sic*] language’ is unclear, though presumably this means the language used by the chair of the meeting and most speakers. It is clearly unlikely that Gaelic is to be the principal language used at many public meetings; the key question is what arrangements are to be in place for Gaelic speakers to use Gaelic at meetings which are largely or overwhelmingly held in English. The point that ‘provision of any interpretation facilities [should be] advertised in prior publicity’ skirts the main issue. A new section should be added, to the effect ‘Simultaneous interpretation facilities should be made available at appropriate public meetings’, with clarification then given as to how ‘appropriateness’ is to be measured and how much variability should be allowed in this respect.

In relation to ‘Internal Communications’, the first two bullet points are not clear. What do ‘tolerance’ and ‘encouragement’ consist of here, and what kinds of Gaelic use should be tolerated and encouraged? Presumably it cannot mean that Gaelic speakers should be encouraged to make business-related communications to English-monoglot colleagues in Gaelic?

In relation to ‘Increasing Language Capacity’, operationalising these principles will be one of the key challenges arising in connection with any Gaelic plan. Crucially, the section dealing with the learning of Gaelic (at the top of p. 18) should be clarified so as to place an emphasis on staff acquiring sufficient Gaelic to be able to carry out their jobs through the medium of Gaelic and to provide services to the public through the medium of Gaelic. While it is obviously useful for a large proportion of staff to know Gaelic to an elementary level, it is more important to ensure that learning and training

leads to real improvements in relation to the ability to operate bilingually and provide bilingual services. This point is crucial and should be strongly highlighted.

There is a minor but important issue relating to wording in connection with the second bullet point in this sub-section. The reference to ‘non-Gaelic staff’ should be changed to ‘non-Gaelic-speaking staff’. In public discourse in Scotland there is a problematic tendency to distinguish between ‘Gaelic’ and ‘non-Gaelic’ individuals on an almost ethnic basis, while the Bòrd should promote the idea of Gaelic language skills as acquirable by all.

- 18 The scope of the ‘Language Impact Audit’ is not clear. It should be made clear that such impacts should be routinely assessed and added into the standard framework of all pertinent policy documents.

In relation to ‘Social & Health Functions’, the nature of the ‘encouragement’ and ‘engagement’ contemplated in relation to 0-3 Gaelic-medium provision is not clear. It would also be useful to quantify the phrase ‘significant numerical concentration’ more specifically. A figure of 2,000 in a particular local authority area might be an appropriate trigger here; certainly the cities of Aberdeen, Edinburgh, Glasgow and Inverness should be brought within the scope of this provision.

- 19 Detailed comments in relation to education are given in the discussion of the National Gaelic Education Strategy. The only point that requires to be made here is that the term ‘standard provision’ used in the last bullet point should be explained more fully. Does it mean that all schools (primary and secondary?) in such areas should provide Gaelic-medium education? That Gaelic-medium education should be the default form of provision, requiring parents to ‘opt out’ if they wish English-medium education for their children? Would either of these approaches work in, say, Glasgow (home to the largest numerical concentration of Gaelic speakers outwith the Western Isles), where at the moment only 1 primary school out of around 140 offers Gaelic-medium education?

In relation to ‘Communication Functions’, again the term ‘significant numerical concentration’ should be quantified.

- 22 In relation to the sub-heading ‘Employment’ in the first column, the word ‘may’ should twice be replaced by ‘should’ in the first sentence, in relation to Gaelic-essential and Gaelic-desirable posts.

The problem of quantifying ‘significant numerical concentration’ arises here once again, but with the added complication that in one section it is connected to a 20% threshold and elsewhere to a 40% threshold. It would be clearer to give guidance as to how significant ‘significant’ is. (Note that elsewhere the 5% threshold is used, so a third numerical benchmark would be useful).

- 26 There are some minor points of vagueness in relation to ‘Publicising’. The sentence reading ‘The Gaelic plan should be published bilingually and made available on the internet’ might be re-written to provide ‘The Gaelic plan should be published bilingually in both hard-copy and electronic format and should be made available from the body’s home page’. It is possible to post a document on a website but not in a way

that makes it obviously accessible. Putting a clear link to the Gaelic plan on the home page is also useful in status planning terms.

The proviso that the plan 'should be brought to the attention of new staff' should be strengthened. It would be clearer and safer to say 'All new staff should be given a copy of the plan when they take up their posts'.

- 28 The reference to the European Charter is not accurate in implying that certain obligations fall exclusively to the Scottish Ministers. The UK Government is responsible for ensuring the implementation of the Charter by all levels of government, including local authorities, and appropriate public bodies. It is critical that local authorities and public bodies recognise and endeavour to meet their obligations under the Charter.
- 33 For reasons discussed in relation to the National Gaelic Education Strategy, the Board of Celtic Studies (Scotland) should be added to the Glossary of Gaelic Organisations.