

Guidance on Gaelic Language Plans - consultation

This constitutes my response to the above consultation process.

I welcome this document which is based on international best practice and which should lead to the creation of plans which will give Gaelic speakers nationally a range of opportunities to use the language and will also reinforce the status of Gaelic as an official and national language of Scotland.

I particularly welcome the following areas of the guidance, all of which I feel to be absolutely essential if language plans are to be successful in encouraging Reversing Language Shift (RLS):

- The insistence that the level of provision should be based on the overall number of Gaelic speakers served by a particular group, assuring that Gaelic services will be available in areas with significant numbers of Gaelic speakers even where they form a small percentage of the population. To have based the level of provision solely on areas where significant percentages of the public speak Gaelic would have denied the vast majority of speakers services in Gaelic.
- The national focus of the guidance. It is necessary for RLS that services should be available throughout Scotland and that Gaelic be promoted symbolically nationally through measures which increase its visibility.
- The insistence that plans should follow international best practice such as the language schemes of Ireland and Wales (p5). In this respect, I disagree completely with the City of Edinburgh council's assertion that the examples of Ireland and Wales differ greatly from Scotland and do not constitute valid models for Scotland.
- The equal respect principle.
- The inclusion of the principles of normalisation, active offer and progressive growth and the insistence that both latent and potential demand be taken into account.
- The clear recognition that there is a difference between the level and type of provision appropriate for Gaelic and that made for non-indigenous languages (p5). This is an essential principle for language plans as public bodies frequently use Scotland's linguistic diversity as an excuse for making no provision for Gaelic or for making inappropriate provision.
- That commitments in language plans should be clear, unequivocal, precise and quantifiable (p13). This is also an absolutely essential principle if meaningful language plans are to be drawn up as vague plans will not encourage uptake of Gaelic services.
- The principle that national bodies should build the official status of Gaelic into "the national image and activities of the body" (p14). [See also below]

It is vital for the success of the language plans drawn up by public bodies and to the success of the Gaelic Language (Scotland) Act itself that the recommendations in the current draft are not weakened or watered down.

I would also suggest the following amendments to the draft guidance to improve its effectiveness in RLS terms:

Equal Respect

While the guidance (p8) states that Bòrd na Gàidhlig's guidance, advice and assistance should seek to give effect to the equal respect principle, it does not go as far as to say that public bodies' language plans should also do so. Welsh language schemes normally start with the following words: "The [*name of public body*] has adopted the principle that, in the conduct of public business in Wales, it will treat the English and Welsh languages on a basis of equality. The [*name of public body*] Welsh Language Scheme sets out how we will put this principle into practice." I recommend that such a statement be added to the beginning of each Gaelic Language Plan, substituting "equal respect" for "equal validity" and "Scotland / Gaelic" for "Wales / Scotland".

Level of Provision

It should be made clearer in the guidance that plans should apply to the whole range of a body's operations. At present there is a tendency for local authorities in particular to equate Gaelic with education or the arts and this must be challenged to ensure that Gaelic speakers be given the widest possible range of opportunities to use the language and to ensure maximum visibility of the language.

It should also be made clear in the guidance that plans should apply to the whole geographical area of a body's operation. Of the few national public bodies currently making provision for Gaelic (e.g. SNH), there is a tendency to adopt Gaelic policies which in practice cover only the Highlands or only particular areas thereof such as Skye and Lochalsh or the Western Isles. This should be challenged robustly in the guidance. While a geographical variation in services provided is both reasonable and acceptable, it should be made clearer that a baseline of services should be made available nationally where geography is not a significant factor (e.g. publications and ability to communicate with the group in Gaelic). More importantly, it should be clearly stated that *visible bilingualism* such as bilingual logos and corporate identity should be implemented *throughout Scotland* and not only in the Highlands or certain areas thereof. Page 14 states that:

"As an official language of Scotland, it is appropriate that this status for Gaelic should be built into the national image and activities of the body, though at a

local level the choice of measures may be influenced by the significance of Gaelic locally” (p14).

This should be changed to read:

“As an official language of Scotland, it is appropriate that this status for Gaelic should be built into the national image and activities of the body, while at a local level the choice of activities may be influenced by the significance of Gaelic locally, the national image should be used throughout Scotland”

I believe that the guidance should also make it clearer that absolute number of Gaelic speakers is as important a factor to take into account in deciding levels of provision as is the percentage (Geographical flexibility, p9). Unless this point is made very clear, it can be expected that areas containing very large numbers of Gaelic speakers such as Edinburgh City Council and Glasgow City Council will try and make only minimal provision for Gaelic on the basis that its speakers form only a small percentage of the population. Mentioning the main conurbations by name would be also be useful. It should also be made clear that symbolic bilingualism such as bilingual corporate identity is crucial in local public bodies serving areas with a large number of Gaelic speakers even where they form a small percentage of the population.

The section dealing with progressive growth (p9) deals with the differing levels of provision which might be appropriate in different circumstances. It states that “if geography is not a significant factor, for instance in dealing with mail in Gaelic, then provision should be at the same level across the sphere of operation of the body”. It should be stated specifically that bilingual corporate identity should also be at the same level across the sphere of operation of the body nationally. This is crucial to raise awareness amongst non-Gaelic speakers and to build confidence amongst Gaelic speakers.

The section covering confidence building (p10) states that “a high visibility for the language is in itself necessary for a broader facility in the written language”. I agree strongly with this, however, it should also be stated that high visibility for the language is also vital for general confidence building and for raising awareness about the language.

Content of Plans

Education Functions: new bullet points should also be included as follows:

- Expansion with appropriate resourcing of the provision of Gaelic as a subject for learners at primary and secondary school level.

- Support and develop the Gaelic adult learners' sector to enable more learners to reach fluency in the language.
- Actively publicise and promote the availability of Gaelic-medium education.

I agree strongly with the emphasis in the guidance on Gaelic-medium dedicated schooling and of the introduction of Gaelic-medium education as standard in appropriate areas. However, I am not sure about the 40% figure. I believe that it would be better to mention areas by name such as the Outer Hebrides, Sleat and other appropriate areas as it is likely that the proportion of Gaelic speakers will have fallen to below 40% in many areas where Gaelic is currently spoken by a majority by 2021, if not by 2011. Adopting a 40% figure would also rule out or soon rule out GME as standard provision in the largest settlements of the Gaidhealtachd such as Stornoway, Balavanich and Portree. If Gaelic is to have any hope of continuing to be a community language in the Western Isles, Skye and any other similar area, Gaelic-medium education must be introduced as standard provision regardless of whether the number of Gaelic speakers falls below 40% in the near future.

Cultural functions: I agree that interpretation of and access to presentation of heritage, culture and art on offer should be available in Gaelic where 5% of the population by parish or a significant numerical concentration are shown by the latest census to have a Gaelic language skill. However, I believe that it also has to be made clear that all *national* institutions *wherever they are situated* should make such provision such as the National Museums, National Galleries etc. It should also be made clear that areas with large numbers of Gaelic speakers such as Glasgow, Edinburgh should be expected to offer such Gaelic services. While I think that the 5% figure is reasonable for a local figure, I think it would also be useful to state that it is expected that such Gaelic-medium provision be made throughout the Highlands as I'm sure that Gaelic either is or will soon be spoken by under 5% of the population in some areas of the Highland and Argyll and Bute council areas.

In general, I would suggest that "significant numerical concentration" be replaced with "significant number / significant proportion of all Gaelic speakers" as there is a risk that people will confuse numerical concentration with percentage. It would also be useful to make it clear what constitutes a significant number or numerical concentration. Without doing this, it is likely that a public body would view 1000, 2000 or even 5000 Gaelic speakers as being a negligible number even though these are very large numbers in Gaelic terms.

I hope that these comments will be of use.