

Introduction

Comann nam Pàrant welcomes Scottish Government's commitment to introduce legislation to progress their commitments to Gaelic, and the opportunity to participate in such an open consultation.

A Scottish Languages Bill must deliver a national Gaelic language strategy for the next 25 years – A clear vision for the language to catch the imagination of the public - led at ministerial level with Scottish Government expectations very clear.

The Scottish Government has moved to a fundamental human rights-based approach in policy making, an approach which must guide this legislation. Gaelic is part of the equalities agenda but is not treated seriously in comparison to race, gender, sexual orientation, or disability. A rights-based approach would embed Gaelic Medium Education (GME) and give it equal status with English Medium Education (EME). This would give a clear commitment to the increasing numbers of children educated through Gaelic, promote equality, and reflect the desire of the majority of people in the country, that the language is supported.

In recognition of the status of Gàidhlig as a minority language, and Article 30 of the UNCRC, the time has come in Scotland to **create the right for families to access GME**; this legislative underpinning is fundamental to ensure that all children have the chance to access education in their national language and to hold national and local policy makers and practitioners to account in the way that they address the challenges of GME delivery. This would also demonstrate serious commitment by legislators to develop Gaelic within the broader population, place GME on an equal footing to EME and offer long overdue recognition to the indigenous Gaelic speaking population of this country.

UNCRC - Article 30

In those States in which ethnic, religious or linguistic minorities or persons of indigenous origin exist, a child belonging to such a minority or who is indigenous shall not be denied the right, in community with other members of his or her group, to enjoy his or her own culture, to profess and practise his or her own religion, or to use his or her own language.

We recognise the importance of all Scotland's indigenous languages and their contribution to the cultural diversity of the nation and support measures for Scots within this consultation.

Thinking of barriers, obstacles, and solutions - What are the key aspects you feel should be included in a new strategic approach to Gaelic medium education?

GME is acknowledged as a fundamental requirement for the maintenance and revival of the Gaelic language. Pupils are expected to achieve fluency in the language through GME, but they must also be nurtured and encouraged to undertake a lifelong journey of learning and acquisition with Gaelic as an important part of their identity.

GME practice is guided by two documents, Education Scotland's 'Advice on Gaelic Education' and Bòrd na Gàidhlig's 'Statutory Guidance on Gaelic Education'. The Statutory Guidance was issued to provide guidance relating to the Education (Scotland) Act 2016 and its provisions for the Gaelic medium primary education (GMPE) request process and the duty placed on education authorities to promote and support Gaelic education.

These documents detail the immersion experience that is fundamental to Gaelic medium education and any new strategic approach must be based on this best practice advice on pedagogy of GME. The new strategic approach must build on the achievements and progress made over the past 35 years.

The amalgamation of the Advice and Guidance into one document as part of the review of Statutory Guidance would provide greater clarity for all stakeholders in Gaelic education.

Comann nam Pàrant is named as a statutory consultee in Statutory Guidance. This recognition in legislation of Comann nam Pàrant as a national organisation which represents the views of families in GME has been fundamental to the continued successful working relationship with key stakeholders in both education and Gaelic development. The aspiration to embed Gaelic securely within new agencies must therefore accommodate relevant bodies such as CnP (N) so that planning and strategy going forward may benefit from the particular skill set which they offer.

There should be a duty upon local authorities and schools to liaise with CnP in the same way that they are required to do so with agencies such as National Parent Forum Scotland and Parent Councils. Introducing such a measure into the legislation would ensure the representation of Gaelic parents and carers at both national and local level.

A new Strategic Approach to Gaelic medium education should include:

- 1. A right to Gaelic medium education for all families who desire it.**
- 2. Revised and strengthened Statutory Guidance supported by appropriate legislation.**
- 3. A requirement for all local authorities to provide a Gaelic in Education 5-year Strategic Plan and report on progress annually (similar to Welsh Plans).**
- 4. An inter-authority collaborative approach to delivery of GME.**
- 5. Improved resourcing.**
- 6. A formal structure within local authorities, that would include councillors, officers, and parents, to advise on GM.**

1. Right to Gaelic medium education

The Education (Scotland) Act 2016 gave a right to parents to request GMPE from their local authority. There is no right to GMPE. We believe that legislation must provide a right for parents to have their children educated in Gaelic.

Although disappointed that the legislation in 2016 did not grant any rights to GME for parents, Comann nam Pàrant welcomed the publication of Statutory Guidance and the fact that it delivered a process in legislation whereby parents could request GMPE as progress towards a parental right. We did, however, express concern that the process for requesting GMPE was complicated for parents saying in our response to the consultation “if we are looking for substantial expansion in GME – and this is the aim under current Scottish Government legislation – it does not seem reasonable to expect one parent to take responsibility for making a request to a local authority for GME in their area. Nor does it seem reasonable to expect that a particular parent might take responsibility for collating information on potential interest from other families, as might impinge on data protection issues. We believe that there should be a clearer role in this process for Gaelic organisations.”

Our opinion has not altered - the current process places too much responsibility on parents, especially the lead parent. One solution would be for individual parents to register their interest with a central body such as Bòrd na Gàidhlig or Comann nam Pàrant. It would then be the responsibility of that organisation to contact local authorities informing them of the interest. Organisations could then work in collaboration with the local authority to promote the opportunity for GME in an area and establish provision once there was sufficient demand. It would also improve the current process if, following full assessment, the report from the local authority and the response of statutory consultees (BnaG, CnP(N) and NPFS) were submitted to HMI for the final decision on whether GMPE should be established. All

requests made which follow guidance should proceed immediately to full assessment, there should be no need for an initial assessment.

Evidence in support of change – The request for GMPE to Glasgow City Council in 2022, which met the requirement in Statutory Guidance of 5 children due to start P1 in August 2023 and was supported by all statutory consultees who responded to the council as part of the full assessment, was refused. All children involved had been in Gaelic early learning, however not all families were able to send their children outwith the local authority for provision and so lost the opportunity to continue their Gaelic learning.

Parents have no right to appeal if the local authority refuses a request for GMPE. There should be a process within legislation for parents to appeal.

The process should also be amended to allow a request for a P1/2 composite class as happened in Renfrewshire. This would allow families with children who had already commenced P1 to be included on the assessment request, and as part of the minimum numbers required.

At present the request process only relates to primary education but the Statutory Guidance suggests that in the future Scottish ministers may make regulations, expanding the process to allow a request to be made for early learning and childcare. This would be appropriate given that we have a 3-18 curriculum and the importance of early learning and childcare in providing an opportunity to improve children's skills in Gaelic prior to starting school. Planning for a 3-18 continuum of learning must also include secondary provision.

There should be a requirement for every local authority to assess demand annually for GMPE from all parents of children at nursery stage in their area as part of their duty to promote and support GME. This would shift more of the responsibility for development and growth in GME from parents and onto the local authorities.

The underlying principle must be that GME is available to every family who wishes it.

2. A revised and strengthened Statutory Guidance - Part 2

Part 2 of the Statutory Guidance has not been well implemented by local authorities. On its initial publication, local authorities were made aware that the Guidance was Statutory and that there was an obligation to implement it. However, it is our experience that this has not been the case in practice. This may be partly due to language used within the document that is open to a variety of interpretations, along with a lack of understanding that the guidance is statutory. HMI have also noted that schools are failing to make full use of the Statutory Guidance with Education Scotland's 'School Inspection Findings 2018-19' stating *"Overall, educators are not yet making sufficient use of the Statutory Guidance on Gaelic Education, 2017. In some cases, the lack of resources impacts on headteachers' ability to implement this Guidance. On other occasions, the Guidance is not being considered as part of the school's arrangements for self-evaluation and improvement."*

Example of where clarification is required:

The section on GME and catchment areas and placing guidelines lacks clarity. This has allowed at least one local authority to refuse transport to GME for families. This raises issues of equity – families in EME are provided with transport if they live outwith a certain distance from their catchment school, in GME there may only be one school within a local authority area and families should have a right to transport to that provision thus ensuring that there is parity with EME.

Evidence in support of change – Aberdeen City Council’s removal of transport and following that their proposal to introduce very restrictive catchment areas relating to the schools which host GM provision. The decision to remove transport was made with no consultation with parents or any other stakeholders.

There are examples of good practice with setting of catchments and transport provision – Highland Council are in the process of establishing catchments for all their Gaelic medium provision and East Renfrewshire Council included a catchment in their consultation to establish new GMPE in their local authority area.

“In order to access a GMPE place, it is proposed that all East Renfrewshire residents will apply for a place as a catchment applicant to the GMPE school in accordance with the current school admissions and placing request policies”

Examples of failure to implement Statutory Guidance:

The Guidance refers to a progressive 0-18 learning experience with particular attention to key transition points. In practical terms such transitions are not always possible for families, for example in Glasgow due to the imposition of a cap on numbers at P1 there are children in Gaelic ELC who have not been able to progress to GMPE.

There is little evidence that many local authorities have followed recommendations in the Guidance on the duty to promote and support GME. In our view one of the most effective means of promotion from local authorities would be for them to include Gaelic medium education as an integral part of their ‘normal’ activities. For example, all Local Authority Early Years Strategies should include support for Gaelic pre-school and all Family Information Services should include information on GME. Local authorities can also raise awareness of Gaelic medium provision through a variety of promotional activities. This may also involve on occasion contacting parents on an individual basis, for example, by sending letters to pre-school parents informing them of the availability of GME, such as has been done by Highland Council.

Education authorities have failed to plan for continuity from primary into secondary. The range of National Qualifications through the medium of Gaelic should be incrementally increased according to a nationally agreed development plan. Local Authorities and schools should annually monitor provision, uptake, and success in acquiring certification through Gaelic and deliver plans to grow provision. See section on secondary curriculum below.

Additions to Statutory Guidance:

Guidance is required on progressing GME from being delivered in dual language schools to stand-alone models, the gold standard for successful delivery in immersion education. Currently, progression to stand-alone schools is too dependent on parental activism with parents often facing strong opposition from local authorities. As GM numbers grow it would be appropriate if local authorities had an obligation to consult on stand-alone schools when certain conditions are met e.g. number of GM pupils, % of GM pupils in school population or parental request for a school.

Clarification for parents and local authorities on education, environment, and policies in a Gaelic school. There should be a Gaelic first policy for GME schools, with resources, additional teaching, extracurricular activities etc. to be delivered through the medium of Gaelic as a priority, with English being the method of instruction used only when a Gaelic model cannot be delivered.

3. A requirement for all local authorities to provide a Gaelic in Education 5-year Strategic Plan and report on progress annually

Currently some actions relating to Gaelic education are included in Local Authority Gaelic Language Plans (GLP), but these tend not to be the main focus of the GLP. Gaelic in Education Strategic Plans would ensure that local authorities prioritise delivery of Gaelic education and that plans focus on improvements and growth within the sector. Welsh Education Plans have clear targets for improvement identified for each local authority area regarding both planning and standards of education and Gaelic Education Plans should have a similar structure.

Gaelic in Education Strategic Plans should be developed in consultation with all stakeholders and progress with plans should be reviewed annually by either Bòrd na Gàidhlig, Scottish Government or HMI.

4. An inter-authority collaborative approach to delivery of GME

The number of pupils and schools in GME is still relatively small in comparison to EME. This provides an opportunity for local authorities to work collaboratively to ensure that families can experience high quality GME provision in all areas. For example, in several areas local authorities are struggling to deliver the secondary curriculum in Gaelic and an inter-authority Gaelic secondary school may be a solution. The regional collaboratives have, especially in the Northern Alliance, led to some collaborative working but this needs to be taken forward at a national level by a structure specific to Gaelic.

5. Improved Resourcing

Stòrlann was established in 1999 to co-ordinate the production and distribution of resources for Gaelic education. Other companies such as Gilets now produce materials in Gaelic. These have been welcome developments which have led to an improvement in the resources available to teachers, pupils, and parents. However, teachers are still having to translate many of their own resources and pupils have limited access to literary materials, especially for reading outwith school. A new strategic plan should review the mechanism for resourcing GME and ensure funding to enable production of new resources.

6. A formal structure within local authorities, that would include councillors, officers, and parents, to advise on GM

Some local authorities already have 'Gaelic Implementation Groups' or similar. We believe that this would be useful in all local authority areas with GME. These forums improve communication and are an opportunity to deliver better outcomes for GME.

What steps do you think should be taken to support and promote Gaelic education and to ensure that any new strategic approach to Gaelic medium education is implemented?

Funding

Gaelic Specific Grant has been available since 1986 to support developments in Gaelic education. The grant was intended to support local authorities with the initial costs of establishing new Gaelic medium provision and although there is still an expectation from Scottish Government that costs be mainstreamed within 5 years this does not always happen. This, along with increasing numbers in GME and new provision, is putting additional strain on a small budget.

The Gaelic Schools Capital Fund, established in 2007 to assist the development of Gaelic education, has in the past year been used to support improvements to schools which, although they do deliver GME, are EM schools, and the work does not seem to us to be directly related to Gaelic development. There needs to be more transparency around both funds with detail on their allocation published on an annual basis. This could be accompanied by an impact assessment for the funds.

A review of both these funding streams, along with additional new funding would allow more targeted support for the GM sector, for example more linguistic support in classes and extra-curricular activities.

Ensure implementation of Statutory Guidance within the new strategic approach

All agencies, especially local authorities, must be made aware that there is Statutory Guidance on Gaelic education and that compliance with the guidance is **not optional**. Information sessions on implementation of the guidance should be provided by BnaG.

A national curriculum which has a degree of autonomy at school level requires more guidance from national agencies so that GME may be delivered to a consistent standard across local authorities and schools. This is usually in relation to compliance with Education Scotland's 'Advice on Gaelic Education' or Bord na Gàidhlig's Statutory Guidance on Gaelic Education. Parents with concerns about the implementation of these documents in their school, and who feel that the school and local authority are not addressing these concerns, have an expectation that either Bòrd na Gàidhlig or Education Scotland will be able to address their concerns. This is often not the case and parents find this very frustrating. This could improve if inspection of GME were to be more intelligence led rather than the present situation with GM inspections taking place as an element of an EM inspection.

There is a need for greater clarity for parents on the roles of the national agencies. This must include Bord na Gàidhlig, who most parents view as the principal authority on Gaelic education.

Workforce planning

The recruitment and retention of fluent Gaelic speaking teachers has been, and continues to be, challenging for Gaelic medium education. We welcome the initiatives currently supported by Bòrd na Gàidhlig, but it is clear that more needs to be done. For example, we have previously asked Scottish Government to provide bursary support for Gaelic primary and secondary teachers similar to those put in place for STEM subjects. This would allow fluent Gaelic speakers to consider a change in career and train as teachers. Local authorities must also take responsibility and be willing to engage in initiatives such as immersion programmes for teachers.

Regarding the use of technology such as E-sgoil, we believe that it could be useful as a tool to extend the teaching of subjects in Gaelic with the right support for pupils or as part of an interim support package when a local authority is struggling with recruitment, but never as a long-term replacement for teachers. There cannot be any compromise on quality in GME. There are too many classes in GME currently that, due to the current staffing crisis, are without a Gaelic speaking teacher. This often results in pupils being taught in English by a variety of temporary teachers with little or no Gaelic input. There needs to be a national strategic approach put in place to support schools to put more effective mechanisms in place to maintain GME for pupils. This could, for example, involve an organisation such as Fèisgoil who could provide regular enjoyable Gaelic lessons or activities for pupils.

Statutory Guidance recommends that "Education authorities should consider the different demands on the GME teacher and consideration should be given to different class sizes in GME". It also states, "The education authority should also give serious consideration to the use of language assistants to support GMPE teachers and the language acquisition of GMPE pupils". In the early years of GME there were preferential ratios and small classes. It was recognised that there was an additional burden on teachers who were teaching classes of mixed fluency ability with few resources. Preferential ratios have been withdrawn although class sizes have increased, and pupils start school with varying degrees of fluency. Resources have improved but are nowhere near the level which we see within EME. The opportunity to train and employ 'language assistants' has only recently made some progress with the intervention of BnaG following vigorous campaigning by CnP over a number of years.

If we are to attract and retain GM teachers, and improve fluency in GM pupils, the current situation must be addressed and the recommendations in the Statutory Guidance implemented with preferential ratios reinstated, and language assistants employed to support language use and learning in the class. GME resourcing must be reviewed and properly addressed so that staff and pupils are supported through their education.

Teacher training and CPL opportunities for teachers should include language immersion pedagogy. Teachers need to be able to develop the pupils' skills in Gaelic grammar and use of idiom whilst teaching the curriculum subject content.

There are other positions in the Gaelic medium workforce where we are struggling to recruit staff, e.g., early learning and childcare, extra-curricular activities, administration and other support staff in Gaelic schools. These positions are all important in developing the language skills of pupils. There are a variety of reasons for the challenges in recruitment to these posts, often related to low salaries, but the situation in Gaelic is exacerbated with extremely low numbers of Gaelic learner pupils at secondary, making us almost entirely dependent on GM pupils for the future workforce. Many GM pupils lack opportunities to develop their Gaelic at secondary resulting in them leaving school with little confidence in their Gaelic abilities and reluctant to go for Gaelic jobs.

Secondary curriculum

The majority of GMPE pupils still do not have the opportunity to continue to develop their language skills in secondary education.

The decreasing numbers of pupils continuing with Gaelic as a subject, both fluent and learners, at secondary level is alarming. This will without doubt have an impact on the number of pupils able to teach in Gaelic, which will have a further detrimental effect on teacher numbers. This decline in pupil numbers will result in many pupils who, despite attaining a degree of fluency in Gaelic at primary level, will leave school with little or no Gaelic. This approach will not deliver the desired numbers of fluent Gaelic speakers unless urgent action is taken. We believe that the main reason for the drop off in numbers is due to the limited choices offered to pupils through Curriculum for Excellence at the end of S3.

Timetables in secondary schools can cause difficulties in Broad General Education as well as the Senior Phase with pupils being taken out of classes to allow them to study Gaelic. This often results in pupils developing a resentment towards the language especially if they are being asked to leave a subject area that they enjoy. Timetabling for GME pupils must be addressed. The requirement for Gaelic to be a core subject for GM pupils when they progress to secondary education could assist with timetabling issues.

A clearer definition on Gaelic medium education at secondary level must be added to the Statutory Guidance on Gaelic Education which currently states, *"Schools should aim to deliver a sufficient proportion of the secondary curriculum through the medium of Gaelic to enable young people to continue to develop their fluency in Gaelic."* The variation in provision currently seen between schools suggests that clarification is essential in this area.

All educational agencies should take cognisance of data on Gaelic education which is readily available and must act on that information.

All designated secondary schools for Gaelic medium pupils must be made aware of the minimum offer that is expected to be delivered for GM pupils with GME as a compulsory part of broad general education in keeping with Education Scotland's Advice on Gaelic Education.

If a broader range of SQA qualifications offered in Gaelic was available in the curriculum in secondary schools, this would enable pupils to develop their Gaelic language skills in these subjects and would also make it easier for pupils to return to Gaelic (fluent) as a Higher in 6th year if they had not been able to take it in 5th year.

There is an opportunity with the ongoing reform process in education to improve the educational and linguistic outcomes for GME pupils. The current review on the future of qualifications and assessment must include a strong focus on GME:

- Reform could include the introduction of a leaving certificate. This would provide an opportunity to acknowledge that pupils have been educated through the medium of Gaelic with details of involvement and achievements in activities such as an Deasbad Nàiseanta and FilmG.
- Opportunities for inter-disciplinary learning should be progressed for GME.
- An expansion of qualifications in Gaelic offered and steps taken which would improve the uptake of these awards
- The opportunity for all GM pupils to develop their language skills at secondary level which will ensure that they exit as fluent Gaelic speakers able, should they wish, to continue with Gaelic as part of their career progression and / or as part of their daily lives.
- It is essential that there be an assessment of literacy in Gaelic for all pupils who have come through Gaelic medium education

Extra-curricular Activities

It is essential that our young people in GME have opportunities to use Gaelic in a wide variety of situations with activities that are attractive to their age group. The work of Comunn na Gàidhlig's Iomairtean Officers and Spòrs Gàidhlig are both models that offer these opportunities and should be extended so they can reach a greater number of pupils across the country more frequently. There are virtually no other organisations offering activities to children and young adults in Gaelic, and this must be addressed in order to normalise the use of Gaelic outwith the school.

Engagement of Families

Family engagement with GME is essential if we are to create a generation of confident Gaelic speakers who are able to use Gaelic socially in the home and community. Families need to be able to make informed choices when deciding on GME for their child and be given information detailing the support they will be expected to give to their child in GME. Gaelic classes should be available to all parents who do not yet speak the language and advice given on increasing the use of Gaelic in the home.

Some schools have parent homework groups and focused workshops, for example on literacy and numeracy. Most importantly parents should feel that they can approach the school for support and all school activities to boost parental involvement should be encouraged.

An early learning and childcare setting is the first contact many families have with Gaelic and Gaelic education. This is the best time to support and encourage families to engage with the language and increase the use of Gaelic in their homes. Comann nam Pàrant has received funding from Scottish Government for the past 11 years which has allowed us to support part of the voluntary Gaelic early years sector. This funding has not increased over that time despite the growing demands on the sector. In order to improve Gaelic language skills prior to enrolment in statutory education and increase the amount of Gaelic usage in homes and communities there must be more support and an improved nationally co-ordinated approach for families with 0-3 year olds. The creation of more opportunities for immersion in the early years will ensure that more children start GMPE with enhanced Gaelic language skills.

Many parents who wish GME for their children may not speak any Gaelic, may have one parent in the home who speaks Gaelic or may speak some Gaelic but are not sure of how to communicate with their children in Gaelic. All families irrespective of their language profile may require support to increase their Gaelic usage.

Additional Support Needs

If GME is to be truly inclusive, we must ensure provision for children with learning support needs. Support should, as far as possible, be in Gaelic and with advice taken from professionals who have knowledge of bilingualism, and any decisions taken in partnership with parents.

Bòrd na Gàidhlig commissioned an audit on ASN in GME in 2014 and it would be timely as part of the new strategy in GME to assess the progress that has been made on the recommendations provided in the audit, so that any gaps in resources are identified particularly in relation to assessment in the early stages of GME.

A number of respondents to the audit *“made strong representation for additional support staff in the role of language assistants to be involved with oral language group work focused on Primary 1&2 in particular. This feature of provision was given emphasis in situations in which most parents with children in GME had no, or little, knowledge of Gaelic, or children were from social contexts with limited Gaelic language exposure;”* We have referred elsewhere in our response to the role of language assistants in GME, this is yet another example of the repeated pleas for more support in classrooms in the early years of total immersion in GME.

Are there any other points you would like to make about the provision of Gaelic medium education and Gaelic learner education in Scottish education?

Outcomes of Gaelic medium education

“Gaelic Medium Education, based on the principles of immersion with its resultant fluency, is recognised as the best way of achieving a sustainable future for the Gaelic language”. (Education Scotland, ‘Advice on Gaelic Education 2015’)

In order for pupils to become fluent through immersion there needs to be a much greater focus on linguistic support for pupils and teachers in GME. Too many pupils are leaving GME with good educational qualifications but with limited fluency in Gaelic. The aim must be for a high quality immersive educational experience which results in fluent adults equipped to pass the language on to the next generation.

There are additional challenges which must be addressed to ensure Gaelic is a vibrant element in the young person’s life outwith the immediate confines of the classroom. Additional wider curriculum opportunities through the medium of Gaelic are important in GME primary and secondary CfE delivery so that learning may be consolidated through such social interaction and thus by extension, normalise the process. This could be achieved through better planning, and co-ordination by national agencies, local authorities, and schools. Recent initiatives by Bòrd na Gàidhlig, particularly in planning for improvement at secondary level, are addressing some of the issues, but compliance with BnaG recommendations must be compulsory for local authorities and schools if there is to be meaningful progress.

4. Do you have views on what measures should be in place to support Gaelic speakers in areas with significant numbers of speakers?

There are significant numbers of speakers in both rural and urban areas, and both require support. In geographical areas where Gaelic is spoken by a significant percentage of the population there should be mainstreaming of Gaelic services with public bodies such as local authorities and health boards delivering a ‘Gaelic First’ policy. Support for Gaelic should not be entirely dependent on additional funding for Gaelic.

6. How would you balance the commitment to put measures in place in areas where there are significant Gaelic speakers with the principle that Gaelic should be a national language for all of Scotland?

The status of Gaelic as a national language of Scotland must be promoted and protected in all areas thus ensuring parity of position with English.

Gaelic should, however, have enhanced status in geographical areas where it is the language of the community. Gaelic must be protected in these areas whilst action is taken nationally to reverse language shift. However, we are aware of concerns that the establishment of Gàidhealtachd areas will mean less support for activities in other areas. Gaelic communities around all schools with GME must continue to be developed, with families in all areas equally valued and supported.

7. Are there any further points you would like to make about the commitment to explore the creation of a Gàidhealtachd and the associated commitments relating to Gaelic use in family and community?

The main focus in all Gàidhealtachd areas, should they be established, must be on securing inter-generational transmission of Gaelic in families. Advice and support on raising children as first language Gaelic speakers should be available to all families living in a Gàidhealtachd area. Childcare and family activities should be provided in Gaelic. Research on parental attitudes should be carried out and any barriers to using Gaelic in the home and community addressed.

All schools in Gàidhealtachd areas should be Gaelic medium with English medium education phased out of the majority of schools in the designated area.

The vision must be for Gàidhealtachd areas that are not simply static entities but areas that will be supported to evolve and expand through time.

Do you have any views on the current duties of Bòrd na Gàidhlig and any suggestions of how these could operate more effectively or efficiently?

Bòrd na Gàidhlig needs more resources (financial and staffing) and increased powers so that it may carry out the duties that are needed to ensure the implementation of policies and practice that will lead to improved outcomes for Gaelic in Scotland. Any review of the Bòrd's performance must consider the financial restrictions with which it has had to operate, as well as the constraints of a weak legislative framework.

The language planning process should be reviewed and strengthened to ensure greater impact. Plans for education must be introduced as we have suggested in our response above.

Do you have any views on structural changes at Bòrd na Gàidhlig which could strengthen the promotion of and support for Gaelic in Scotland?

We note in the consultation reference as to whether Bòrd na Gàidhlig should be "closer to the Scottish Government". In our opinion BnaG must remain in its current form as an arms-length organisation that will continue to build on existing relationships which it has with the main Gaelic organisations who support the delivery of actions within the national plan for Gaelic and also work closely with Gaelic speaking communities. Whilst it is important that progress is made with normalising Gaelic within publicly funded bodies, such as the participants in the Faster Rate of Progress initiative, there are very few organisations which operate through the medium of Gaelic and it is imperative that all Gaelic

organisations, including BnaG, are supported to continue to use Gaelic in everyday activities in the workplace.

It would strengthen the position of Gaelic within Scottish Government if all policies introduced were to have a 'Gaelic Impact' assessment similar to the 'Equality Impact' and 'Children's Rights and Wellbeing' assessment currently undertaken.

More meaningful opportunities for communities and Gaelic organisations to debate policy with BnaG and Scottish Government would be of benefit. Such opportunities were previously available at conferences such as those which were held on an annual basis by Comunn na Gàidhlig. There will be a greater sense of ownership of policies if these gatherings agree actions to take forward.

Comann nam Pàrant values the current collaborative working relationship that we have with Bòrd na Gàidhlig, and we are keen that this should continue. This collaboration has resulted in significant progress with a number of important initiatives over the past few years.

Are there any further points you would like to make about the review of the functions and structure of Bòrd na Gàidhlig which seeks to ensure Scotland has the most effective leadership body and network of organisations for the promotion of Gaelic?

We need a framework that is clear and unambiguous. A legal right to GME, backed with rigorous powers for a compliance and enforcement process.

Enhanced Bòrd na Gàidhlig

More powers for Bòrd na Gàidhlig to impose new legal duties regarding GME and Statutory Guidance applicable to local authorities. The Bòrd to support local authorities in delivering their duties, as well as promotion and development of new provision such as stand-alone schools.

Language Commissioner

An independent Language Commissioner as a (third party) arbitrator on behalf of the speakers of the language and the language itself. The Gaelic language commissioner would have powers to monitor compliance with the legal duties through the checking of annual reporting by local authorities, and investigate any complaints regarding non-compliance. This would include any complaints against the Bòrd.

Whatever decision is taken with regard to the bodies who will implement and regulate the new legislation there must be absolute clarity as to where responsibilities and accountability lie.

With this Bill the Scottish Government has the opportunity to offer real protection and support to the Gaelic language and its speakers, to take radical action to reverse the decline in speaker numbers and to help preserve the language for future generations.

M.Wentworth
08.12.2022