Consultation on The Scottish Government Commitments to Gaelic and Scots and a Scottish Languages Bill

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Language Sciences Institute UHI Response to Scottish Government's Consultation on Gaelic and Scots and Scottish Languages Bill

Introduction

The Language Sciences Institute of the University of the Highlands and Islands connects innovation and expertise in research and learning with the multi-disciplinary strengths of the UHI academic network to reconfigure current approaches to the revitalisation of minority languages. The Language Sciences Institute has a particular focus on the traditional Gaelic speaking communities of Scotland.

The Language Sciences Institute provides a focus for informed debate and discussion on factors in relation to creating a sustainable future for Gaelic as a communal and social identity. The Institute also provides a forum for facilitating engagement in a meaningful and positive way with the traditional language community and with the new Gaelic communities emerging within the larger urban conurbations of Scotland. The Language Sciences Institute has a central role in researching and informing national policy in this area of language planning in Scotland. Institute staff work across specific university disciplines to address increasingly complex social and global problems of sustaining minority languages and cultures in an integrated way.

Our responses to the consultation questions follow:

Gaelic medium education

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?

The provisions of the Statutory Guidance on Gaelic Education came into effect in February 2017. Whilst the Statutory Guidance and the 2016 Education Act were viewed as important legislative milestones for Gaelic Medium Education it is questionable if much has changed in relation to improving parental rights to access GME for their children and whether this legalisation has changed policy and commitment to GME at Local Authority levels, and importantly to the degree of oversight given by Scottish Ministers to increasing the scale and scope of GME. The reality, in relation to actual numbers at least, is that primary school pupils in Gaelic-medium education have increased by 80% since 2005, and secondary GME pupil numbers by around 48%. However, these increases in absolute numbers only account for 1% of the total primary school pupils in Scotland's schools and for 0.5% of secondary school pupils. If GME pupil numbers are to be sustained at current levels, even before any thought is given to increasing pupil numbers at both primary and secondary levels substantially, then some radical thinking needs to be considered in relation to (a) teacher numbers coming into the profession, and (b) the degree of linguistic skills across the teaching cohort.

Further improvements to the Gaelic-medium system of education require legislative change to strengthen parental rights and Government oversight of the provision provided by Local Authorities. It also requires a step-change in how the Scottish Government resources and supports Gaelic-medium education going forward and any new legislative reform needs to be meaningful, resourced and aligned with targets which can create change and show progress. It is important to note that, whilst it is critical to increase the numbers of children entering Gaelic-medium education, it is also crucial that children are achieving levels of fluency in the language as they transit from primary to secondary education and thereafter in the tertiary system and/or the world of work.

Consideration should be given to strengthening the following areas of intervention to support the future provision of Gaelic-medium education:

- The creation of a coordinating Gaelic Teachers' Training Academy which would link teaching Colleges/learning centres to promote knowledge exchange, and a collective endeavour between students/teachers on GME training courses and participants on CPD courses to strengthen support networks across the GME teaching/learning community. Such a coordinating role could be based at the University of the Highlands and Islands.
- In order to strengthen the policy and resource frameworks for GME, a stand-alone department/organisation for Gaelic education should be established. The new organisation/department – **Foghlam Gàidhlig** – would have overall responsibility for Gaelic-medium education, including that of developing a new Gaelic-based curriculum which is not a 'mirror' of the English-language based curriculum.
- It is important that the Gaelic-based educational curriculum is founded on the cultural capital of the Gaelic community and framed within a model of minority language communal renewal.
- A Gaelic language competence system to support aspiring teachers wishing to enter GME.
- An adequately resourced Continuous Professional Development model for all GME teachers.
- A Schools-placement system for Gaelic teachers that will lead to a full-time position within Gaelic schools.
- Funded and resourced National/Regional educational support strategies for the following areas of intervention:
  - Early-years to Tertiary
  - Learning Support Needs
  - Family language learning support systems
  - Adult Learning Centres
- Gaelic Language Learning Immersion Strategies developed and resourced for:
  - Teachers and Support Staff
  - Schoolchildren and Families
- A funding and resource support model to attract primary and secondary school teachers, early-years teachers and support staff into recognised and long-lasting career structures.

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

Relevant Gaelic education legislation should be reviewed to assess areas where improvements are required in terms of parental rights to access GME and how the legislative responsibilities placed on Local Authorities are being implemented with the degree of commitment required to support GME. In addition, Scottish Government and relevant Ministers need to show leadership in accelerating progress in extending access to GME across Scotland and in ensuring that targets are set and achieved across the various dimensions of GME. The following actions could be considered as appropriate:

- A review of current legislation to identify strengths and weaknesses in current policy and support mechanisms.
- The prioritisation of Gaelic-medium education actions to develop and create a sustainable model for GME. This would entail the development of an appropriate and comprehensive Gaelic-medium education strategy linked to a Gaelic-medium education workforce plan which would be under the auspices of a new organisation, Foghlam Gàidhlig.
- An adequately funded resource model to deliver on identified priorities.
- A research and evaluation system to support a new GME strategy.

- A Communication strategy which would enhance linkages between Scottish Government GME priorities with knowledge exchange and information pathways with teachers, aspiring teachers and parental groups.
- Ensuring that there is a Ministerial/Parliamentary Committee oversight of the delivery of a new GME strategy and approach.
- Ensuring that appropriate levels of governance, agency and accountability elements/dimensions are embedded in any new approach implemented for 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?

Gaelic medium education and Gaelic learner education is skewed more towards "levels of activity" (number of children enrolling for GME/GLE) and less to the achievement of qualitative outcomes (fluency and capability in Gaelic). Whilst recognising there are resource and capacity constraints in creating rapid changes to the prevailing systems, the following areas are highlighted for priority in building a new foundation for the future:

- The rights of parents to access GME for their children need to be strengthened, and resource structures enhanced to improve support to families, both native speaking families and families learning Gaelic alongside their children.
- Adult learning centres need to be established and resourced at selected locations across Scotland to support the learning of Gaelic outwith the school system.
- A research and evaluation support structure needs to be developed which provides a deeper understanding of the dynamics of learning and using Gaelic in Scotland, in relation to GME/GLE.
- A competence assessment framework needs to be introduced for GME to ensure children are achieving adequate levels of fluency as they journey from primary to secondary schooling.
- Recognition needs to be given to regional differences in terms of the support required for children, teachers, teaching assistants, and parents, in the creation of a sustainable future for Gaelic as a community language beyond the school environment.
- A resourced and credible GME strategy and associated priorities need to be communicated to parents and the wider community of the role Gaelic has in contemporary Scotland. This would also include recognising the importance of integrating the 'community dimension' of learning within any new legislation in supporting the achievement of fluency in Gaelic.
- A set of challenging (but achievable) targets need to be developed for GME from Early years to Tertiary levels and monitored on an annual basis to enable lessons to be learned and adjustments made to GME strategies and plans.
- Any new legislation needs to ensure "additionality" is built into support to Gaelic-medium education and Gaelic development generally in a context where legislative support for Gaelic and Scots is amalgamated within a single Language Act. There should be no competition for resources between different language interests.

The Gàidhealtachd Designation

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

The main challenge to establishing a Gàidhealtachd designation is that it should engage realistically with the speaker group to improve its societal situation. A common anxiety about the establishment of the designation, if inappropriately implemented, is that it may cause the depletion of resources and energy merely to affect an official status which brings little of consequence to bear on society beyond its symbolic appeal.

However, a cautious welcome may be extended in that the idea behind it clearly concedes the principle that different approaches are needed in different areas with different populations of Gaelic speakers and learners. The introduction of a Gàidhealtachd designation might now be the only way to safeguard the continuing use of Gaelic as a community language in the well-defined geography of the Western Isles, and perhaps the only way of safeguarding its maintenance, or indeed reintroduction, across other parts of Scotland where the density of Gaelic speakers in any local population is very significantly lower. Gaelic as a "language for all of Scotland" can only gain from seeing its Hebridean vernacular districts stabilised.

Whether these districts with existing Gaelic communities gain from being newly labelled as either a unitary "Gàidhealtachd" or a collection of several "Gàidhealtachdan" – with other "kinds" of Gàidhealtachd being offered a different kind of recognition in urban/diaspora situations – is a secondary question. The important point is that the remaining social geography of Gaelic as a community language – already well defined by both geography (through its islandness) and administratively (though existing local authority boundaries) – is acknowledged and protected. The unhelpful deployment of the "divisiveness" trope in this regard only serves to muddy the waters on the strategic need to focus in a coherent, coordinated way on the various requirements of the existing speakers in the vernacular context, speaker networks beyond the vernacular Gaelic social geography, and learner networks in various locations.

Differentiation of varying social contexts is the cornerstone of relevant and cohesive minority-language policy and paves the way for a realistic strategic complementarity between the efforts of those involved in differing aspects of Gaelic affairs – social, institutional, educational and creative. In short, a different-courses-for-different-horses approach would be a more realistic basis for action than continuing with the now less than effective national planning approach to Gaelic language policy. One of the perverse outcomes of current Gaelic-language policy is that the vernacular community feels dissociated from it. Considering a possible Gàidhealtachd designation indicates a willingness to examine a new course of action which moves beyond current limitations. Indeed, sustaining Gaelic as a community language in its vernacular social geography is relevant to all who are involved in different aspects of Gaelic affairs for the simple reason that learning, promoting and engaging creatively with Gaelic becomes more difficult in the absence of a vernacular community.

As language use is a collective endeavour, the societal erasure of the day-to-day vernacular language obviously weakens the collective capacity of speakers to make their language and culture a vital concern of the society in which they live.

There is no need to draw a new "Highland line" anywhere. Existing geographical and local authority boundaries already define distinct areas, with needs that are also distinct. The critical point is that this distinctiveness should be acknowledged when it comes to shaping effective policy and planning for the language.

This proposed Gàidhealtachd socio-geographic status could evolve as a meaningful and productive designation as the operational focus of the Urras na Gàidhlig model, suggested in the *Gaelic Crisis* study. We envisage that the Councils of the Western Isles, the Highlands, and Argyll and Bute could agree the operational and geographic extent of the remit of Urras na Gàidhlig as the primary Gaelic community development agency in their region.

For the Gàidhealtachd designation to be meaningful, the process to establish this new social policy status would need to resolve the following issues:

- The original use of the term, Gàidhealtachd, indicating the socio-geographic extent of the Gael no longer corresponds with the current geographic use of the term. The centuries long trajectory of language shift to English in Scotland has led to the current situation where only a relatively small area of the Highlands and Islands could be designated in any meaningful sociolinguistic sense as a "Gàidhealtachd".
- In the absence of a clear sociolinguistic rationale and the prioritisation of the societal requirements of sustaining Gaelic as a community language, the Gàidhealtachd designation will become a counter-productive symbolic status whereby public assertions merely serve to camouflage an otherwise unhindered societal trend towards the endgame communal erasure of Gaelic as a community language.
- The option to designate a Gàidhealtachd status, with little of societal value to actual Gaelic communities beyond its symbolic appeal, would in effect render Gàidhealtachd status another public instrument of English-language planning among the vestigial vernacular group in Scotland, i.e. being little more than a revamped version of the perverse outcomes of current Gaelic-language policy.
- The Gàidhealtachd proposal borrows from the Gaeltacht administrative unit in Ireland. The Gaeltacht was delimited primarily in regions of the western seaboard in Ireland in the 1920's when significant proportions of these districts comprised 80%+ of active native speakers of Irish. As only 1 out of 5 people now live in districts where Irish is used as a community language (to any appreciable extent), most Gaeltacht residents do not encounter the use of Irish beyond its formal practice mainly in the school system and in symbolic state provision for the Gaeltacht as an administrative unit. In short, the socio-cultural link between the Gaeltacht as a cultural and sociolinguistic entity and the Gaeltacht as an administrative unit for state activity has been lost for the majority of Gaeltacht residents.
- Obviously, the Gàidhealtachd proposal in Scottish context has, as it starting position, much weaker social densities of speakers than in the Irish case, thus implying that efforts to establish the proposed Gàidhealtachd status as a societally meaningful endeavour will be even more challenging.

Any meaningful discussions on a Gàidhealtachd designation would need to establish a series of working groups of elected officials, community representatives, public officials, and academic advisors.

These would be established by the Scottish Government to draft strategies to address the societal and formal requirements as set out below:

- How to structure two broad-based strategies to support Gaelic speakers and learners:
  - Highlands/Hebrides where there are relatively <u>significant concentrations</u> of Gaelic speakers, and the language is common in most localities in everyday social situations.
  - Urban areas/cities where there are <u>significant numbers</u> of Gaelic speakers/learners who need specific Gaelic language support measures to aid learning and use outside schools and institutions.

- Establishing a process to engage with communities in discussions on which types of models of support would be applicable and practicable to their respective localities. This is a fundamental prerequisite before any 'measures' of intervention are introduced from external sources. The importance of community agency and governance needs to be recognised in any policy prescriptions developed beyond this consultation timeframe.
- Consideration of the potential for utilising existing community-based organisational/voluntary structures as key elements of any programme of support measures.
- A starting point for discussions would be the following sources:

https://www.uhi.ac.uk/en/research-enterprise/res-themes/humanities-and-arts/language-sciences-institute/publications/the-gaelic-crisis-in-the-vernacular-community/chapter-9-towards-a-new-model-for-the-revival-of-the-gaelic-community/

https://www.uhi.ac.uk/en/research-enterprise/res-themes/humanities-and-arts/language-sciences-institute/publications/agency-and-participation-factors-the-gaelic-vernacular-community/

Do you have views on how such areas should be defined?

Areas of intervention can be readily defined by existing regional and/or sub-regional boundaries. Such areas are already coherent in terms of 'community' and in how resources are and/or can be allocated for developmental purposes. For example, the Local Authority areas of Eilean Siar, Highland, and Argyll and Bute could engage in a consultation process with community stakeholders in the various districts of the remaining vernacular Gaelic communities to agree an operational mechanism to bolster language support and revitalisation within their respective regional localities.

One particular area for discussion would centre on whether a locally controlled Trust could be established, such as suggested by Ó Giollagáin *et. al*. (2020) - Urras na Gàidhlig.

Such an operational area would in effect correspond with the social and geographic extent of designating 'Gàidhealtachd' status for the vernacular communities. The establishment of a development framework such as, for example, Urras na Gàidhlig (or utilising an existing Trust/Cooperative) to support socio-economic development among the remaining Gaelic communities should be one of the main priorities for a new approach for Gaelic policy and strategic reform in a reformed legislative era for Gaelic in Scotland.

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 core issue for consideration about the role of Gaelic culture, heritage and speakerhood in perceptions of national identity is the reality gap between aspirations for Gaelic and the societal extent of the language as it currently exists. Political and institutional assertions about Gaelic will become increasingly difficult to sustain, from a societal perspective, as part of the national narrative in the absence of any communities of native speakers or indeed Gaelic learners achieving levels of fluency which can support sustainable Gaelic-speaking communities of the future. Under current circumstances, the remaining Gaelic communities are no longer sustainable.

Therefore, if a radical and effective new policy framework cannot be brought into being for whatever reason, those continuing to promote the status of Gaelic as being of importance to Scotland will need to address some fundamental and difficult issues: who learns a language with no native-speaking group? And how can a significant aspect of national aspiration be based on a linguistic identity which does not actually exist as a dynamic socio-cultural reality in any community?

In relation to practical policy in terms of Gaelic promotion and protection, it is debatable whether Gaelic can now be sensibly classified as 'a national language for all of Scotland' when only slightly more than 1% of the population has some understanding of the language. The use of such aspirational terminology acts as a deflection from a focus on the real challenges which need to be urgently addressed in communities across the Highlands and Islands and in our urban areas and cities.

There should be an acknowledgement that there are two distinct language groups: (a) the native speaking community where there remains a relatively significant speaker group; and (b) the Gaelic new speaker/learning community located primarily in urban/city areas. In developing legislation and subsequent policy measures, care should be taken that artificial demarcation boundaries are not created when the situation on the ground across regions and localities can be far more fluid than is sometimes recognised and needs to be supported by specific and dedicated interventions at the most practical level of community engagement.

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?

Without some careful consideration which would include an ex-ante appraisal of the potential impact of such a geographical classification, the likelihood is that the creation of a 'Gàidhealtachd' designation will act as a distraction from where the focus for Gaelic promotion and protection development needs to be directed and supported.

Any changes to policy structures and the allocation of resources need to put Gaelic speaking and Gaelic learning families and associated communities at the centre of the consultation and developmental focus.

The structure and functions of Bòrd na Gàidhlig.

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?

The question assumes that respondees have a sufficient level of knowledge of the range of duties currently within the remit of the Bòrd and gives the potential opportunity for responses to be based on perception rather than knowledge of reality. It should be acknowledged that Bòrd na Gàidhlig have made significant progress in addressing the corporate issues raised by various recent audit reports and by the Audit Scotland review. However, corporate efficiency does not necessarily mean that the Gaelic policy development focus and priorities pursued by the Bòrd are now meeting the demand to ensure interventions in support of language promotion and protection are fit for purpose and are generating sufficient outcomes that will sustain Gaelic as a community language for future generations.

The duties of Bòrd na Gàidhlig (as they have evolved since 2005) now mismatch both the financial and human resources available to the organisation.

No organisation can operate effectively or efficiently when demand for its services have increased substantially since its formation without a concomitant increase in financial and staff resources.

Recognising that changes to organisational entities should be expected in any public policy structural framework it would be prudent to undertake a formal review of the functions and responsibilities of the Bòrd, in the context of the objectives of the 2005 Gaelic Act, beyond the conclusion of this consultation. Adopting changes to legislation and subsequent organisational delivery structures should not be undertaken without an informed foundation to support change. However, assuming no change in financial resources, as dictated by current national public funding challenges, it is clear that the duties of the Bòrd will need to change and/or be reengineered with some difficult decisions on priorities to be taken by Scottish Government, with Scottish Ministers taking responsibility for such prioritisation rather than deflecting them on to Bòrd na Gàidhlig or other public bodies.

Attached to the current duties of the Bòrd, it is questionable if the Language Plans of Public Bodies or indeed National Gaelic Language Plans are making much of a difference in supporting an increase in the number of people who are fluent Gaelic speakers and daily users of the language. There is a mismatch between expectations in terms of what these instruments of intervention can achieve in reality when aligned with the real situation of c.1% of the population with some understanding of Gaelic. The pretence of progress through a focus on some limited 'activity' headlines will not deliver on the primary objective of increasing the number of fluent and habitual users of Gaelic across Scotland. Increasing the numbers of people registered on Duolingo learning Gaelic does not necessarily translate into functioning and sustainable Gaelic-speaking families/communities. Whereas all learning opportunities and individuals making personal decisions to learn Gaelic are to be applauded, care should be taken that language policy is not being driven by headlines solely based on activity numbers.

Additionally, a significant element of the duties of the Bòrd should be on managing a comprehensive research and evaluation strategy which is capable of informing Gaelic language policy and planning across all relevant regional areas of Scotland. To date, no systematic evaluation has been undertaken of the individual language plans of public bodies, yet some organisations are now preparing and/or are on the fourth language planning cycle and remain in receipt of public funds to deliver on such plans, while the Bòrd relies on the self-evaluation of public bodies in the reporting of agreed actions.

This is not an appropriate way to ascertain the impact of public policy. In support of Bòrd na Gàidhlig, Scottish Government should also take responsibility for the evaluation and assessment of the impact/outcomes generated through Gaelic language plans across the public sector in Scotland.

The Bòrd's role as the primary holder of financial resources needs to be reviewed to guard against creating a 'clientelist' mentality amongst supported development groups/organisations, and ultimately to ensure value for money in the use of scarce resources. For example, development funding could be routed through other public sector organisations, thereby instilling some degree of collective responsibility for Gaelic development across Scotland. For clarity, funding associated with the implementation of the Gaelic language plans of public bodies would be managed by Bòrd na Gàidhlig, and community-focused development funding for the maintenance of Gaelic within communities would be directed through another organisation such as for example, Urras na Gàidhlig as suggested by Ó Giollagáin et. al. (2020).

In the prioritisation of duties, consideration should also be given to transferring most of the responsibilities of Gaelic education to another body – **Foghlam Gàidhlig** – with the Bòrd remaining as a principal statutory consultee on Gaelic education matters.

As indicated above the duties and responsibilities alongside the operational structure of Bòrd na Gàidhlig need to take account of the tensions between the processes of revitalisation (promotion), and the grass-roots activities associated with the language-in-society maintenance (protection) of a minority language such as Gaelic.

The strategic and operational structures of Bòrd na Gàidhlig need to reflect such tensions and therefore consideration should be given to an organisational framework where there is a clear demarcation between the regulation of Gaelic Language Plans, and development activity at the interface with communities.

Gaelic as a community language is in a fragile state and it is not prudent nor appropriate for Gaelic public policy, and the attendant risks associated with language promotion and protection, to be primarily vested in a single body with limited resources.

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

The wording of the above question fails to recognise that, for a sustainable position for Gaelic to be achieved in Scotland, policy interventions are required that recognise the importance of 'language protection' alongside 'language promotion'. It is singularly problematic if those developing and creating policy in Scottish Government and in Bòrd na Gàidhlig do not recognise this twin-pole strategic pathway as fundamental in the process underpinning the revitalisation and maintenance of a minoritised language.

It has become clear that the task of Gaelic language promotion and protection in Scotland for a highly minoritised language is beyond the scope, resources and capabilities of a single organisation with an annual budget of c.£5.5 million. Gaelic public policy is primarily focused on education and learning with little effort or resources expended on maintaining existing Gaelic speaking communities – in other words the vernacular/indigenous Gaelic speaking group. In some respects, it could be argued that there is a policy of 'managed decline' with the respect to the vernacular Gaelic group, primarily located in the Hebrides.

Without adequate supports to the indigenous Gaelic community, it is problematic to claim to sustain a language policy objective to strengthen the state of Gaelic, based on the current strategic and operational apparatus, when the focus of intervention remains overwhelmingly on Gaelic learning in schools.

Any structural changes to the operational functions of Bòrd na Gàidhlig need to focus on the 'protection' of Gaelic as much as 'promotion' and support for the language. A more pronounced focus needs to be brought to bear on protecting and strengthening Gaelic language use and Gaelic speaking capacities amongst the native speaking community and importantly in tandem with providing adequate resources to support Gaelic learners and new speakers across Scotland.

Inherent in such an approach is the need for a social strategy which would act as a bridgehead between the L1 and the L2 communities. Currently there is a lack of complementarity or recognition that strengthening the position of Gaelic in Scottish society requires developing the social capital bonds/linkages between the two Gaelic speaking communities.

Some additional areas for discussion and consideration follow:

- There is a clear tension between regulation and development in the work of the Bòrd, and a separation of duties needs to be considered to create a more effective and efficient system of governance and accountability.
- It should be possible to restructure the organisational operations of the Bòrd to create two specific Directorates: Regulation and Development, each with their own separate leadership teams reporting to the Board of Directors and ultimately responsible to Scottish Ministers. Each of the Directorates could be based at two different locations: for example, Regulation in Edinburgh/Glasgow and Development at a location in the Islands.
- Development activity associated with the development Directorate should also be based on a regional/sub-regional basis reflecting that the support required for Gaelic-language protection and promotion has different requirements across localities. A language-in-society model must be developed that provides community agency and governance of resources and priorities to the vernacular Gaelic-speaking community, whilst recognising a similar framework of support is required for the Gaelic-learning communities of Scotland. A National Gaelic Plan for Scotland which doesn't fully reflect and respect the differentials in support needed for Gaelic revitalisation and maintenance will not generate the required language outcomes needed to create a sustainable future for Gaelic. If Scottish Government and Bòrd na Gàidhlig do not recognise the significant challenges which exist across Gaelic communities (Gaelic education/new speakers and learners; and the native speaking communities) then it is highly questionable whether Gaelic development policy in Scotland will achieve any degree of success in the long-term.
- A new joint pan-Highlands and Islands and a pan-Scotland programme of development activity should be created and implemented between the Bòrd and other development bodies to mitigate against a 'silo' mentality being attached to Gaelic development and recognising that support in terms of the promotion and protection for Gaelic reaches beyond the remit of the Bòrd.
- A model of development support for Gaelic should exclude the possibility of appointing a Language Commissioner. There are insufficient powers within the current 2005 Gaelic Act to enable a Language Commissioner to operate efficiently and effectively. The focus should be on supporting existing Gaelic-speaking communities and in ensuring that support systems are adequately resourced to increase the numbers of speakers and users of Gaelic.
- A realistic and practical approach should be taken to any potential restructuring activity to reset the strategic and operational remits of the Bòrd, reflecting priorities and the resources and capacities available to effect change.

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?

Beyond audits of the corporate functions of Bòrd na Gàidhlig the Scottish Government should also ensure an evaluative framework exists which is capable of assessing and measuring two broad areas of policy endeavour: (a) the language competences and capabilities of children within Gaelic-medium education; and (b) the effectiveness of policy measures in the achievement of language outcomes and changes in Gaelic language behaviours across communities targeted by public policy on Gaelic development. Other areas for discussion to strengthen policy and development, leadership, and network coordination for the promotion and protection of Gaelic could usefully include the following:

- Bòrd na Gàidhlig needs to find a mechanism whereby it ensures that it is seen to be actively working in tandem with the Gaelic speaking and learning communities, and to mitigate the perception that it is an organisation which is somewhat removed from the reality of the state of Gaelic within communities.
- To enable a strong partnership to be developed between official bodies and the Gaelic community a system of representation needs to be developed at national and regional levels which strengthens community participation in relation to community governance, agency and accountability.
- Representation could entail the staging of a biennial Gaelic Congress to enable the wider community to exchange ideas, views and initiate discussions on changes required to improve systems of support and development.
- Consideration could also be given in terms of how the Board of Bòrd na Gàidhlig is appointed and how well it represents community interests and concerns. It could be possible to have a selected number of Board Members appointed by Scottish Ministers and also have Community Members appointed by communities to represent relevant regional areas of Scotland.
- A further discussion on options to restructure Bòrd na Gàidhlig and issues associated with the current approach to Gaelic development in Scotland can be found at:
  Moving beyond Asocial Minority-Language Policy: Conchúr Ó Giollagáin and Iain Caimbeul:
  https://www.euppublishing.com/doi/full/10.3366/scot.2021.0360?role=tab

However, whatever proposed structural reforms, new strategic initiatives, status designations are devised for Gaelic promotion and protection, they will have to address the following core issues, as agreed by participants at the recent Soillse Conference held in Stornoway (www.soillse.ac.uk/program-na-co-labhairt/):

'We call upon decision-makers in Scottish Government, Local Authorities, development agencies and academic institutions to:

1. Base the framework for Gaelic policy decisions and revitalisation priorities on the best available evidence.

2. Acknowledge through practical and appropriate support structures that each community of speakers and network of learners across Scotland has specific requirements.

3. Clearly demonstrate conviction and leadership by working in productive partnership to protect and develop Gaelic communities.

4. Invest and provide adequate funding and resources, in an equitable and efficient manner, in the effective support of island-based Gaelic-speaking communities to provide for sustainable sociocultural and Gaelic development.

5. Recognise and utilise the core role of the family and community as indispensable sociocultural and linguistic cornerstones for Gaelic language maintenance and revitalisation.

6. Place Gaelic development in island communities within a comprehensive whole-of-society approach, recognising the critical importance of supportive socioeconomic and sociocultural conditions, including Gaelic arts and heritage, as prerequisites for credible Gaelic language promotion and protection in creating a basis for a sustainable future for Gaelic in our island communities.

7. Reform and resource the Gaelic development support structure on a regional basis and recognise the various development requirements of varying speaker communities and networks of learners in order to increase mutual cooperation and complementary outcomes for all Gaelic speakers.

8. Realign and strengthen the Gaelic development role of UHI as the primary teaching, learning and research institution to enable a significantly more proactive partnership with Gaelic communities and with development partners; this should entail developing an evidence-based policy framework and public engagement approach, rooted in a pro-active research agenda, to address critical socioeconomic and cultural challenges.'

Consultation responses are invited on the question of support for the Scots language.

We do not have sufficient knowledge and expertise to provide comment on the question of support for the Scots language. However, we do recognise the need to provide support for the Scots language.