

<p>Bile nan Cànan Albannach Co-chomhairle Freagairt bho Bhòrd na Gàidhlig</p> <p>08 Màrt 2024</p>	<p>Scottish Languages Bill Consultation Response by Bòrd na Gàidhlig</p> <p>08 March 2024</p>
<p>Tha Bòrd na Gàidhlig a’ cur fàilte air a’ chothrom freagairt a chur air Dreachd Ìre 1 de Bile nan Cànan Albannach. Nuair a thathar a’ beachdachadh air an tagradh, bu toil le Bòrd na Gàidhlig iomradh làidir a thoirt air ar freagairt do mheòrachan ionmhais Bile nan Cànan Albannach. (Eàrr-ràdh 1)</p> <p>Tha sinn a’ cur air adhart ar beachd a-rithist gum feum stòrasan iomchaidh a bhith ann airson an reachdais ùir gu dèanamh cinnteach gun tèid atharrachadh a chur an sàs gu h-èifeachdach, cho math ri mhodail airson bun-maoineachaidh, a nì cinnteach gu bheil soirbheas na amas follaiseach aig an reachdas, agus e air a bhonntachadh air tasgadh. Às aonais seo chan eil e idir coltach gun tèid aig an reachdas air prìomh raon amasan a libhrigeadh, gu sònraichte atharrachadh mòr ann am poileasaidh agus obair, leithid a bhith a’ toirt a-steach sgìrean cànan sònraichte. Tha fìor chunnart ann cuideachd gun sguireadh coimhearsnachdan a bhith a’ gabhail pàirt ann am pròiseas nach aithnicheadh gu h-iomchaidh na dùbhlain a tha romhpa bho latha gu latha, agus mar sin shìoladh earbsa agus com-pàirteachadh às, rud a bheireadh droch bhuaidh air leasachadh cànan.</p> <p>Tha Bòrd na Gàidhlig a’ cur fàilte air na prionnsabalan a tha air am mìneachadh san reachdas seo chun na h-ìre is gu bheil iad stèidhichte air frèam ionmhais is tasgaidh reusanta.</p>	<p>Bòrd na Gàidhlig welcome the opportunity to respond to the Stage 1 Draft of the Scottish Languages Bill. When considering our submission Bòrd na Gàidhlig would like to strongly reference our response to the financial memorandum of the Scottish Languages Bill. (Appendix 1)</p> <p>We reiterate our belief that the introduction of new legislation must be adequately resourced to ensure the effective implementation of change, as well as a core funding model which will ensure that success is a demonstrable objective of the legislation as it is underpinned by investment. Without this it is difficult to envisage legislation being able to deliver on the key range of objectives, particularly major policy and operational change such as the introduction of areas of linguistic significance. There is also a real danger that communities will disengage with a process that fails to adequately recognise the challenges they are facing on a daily basis, thereby eroding trust and engagement which will have serious consequences for language development.</p> <p>Bòrd na Gàidhlig welcome the principles set out in this legislation to the extent that they are matched with a realistic financial and investment framework.</p>

Pàirt 1, Caibideil 1: Taic dhan Ghàidhlig

Part 1, Chapter 1: Support for the Gaelic language

Earrann 1: Inbhe na Gàidhlig

Tha Bòrd na Gàidhlig a' cur fàilte air na h-ullachaidhean ann an Earrann 1 agus air an inbhe a tha a' tighinn às an reachdas seo. Tha e cudromach inbhe laghail na Gàidhlig a neartachadh agus sinn ag àbhaisteachadh na Gàidhlig ann am pròiseasan co-dhùnaidh a thaobh poileasaidh poblach na h-Alba.

Section 1: Status of the Gaelic language

Bòrd na Gàidhlig welcome the provisions in Section 1 and the status that arises from this legislation. Strengthening Gaelic's legal status is important as we normalise consideration of Gaelic in Scotland's public policy decision-making processes.

Earrann 2: Uallaichean Bhòrd na Gàidhlig

Tha Bòrd na Gàidhlig a' tuigsinn nan ullachaidhean ann an Earrann 2 agus tha sinn den bheachd gu bheil na riathanasan a thathar a' cur air Bòrd na Gàidhlig iomchaidh. Gu sònraichte, tha sinn a' cur fàilte air na h-iomraidhean air gèilleadh agus air a' chomas againn dèanamh cinnteach gu bheil ùghdarrasan poblach a' coileanadh an cuid dhleastanasan a thaobh na Gàidhlig.

Section 2: Functions of Bòrd na Gàidhlig

Bòrd na Gàidhlig understand the provisions in Section 2 and consider the requirements being placed on Bòrd na Gàidhlig to be appropriate. In particular, we welcome the references to compliance and our ability to ensure that public authorities are fulfilling their obligations to Gaelic.

Tha feum air modail structarail agus modail tasgaidh oir bidh feum aig na h-ullachaidhean ùra air stòrasan susbainteach ùra a bharrachd.

There is a requirement for a structural and investment model as new arrangements will require significant additional resource.

Earrann 3: Plana Corporra Bhòrd na Gàidhlig

Tha Bòrd na Gàidhlig a' tuigsinn nan ullachaidhean ann an earrann 3 agus tha e den bheachd gu bheil na riathanasan a thathar a' cur air Bòrd na Gàidhlig iomchaidh.

Section 3: Bòrd na Gàidhlig Corporate Plan

Bòrd na Gàidhlig understand the provisions in section 3 and consider the requirements being placed on Bòrd na Gàidhlig to be appropriate.

Dh'iarraimaid soilleireachadh air an dòigh-obrach gus dèanamh cinnteach gu bheil prìomhachasan aontaichte Bhòrd na Gàidhlig aig cridhe a' Phlana Chorporra dheireannaich.

We would request clarification on the mechanism to ensure that the agreed priorities of Bòrd na Gàidhlig are central to the finalised Corporate Plan.

Earrann 4: Sgìrean Cànan Sònraichte

Tha Bòrd na Gàidhlig a' cur fàilte air an fhòcas air Sgìrean Cànan Sònraichte anns a' Bhile agus dh'iarraimaid gun

Section 4: Areas of linguistic significance

Bòrd na Gàidhlig welcome the focus on areas of linguistic significance in the Bill and would



rachadh sgrùdadh iomchaidh a dhèanamh air an fhrèama airson leasachadh cho cudromach ann am poileasaidh Gàidhlig. Bu toil le Bòrd na Gàidhlig còmhradh farsaing a bhith ann, ach bu mhath leinn dèanamh cinnteach gun neartaich reachdas suidheachadh na Gàidhlig anns na coimhearsnachdan sin. Thogamaid a' cheist cuideachd dè an ìre riaghaltais as iomchaidhe gus sgìre cànan sònraichte a shònrachadh, agus dè an t-àite a bhiodh aig a' choimhearsnachd fhèin sa phròiseas.

A' neartachadh choimhearsnachdan

Tha fòcas air neartachadh leasachadh agus co-thaobhadh poileasaidh ann an coimhearsnachdan na phrìomhachas do Bhòrd na Gàidhlig. Tha na prìomh bhuidhnean libhrigidh againn aig teis-meadhan na h-obrach sa choimhearsnachd, agus aig teas-meadhan libhrigeadh nam prìomhachasan nàiseanta a chaidh aontachadh ann am Plana Nàiseanta na Gàidhlig.

'S e briseadh-dùil mòr a th' ann gu bheil neo-sheasmhachd maoinachadh Bhòrd na Gàidhlig air fàgail gun robh a' bhuidheann feumach air àrdachadh maoinachaidh sealach gus Sgeama nan Oifigearan Gàidhlig a mhaoineachadh, sgeama le farsaingeachd de dh'oifigearan leasachaidh Gàidhlig stèidhichte sa choimhearsnachd gu sònraichte ann an sgìrean a bhiodh air am meas mar sgìrean cànan sònraichte. Mar thoradh air an àrdachadh sin a bhith air a thoirt air falbh airson 24/25, chaidh droch bhuaidh mhòr a thoirt air an sgeama sin aig àm far a bheil a' brosnachadh sgìrean cànan sònraichte mar fhuasgladh reachdail air na dùbhlain a tha mu choinneamh choimhearsnachdan Gàidhlig.

Feumar leasachadh air a stiùireadh leis a' choimhearsnachd a chur an comas mar raon prìomhachais. Aig an àm seo, Tha Bòrd na Gàidhlig ag obair air planaichean Gàidhlig coimhearsnachd ann an com-pàirteachas leis a' choimhearsnachd agus na prìomh bhuidhnean libhrigidh againn ann an 2 sgìre: ann an Uibhist agus ann an Leòdhas, far a bheil adhartas a' sealltainn miann coimhearsnachdan sealbh a ghabhail air leasachadh na Gàidhlig. Feumar leasachadh a thoirt air adhart ann am prìomh roinnean, a' coimhead air raon

request that such an important development in Gaelic language policy and its framework should receive appropriate scrutiny. Bòrd na Gàidhlig would appreciate a wide discussion but would like to ensure that legislation strengthens the position of Gaelic in these communities. We would also raise the question which level of Government is the most appropriate to make the designation of area of linguistic significance, and the role of the community itself in the process.

Strengthening communities

Focus on strengthening development and policy cohesion in communities is a priority of Bòrd na Gàidhlig. Our key delivery bodies are integral to the on-the-ground work, and delivery of the national priorities agreed in the National Gaelic Language Plan.

It is a major disappointment that the instability of funding to Bòrd na Gàidhlig has resulted in the organisation being reliant on uplift funding to fund the Gaelic Officers scheme, a range of community-based development officers primarily in areas which would be considered areas of linguistic significance. The withdrawal of that uplift for 24/25 has resulted in that scheme being significantly impacted at a time where areas of linguistic significance are being promoted as a legislative solution to the challenges facing Gaelic communities.

A priority area must be the enablement of community-led development. Currently Bòrd na Gàidhlig are working on community Gaelic language plans in partnership with the community and our key delivery bodies in 2 areas, in Uist and in Lewis, where progress is demonstrating the desire within communities to take ownership of Gaelic development. There is a need to progress development in key areas looking at a wide range of initiatives which will



farsaing de dh'iomairtean a neartaicheas a' Ghàidhlig aig ìre coimhearsnachd. Ma tha frèam ionmhais is tasgaidh an lùib a bhith a' sònrachadh sgìre cànan sònraichte, leigeadh seo le coimhearsnachdan sealbh a ghabhail air an leasachadh agus prìomhachasan ro-innleachdail a thoirt air adhart anns an dòigh as fheàrr a dh'obraicheas dhan sgìre aca.

Ann an 1B(1) tha e ag ràdh “Faodaidh ùghdarras ionadail a bhith a' sònrachadh...”

Mar sin, tha roghainn aig an Ùghdarras Ionadail co-dhiù an sònraich iad Sgìre Cànan Sònraichte. Tha e soilleir gum biodh e feumail fòcas a mheudachadh agus bunait shoilleir de thaic dhan chànan a shealltainn ann an sgìrean leithid Comhairle nan Eileanan Siar, ach feumaidh sinn coimhead nas fhaide na seo agus faighneachd carson a bhiodh ùidh aig ùghdarrasan ionadail ann an Sgìrean Cànan Sònraichte. Bu chòir a' cheist seo a chur gu dìreach air ùghdarrasan ionadail, ach tha e soilleir gu bheil prìomh cheistean ann a thaobh culaidhean-brosnachaidh.

Culaidhean-brosnachaidh

Dè a' chulaidh-bhrosnachaidh a th' ann airson a bhith a' sònrachadh Sgìrean Cànan Sònraichte? Leis nach eil gealltanais ann a thaobh stòrasan airson cur an gnìomh a' Bhìle, feumar aithneachadh gur dòcha gun roghnaich ùghdarrasan ionadail gun a bhith gan sònrachadh mar thoradh air dìth stòrasan aig an àm seo, a bharrachd air dìth soilleireachd air na bhiodh sònrachadh den t-seòrsa a' ciallachadh an da-rìribh. Bidh dùil am measg choimhearsnachdan gum bi barrachd gnìomhachd agus gun tèid barrachd a chosg air leasachadh mar thoradh air an t-sònrachadh seo.

Roghainneil

Leis gu bheil inbhe mar sgìre cànan sònraichte roghainneil, dh'fhaodadh e a bhith na bhriseadh-dùil do choimhearsnachdan ionadail agus gum bi iad a' faireachdainn nach eil iad air an riochdachadh, ma tha iad airson a bhith nan sgìre sònraichte ach nach eil an t-ùghdarras ionadail a' gabhail ris a' phròiseas. Tha Bòrd na

strengthen Gaelic at a community level. If the designation of area of linguistic significance delivers a financial and investment framework then this should allow communities to take ownership of their development and drive strategic priorities in a way that works best for their area.

In 1B(1) it states that ,”A local authority may designate...”

Therefore, the Local Authority has a choice in whether they would designate an Area of Linguistic Significance. To increase the focus and demonstrate a clear basis of support for the language in areas such as Comhairle na Eilean Siar is clear, however we must look beyond this and ask why local authorities would seek to actively engage with Areas of Linguistic Significance. This question should be put directly to local authorities but key questions of incentivisation are evident.

Incentivisation

What is the incentive for declaring an Area of Linguistic Significance? With the lack of commitment to resources in relation to implementation of the Bill, consideration must be given that local authorities may choose not to designate due to inability to resource at this current point, as well as a lack of clarity on what such a designation will mean in practice. The expectation amongst communities will be that such a designation will result in more activity and increased development spending.

Optional

This optional nature of designation to area of linguistic significance status may lead to local communities being disappointed and consider themselves disenfranchised if they wish to be a designated area but their local authority is not engaging in the process. Bòrd na Gàidhlig believe



Gàidhlig den bheachd gum bu chòir còir a bhith aig coimhearsnachd sònrachadh iarraidh agus gum bu chòir aghaidh a thoirt air seo anns a' Bhile.

Earrann 5: Ro-innleachd na Gàidhlig

Tha Bòrd na Gàidhlig a' cur fàilte air ro-innleachd na Gàidhlig a bhith air a chur an àite Plana Nàiseanta na Gàidhlig. Leis gun tèid a h-ullachadh le Ministearan na h-Alba, bidh fòcas agus inbhe nàiseanta aice agus bu chòir gum bi i air a h-amalachadh ann an raon nas fharsainghe de dh'amasan poileasaidh nàiseanta.

Tha 2A (3) ag ràdh, **"Ann a bhith ag ullachadh ro-innleachd na Gàidhlig feumaidh Ministearan na h-Alba dreachd ro-innleachd fhoillseachadh agus co-chomhairle a chumail leis an fheadhainn a tha iad a' meas iomchaidh."** Tha Bòrd na Gàidhlig den bheachd gum bu chòir riatanas a bhith ann co-chomhairle a chumail le Bòrd na Gàidhlig agus le coimhearsnachdan air feadh na h-Alba, a bharrachd air buidhnean iomchaidh eile, gus dèanamh cinnteach gu bheil a' cho-chomhairle cho èifeachdach 's a ghabhas.

Mar phuing bheag ach cudromach, chanamaid gu bheil am facal Nàiseanta a thaobh a' Phlana Nàiseanta làithrich a' sealltainn gur e plana a th' ann airson leasachadh air feadh na h-Alba. Tha e cudromach gum bi an ro-innleachd a' gabhail a-steach coimhearsnachdan uile na h-Alba agus gu bheil i air a h-aithneachadh mar sin.

Earrann 6: Bun-inbhean Gàidhlig

Tha Bòrd na Gàidhlig a' cur fàilte air na faclan sa Bhile gum bi cumhachd aig Ministearan na h-Alba riaghailtean a dhèanamh agus bun-inbhean agus riatanasan a shònrachadh co-cheangailte ri adhartachadh agus comasachadh cleachdadh na Gàidhlig a bhuineas do dh'ùghdarrasan poblach iomchaidh.

Dh'iarradh Bòrd na Gàidhlig barrachd fiosrachaidh mu shusbaint nam bun-inbhean agus nan riaghailtean. Feumaidh an reachdas a bhith soilleir air dè na bun-

that there should be a community right to request designation and that this should be addressed in the Bill.

Section 5: Gaelic Language Strategy

Bòrd na Gàidhlig welcome the replacement of the National Gaelic Language Plan with the Gaelic Language Strategy. The national focus and status due to its preparation by Scottish Ministers should see an integration into a wider range of national policy objectives and this is a positive step forward.

2A (3) states that, **"In preparing the Gaelic language strategy the Scottish Ministers must publish a draft strategy and consult such persons as they consider appropriate."** Bòrd na Gàidhlig believe there should be a requirement to consult with Bòrd na Gàidhlig and with communities across Scotland, as well as other relevant bodies, in order to ensure that consultation is as effective as possible.

A minor but important point, we would suggest that the use of the word National in relation to the current National Plan conveys that it is a plan for development across the whole of Scotland. It is important that the strategy is one which covers all the communities of Scotland and is recognised as such.

Section 6: Gaelic language standards

Bòrd na Gàidhlig welcome the insertion that Scottish Ministers will have the power to make regulations and specify standards and requirements relating to promoting and facilitating the use of Gaelic which will apply to relevant public authorities.

Bòrd na Gàidhlig would request more information on the content of the standards and regulations. The legislation must be clear on



inbhean agus riaghailtean air a bheilear a' toirt iomradh agus dè na sgìrean air am bi iad a' toirt buaidh. Mar eisimpleir, ciamar a bhios modail nam bun-inbhean a' buntainn ri Sgìrean Cànain Sònraichte? Bhiodh Bòrd na Gàidhlig airson raon farsaing agus in-ghabhalach de dh'inbhean agus de riaghailtean fhaicinn, le meòrachadh air a dhèanamh air cur an gnìomh agus air amalachadh èifeachdach.

Tha Bòrd na Gàidhlig cuideachd a' cur fàilte air mar a bhios na trì eileamaidean de ro-innleachd cànain, inbhean agus planaichean cànain Gàidhlig a' tighinn còmhla gus dèanamh cinnteach gum bi adhartas agus cunbhalachd ann am brosnachadh na Gàidhlig ann an Alba. Bheir e ùine gus siostam bun-inbhean coileanta amalaichte a chruthachadh agus feumaidh dòigh-obrach gu math sònraichte a bhith ann gus dèanamh cinnteach gu bheil tuigse nas soilleire agus nas mionaidiche air mar a thathar an dùil gun tèid seo a choileanadh.

Tha feum ann cuideachd air modail tasgaidh gus a bhuileachadh, oir bidh feum air tuilleadh planadh buidhne agus air modail gèillidh sònraichte do na riathanasan a bharrachd a thaobh dearcnachadh agus aithris.

Earrann 7: Dleastanasan ùghdarrasan poblach buntainneach

Tha Bòrd na Gàidhlig a' cur fàilte air an dòigh-obrach a chaidh a ghabhail agus air comas Mhinistearan na h-Alba an dà chuid stiùireadh agus àitheantan a thoirt do bhuidhnean poblach. Bidh seo na phrìomh mheadhan nuair a thathar a' dèiligeadh ri neo-ghèilleadh agus mì-mhèineachadh sam bith air na riathanasan a chuirear air buidhnean.

Earrann 8: Aithisgean air ro-innleachd na Gàidhlig, bun-inbhean agus dleastanasan

Tha Bòrd na Gàidhlig a' tuigsinn cho cudromach 's a tha e a bhith ag aithris air an ro-innleachd, bun-inbhean agus dleastanasan agus tha iad a' cur fàilte air an riathanas a bhith ag aithris do Phàrlamaid na h-Alba.

what standards and regulations is referring to and what areas will be covered. For instance, how will the standards model apply to areas of linguistic significance? Bòrd na Gàidhlig would wish to see a broad and inclusive range of standards and regulations, where consideration has been given to the implementation and to effective integration.

Bòrd na Gàidhlig also welcome that the three elements of Gaelic language strategy, standards and Gaelic language plans will work together to ensure progress and consistency in the promotion of Gaelic in Scotland. An integrated comprehensive standards regime will take time to develop and must be very specific in its approach to ensure clarity of understanding and more detail on how it is anticipated that this will be achieved is necessary.

There is also a requirement for an investment model for implementation, as this will require additional organisational planning and a bespoke model of compliance with additional requirements on monitoring and reporting.

Section 7: Functions of relevant public authorities

Bòrd na Gàidhlig welcome the approach being taken and the ability of Scottish Ministers to issue both guidance and direction to public bodies. This will be a key mechanism when dealing with non-compliance and any misinterpretation of the requirements being placed upon bodies.

Section 8: Reporting on Gaelic languages strategy, standards and duties

Bòrd na Gàidhlig understand the importance of reporting on the strategy, standards and duties and welcome the requirement to report to the Scottish Parliament.



Coltach ri earrann 6, tha feum air modail tasgaidh airson buileachadh, oir bidh feum air barrachd planadh buidhne agus air modail sònraichte de ghèilleadh ri riatanasan a bharrachd a thaobh sgrùdadh agus aithris.

Earrann 9: Planaichean Gàidhlig

Tha Bòrd na Gàidhlig a' cur fàilte air earrann 9. Tha sinn den bheachd gun cuir na h-atharrachaidhean a thaobh planaichean cànan, bun-inbhean agus ro-innleachd na Gàidhlig barrachd uallach obrach air a' bhuidhinn. Feumar stòrasan gu leòr a bhith ann airson an eòlais agus nan daoine a tha a dhìth gus an obair seo a dhèanamh gus am bi com-pàirteachadh, dearcnachadh agus aithris èifeachdach ann.

Earrann 10: Aithris air còraichean is uallaichean fearainn: bithear a' toirt feart do thaic don Ghàidhlig

Tha Bòrd na Gàidhlig a' cur fàilte air an aithris seo agus sinn ag aithneachadh gu bheil Gàidhlig agus cùisean fearainn dlùth-cheangailte ann an iomadh coimhearsnachd Gàidhlig agus gu bheil beachdachadh den t-seòrsa seo cudromach.

Caibideil 2: Foghlam

Tha Bòrd na Gàidhlig a' cur fàilte air an earrann a thaobh foghlam ann am Bile nan Cànan Albannach a chionn 's gu bheil e a' leabachadh foghlam Gàidhlig ann an reachdas foghlaim nàiseanta. Tha a bhith a' cur ghnìomhan Gàidhlig ann an Achd an Fhoghlaim na cheum cudromach airson a bhith ag àbhaisteachadh foghlam Gàidhlig agus tha e a rèir a' phrionnsabail bhunaitich gum bi Alba a' toirt seachad foghlam ann an dà chànan, an dàrna cuid tro mheadhan na Beurla no tro mheadhan na Gàidhlig.

As with section 6, there is a requirement for an investment model for implementation, as this will require additional organisational planning and a bespoke model of compliance with additional requirements on monitoring and reporting.

Section 9: Gaelic language plans

Bòrd na Gàidhlig welcome Section 9. We believe that the changes relating to Gaelic language plans, standards and strategy will place an increased work requirement on the organisation. The expertise and people resource requirement required to undertake this work will have to be resourced adequately in order for effective and efficient engagement, monitoring and reporting to take place.

Section 10: Land rights and responsibilities statement: regard to be had to supporting Gaelic

Bòrd na Gàidhlig welcome the inclusion of this statement with an understanding that in many Gaelic communities Gaelic and land issues are closely related, and such consideration is essential.

Chapter 2: Education

Bòrd na Gàidhlig welcome the education section of the Scottish Languages Bill as it embeds Gaelic education in national education legislation. The insertion of Gaelic language activities into the Education Act is an important step forward for normalising Gaelic education and reflects the fundamental principle that Scotland provides education in two languages, either through the medium of English or through the medium of Gaelic.



Earrann 11: Dleastanas aig Ministearan na h-Alba foghlam Gàidhlig a chur air adhart is taic a thoirt dha

Tha Bòrd na Gàidhlig a' cur fàilte air na h-ullachaidhean ann an Earrann 11, gu sònraichte a bhith a' gabhail a-steach foghlam adhartach agus air an dòigh-obrach ro-innleachdail nàiseanta ùr a thathar a' moladh.

Earrann 12: Cumhachd aig Ministearan na h-Alba gus bun-inbhean a stèidheachadh airson foghlam Gàidhlig ann an sgoiltean

Tha Bòrd na Gàidhlig a' cur fàilte air an ullachadh ann an Earrann 12 a bheireadh cumhachd do Riaghaltas na h-Alba riaghailtean a dhèanamh a' suidheachadh bun-inbhean airson foghlam tro mheadhan na Gàidhlig agus foghlam luchd-ionnsachaidh na Gàidhlig. Dh'iarraimaid soilleireachadh air carson a dh'fheumar dèiligeadh ris na riatanasan a bharrachd ann an Earrann 18 san reachdas seo, a bharrachd air na rèiteachaidhean dearcnachaidh is ath-sgrùdaidh a th' ann mar ann an Achd Ìrean ann an Sgoiltean na h-Alba is msaa (2000) agus Achd an Fhoghlaim (2016).

Dh'iarraimaid cuideachd soilleireachd air mar a thèid co-dhùnaidhean sam bith a thaobh inbhean foghlaim a leabachadh sa phròiseas Ath-leasachaidh Foghlaim leantainneach.

Earrann 13: Stiùireadh do dh'ùghdarrasan poblach air foghlam Gàidhlig

Tha Bòrd na Gàidhlig a' cur fàilte air na h-ullachaidhean ann an Earrann 13 a tha a' gluasad an dleastanais airson a bhith a' toirt seachad stiùireadh reachdail air foghlam Gàidhlig bho Bhòrd na Gàidhlig gu Riaghaltas na h-Alba.

Earrann 14: Àithntean do dh'ùghdarrasan foghlaim a thaobh foghlam Gàidhlig

Section 11: Duty of Scottish Ministers to promote Gaelic education

Bòrd na Gàidhlig welcome the provisions in Section 11, in particular the inclusion of further education and the proposed new national strategic approach.

Section 12: Power for Scottish Ministers to set standards relating to Gaelic education

Bòrd na Gàidhlig welcome the provision in Section 12 that would give the Scottish Government the power to make regulations setting standards for Gaelic medium and Gaelic learner education. We would request clarification on why the additional requirements in Section 18 need to be addressed in this legislation, in addition to the existing monitoring and review arrangements such as in the Standards in Scotland's Schools etc Act (2000) and the Education Act (2016).

We would also request clarity on how any decisions on education standards will be integrated into the ongoing Education Reform process.

Section 13: Guidance to public authorities relating to Gaelic education

Bòrd na Gàidhlig welcome the provisions in Section 13 which transfers the duty of providing statutory guidance on Gaelic education from Bòrd na Gàidhlig to the Scottish Government.

Section 14: Directions to education authorities relating to Gaelic education



<p>Tha Bòrd na Gàidhlig a’ cur fàilte air an t-soillearachadh ann an earrann 14.</p>	<p>Bòrd na Gàidhlig welcome the clarification in Section 14.</p>
<p>Earrann 15: Tha an dleastanas coitcheann gus foghlam a thoirt seachad a’ gabhail a-steach foghlam Gàidhlig</p>	<p>Section 15: General duty to provide education includes Gaelic education</p>
<p>Tha Bòrd na Gàidhlig a’ cur fàilte air na h-ullachaidhean ann an Earrann 15 leis gu bheil e a’ cuideachadh gus foghlam Gàidhlig àbhaisteachadh agus gu bheil e a rèir a’ phrionnsabail bhunaitich gu bheil Alba a’ toirt seachad foghlam ann an dà chànan, an dàrna cuid tro mheadhan na Beurla no tro mheadhan na Gàidhlig.</p>	<p>Bòrd na Gàidhlig welcome the provisions in Section 15 as it helps to normalise Gaelic education and reflects the fundamental principle that Scotland provides education in two languages, either through the medium of English or through the medium of Gaelic.</p>
<p>Earrann 16: An dleastanas gus foghlam Gàidhlig a chur air adhart nuair a thathar a’ coileanadh uallaichean fo Achd an Fhoghlaim (Alba) 1980</p>	<p>Section 16: Duty to promote Gaelic education in exercising functions under the Education (Scotland) Act 1980</p>
<p>Tha Bòrd na Gàidhlig a’ cur fàilte air na h-ullachaidhean ann an Earrann 16.</p>	<p>Bòrd na Gàidhlig welcome the provisions in Section 16.</p>
<p>Earrann 17: A’ roinn fiosrachaidh mu fhoghlam Gàidhlig</p>	<p>Section 17: Information-sharing about Gaelic education</p>
<p>Bu toil le Bòrd na Gàidhlig soilleireachd iarraidh air an adhbhar airson Earrann 17.</p>	<p>Bòrd na Gàidhlig would request clarification on the full purpose of Section 17.</p>
<p>A bheil seo gus dèanamh cinnteach gu bheilear a’ coileanadh a’ ghnìomh gèillidh, mar a tha air a mhìneachadh ann an caibideil 1, agus gus an gabh aithris iomchaidh a dhèanamh air? No an tèid a chleachdadh gus an ro-innleachd Ghàidhlig fhiosrachadh?</p>	<p>Is this to ensure that the compliance function, as set out in chapter 1, is being met and can be reported on adequately. Or will it be used to inform the Gaelic strategy?</p>
<p>Am biodh e mar dhleastanas air Bòrd na Gàidhlig an dàta a chumail agus a thoirt do dhaoine eile? Mas e seo an suidheachadh, dh’fhaodte gum bi buaidhean laghail is obrachail air a’ bhuidhinn air am feumar beachdachadh.</p>	<p>Would Bòrd na Gàidhlig be required to hold the data and provide it to others? If this is the case, there may be legal and operational impacts on the organisation which would have to be considered.</p>
<p>Earrann 18: Planadh airson foghlam Gàidhlig a lìbhrigeadh</p>	<p>Section 18: Gaelic education delivery planning</p>



<p>Chuireadh Bòrd na Gàidhlig dragh an cèill a thaobh nan ullachaidhean ann an Earrann 18. Ma tha sinn gu bhith a' leabachadh foghlam Gàidhlig anns an t-siostam foghlaim, carson a tha dearcnachadh air libhrigeadh taobh a-staigh phlanaichean Gàidhlig? Tha a bhith a' cur a-steach (4A) agus (5)(ab) a' dol an aghaidh a' phrionnsabail a bhith a' leabachadh foghlam Gàidhlig gu h-iomlan ann an rèiteachaidhean reachdail airson foghlaim agus dh'iarraidh Bòrd na Gàidhlig gun rachadh seo a thoirt às a' bhile.</p>	<p>Bòrd na Gàidhlig would express concern in relation to the provisions in Section 18. If we are embedding Gaelic education in the education system, why is the monitoring of delivery within Gaelic plans? Inserting (4A) and (5)(ab) goes against the principle of embedding Gaelic education fully into the education legislative arrangements and Bòrd na Gàidhlig request that this is removed.</p>
<p>Earrann 19: Dleastanas gus taic a thoirt do chothroman air foghlam tron Ghàidhlig</p> <p>Tha Bòrd na Gàidhlig a' cur fàilte air na h-ullachaidhean ann an Earrann 19 agus a' cur fàilte air leudachadh air cothrom air foghlam Gàidhlig.</p>	<p>Section 19: Duty to support access to Gaelic medium education</p> <p>Bòrd na Gàidhlig welcome the provisions in Section 19 and welcome the broadening of access.</p>
<p>Earrann 20: Dleastanas sgìre-sgoile a stèidheachadh airson sgoiltean a tha a' solarachadh foghlam tron Ghàidhlig</p> <p>Tha Bòrd na Gàidhlig a' cur fàilte air na h-ullachaidhean ann an Earrann 20, a tha a' togail air a' mholadh làithreach anns an Stiùireadh Reachdail air foghlam Gàidhlig.</p>	<p>Section 20: Duty to establish a catchment area for schools providing Gaelic medium education</p> <p>Bòrd na Gàidhlig welcome the provisions in Section 20, which builds on the current recommendation in the Statutory Guidance on Gaelic education.</p>
<p>Earrann 21: Còmhdhail do dh'fhoghlam tro mheadhan na Gàidhlig: Achd nan Sgoiltean (Co-chomhairleachadh) (Alba) 2010 ga coileanadh</p> <p>Tha Bòrd na Gàidhlig a' cur fàilte air na h-ullachaidhean ann an Earrann 21.</p>	<p>Section 21: Transport to Gaelic medium education: application of Schools (Consultation) (Scotland) Act 2010</p> <p>Bòrd na Gàidhlig welcome the provisions in Section 21.</p>
<p>Earrann 22: Measaidhean: an cumhachd gus cumhachan eadar-dhealaichte a stèidheachadh airson diofar sgìrean</p> <p>Tha Bòrd na Gàidhlig a' cur fàilte air na h-ullachaidhean ann an Earrann 22.</p>	<p>Section 22: Assessments: power to make different provision for different areas</p> <p>Bòrd na Gàidhlig welcome the provisions in Section 22.</p>



Earrann 23: Leudachadh gus am bi measaidhean a' gabhail a-steach tràth-ionnsachadh is cùram-chloinne

Tha Bòrd na Gàidhlig a' cur fàilte air na h-ullachaidhean ann an Earrann 23. Leigidh seo le barrachd chloinne làn bhogadh fhaighinn sa Ghàidhlig bho aois nas òige.

Earrann 24: Dleastanas a bhith a' cumail co-chomhairle agus planadh a dhèanamh air lìbhrigeadh tràth-ionnsachadh agus cùram-chloinne

Tha Bòrd na Gàidhlig a' cur fàilte air na h-ullachaidhean ann an Earrann 24.

Earrann 25: Dleastanas gus co-chonaltradh is planadh a dhèanamh a thaobh sheirbheisean tràth-ionnsachaidh is cùraim-chloinne

Tha Bòrd na Gàidhlig a' cur fàilte air na h-ullachaidhean ann an Earrann 25.

Eàrr-ràdh 1

Meòrachan Ionmhais Bile nan Cànan Albannach Freagairt Bhòrd na Gàidhlig 01 Màrt 2024

Tha Bòrd na Gàidhlig a' cur fàilte air a' chothrom freagairt a chur dhan cho-chomhairle air Meòrachan Ionmhais Bile nan Cànan Albannach.

Tha am Meòrachan Ionmhais a' mìneachadh, ann am paragraf 6, "Is e Bile a tha seo gus dèanamh cinnteach gu bheil structar an sàs air feadh an riaghaltais agus Rianachd na h-Alba san fharsaingeachd gus feumalachdan choimhearsnachdan na Gàidhlig agus na Scots, agus feumalachdan na Gàidhlig is na Scots fhèin a choileanadh san àm ri teachd." Tha Bòrd na Gàidhlig a' cur fàilte air a'

Section 23: Extension of assessments to early learning and childcare

Bòrd na Gàidhlig welcome the provisions in Section 23. This will enable more children to receive total immersion in Gaelic from an earlier age.

Section 24: Duty to consult and plan on delivery of early learning and childcare

Bòrd na Gàidhlig welcome the provisions in Section 24.

Section 25: Conditions of grants to the Scottish Further and Higher Education Funding Council

Bòrd na Gàidhlig welcome the provisions in Section 25.

Appendix 1

Response to Financial Memorandum of the Scottish Languages Bill – Bòrd na Gàidhlig 1 March 2024

Bòrd na Gàidhlig welcome the opportunity to respond to the Financial Memorandum of the Scottish Languages Bill.

The Financial Memorandum outlines, at paragraph 6, that "This is a Bill to ensure that there is a structure in place across government and the wider Scottish Administration to meet the needs of Gaelic and Scots communities and languages for the future." Bòrd na Gàidhlig welcome this aspiration, however, we have



mhiann seo ach tha sinn teagmhach a bheil e comasach seo a choileanadh tron mhodail ionmhais làithreach.

Tha na faclan a leanas ann am paragraf 8 sa Mheòrachan Ionmhais: **“Tha caiteachas Riaghaltas na h-Alba airson na Gàidhlig agus na Scots air a bhith an ìre mhath seasmhach bho 2010/11.”**

Tha cleachdadh an fhacail seasmhach sa cho- theacsa seo a’ cur an inntinn dhaoine gun deach maoinachadh gu leòr a thoirt seachad gus amasan an Riaghaltais a choileanadh. Tha am maoinachadh a tha ri fhaighinn, agus dleastanas agus adhbhar Bhòrd na Gàidhlig, mar thoradh air Achd na Gàidhlig (Alba) 2005. Choimisean an Riaghaltas a bh’ ann aig an àm sin comhairle agus a rèir seo, bhiodh feum air riarachadh maoinachaidh bliadhna de £10M do Bhòrd na Gàidhlig gus riathanasan Achd 2005 a lìbhrigeadh. Ann an 2007 b’ e £5M am maoinachadh a chaidh a riarachadh, agus is e am maoinachadh seo a tha air fuireach aig an aon ìre bhon àm sin, le àrdachadh beag sealach aig diofar amannan gus cur ris a’ phrìomh-shuim seo. Nam biodh an ìre maoinachaidh seo air a bhith air a chumail suas, airson a bhith a’ gabhail a-steach àrdachaidhean ri linn na h-atmhorachd, bhiodh Bhòrd na Gàidhlig a’ faighinn buidseit de £10M ann an 2024-25: dìreach a’ coileanadh na h-ìre maoinachaidh tùsail a chaidh a mholadh às dèidh mu 20 bliadhna. Ged a bhiodh suidheachadh mar sin na bhriseadh dùil do na comhairlichean tùsail, bhiodh an suidheachadh an dà-rìribh na chùis eagail. Is e £5.125M am buidseat a chaidh a riarachadh do Bhòrd na Gàidhlig airson 2024-25, mu £5M goirid air a’ mhaoineachadh a bhiodh ann nan deidheadh ìre maoinachaidh 2007 a chumail suas ris an atmhorachd. Nan robh am buidseat air atharrachadh a rèir na h-ìre as ìsle de dh’atmhorachd, gun a bhith a’ faighinn tasgadh sam bith a bharrachd, bhiodh Bhòrd na Gàidhlig a’ faighinn timcheall air £8.5 millean sa bhliadhna, mar sin a h-uile bliadhna far a bheilear a’ lìbhrigeadh buidseat gun atharrachadh, tha seo a’ fàgail gum bi gearradh anns na goireasan a tha rim faotainn, rud a bheir buaidh shoilleir air feadh nan coimhearsnachdan Gàidhlig. Gu sìmplidh, tha Bhòrd na Gàidhlig a’ faighinn gearradh airgid nuair a thathar a’ gabhail a-steach buaidh na h- atmhorachd.

concerns that this is achievable under the current financial model.

At paragraph 8 in the Financial Memorandum, it states that: **“Scottish Government expenditure for Gaelic and Scots has remained relatively stable since 2010/11.”**

The use of the word stable in this context implies that sufficient funding has been provided to achieve the aims of Government. The funding made available, and the role and purpose of Bòrd na Gàidhlig, are a result of the Gaelic Language (Scotland) Act 2005. Government at the time commissioned advice that recommended that to deliver the requirements of the 2005 Act would require an annual funding allocation of £10M to Bòrd na Gàidhlig. In 2007 the funding allocated was £5M, and it is this funding that has remained static since that time, with minor one-off increases at various points to supplement this core amount. If this funding level had been maintained, to take account of increases in costs, Bòrd na Gàidhlig would be in line for a budget of £10M in 2024-25: only achieving the initial recommended level of funding after a period of some 20 years. While such a scenario would be disappointing enough to the initial advisers, the actual position would be alarming. The budget allocated to Bòrd na Gàidhlig for 2024-25, at £5.125M, is some £5M short of the funding that would be available had the 2007 level of funding being maintained. Adjusting the budget for the lowest calculation of inflation as opposed to any additional investment, Bòrd na Gàidhlig should be receiving in the region of £9.5 million a year, therefore every year where a standstill budget is delivered it is a cut in available resources, the impact of which is felt across Gaelic speaking communities. Simply, Bòrd na Gàidhlig is receiving a real terms cut in funding.



A rèir earrann 13 den Mheòrachan Ionmhais “Is e a’ phrìomh bhuaidh aig ullachaidhean a’ Bhìle gluasad adhbharachadh ann an gnìomhachd, ath-riarachadh ghoireasan a thaobh obair agus aire. Tha Riaghaltas na h-Alba den bheachd nach eil na h-ullachaidhean a’ cruthachadh chosgaisean gu tur ùr no riathanas airson caitheamh gu tur ùr.”

Thogadh Bòrd na Gàidhlig ceist an gabh reachdas sam bith a choileanadh gun mhaoineachadh ùr, gu h-àraidh reachdas a dh’atharraicheas gnìomhan bhuidhnean, anns an eisimpleir seo, Bòrd na Gàidhlig, agus a chuireas riathanasan ùra air buidhnean poblach, mar eisimpleir, a’ stèidheachadh Sgìrean Cànain Sònraichte, agus a’ stèidheachadh mhodhan sgrùdaidh airson a bhith a’ cur an gnìomh inbhean cànain agus Ro-innleachd Nàiseanta na Gàidhlig a thathar a’ moladh. Dh’fheumadh goireasan sam bith a tha a dhìth gus am Bìle a chur an gnìomh a bhith air a thoirt seachad leis an Riaghaltas leis nach eil sùbailteachd ann am buidseatan leasachaidh a tha gu math cuingealaichte mar-thà. Tha obair-leasachadh na Gàidhlig a’ lùghdachadh aig an àm seo, le fìor dhroch bhuaidh air ar coimhearsnachdan, mar thoradh air lùghdachadh ann am maoinachadh do Bhòrd na Gàidhlig.

Gus am feum as fheàrr a dhèanamh den tasgadh ann an iomairtean leasachaidh Gàidhlig le Bòrd na Gàidhlig tha sinn air a bhith ag obair le Coimhearsnachdan agus Prìomh Bhuidhnean Lìbhrigidh gus dòigh-obrach nas ro-innleachdaile a chruthachadh a thaobh cleachdadh nan stòrasan a tha ri fhaighinn. Tha fòcas aig seo air sgìrean far a bheilear an dùil gun tèid an comharrachadh mar Sgìrean Cànain Sònraichte. Tha an obair seo air deagh adhartas a dhèanamh agus mar thoradh air seo chaidh fianais a chruthachadh a thaobh na h-ìre de thasgadh a dh’fheumar gus leasachadh a thoirt air adhart ann an dòigh ro-innleachdail èifeachdach. Am measg nam prìomh leasachaidhean a rinneadh, chaidh aontaidhean maoinachaidh ioma-bliadhna a thoirt a-steach airson Prìomh Bhuidhnean Lìbhrigidh stèidhichte air planaichean gnìomhachais, tabhartasan coimhearsnachd beaga gan lìbhrigeadh thar 2 bhliadhna gus buaidh àrdachadh agus ath-sgrùdadh air Oifigearan Leasachaidh Gàidhlig stèidhichte sa Choimhearsnachd ann an coimhearsnachdan air am maoinachadh san dà 2

The Financial Memorandum in section 13 states, “The main impact of the Bill provisions is a shift in activity, a repurposing of resources in terms of effort and attention. The Scottish Government considers that provisions do not create wholly new costs or a requirement for wholly new spend.”

Bòrd na Gàidhlig would question whether any legislation can be achieved without new spend, particularly legislation which changes the functions of organisations, in this instance Bòrd na Gàidhlig, and places new requirements on public bodies, for example Areas of Linguistic Significance. Any resource requirement for implementing the Bill would have to be provided from the Government as there is no flexibility in currently heavily constrained development budgets. Gaelic development is currently reducing, with a significant negative impact on our communities, due to reductions in funding to Bòrd na Gàidhlig.

To maximise the effectiveness of the investment in Gaelic Development initiatives by Bòrd na Gàidhlig we have been working with Communities and Key Delivery Bodies to develop a more strategic approach to the utilisation of the investment funding available. The focus of this being in areas which would be expected to be designated as Areas of Linguistic Significance. This work has progressed well and has resulted in the provision of evidence to support the level of investment required to progress development in an effective strategic manner. Key developments undertaken include the introduction of multi-year funding agreements for Key Delivery Bodies based on business plans, small community grants being delivered over a 2-year period to increase impact and a review of the Community based Gaelic Development Officers in communities funded over the past 2 years with additional funding made available by



bhliadhna mu dheireadh le maoinachadh a bharrachd ri fhaighinn leis an Riaghaltas. Ged a dh'fheumas buidseatan leasachaidh airson 2024- 25 a bhith air an cumail ris an £3.491M anns an Tabhartas-gus-Cuideachadh a thathar a' toirt dhan Bhòrd, tha e soilleir bhon iarrtas aithnichte gum biodh feum air £3M a bharrachd ann an 2024-25 gus na feumalachdan a chaidh a chomharrachadh airson na bliadhna a tha romhainn a choileanadh.

Tha am Bile a' moladh a bhith a' sònrachadh Sgìrean Cànain Sònraichte agus thathar a' cur fàilte air seo. Bidh feum air tasgadh a bharrachd anns na sgìrean sin, ge-tà, ma tha an iomairt seo gu bhith susbainteach, seach dìreach a bhith na ainm. Tha an iomairt seo a' dol gu math leis an obair a tha a' dol air adhart mar-thà gus Planaichean Gàidhlig stèidhichte sa Choimhearsnachd a chruthachadh. Chaidh seo a chomharrachadh mar phrìomhachas ann am Plana Nàiseanta na Gàidhlig cuideachd. Bidh na Planaichean fhèin cuideachd feumach air maoinachadh tasgaidh gus an cur an gnìomh.

Tha Ionadan/Co-ionadan Gàidhlig a' sìor fhàs nas cudromaiche ann an Coimhearsnachdan Gàidhlig cuideachd agus tha seo na eileamaid bhuntainneach de bhith a' dèanamh cinnteach gu bheil Sgìrean Cànain Sònraichte buadhmhor. Bidh feum air tasgadh leantainneach a bharrachd anns na h-Ionadan/co-ionadan sin, a bharrachd air a' mhaoineachadh a th' aig Bòrd na Gàidhlig aig an àm seo. Feumar an tasgadh anns na h-iomairtean a thoirt air adhart ann an dòigh bhrìghmhor bho 2025-26 agus ghabhadh a' bheàrn a tha air fhàgail de £2M a thasgadh gus na feumalachdan a bharrachd a chaidh a chomharrachadh le coimhearsnachdan Gàidhlig a thoirt air adhart bho sin a-mach.

Bu toil le Bòrd na Gàidhlig a ràdh a-rithist gur e stòras sòisealta, coimhearsnachd, cultarail agus eaconamach a th' anns a' Ghàidhlig a tha na bhuannachd do dh'Alba air fad. Tha tasgadh sa Ghàidhlig a' cur ri targaidean poileasaidh nas fharsainge ris a bheil an Riaghaltas airson dèiligeadh, leithid crìonadh-sluaigh air a' Ghàidhealtachd agus sna Eileanan agus fàs eaconamach ann an coimhearsnachdan cugallach, a bharrachd air raon farsaing de thargaidean foghlaim, sòisealta, eaconamach agus cultarail. Gus a làn bhuaidh a choileanadh, feumaidh taic a bhith aig a' Ghàidhlig air feadh an Rìghaltais le

Government. While development budgets to be allocated for 2024-25 have had to be limited to the £3.491M available in the Grant in Aid being provided, the known demand makes it clear than an additional £3M would be required in 2024-25 to meet the needs that have been identified for the year ahead.

The Bill proposes the designation of Areas of Linguistic Significance, and this is welcomed. There will however be a need for additional investment in these areas if this initiative is to be anything other than a descriptive label. The initiative links well with the work already underway to develop Community based Gaelic Language Plans. This has also been identified as a priority in the National Gaelic Language Plan. The Plans themselves will also require investment funding to be put into effect.

The growing significance of Gaelic Centres/hubs within Gaelic Communities is also a relevant element in making areas of linguistic significance impactful. Additional ongoing investment will be required in these Centres/hubs, beyond the funding which is currently available to Bòrd na Gàidhlig. These initiatives will require investment from 2025-26 to be progressed in a meaningful way and the remaining shortfall of £2M per annum could be usefully deployed to meet the additional identified needs of Gaelic communities from that point.

Bòrd na Gàidhlig would like to reiterate that Gaelic is a social, community, cultural and economic asset that benefits all of Scotland. Investment in Gaelic contributes to the wider policy targets which Government are seeking to address, such as depopulation in the Highlands and Islands and economic growth in fragile communities, as well as a wide range of education, social, economic, and cultural targets. In order to achieve its potential impact, it must be supported across Government with fair and



maoineachadh cothromach a tha a rèir dleastanasan reachdail Bhòrd na Gàidhlig.

equitable funding and commensurate with the statutory responsibilities of Bòrd na Gàidhlig.



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