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Response from Glasgow City Council to the Scottish Languages Bill – 8 March 2024

We welcome the Scottish Languages Bill and are pleased to have the opportunity to respond with some observations and comments on the different sections of the Bill.

Official status for Gaelic in Scotland is a very welcome message as it puts Gaelic on an equal footing with English. Inevitably that also raises some questions about the practical application of official status in the business of public authorities. It raises some serious financial considerations and challenges about the level of public funding from the inception of Bòrd na Gàidhlig in the Gaelic Language (Scotland) Act 2005 to the present day.

Current funding levels for Gaelic are very low. The Gaelic total of £29.6m in 2024-25 amounts to about 0.0005% of the total Scottish Government's budget of £59.7b. According to the Government's breakdown, £12.6m goes to MG ALBA for Gaelic broadcasting; £10m is disbursed by the Scottish Government for Gaelic in education and learning; £5.125m goes to Bòrd na Gàidhlig to fund its own work as well as that of the main Gaelic organisations and Gaelic development work by community groups and public authorities; and £1.6m goes to Sabhal Mòr Ostaig and Stòrlann.

Gaelic language and culture should be seen as an investment in our children's future and it needs to be well resourced. In 2006-07, Grant in Aid funding from the Scottish Government to Bòrd na Gàidhlig amounted to £4.439m, less than half of the minimum £10m recommended in the MacPherson report several years earlier. For 2024-25, the Bòrd's funding has been set to £5.125m, an increase of only £686k over 18 years. Our estimate using the [Bank of England Inflation Calculator](#) is that the actual funding level from 2006-07 levels should be around £7.6m, and if MacPherson's recommendation of £10m had been followed, Bòrd na Gàidhlig's budget for 2024-25 would be £16.5m, not £5.125m.

The consequence of underinvestment in Gaelic over the 20 years since the Gaelic Language (Scotland) Act 2005 is a decline in confidence in the language with individuals facing the prospect of redundancy due to cuts in Scottish Government funding. That is not the situation anyone would have envisaged two decades ago.

The Scottish Languages Bill contains some new ideas and proposals with the Scottish Ministers more engaged in guidance and direction and an interesting change in the relationship between Bòrd na Gàidhlig and the Scottish Ministers. Potentially a higher degree of power and influence by Ministers could stimulate greater interest in Gaelic across more communities but similarly it could make Gaelic development even more vulnerable to the political priorities of ministers and economic pressures on central government. While decision-making inevitably has to be made centrally, the local, community level throughout Scotland must not be forgotten. Gaelic strategy and planning should happen *leis na daoine, airson na daoine* (with the people, for the people).

A big concern to anyone with an interest in the growth and sustainability of Gaelic is the potential loss of many skilled, committed people from a hitherto thriving network of Gaelic development officers. The Scottish Government's funding to Bòrd na Gàidhlig for those Gaelic officers for three years was very much welcomed but the negative impact of funding cuts on the development of Gaelic across the Highlands, islands and urban areas, cannot be ignored.

The idea of creating areas of linguistic significance, as seen in other minority language spheres, is an important development in the Bill. As a local authority with a wealth of Gaelic education, heritage and culture, we welcome the proposal to designate areas of linguistic significance. However, we

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would welcome greater detail about what becoming an area of linguistic significance would mean in practice.

Part 1, Chapter 1: Support for the Gaelic Language

Section 1: Status of the Gaelic language

Glasgow City Council welcomes the provisions for the Gaelic language to have official status within Scotland. Gaelic language and culture has been an integral part of Scotland throughout our history and needs to be recognised and treated as a normal, everyday feature of life all over Scotland. It also needs to be more supported and better funded by the Scottish Government.

Section 2: Functions of Bòrd na Gàidhlig

Glasgow City Council welcomes the strengthening of provisions for Bòrd na Gàidhlig. The proposed change in the Gaelic Language (Scotland) Act 2005 to give the Bòrd the additional function of “monitoring and reporting to Scottish Ministers on compliance by relevant public authorities with their duties under this Act” should focus the attention of all public authorities to give more support for officers to monitor and deliver their Gaelic Language Plans. However, public authorities like Glasgow City Council would incur additional costs for monitoring and delivery, which would be difficult to sustain within existing limited budgets.

We welcome the strengthened provisions on equal respect, specifically “ensuring that the Gaelic language is treated with equal respect with the English language”. We also support the Bòrd’s role in “encouraging and supporting the use and understanding of the Gaelic language, with a particular focus on areas of linguistic significance”.

Section 3: Bòrd na Gàidhlig Corporate Plan

This requires Bòrd na Gàidhlig to submit a Corporate Plan to the Scottish Ministers who may approve, modify or reject the plan. We welcome these provisions.

Section 4: Area of linguistic significance

This is one of the key provisions in the Bill. An area of linguistic significance is defined as an area that “contains a significant number of people with Gaelic language skills” (defined as at least 20% of an area’s population with Gaelic language skills). Glasgow would not satisfy that criteria.

However, the bill goes on to say in Section 1A (1)(b) that an area may be designed as an area of linguistic significance if “the area does not contain a significant number of people with Gaelic language skills but (i) is historically connected with the use of Gaelic (ii) the area is one in which teaching and learning by means of the Gaelic language is provided, or (iii) the area is one in which significant activity related to the Gaelic language or Gaelic culture takes place. Glasgow, or parts of Glasgow, would qualify under (ii) and (iii) of the above criteria.

The second part of this section (Areas of linguistic significance) goes on to discuss how the area would be designated. The Bill states that (1) A local authority may designate all or part of its area as an area of linguistic significance if it considers that the area falls within the description of an area of linguistic significance set out in Section 1A (1). It then states that the local authority must consult with Bòrd na Gàidhlig and other individuals, publicise the proposed designation and reasons for it, and submit the proposed designation to the Scottish Ministers for decision.

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Glasgow City Council would need to consider such a designation very carefully but it is more likely than not that, on balance, adopting this designation would be a positive development for Gaelic in the city. However, before then the council would welcome discussions with Bòrd na Gàidhlig and with the Scottish Ministers to understand the practical implications and the benefits of adopting the designation as an Area of linguistic significance. There would be significant costs involved in the planning and implementation of this designation, including a decision as to whether or not to include the whole city or just certain areas. We would also need to consult with the city's Gaelic community and wider population to ensure an appropriate level of engagement and debate.

Section 5: Gaelic Language Strategy

Glasgow City Council welcomes the idea of a Gaelic Language Strategy rather than a National Gaelic Plan. As the Strategy would be prepared by the Scottish Ministers, it should strengthen the image and focus of Gaelic and specifically help ensure that Gaelic is part of the thinking and decision-making process within all wider policy areas, not just be siloed largely into education and learning.

Towards that, we warmly welcome point 2B of the Bill - Effect of the Gaelic language strategy – in that “(1) The Scottish Ministers must have regard to the Gaelic language strategy in (a) making their policies (including proposals for legislation) and (b) exercising their functions. (2) A relevant public authority must have regard to the Gaelic language strategy in exercising its functions”.

Section 6: Gaelic language standards

Glasgow City Council welcome the idea that the Scottish Ministers can “specify standards and requirements relating to promoting, facilitating and supporting the use of the Gaelic language which are to apply to relevant public authorities in exercising their functions”. The Bill does not specify what those standards are but it would be stronger and clearer if it did.

In Wales, standards were established through the Welsh Language (Wales) Measure 2011. Welsh language standards promote and facilitate the Welsh language and ensure that the Welsh language is not treated less favourably than the English language in Wales. The same should apply to Gaelic in Scotland.

In Wales, organisations can be subject to comply with standards in Service delivery, Policy making, Formulating new policy, Operational, Promotion and Record keeping. The Scottish Languages Bill needs to clarify what the standards are for Gaelic in Scotland.

A key element for the success of language legislation in Wales, Ireland and, more recently, Northern Ireland has been the appointment of a Language Commissioner. The Commissioner has the power to enforce standards on organisations which in turn increases citizen confidence in Welsh and Irish. Would a Gaelic Language Commissioner, if added to this Bill, make a difference in Scotland? Undoubtedly... but the political, social and economic environment in Scotland may not be ready for such a development just yet.

Section 7: Functions of relevant public authorities

Glasgow City Council welcomes the provisions of this Section. However, the use of the words “the desirability of” in Section 7, 2D seem to us quite vague and would suggest that they be replaced by “the need to (a) promote, facilitate and support the use of the Gaelic language, (b) develop and encourage Gaelic culture”. We also welcome the involvement of the Scottish Ministers in issuing guidance and giving directions to the public authority in the exercise of its functions.

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

Glasgow City Council welcomes the provisions of this section. Reporting on progress and compliance with the Gaelic language strategy are very important and likewise that those reports are made available to the Scottish Parliament.

Public authorities must comply with “the duty imposed by Section 2B(2)” and “the standards and regulations specified in regulations made under section 2C(1) and “the duties imposed by section 2D”.

Section 9: Gaelic language plans

Glasgow City Council welcomes these provisions. Additional requirements from Bòrd na Gàidhlig will be met by the authority, especially timeous submission of reports relating to the authority’s Gaelic Language Plan. Likewise, we welcome the role of the Scottish Ministers in providing us with guidance and direction on Gaelic Language Plans.

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

Glasgow City Council welcomes this provision. Land and the Gaelic language are closely aligned in many parts of the country so it is correct to include a clear and positive message about the promotion, facilitation and support for Gaelic in the Land Reform (Scotland) Act 2016.

Chapter 2: Education

In this section of the bill, there is a new duty on Scottish ministers to promote, facilitate and support Gaelic education. This is an important and positive move to give weight to the case for Gaelic education. In particular, it is positive to see that this applies to both Gaelic Medium Education (GME) and Gaelic Learners’ Education (GLE). In order to support Scotland’s languages, it is key that all learners, regardless of educational setting, can access Gaelic learning experiences.

With regards to new powers to set standards in relation to Gaelic education, it is important that local authorities are given more detail on what standards are referred to. It is also key that consideration is given to staffing and the development of staff skills in Gaelic, whether for GME or GLE. Without appropriate staffing, and resources to train staff, Gaelic education will be Gaelic in name alone.

Section 11: Duty of Scottish Ministers to promote Gaelic education

In this section, there is a new duty on Scottish ministers to promote, facilitate and support Gaelic education. This is an important and positive move to give weight to the case for Gaelic education. In particular, it is positive to see that this applies to both Gaelic Medium Education (GME) and Gaelic Learners’ Education (GLE). In order to support Scotland’s languages, it is key that all learners, regardless of educational setting, can access Gaelic learning experiences.

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

With regards to new powers to set standards in relation to Gaelic education outlined in Section 12, it is important that local authorities are given more detail on what standards are referred to. It is also key that consideration is given to staffing and the development of staff skills in Gaelic, whether for

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GME or GLE. Without appropriate staffing, and resources to train staff, Gaelic education will be Gaelic in name alone.

Section 13: Guidance to public authorities relating to Gaelic education

Section 13 relates to the new powers given to Scottish Ministers to give guidance on GME and GLE. While guidance and the sharing of expertise is always welcome, local authorities must remain in control of the development of Gaelic education, in line with their other priorities.

Section 14: Directions to education authorities retaining to Gaelic education

To this end, more detail is needed on the nature of directions given to local authorities by Scottish Ministers, as outlined in Section 14.

Section 15: General duty to provide education includes Gaelic education

Section 15 refers to the clarification that Gaelic education comes under the definition of school education. This is a welcome move which gives weight and status to Gaelic education.

Section 16: Duty to promote Gaelic education in exercising functions under the Education (Scotland) Act 1980

While it is stated that there is no impetus for new GME, adequate consideration must be given to the resources required to promote Gaelic education.

Section 17: Information-sharing about Gaelic education

This section references the requirement to share information about Gaelic education. This requirement will require increased officer time and this must be taken into consideration.

Section 18: Gaelic education delivery planning

This section states that the Gaelic Language (Scotland) Act 2005 will be modified to require public authorities that are also education authorities (such as, Glasgow City Council) to include a plan for Gaelic education within the authority's Gaelic Language Plan. It requires additional consultation with named bodies and to "make further provision about the matters which an education authority must include in its Gaelic language plan".

It will be important to know how this is envisaged to work practically. While guidance and mutual support is often highly beneficial, it is important that Education authorities maintain control of the content that goes into the authority's Gaelic Language Plan and how it fits into their overall strategic planning.

Section 19: Duty to support access to Gaelic medium education

It is important to know how local authorities with GME and local authorities requiring access to GME for pupils will be expected to work together. As a local authority with extensive GME provision, the fact that our neighbours will have a duty to support access to GME will impact our planning for pupil and staff numbers in our GME establishments. The financial relationships between local authorities will also be key to making this a success.

Section 20: Duty to establish a catchment area for schools providing Gaelic medium education

We welcome this provision. Glasgow already has a catchment area in place for schools providing Gaelic medium education.

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Section 21: Transport to Gaelic medium education: application of Schools (Consultation) (Scotland) Act 2010

While it makes sense to standardise the process for allocating free transport, this process will have costs in terms of officer time which must be considered.

Section 22: Assessments: power to make different provision for different areas

While the Education (Scotland) Act 2016 gives the number of pupils who may trigger a full GMPE assessment as five, it is important to know precisely what numbers of pupils will trigger a full GMPE assessment as this will impact our staffing and may require increased agility to respond to requests.

Section 23: extension of assessments to early learning and childcare

It is welcome to standardise and clarify the process for enrolment based on age into GMPE and GMELC. The part of this section relating to Section 11(1) of the 2016 Act states that requests to assess the need for GMPE and GMLE will not be considered “repeat requests”. This increased duty to undertake assessments will increase the required officer time.

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

The duty to consult on Gaelic Medium Early Learning and Childcare will require officer time to undertake consultations, collate results and present results. In addition, appropriate resources and time will be required to source or train staff to deliver these services.

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

Glasgow City Council welcomes the provisions of this section.

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