

## **THE DRAFT NATIONAL GAELIC LANGUAGE PLAN 2023-28**

### **A review by the Language Sciences Institute UHI**

#### **Introduction**

A review is provided by the Language Sciences Institute UHI of the draft National Gaelic language for 2023-28.

Comments are provided for all sections of the draft plan with conclusions provided suggesting areas for improvement for the final version of the Plan.

#### **1. THE VISION FOR 2023-2028**

Gaelic is part of the heritage of Scotland and belongs to everyone. It already enriches the daily lives of the people of Scotland and beyond. It creates benefits, both social and economic, and increases wellbeing for Gaelic users, learners, and supporters, across Scotland and internationally. It is envisaged that through this Plan, all these benefits will be increased, and more people can engage with the language. The future of the language depends on people committing to and being able to use Gaelic.

This Plan will build on the successes of previous Plans and also address the challenges of recent times and Gaelic's history. The Plan will be as successful as the commitment, collaboration, investment, and action achieved.

#### **Comments:**

This is the fourth National Gaelic Language Plan, and this vision statement does not state anything purposeful about how Bòrd na Gàidhlig is to achieve its primary aim which underpins the existence of the organisation. It is not a vision statement but an aspirational statement of little or no consequence in relation to the ultimate mission of Bòrd na Gàidhlig.

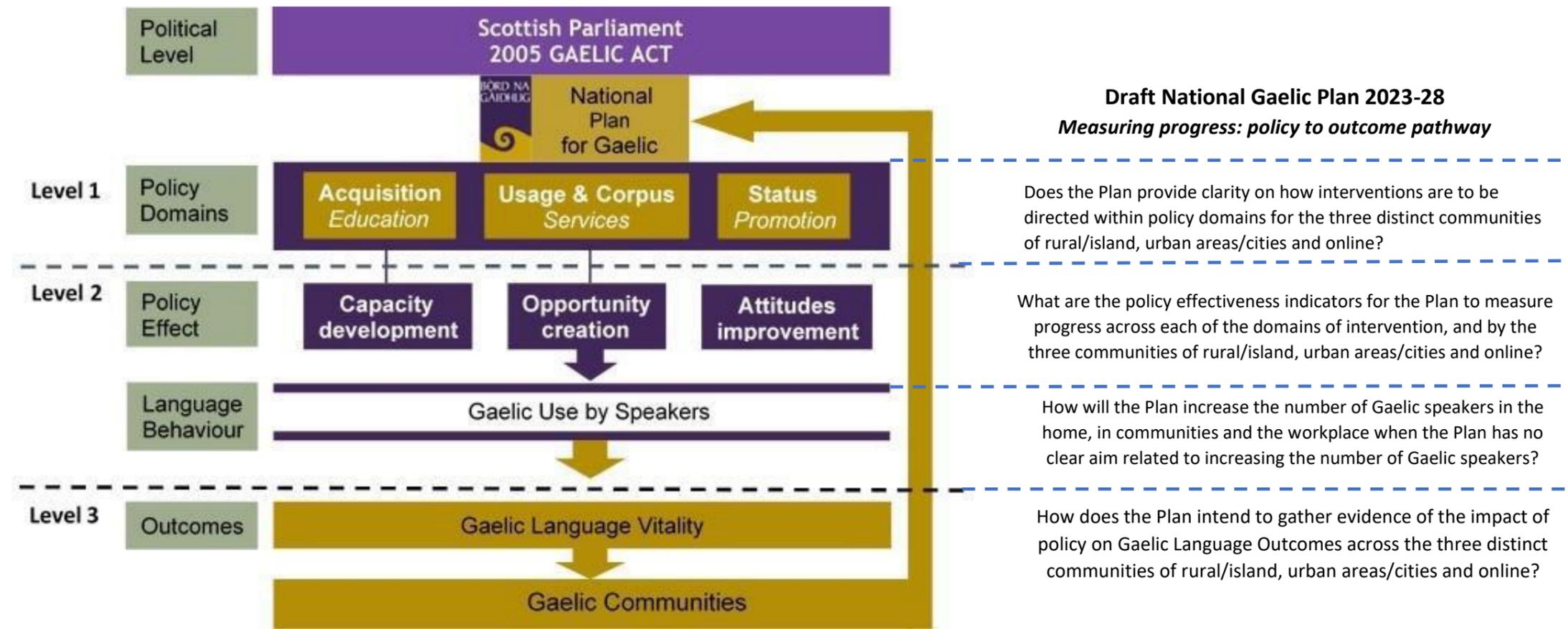
A vision statement should outline what Bòrd na Gàidhlig would like to achieve and gives purpose to the existence of the Bòrd and by extension the range of development bodies primarily funded through the Bòrd's funding mechanisms. The vision statement is the anchor point for the National Gaelic Language Plan, for Bòrd na Gàidhlig and for the wider Gaelic speaking and learning communities. It should be a focused statement which gives meaning the Bòrd's ultimate mission of increasing the number of Gaelic speakers in Scotland and increasing the use of Gaelic within families and communities.

It should be a statement of intent around which young people, families and communities can coalesce to achieve the ultimate vision, more Gaelic speakers, and more use of Gaelic as the language of daily life in a range of different communities and geographies of Scotland.

## 2. AIMS

There are two main Aims in the Plan: 1. Increase the use of Gaelic 2. Increase the learning of Gaelic

Comments on the two aims in the current draft plan are set in the context of the ‘*pathway-to-impact*’ model adapted from François Grin (2003)<sup>1</sup> as set out below.



### Comments:

The concerning aspect of this draft plan is that it seems to have been developed without any recourse to the current research base available in relation to Gaelic in Scotland nor does it display any deep understanding of the processes which should underpin community development. The development of Gaelic-language policies and programmes will not be sufficiently robust or relevant if no cognisance is taken of any improvements in language vitality under previous national language plans. An understanding of the community language dynamics extant within each of the three distinct communities identified in this draft Plan is also critical in the development of a strategic framework for intervention at appropriate levels of engagement.

To set the strategic basis for the fourth National Language Plan for Gaelic on two aims without stating the primary foundational objective of a language revitalisation pathway: *increasing the number of speakers*, is a major omission, which needs to be rectified in the final draft. Whilst the aim “increasing the use of Gaelic” is relevant and important, it does not follow that “use of Gaelic” is directly related to “speaking Gaelic”. The aims of this Plan need to be set around speaking Gaelic, using Gaelic; and learning Gaelic; and creating the environments for this to happen within the three main types of community highlighted in the draft plan – island and rural, towns and cities, and online. These three communities have somewhat different dynamics and needs, and the Plan should be specific about how each community is to be supported and by which specific strategic mechanisms in the context of speaking, learning and use.

The Plan also needs to address the four questions highlighted for the three domain levels illustrated in the above model. The Plan should also provide an overview of the current statistical context for Gaelic in Scotland.

<sup>1</sup> Grin, F. (2003) Language Policy Evaluation and the European Charter for Regional or Minority Languages. Basingstoke: Palgrave Macmillan.

### 3. AMBITIONS FOR 2028

1)	<b>Ambition</b>	<b>Comments</b>
		<i>A National Plan for Gaelic for a language under significant challenges should not be partly based around “ambitions.” Clarity of purpose and a focused, rigorous, measurable targets are required to make progress along a pathway that is encapsulated in a clear vision, which is understood by all.</i>
2)	Increase the number of local and digital hubs across Scotland which are supported so that Gaelic is used regularly from 27 in 2021 to 50.	The definition of “local and digital” hubs? How will such hubs be funded? What is their strategic purpose and where do they fit into the overall national strategy?
3)	Everybody in Scotland is able to access and enjoy Gaelic arts and culture in person and online	There are no barriers in Scotland for anyone to access Gaelic arts and culture. A somewhat meaningless statement for a national plan as Bòrd na Gàidhlig has no real control over ‘access’ to Gaelic arts and culture.
4)	Gaelic media will reach 1 million people a week and support up to 250,000 new users of Gaelic	Are these national or international numbers that are being quoted? How robust will be the evidence base to measure these two aspirations? How much control has BnaG over these aspirations?
5)	The range of services provided by public authorities through the medium of Gaelic has increased substantially	Is there sufficient evidence from the public which shows there is a demand for Gaelic services? Which services are currently available and are in demand and which additional services will be available over the lifetime of this plan? What does “increased substantially” mean in reality?
6)	Gaelic is normalised as a language in the home, socially and in the workplace across the country	“Normalised” should be defined in terms of the three dimensions indicated. At the last Census only 27% of Gaelic speakers in Edinburgh spoke Gaelic at home and 77% of Gaelic speakers in the Western Isles spoke Gaelic at home. There are significant challenges in both localities to change the “normalisation” measure of success and particularly in urban centres and major cities, yet this draft plan seems to assume that a language planning policy for the Western Isles is also relevant and appropriate for the City of Edinburgh.
7)	Primary pupils across Scotland will have enjoyed and benefited from engaging with Gaelic through the 1 + 2 initiative	“Enjoyed” and “benefited” are highly subjective terms and difficult to measure. Are levels of language competence being evaluated across the GME cohort in Scotland? Aspirational statements seem to be made without reference to the data collected by BnaG on GME and GLE education provision across Scotland.
8)	Over 500,000 people continue to be engaged in learning Gaelic	This action tends to suggest that public policy for Gaelic is now partly directed by media headlines. How is this action tracked and evaluated, and how many learners achieve any degree of fluency beyond a few sentences? The more people learn Gaelic and/or engage with the learning process is to be welcomed but the weakness in the current policy is the lack of support systems to increase the numbers of learners making progress towards fluency. Improving support systems for Gaelic learners at all levels should be an ambition and an action for the fourth National Gaelic Language Plan.

**4. TARGETS FOR 2028**

1)	<b>Target</b>	<b>Comments</b> <i>Targets below refer to public authority language plans and Gaelic education and none of the 6 targets could be considered as SMART targets. In addition, and a significant omission, no targets relate to speaking Gaelic within families and/or communities, nor is there any target(s) related to the intergenerational transmission of Gaelic. These foundational elements of language revitalisation should be considered as essential building blocks for public authority language planning and for Gaelic in all levels of educational provision. The sustainability of Gaelic depends more on micro level language planning at the community level than solely being dependent on the education system or the macro language planning processes of public bodies. Communities are the key agents to drive the future sustainability of Gaelic, and this should be reflected in the final version of this draft Plan.</i>
2)	100 public bodies engaged in developing and implementing their Gaelic language plans	57 Gaelic Language Plans have been agreed thus far with Bòrd na Gàidhlig. 100 Plans would imply a c.75% increase in the number of Plans in stages of development and implementation. The target should be focused on implementation and the measurement of impact in the context of the overall aims of the National Gaelic Language Plan.
3)	Local Authorities will ensure year-on-year growth in Gaelic medium education (GME) at early-years, primary and secondary levels; and in Gaelic learner education (GLE)	The target is not specific in terms of meaning nor output.
4)	Increase the number of stand-alone GM schools from the current level to 16 – through collaboration and investment between LA and SG capital and Scheme of Specific Grants collaboration	Within the five years of this Plan, is this a credible target in the context of available resources and the timelines involved in securing funding and planning approvals from local education authorities. Currently, according to Bòrd na Gàidhlig education data there are 8 primary schools reported as 100% Gaelic Medium Education and 1 secondary school with 100% Gaelic Medium Education.
5)	Local Authorities with Education bodies ensure that Early Years, Primary and Secondary have GM curriculum offers with appropriate cultural content support	The target is not specific in terms of meaning nor output.
6)	Local Authorities will ensure an expanded and developed GM curriculum offer for Broad General Education and the Senior Phase, with annual improvement planning and standards and quality report	The target is not specific in terms of meaning nor output.

## 5. INCREASE THE USE OF GAELIC

1.	<u>Communities</u> <i>Support for all Gaelic users and learners in their communities and in the networks in which they operate is increased; recognising the three main types of community – island and rural; towns and cities; and online.</i>	Community networks will continue to be prioritised with the promotion of Gaelic a central part of their activity	The fourth NGLP should now be moving beyond “promotion of Gaelic” and focusing on speaking and use of Gaelic across relevant domains of activity. Community networks should also be defined to enable ‘people and place’ to be central to any prioritisation of resources.
2.	The actions stated for this area of activity are not clear on how each of the three main types of community – island and rural; towns and cities; and online are to be supported through the Plan. The Plan should identify actions related to each specific community area and where there are cross-cutting actions/themes, they should be specified as well. Coherence, a clarity of approach and purpose are fundamental to the success of this Plan at a critical time for Gaelic as a living language of the community.	Support for network of Gaelic Officers to develop local programmes for all ages is increased	Primarily, the explanation for this action is focused on the project officers rather than on the community. The quality-enhancement system will be based on a model utilised by Education Scotland although how such a model will develop appropriately structured programmes with an input from the local community is unclear. Models which have already well-known and documented in the research literature related to language planning would be considerably more appropriate in the Gaelic context and in particular: the <i>Sustainable Use Model</i> <sup>2</sup> and the <i>Community-based Language Planning</i> <sup>3</sup> model. The community-based approach suggested by the <i>Staing na Gàidhlig</i> <sup>4</sup> research should also be explored as a mechanism to engage the community in the revitalisation of Gaelic.
3.		The availability and promotion of Gaelic events and activities for young people will be increased	Highly aspirational and requiring significant resources. The Bòrd has little leverage to require organisations currently delivering in English to expand their respective activities into Gaelic, as well, without some significant resource input. Strengthening the current system through financial and people resources would be a more realistic action and would increase capability and capacity at local levels.
4.		There will be a focus on on-line communities and the opportunities to use Gaelic in this context	Could usefully state an action on extending the use of technologies rather than a catch-all ambiguous link to on-line communities. Are online communities getting primacy over island/rural and town/city communities?
5.		Community trusts and third-sector organisations will be supported to appreciate their important role in promoting the use of Gaelic	The support to be provided should be stated clearly in terms of finance, governance, and agency factors so that communities can be in charge of their own development needs and requirements. The naming of individual trusts/organisations should be excluded for the ‘actions’ narrative.
6.		Communities who are working with public / private sector partnerships will raise the profile and opportunities for Gaelic so that the language is strengthened by developments.	This action is unclear as to its intention and output. A range of development organisations are named in the narrative for the action, but no mention is made of a key institution, the University of the Highlands and Islands.
7.		<u>Home</u> <i>Opportunities to use Gaelic at home through digital and physical resources</i>  It is unclear as to why the list of actions listed under this particular heading do not identify the importance of people resources and the role of family within the home-community nexus.	Support growth in digital content available for people to access through media

<sup>2</sup> Paul Lewis and Gary Simons (2016) *Sustaining Language Use: Perspectives on community-based language development*. Dallas, Texas: SIL International.

<sup>3</sup> Hanawalt, Charlie, Bryan Varenkamp, Carletta Lahn, Dave Eberhard. 2015. *The Guide for Planning the Future of Our Language*. Dallas: SIL. <http://www.leadimpact.org/language/#the-future-of-our-language>.

<sup>4</sup> Ó Giollaáin, C., Camshron, G., Moireach, P., Ó Curnáin, B., Caimbeul, I., MacDonald, B. and Péterváry, T. (2020). *Gaelic Crisis in the Vernacular Community: A comprehensive sociolinguistic survey of Scottish Gaelic*. Aberdeen: Aberdeen University Press.

8.		More Gaelic books and other resources will be available and promoted	Stòrlann is not mentioned in the 'action' narrative.
9.		Initiatives to support individuals and families to create and use their own content will be developed	This is aspirational and requires resources and competent partners who can work with schools and young people in particular. It would be clearer to state "promote, fund, and develop initiatives with x...to develop Gaelic content"
10.		Promote that Gaelic versions of technologies in the home are developed	Similar to above action. Need more than promotion. Which actions will be implemented and resourced?
11.		Increase recognition of and support for the measures that promote the use of Gaelic in homes.	This is a meaningless action without a detailed and dedicated set of action areas.
12.	<u>Media, arts, culture, and heritage</u>  Specific actions should be detailed for each of these areas of activity. For example, how is the 2023-28 Plan going to support Gaelic culture and heritage?	Media will run throughout delivering the Plan - in the home, in the community, in the economy and in learning – primarily through implementation of the MG ALBA Lèirsinn 2022-2027	The National Plan for Gaelic should not be partly dependent on the successful delivery of the strategic plan of another organisation. There is a danger that this action will increase the distance between language use at the family and community level in favour of passive consumption through a computer and/or a television screen or through other online media.
13.		Emphasis will be placed on media activities appealing to young people	What does this mean in reality? Why not be specific about a linkage to schools and colleges?
14.		More arts organisations, activities and festivals encouraged and supported to include Gaelic	A bland statement and not a measurable action. Encouraging and supporting is not the same as implementation. Are the arts organisations related to the 'action' "universal" or are they Gaelic orientated?
15.		Increase support from public bodies for Gaelic arts bodies to create opportunities, access, skills, participation	Does support mean financial support and dedicated budgets or is the action a generalised aspiration?
16.		Expand Gaelic publishing provision of opportunity and encouragement to writers and other creators.	A rewording of the action would bring a clarity of purpose in the support of all levels of Gaelic publishing and the production of creative content. Gaelic media requires creative content – is this Plan configured with a clear strategic pathway to support this important strand of Gaelic language development?
17.	<u>Business and the economy</u>  The preamble to this section indicates economic impact studies by MG ALBA and Glasgow City Council. There is no mention of the HIE study.  The preamble also suggest that Gaelic has ....an important and increasing place....in growing renewables and land and maritime carbon capture developments." An explanation to understand a relationship between these linkages and how they could be measured in relation to actual language outcomes arising from this Plan would be useful.	Support for businesses to increase the use of Gaelic in services and products as well as in the workplace, and for expansion of services and products	What is meant by support in this context? The action is wide-ranging and requires a series of sub-actions to bring clarity to the intent underpinning the action.  Is there going to be a dedicated programme to support businesses to produce and provide Gaelic services? Has any analysis been undertaken to indicate that there is an actual need and/or a demand for Gaelic services? Does the Bòrd have any leverage to increase Gaelic use in the workplace? What Gaelic 'products' will be considered for support? Should the Bòrd be investigating how the Gaelic economy operates assuming such an economy exists?
18.		Extend research on the already established economic impact of Gaelic in Scotland	What does "extend research" mean? Is the Bòrd going to establish a process to gather relevant data on an annual basis on Gaelic labour market activity and Gaelic-related economic outputs, for example.  Of more importance would be the development of an evaluation methodology to measure Gaelic language outcomes generated by the fourth National Gaelic Language Plan and the existing Language Plans of public authorities.

19.		Entrepreneurial and leadership skills in business training to be developed for delivery in Gaelic	This action and the following actions could be developed to be more specific in terms of the types of training and courses required to develop and extend the skills sets needed for Gaelic public administration, as this is where most Gaelic employment is concentrated. Who will be the partner institution(s) to deliver on the action?
20.		Expand the Gaelic labour market through promoting careers which value Gaelic skills, apprenticeships, skill development and training programmes and strengthen career routes and succession planning for careers where Gaelic is deemed essential or desirable	
21.		The public sector, working in partnership with the private sector, will ensure that renewables, climate change investment and related developments should deliver for communities and for Gaelic.	This action is meaningless as worded. The action could be specific in stating that a percentage of community benefits from the renewable industry are directed towards a fund to support Gaelic-speaking communities and Gaelic-related development initiatives. Such a fund would be regionally specific.
22.	Public authorities	Build even greater impact from Gaelic Language Plans, the range of authorities, the provision, promotion, and uptake of the services offered in their individual communities and their effectiveness	What is the counterfactual position to enable this "greater impact" to be measured? Will there be an operational plan to measure such "impacts"?
23.		SG will take forward a Scottish Languages Bill with provision for Gaelic at its core	Bòrd na Gàidhlig has no direct control over these specific actions.
24.		SG will explore the creation of a Gàidhealtachd	
25.		Ensure Gaelic is included and prioritised in activity resulting from the Islands Act	Gaelic already alluded to in the Islands Act. What is required is an action which develops a methodology to evaluate/measure the impact of the Islands Act on the Gaelic community and on Gaelic as a community language.
26.		SG takes forward its commit to review the functions and structures of Bòrd na Gàidhlig	Bòrd na Gàidhlig has no direct control over these specific actions.
27.		Enhance momentum with the Faster Rate of Progress initiative and Convention of the Highlands and Islands workstreams	How will momentum be measured? It would be more beneficial to evaluate the real impact of this Initiative on Gaelic language outcomes and the impacts generated by the Language Plans of the public/development bodies involved in the Initiative.
28.		Increase the co-ordination with all the projects which enrich and retain the vitality of the Gaelic language.	How will the action be measured and does the Bòrd have a set of indicators which they publish that measure the vitality of the Gaelic language? It would be more progressive to develop a series of indicators/measures that would illustrate Gaelic vitality across the three specific communities identified by this National Gaelic Language Plan.

**6. INCREASE THE LEARNING OF GAELIC**

1.	<u>Home</u>  Promotion of all influences and measures that encourage Gaelic language learning for young people and families in the home, including families where members may lack confidence in using Gaelic. There are many Gaelic influences which enter the home and there are opportunities to increase awareness and promotion of these. There are many on-line opportunities that are watched and listened to for all ages in homes.  <i>The preamble (above) to this aim needs to move beyond "promotion" and focus on the significant challenges which exist in relation to the home environment and the speaking, learning and use of Gaelic. This is the fourth National Gaelic Language Plan which needs to move beyond promotion and actions based on the 'expectation of hope' to a series of well-constructed actions which deal with the real-world situation of Gaelic.</i>	Ensure that the role of digital in delivering quality learning in the home is available for Gaelic	An important dimension to the overall delivery environment but it would help to state how this action would "ensure" success. Digital is a 'medium,' so a delivery mechanism(s) should be stated.
2.		Establishing and promoting GME Early years centres, 0-3 provision and related initiatives	This is a critically important action. The action should state the development of a comprehensive and funded plan to support the development of the early-years sector across Scotland.
3.		Local Authorities with the support of national and local parent organisations ensure that GME is actively promoted and that more families are supported in learning Gaelic at home	These actions are important and require dedicated strategic and operational plans which are adequately resourced. The actions could be re-stated in a more pro-active way to signal intent to improve, extend and resource the current network.
4.		Initiatives and projects that encourage and support Gaelic learning for GME parents are extended annually, enabling more parents and carers to use the language confidently at home	
5.		NHS Boards, other public authorities and Gaelic projects and bodies to ensure that Gaelic learning is promoted in home life.	How is the action to be implemented? A re-stating of the action would bring focus and clarity.
6.	<u>School</u>	Local Authorities and SG promote, support, and grow GM Childcare and Early years, Primary and Secondary provision	Actions are not fully under the direct control of Bòrd na Gàidhlig and whilst Bòrd na Gàidhlig has a clear and important role in facilitating actions across relevant authorities, the list of actions presented here could be considered as not sufficiently robust or clear to drive the required processes of implementation.  It would be important advancement if the Bòrd and relevant partners would develop a strategic and operational plan for Gaelic education (early years to secondary) which was resourced in relation to finance, human resources and support mechanisms.
7.		Local Authorities support and grow Gaelic as a modern language in line with the 1+2 national initiative	
8.		Ensure the digital offer for online curriculum delivery strengthens and expands GME and GLE in schools at primary and secondary levels annually	
9.		Develop and extend an appropriate GME curriculum offer for both Broad General Education and Senior Phase in the secondary sector	
10.		Ensure provision of high quality GME and GLE staffing and resources	
11.		Ensure progress and delivery of SG commitments on GME.	
12.	<u>Post-School</u>	Promotion and support for SpeakGaelic and other adult education opportunities	As above: An implementation plan is required to take forward actions and recommendations from research reports which include the following: <i>i. Adult Gaelic Learning in Scotland: Opportunities, Motivations and Challenges. Wilson McLeod, et.al.</i> <i>ii. Learning Gaelic in adulthood: Second language learning in minority language contexts. Marsaili MacLeod</i> <i>iii. Redesigning how adults learn Gaelic. Research led by the University of Aberdeen</i>
13.		Gaelic skills included and promoted in careers opportunities, routes to employment, skills training, and apprentices	
14.		National agencies continue to promote GME Initial Teacher Education, routes into GME/GLE teaching and support for professionals	
15.		Availability of wide range of opportunities to pursue Gaelic learning in Further Education/Higher Education institutions	
16.		Research is supported to improve understanding and effectiveness of Gaelic development.	An action for a 'research and evaluation plan,' to support delivery of the fourth National Gaelic Language Plan would be a positive and important development.

## **Conclusions:**

Gaelic in Scotland is a 'minoritised' language and will in all likelihood be in this state for the foreseeable future. Recognising this situation requires a forensic focus on the promotion, and particularly the protection of Gaelic, through utilising an innovative and strategic approach to the existing empowering legislation of the 2005 Gaelic Act. A National Gaelic Language Plan should be configured at a strategic level to reflect the mutually reinforcing concepts of 'promotion and protection' in the challenging situation to revitalise the overall vitality of Gaelic in Scotland.

At a critical juncture for Gaelic in Scotland this draft Plan falls short in setting out a framework which can strategically address the challenges and opportunities across the three distinct constituencies highlighted in the plan: island and rural; towns and cities; and online. The Plan needs to be restructured to reflect realities in relation to the state of Gaelic rather than focus on the pretence of progress highlighted by a number of the draft action areas, which are in part aspirational, and in many cases lacking specificity. In short, the Draft Plan avoids social reality. An institutional shift is needed from centrally planned language planning activities to a situation where more emphasis is placed on localised (micro) language planning to increase competencies and the autonomy of communities to take greater responsibility in development initiatives. The place of community should be a central to Gaelic language policy and planning, with an emphasis on capacity-building and community agency as key determining factors in strengthening engagement with families and communities at a localised level.

The fourth National Gaelic Language Plan should be capable of learning lessons from the knowledge and evidence generated through the implementation of previous plans. The body of evidence which has been accruing since 2005 should be utilised in a creative and innovative manner to reflect and act on the real-world circumstances of the Gaelic communities to enable a strategic framework capable of maintaining and revitalising the sociolinguistic and ethnolinguistic vitality of Gaelic across discrete communities.

This draft Plan lacks a strategic context and a rationale to explain why a National Gaelic Language Plan is required and why Bòrd na Gàidhlig exists as a public organisation to deliver the aims and actions of such a Plan. The overall framework employed by this draft Plan, which should drive the strategic actions identified, does not fully identify how such actions will engage with the different communities that the draft Plan purports to serve. It lacks innovation and creativity and is not based on relevant research evidence, nor any knowledge gained from previous National Plans, or any evidence gathered from the implementation of the language plans of public bodies. The final version of the Plan needs a degree of reconfiguration from the 'one size fits all' framework to one which serves in a cost-effective and efficient manner the three specific communities this Plan has identified.

It is difficult to understand why the draft Plan does not have a specific aim related to "increasing the number of Gaelic speakers." This is a fundamental aim for any plan which aims to support the maintenance and revitalisation of Gaelic. A specific aim in terms of "increasing the number of Gaelic speakers" needs to be linked to "increasing the use of Gaelic" within a range of different domains such as the workplace, the home and community. As currently configured this draft Plan is not sufficiently transparent on these three important dimensions: the degree and/or the achievement of competence and capability across Gaelic speaking/learning cohorts; the opportunity to use Gaelic in a range of domain settings; and the importance of creating a positive support environment where people will want to speak and use the language. This is the sociolinguistic framework which needs to drive the Plan in the support of a minoritised language such as Gaelic. Additionally, the social and community dimension of Gaelic development needs to be a central element of the finalised version of the Plan and take account of the different communities served by the Plan. As already indicated, support structures suitable for our towns/cities are unlikely to be suitable to engage with the Gaelic communities of the Outer Hebrides or other rural locations of the Highlands and Islands, for example.

In the interest of clarity and simplifying the overall framework for supporting Gaelic development in Scotland, the Plan could usefully consider two strategic themes linked to specific aims and a series of prioritised and SMART action areas, including relevant cross-cutting themes.

A simplified model of a suggested strategic framework is set out in the table below.

<b><u>Strategic Theme</u></b>	<b><u>Gaelic in Communities</u></b>	<b><u>Gaelic in Education</u></b>
<b><u>Aims</u></b>	Speaking; Use; Learning Support Structures	Speaking; Use; Learning Support Structures
<b><u>Intervention Areas</u></b>	Island/rural; towns/cities; online	Early Years; Primary; Secondary; Tertiary
<b><u>Cross-cutting</u></b>	Resource management; knowledge exchange; networking across communities	

As currently configured the actions related to community and education are not sufficiently transparent in how they will be resourced and implemented. In addition, some actions are not within the direct control of Bòrd na Gàidhlig and a number of these actions are not very practicable in terms of being resourced and delivered. In relation to both the 'community' and the 'education' dimensions, it would be prudent to consider dedicated strategic plans/pathways with aims and objectives which can address the range of development challenges which are currently extant in relation to Gaelic development. This would also imply a change in the implementation structure currently utilised by Bòrd na Gàidhlig. These strategic themes/pathways should have financial plans which identify how actions areas are to be prioritised and resourced. Bòrd na Gàidhlig operates within a limited funding regime in relation to a wide-ranging remit and the responsibilities attached to the organisation. This draft Plan, as currently configured, could be setting up the organisation to fail.

The strategic direction and the actions set out in this draft Plan appear to be designed to maintain the development support and funding framework for existing service providers to enable them to continue doing what they have always done, rather than addressing the existing research evidence and community opinion which clearly signal a need to look afresh at the situation of Gaelic language development matters in Scotland.

The draft Plan could also usefully have a section on research and evaluation. Any national Gaelic language strategy should gather relevant evidence to measure the language-related impacts/outcomes generated and the value for money aspects related to Gaelic language plans. Additionally, it is also important to include in the final draft of the Plan, a small number of key indicators capable of providing verifiable evidence of language outcomes resulting from the implementation of public policy in respect of Gaelic development actions. It is of equal importance that national Gaelic-language development policy measures are based on real-world research and evaluation evidence rather than intervention measures based on 'expectations of hope' and a reluctance to address fully the sociolinguistic reality pertaining to Gaelic speaking communities across Scotland.

A reconfiguration of the Plan is essential for actions to be set within extant community dynamics and to take account of existing sociolinguistic and ethnolinguistic research evidence. As presently constructed the draft Plan places an over emphasis on a 'passive consumerist' approach instead of creating a language planning environment based on a new model of governance and agency which can engage in a positive and productive manner with the three distinct communities identified by the draft Plan.