



A chairde,

There is a consultation currently underway on Linguistic Diversity Policy in Belfast City Council. The consultation ends on Tuesday 18th July 2017. You can access the consultation documents on this link: https://yoursay.belfastcity.gov.uk/chief-executives/draft-policy-on-linguistic-diversity/consult_view/

It is important that they hear from the Irish speaking community, especially since there are a number of significant mistakes in the Council's consultation document. You can fill the form in online or else put in a letter or submission **before the deadline** to the following:

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Here are some points you can include in your responses, if you like:

1. General points

- a. It is clear that the consultation document was prepared several years ago and that it has not been properly updated. We regret the significant mistakes in the document relating to the statutory basis of the Irish language in the north. For example, on page 6 of the document, there is a reference to a consultation on Irish language legislation and it says that the results of the consultation are not available. The consultation results were published in October 2015. (94.5% of respondents supported Irish language legislation). Unfortunately, in January 2016, the NI Executive refused to adopt the Irish Language Act. This refusal is not mentioned in the Council's document.
- b. Similarly, on page 11, under section 4. Recommendations, it says, 'The NI Executive has adopted 20 year strategies on both Irish and Ulster-Scots.' This is inaccurate. The Executive has not adopted strategies for Irish or Ulster Scots. The document contains substantial quotes from the unadopted strategies for both Irish and Ulster Scots, creating further potential confusion.
- c. Although the Council has been informed that this consultation document is inaccurate, Belfast City Council has decided not to correct it. We believe that this shows a lack of respect for the Irish speaking community and a failure to understand the significance of recent policy decisions in relation to linguistic diversity.
- d. We welcome the references in the document to the European Charter for Regional or Minority Languages. We believe that the findings of the independent experts on the Charter (COMEX) in relation to Section 75 of the NI Order should be included in the Council's deliberations on linguistic diversity. They are:



(ECRML (2010)4, Strasbourg 21 April 2010, Application of the Charter by the UK, p. 19, parag 12)

123. The COMEX has been informed of several instances, especially within local councils where it was decided not to promote or use the Irish language within their services on the grounds that it would contravene Section 75 of the Northern Ireland Act, which states that public authorities should take due regard of the need to promote equality of opportunity, among others between persons of different religious belief or political opinion. The Committee of Experts emphasises that this undertaking states that the adoption of special measures in favour of regional or minority languages aimed at promoting equality between the users of these languages and the rest of the population or which take due account of their specific conditions is not considered to be an act of discrimination against the users of more widely-used languages.

- e. In addition, the Advisory Committee on the Framework Convention for the Protection of National Minorities has said, (Strasbourg, 22 Nollaig 2011, ACFC/OP/III/(2011)006)

147. [...] The Advisory Committee was disconcerted to hear that some representatives of the authorities consider that promoting the use of the Irish language is discriminating against persons belonging to the majority population. Such statements are not in line with the principles of the Framework Convention, and in particular with the provisions of Article 10. It also reiterates that, in line with Article 4.2 and Article 4.3 of the Framework Convention, implementation of minority rights protected under the Framework Convention are not be considered as discriminating against other persons.

2. Points relating to contents of the consultation document

- a. All languages are deserving of respect, but we do not agree that the circumstances of indigenous languages and those of ethnic minority languages are the same. It is widely recognised internationally that specific actions are required to protect and promote languages that are under threat. The principle of 'language of choice' should be recognised in the Council's policy.
- b. The Council's document proposes different policies for different languages, but does not specify on what these policies will be based. We believe that policy must be based on objective need and on the understanding of the particular importance of indigenous languages in the country / countries in which they are traditionally spoken.
- c. In relation to the duties of the Council in respect of Irish, and the provision of public services through Irish, we propose that the POBAL proposals published in *The Irish Language Act Issue II* should be used as the basis for the Council's



approach. These proposals can be found on page 63, Political Institutions, 2) Local Authorities, Parag 16-24; and page 66, Public Services, parag 31-32. Link to the document: <http://www.pobal.org/gaeilge/wp-content/uploads/2013/03/Acht-na-Gaeilge-Eis-2-Edition.pdf>

We prefer the POBAL proposals, because we feel that the sections of the Council's document relating to duties and services are weak and rather confused. For example:

- We believe that the document puts too much emphasis on 'tolerance and dialogue' instead of on the protection and promotion of Irish.
 - References to signage and branding. Irish language or bilingual (Irish-English) signage should be visible everywhere and not limited to certain areas. In relation to the use of the logo, one bilingual (Irish-English) version of the logo should be adopted and in use everywhere as the official form of the logo. Other languages may be added for use on occasions / materials of specific interest to other language groups.
 - In addition, according to the Council's document it seems that Irish language versions of documents will only be available when requested. We believe that the most used documents and forms should be available bilingually (Irish-English) instead of making available single language English versions. An approach based on 'active offer' should be implemented. Documents and forms could also be made available in other language versions where required
 - in the Council's document, in relation to Irish, there is emphasis on translation and interpretation. Even then, there is no reference to an interpretation system for Councillors (nor for Council Officers who speak Irish) and this is a significant gap.
 - we agree that translation and interpretation are important enabling instruments, but far more support and development services should be included in the Council's policy.
 - in line with the POBAL proposals in the document *The Irish Language Act / Issue II*, we agree that at least one Irish language Officer should be employed and that this full-time post should be focused entirely on the Irish language and the needs of the Irish speaking community in the city rather than sharing duties in respect of other languages.
- d. As well, we support the POBAL recommendations put forward in their research and audit of the needs of Irish language groups in Belfast (2017). These are as follows:
- ▶ Establishing a new department within the Council: Language and community development, tourism, arts and Good practice / Capacity building
 - ▶ The creation of full-time post(s) of Irish Language Officer / Officers within Belfast City Council
 - ▶ Developing criteria to recognize the added value of the Irish language within each funding scheme of the Council, including the multiple annual core funding scheme



- ▶ Making available Language Awareness Training courses to Council staff and Councillors