Additional suggestions by Conradh na Gaeilge for the questions below:

7. If you disagree with the development of a Linguistic diversity policy for Belfast, please explain why?
If ‘other’, please explain:

Although we strongly support the aims and objectives of the draft policy and with the proposed measures for the development and protection of the Irish language, it is our view that it is much more effective to develop stand-alone policies for each language and that indigenous languages are given precedent – these views are endorsed strongly by the Council of Europe.

8. If you have suggestions for improvement or any other comments regarding the draft linguistic policy, please provide more details here

As stated above, the aims and objectives of the draft policy are commendable and it is a significant step forward for Belfast City Council and for minority language communities in Belfast that such a policy will be introduced. This approach, however, is not in keeping with human rights frameworks at international or local level and we believe that the specific needs and requirements of each language community will be better met through the development of stand alone policies for each language – especially in relation to indigenous languages. This is the approach that is recommended by the Human Rights Commission NI, the Council of Europe and the United Nations. As the committee of experts (COMEX) appointed by the Council of Europe stated:

COMEX stated languages need to be treated in accordance with their objective situation and that inappropriate measures based on demands for ‘parity’ will “not serve the needs of either Irish-speakers or Ulster Scots-speakers and will hold back the development of both”. Specific concerns were raised that “inappropriate claims for parity of treatment between Irish and Ulster Scots” had led to incidents of funding or other initiatives for Irish being refused on the basis that it was not possible to reciprocate for Ulster-Scots

This policy must ensure that scenarios described above are not allowed to develop and that the development and protection of Irish is not limited because similar reciprocal measures cannot be taken for other languages under the scope of the draft policy.

9. To what extent do you agree or disagree with the development of an over-arching Language Framework?

Strongly agree X
Agree
Neither agree nor disagree
Disagree
Strongly disagree

If you disagree with or have any comments or suggestions for improvement, please provide more details here:

A comprehensive implementation plan must be developed to clearly set out how the policy will be implemented for each language. In terms of the Irish language, there is a requirement for a resourced-based action plan which meets the needs of the Irish speaking community and this must be independent of the other languages covered by the policy.

11. To what extent do you agree or disagree with the aims and over-arching principles contained within the draft Language Framework? (click on the 'More information' link to read these)

If you disagree with or have any comments or suggestions for improvement, please provide more details here:

We strongly support the overarching principals of the proposed language framework, specifically in relation to the European Charter for Regional and Minority Languages. The Council of Europe has strongly and consistently criticised the lack of implementation and adherence to the charter by public bodies and government departments and we support any efforts which strives to ensure full implementation of this important charter. The Irish language is protected up to Part III of the charter and the council must, therefore, set out an action plan outlining how the various provisions contained within the charter will be implemented.

For example, the Council of Europe and COMEX (who monitor implementation of the charter) have made clear recommendations in relation to signage and bilingual street names. Currently, Belfast City Council's policy is in breach of the charters provisions and we would expect that the councils policy would then be amended to give effect to the full implementation of the charter, as stated above.

12. To what extent do you agree or disagree with our definition of "minority languages"?
The draft policy defines "minority languages" as encompassing all other languages spoken by people who live in, work in or visit Belfast, whether this is their main language or their language of choice.

More progressive terminology has developed in mainland Europe to describe minority indigenous languages – Minoritised languages. This acknowledges that it was through a process that the number of speakers of that particular language fell and not as a result of some defect or weakness in the language itself. We support this approach.

13. To what extent do you agree or disagree with the development of an Irish Language Policy which focuses primarily on the enhancement and protection of the language?

More Information on the proposed Irish Language Policy

   Strongly agree X
   Agree
   Neither agree nor disagree
   Disagree
   Strongly disagree

If you disagree with or have any comments or suggestions for improvement, regarding the proposed Irish Language policy please provide more details here:

It is vitally important that Councils sets out clearly, on a step by step basis, how they will implement the policy in a way that is measurable. While we welcome the policy, the measures contained within it are general and must be accompanied by a comprehensive implementation action plan. This plan should be based on:

   • The requirements of the Irish speaking community
   • Resources made available to that community in a way which supports the growth, development and protection of the language
   • Visibility of Irish increased in leaflets, signage, streetnames and across the city more generally
   • To provide services which are of equal standard as services through English (as appropriate) to the Irish speaking community and that
awareness raising and advertising is done in relation to the provision of these new services

- New funding streams that are directed at supporting the use and increasing knowledge of Irish are developed and provided
- Outreach services provided by council (in terms of youth work, sport etc...) are provided through Irish based on the percentage of Irish speakers in the city

It is vital that the policy is reviewed and strengthened on a regular basis. This is in keeping with international best-practice in terms of language policy and legislation. It is also understood that these reviews are used to strengthen rather than weaken any existing provision.

We recommend that Belfast City Council recognise ‘Fóram na nGael’ as a stakeholder forum to provide advice and recommendations to Belfast City Council in relation to the implementation of the policy specifically and the development of the Irish language across Belfast more generally. This approach is already in place in Derry & Strabane Council and in Mid Ulster Council. In accordance with Article 7(4) of the Charter, councils “shall take into consideration the needs and wishes expressed by the groups which use such languages” in relation to the drafting of language policies.

Local Councils have a duty to create Codes of Courtesy for the Irish language and ensure that all staff members are aware of the procedures in place regarding the language – this derives from Departmental (DCAL) guidance to Councils from 2005 on how to implement Charter effectively.

We strongly recommend that Council undertake extensive awareness raising with the general public and the Irish speaking community specifically to develop a better understanding of the policy, its implications and how the community can best avail of the new services etc... This can be done through leaflets, roadshows, contact with schools, community organisations etc...

### Equality and Good Relations Implications

As part of our commitment to promoting equality and good relations we have completed a screening for the draft Linguistic Diversity Policy. To help ensure that we have fully understood any equality and good relations implications, we would also appreciate feedback on this screening.

**Equality Screening Report**

19. Do you have any comments or suggestions for improvement on the Equality Screening?
A strong Irish language policy will enhance equality in the council and it will ensure, if implemented effectively, that Belfast City Council will be fulfilling their duties as established in international treaties and frameworks that have been ratified by the British Government.

An Irish language policy will contribute significantly to good relations in the city through creating a better understanding of and respect for the language and her speakers.

20. Please use this space if you have any other comments on the draft

Linguistic Diversity Policy and Language Framework

Important that a clear, measurable action plane is developed to give effect to the policy and that resources are made available to ensure effective implementation.