Report on the Consultation Conducted by Belfast City Council into the Draft Language Strategy Action Plan 2024-2026

March 2024

1. Introduction

Belfast City Council launched its Language Strategy 2018-2023 in April 2018. The Language Strategy covers five areas of work: Irish, Ulster Scots; Sign Languages; Newcomer Languages and Languages and Communications for People with Disabilities.

An initial action plan was agreed soon after the launch of the Strategy, and a further action plan was developed and agreed by Council in December 2018. This action plan covered the period up to March 2020. Updating of the action plan was severely delayed by the onset of Covid-19 in March 2020, with the Council going into a "holding pattern" in relation to languages and individual actions being deal with on a case-by-case basis.

During this time the Language Officer and Irish Language Officer worked on a range of different issues including:

- The erection of bilingual signage at Andersonstown and Brooke Leisure Centres
- Organising events for Ulster-Scots Language Week, Burns Night, Sign Language Week and Seachtain na Gaeilge, including online events
- Disability Communications training, Autism NI Impact Award Champion and JAM Card training programmes for front-line staff at Belfast City Hall, Belfast Castle and Malone House.
- Sign Language provision Sign Language accredited courses for front-line staff. A course was completed in June 2023 and a new course has been arranged as from April 2024
- Provision of SignVideo (Video Remote Interpreting) at all leisure centres and at several council venues including City Hall and Belfast Zoo
- Dealing with translation and interpreting language requests. Examples include documents translated from English to a different language e.g. Polish, Irish and Somali and organising language interpreters for meeting between council officers and members of the public
- The Equality Impact Assessment on the revised Dual Language Street Signage Policy
- Developing governance arrangements for and setting up the elected member Language Strategy Working Group and Irish Language and Ulster Scots stakeholder Fora.

During this period officers also began work on the current action plan. The actions in this Draft Action Plan were based on engagement with members and stakeholders and benchmarked against services provided by other councils and public bodies in Northern Ireland and elsewhere. The action plan then received input from managers across the Council and was subjected to discussion and pre-consultation with elected members in the Language Strategy Working Group and stakeholders.

The September 2023 meeting of the Strategic Policy and Resources Committee then gave consent for the Draft Language Strategy Action Plan to be put out to public consultation. Council officers conducted a 14-week public consultation between 16th October 2023 and 22nd January 2024 which included an online questionnaire, online engagement sessions and the opportunity to submit written comments on the Draft Action Plan.

The following report will summarise the main findings and themes of the consultation and present elected members with recommendations for potential changes to the Action Plan or for actions that could be carried forward into the Action Plan's next iteration.

1.1 Layout of the Draft Language Strategy Action Plan

The actions in the draft Language Strategy Action Plan are divided into 5 key themes:

- 1. Access to Council Services;
- 2. Branding;
- 3. Community, Education and Business;
- 4. Staff Awareness and Training;
- 5. Engagement.

The online consultation questionnaire asked respondents their opinion on the actions under each one of these headings and whether they agreed or disagreed with the suggested actions. Respondents were also asked if they had any further comments to add under each heading.

2. Responses from the online consultation questionnaire

Respondents were able to respond to an English or Irish version of the questionnaire. The results from both of these were then aggregated and analysed. In total there were 56 responses to the English version of the survey and 28 responses to the Irish version, a total of 84 responses.

2.1 Access to Council Services

Respondents were asked to what extent they agreed or disagreed with the proposed actions in Section 1 of the Action Plan, Access to Council Services.

To what extent do you agree or disagree with the draft actions in section 1.0 Access to Council Services?	Strongly agree	Agree	Neither agree nor disagree	Agree	Strongly disagree	Total
English Survey	12	10	4	11	19	56
Irish survey	2	0	0	0	26	28
Total	14	10	4	11	45	84
Percentage	16.7	11.9	4.8	13.1	53.5	100

The statistics above show that a majority of respondents (66.6%) across both surveys disagreed with the suggested actions in this section of the action plan, with a smaller percentage (28.6%) agreeing with the proposed actions.

Whilst the majority of respondents are not entirely satisfied with the action plan as currently drafted, the comments received demonstrate that they welcome the Action Plan and the opportunity to communicate a range of proposed improvements and amendments across the various themes and specific actions.

Key themes in the survey responses

A detailed examination of the comments received in relation to Council Services reveals a number of themes. One of the key themes is the issue of cost, and the cost to the Council of rolling out these services in languages other than English.

A range of comments noted the disparity between services which would be rolled out in relation to the Irish language compared to the proposed services which would be available in Ulster Scots. A number of respondents also pointed to the possibility that any services offered in Irish would have to be also delivered in Ulster Scots, thus creating a further cost.

A number of respondents highlighted the perceived damage that rolling out some of these actions could have on good relations in the city, and claimed that the Council's approach to language was politically motivated. Others however noted that the actions had the potential to contribute to good relations in a positive manner.

Some of the comments focused on the need for services for newcomer communities and the availability of English language classes and support for them. Another repeated theme was the need for Sign Language support and support for people with various disabilities and Autism.

A range of responses focused on the Council's approach to the promotion of Irish. Some of these came in the form of a pro-forma response which members of the Irish language

community submitted individually. The main points from this response under this question were:

- The need for a corporate Irish-Language Policy, developed in conjunction with the Irish language community;
- An audit of the Irish-language capability of Council staff and an assessment of willingness of staff to deliver services through Irish;
- Learning Irish to be made part of staff development;
- Translation of key Council documents to Irish and these being made available at the same time as the English version;
- Irish content on the Council's social media to relating to all Council initiatives, not just those aimed at the Irish-language community;
- A publicity campaign to highlight the Council's new approach to Irish.

Respondents from the Irish language community clearly felt that the above actions would have a positive impact on the Irish language community and on the promotion of Irish.

2.2 Branding

Respondents were asked to give their opinions on the proposed actions in the Draft Language Strategy Action plan in relation to Branding. A similar statistical pattern was borne out in the responses here.

To what extent do you agree or disagree with the draft actions in section 2.0 Branding	Strongly agree	Agree	Neither agree nor disagree	Agree	Strongly disagree	Total
English Survey	11	10	6	9	20	56
Irish survey	2	0	0	0	26	28
Total	13	0	6	0	46	84
Percentage	15.5	11.9	7.1	10.7	54.8	100

65.5% of respondents in to this question disagreed or strongly disagreed with these proposed actions, with 27.4% agreeing with the actions as currently drafted.

A number of themes apparent in the response to the first question were also apparent here, including the potential cost implications to having Irish language and Ulster Scots branding throughout the Council.

A small number of comments suggested that the use of Irish or Ulster Scots in the branding of the Council would politicize these languages and that this could lead to damaging good relations in Belfast. A range of comments highlighted the need for a greater focus on Sign Languages and disability communications.

Several responses were in favour of the use of the Irish language in branding. Responses suggested that the initial work on developing a bilingual Irish/English logo and Council branding, similar to what other Councils in Northern Ireland have, should be done now. Respondents here gave the opinion that a bilingual Irish/English logo and branding should become the de facto branding of the Council.

2.3 Community, Education and Business

Those filling in the survey were asked to what extent the agreed or disagreed with the proposed actions under the heading of Community, Education and Business in the action plan.

To what extent do you agree or disagree with the draft actions in section 3.0 Community, Education and Business?	Strongly Agee	Agree	Neither agree nor disagree	Agree	Strongly disagree	
English Survey	13	8	5	12	19	57
Irish survey	2	0	0	0	26	28
Total	15	8	5	12	45	85
Percentage	17.6	9.5	5.9	14.1	52.9	100

57% of respondents to this question either disagreed or strongly disagreed with these proposed actions, with 27.1% of respondents agreeing of strongly agreeing.

The issue of cost again featured heavily in the responses here, with some respondents feeling that this would incur additional costs to the Council. A number of respondents pointed out that some of these actions are or should be carried out by other public sector bodies, namely the Department for Education, Foras na Gaeilge and Comhairle na Gaelscolaíochta.

Some respondents felt that the proposed actions for the Irish language should also be rolled out for Ulster Scots.

The responses which specifically focused on the Irish language sections of the action plan contained a number of recommendations, namely:

- The development of an Gaeltacht Bursary Scheme for young people in the city;
- The use of already existing material on the origin of placenames in a booklet and for this to be distributed through City Hall and other Council facilities;
- A recurring section in Irish in City Matters which includes material aimed at learners of Irish.

While an initial examination of the statistics for this question might suggest that there was strong opposition to these proposed actions in this section of the action plan, an analysis of the written responses, especially those in relation to the Irish language suggest a need for the Council to do more here and for more specificity within the individual actions.

2.4 Staff awareness and training

The next question in the survey focused on the proposed actions in relation to Staff awareness and training.

	Strongly	Agree	Neither	Agree	Strongly	Total
To what extent do you agree or disagree with the draft actions in section 4.0 Staff Awareness and Training?	agree		agree nor disagree		disagree	
English Survey	14	12	8	8	14	56
Irish survey	2	0	0	0	26	28
Total	16	12	8	8	40	84
Percentage	19	14.4	9.5	9.5	47.6	100

It can be seen again that the majority of responses to this question were in disagreement with the suggested actions – 57.1%. 33.4% of respondents to this question agreed or strongly agreed with the proposed actions.

Respondents who left a written comment noted the potential cost of these actions and the impact that it could have on staff. Some respondents also indicated that staff should not only be facilitated to learn and to use Irish, but also to learn and use Ulster Scots and to be trained in how to communicate with Deaf and Disabled people.

In relation to the learning and use of Irish by staff, a recurring theme across the commentary was that staff who chose to learn or improve their Irish should be allowed to do so during the workday and that this should not place them at a disadvantage.

2.5 Engagement

The last question which related specifically to the actions in the Draft Language Strategy Action Plan asked respondents for their opinions on the suggested actions under the heading Engagement.

To what extent do you agree or disagree with the draft actions in section Engagement?	Strongl y agree	Agree	Neither agree nor disagre e	Agree	Strongly disagre e	Tota I
English Survey	14	14	6	7	15	56
Irish survey	2	0	0	0	25	27
Total	16	14	6	7	40	83
Percentage	19.3	16.9	7.1	8.4	48.3	100

A majority of respondents – 56.7% disagreed or disagreed strongly with the proposed actions here, with 36.2% being in agreement.

Similar themes were apparent in the written commentary that appeared in the above questions focusing on cost. One comment suggested that the Language Strategy should help newcomer communities learn English in an effort to help them assimilate into society here.

The overwhelming commentary in relation to the Irish language was that any communication with the Irish language youth sector or with the Irish-medium education sector should be conducted through the medium of Irish and during school hours.

2.6 Other Comments

Respondents were then given the opportunity to make any other comments they might have in relation to the Draft Language Strategy Action Plan. Many of the same comments and themes that were made in relation to the action-specific questions above were reinforced in this section.

These included the perceived cost and resource implications of the action plan, the need for actions being suggested for Irish to be replicated for Ulster Scots, and also comments opposing the promotion of Irish and Ulster Scots. Respondents also noted the need to support Deaf people and those with disabilities. One comment again stressed the need for newcomer communities to be offered English lessons.

The pro-forma responses in relation to the Irish language focused on two main issues. The first was the disappointment that it has taken so long to develop the Draft Language Strategy Action Plan and to put this out for public consultation. The second was to note that the Section S75 Equality Screening exercise into the action plan had screened the Draft Action Plan out which was welcomed by respondents who suggested that this should be the approach to language issues in the future.

3. Key themes across the whole consultation

A number of core themes were present across all responses to the various questions. These were: cost: disparity between Irish and Ulster Scots in the proposed actions; the potential impact on good relations; services for Deaf and disabled communities, and the need for the promotion of Irish.

3.1 Cost

Repeatedly across all questions respondents commented on the potential cost of implementing the actions in the Draft Action Plan. Respondents also pointed to the increased financial pressure on the Council and the current cost of living crisis and questioned the sagacity of spending money on these issues at this time.

3.2 Disparity between Irish and Ulster Scots

A number of respondents voiced the opinion that any services or proposed actions that aim to promote Irish should also be rolled out for Ulster Scots. One respondent felt that this would promote "parity of esteem", and that any work around bilingual Irish/English branding should be replicated to create an equivalent Ulster Scots branding, or for the logo to include English, Irish and Ulster Scots.

3.3 Impact on Good Relations

There was a range of comments across the various questions, often not relating to the substance of the question itself, suggesting that the Draft Language strategy Action Plan, particularly the actions aimed at the promotion of Irish and Ulster Scots, could damage good relations and was being driven by a "political agenda". Comments referred to these proposals as "political point scoring", with one respondent stating that the idea of the use of Irish in branding was little different from the erection of flags and painting of kerbstones.

Any assertions of this nature should, however, be caveated heavily. In its response to the Education Authority's draft Interim Policies for the Irish and Ulster Scots Languages, The Equality Commission for Northern Ireland described the use of Irish and Ulster Scots for official purposes as a "neutral act" which would not be discriminatory.

3.4 Services for Deaf and Disabled Communities

One repeated theme across the answers here was that the Council should focus their energies and the resources from the Language Strategy on providing services for the Deaf community and people with disabilities. These comments often drew contrasts between the proposals to promote Irish and Ulster Scots and the perceived lack of focus in the action plan on services for Deaf and disabled people. A number of comments also suggested that Belfast City Council staff would benefit from training in relation to British Sign Language and Irish Sign Language, along with awareness raising on communicating with people with disabilities and Autism Spectrum Disorder.

3.5 Promotion of Irish

One of the most prominent themes across the questions related to the promotion of the Irish language. Comments in relation to the promotion of the Irish language were made both in individual responses but also in what could be described as a pro-forma response from the Irish language community. While the general tone of these comments was that the promotion of Irish is a positive thing, the proforma answers from the Irish language community strongly voiced the opinion that the Council is not doing enough to promote the language.

The key suggestions from this response were:

- The development of bilingual branding for the Council
- The development of a corporate Irish Language Policy
- The provision of the most commonly-used forms and webpages in Irish
- A Gaeltacht Bursary scheme
- The development of a booklet focusing on placenames, basic Irish and the benefits of bilingualism
- Allowing staff to use and improve their Irish during work hours
- An Irish language page in City Matters
- An awareness raising campaign to highlight the services offered by the Council in Irish

A separate written submission was sent to the Council by a number of Irish language groups in the city, echoing the comments above and making a range of specific recommendations. This will be discussed in further detail below. It is evident from this submission that there is a strong feeling within the Irish language community that the Council is not going far enough in terms of promoting Irish.

4. Written submissions

Over the course of the consultation period the Council received a written response to the survey from the British Deaf Association, the DUP party group within Belfast City Council and from a range of groups in the Irish language community.

4.1 Submission from the British Deaf Association

The submission from the British Deaf Association made specific reference and recommendations in relation to points throughout the Draft Action Plan.

In relation to point 1.1, the provision of translation and interpretation services across the Council, the BDA stated that the Council should work to provide a Video Relay Service for Deaf customers at Council facilities. It was also noted that the needs of Irish Sign Language users (as opposed to British Sign Language users) should be considered here, and queried whether a UK based company would be able to provide ISL service.

The BDA state that where possible, any Sign Language translation/interpreting is carried out by Deaf translators and that these translators are paid on an equal basis to their hearing counterparts.

A number of the recommendations in the submission focused on Council staff and how staff should be empowered to assist with Deaf customers through awareness raising and the establishment of an informal group for Deaf and signing staff or staff who wish to learn Sign Language. Further to this, the BDA suggest that the Council actively consider hiring Deaf and Disabled people into roles where there will be contact with Deaf and Disabled members of the public. the BDA did comment, however, that being Deaf or a Sign Language user in a non-

Signing environment can be particularly challenging, and that any Deaf employees, especially younger Deaf employees should be supported effectively.

The BDA have also suggested that the Council look at holding a festival or large event every year specific to the Deaf community and Sign Language users. Further recommendations include appointed a BSL/ISL poet laureate and developing BSL/ISL creative events and activities that are led by Deaf people and BSL/ISL users.

This submission noted the importance of engagement between the Council and the Deaf and Sign Language community and felt that setting up a BSL/ISL community forum to allow for the Deaf community to actively engage with the Council. The importance of having a younger Sign Language user on this forum was also stressed in this response.

The submission can be read in full at Appendix 1.

4.2 Democratic Unionist Party submission

The Democratic Unionist Party made a written submission to the consultation outlining their opinions and concerns on the proposals therein. One of the key themes in this submission is cost, with the party stating that it felt that the Draft Action Plan is quite ambitious and does not serve the interests of the rate payer.

The DUP stated their opinion that there should be a greater focus on Disability Communications and Sign Language and that the Draft Language Strategy Action Plan presents the Council with an opportunity to take the lead on these issues in Belfast. The DUP make specific reference to the provision of services in Makaton as well as Sign Language and communication boards and visual supports at Council facilities for non-verbal and neurodivergent children and adults.

The submission also suggests training for staff in Sign Language, Makaton and how to communicate with neurodivergent members of the public and those who find communication challenging. The DUP felt that the Council should continue to provide as many job opportunities as possible for members of the public who are in the supported employment sector as possible.

There was a particular emphasis in the DUP submission on the provision of English classes for newcomer communities. The DUP noted that this was needed for Home Office applications for residency here.

One of the points that came across most strongly in the DUP submission was their opinion that the Council has already committed significant time and resources to the promotion of the Irish language through signage and the Dual Language Street Signage policy. The DUP used the submission as an opportunity to highlight their ongoing opposition to the 15% threshold for the erection of a dual language street sign.

The submission makes particular reference to a number of the proposed actions in relation to the promotion of the Irish language and stakes that these are not within the Council's bailiwick. There is specific reference to the proposals to deliver a one-off course on teaching methods to community based Irish language teachers and the deliver of upskilling academies to Irish-language classroom assistants. The DUP feel that these would fall within the remit of an Irish Language Commissioner once appointed. They further state that the proposal to produce a booklet of Irish language phrases and facts about the benefits of bilingualism would come under the remit of the Office of Identity and Cultural expression once established.

The submission can be read in full at Appendix 2.

4.3 Submission by the Irish Language Community

A range of Irish language groups submitted written feedback to the consultation. This feedback was uniform across the groups, with the organisations attaching their own branding to the submission. Submissions were received from:

- Cultúrlann McAdam Ó Fiaich;
- Seachtain na Gaeilge;
- Fís an Phobail;
- · Conradh na Gaeilge; and,
- Cumann Cultúrtha Mhic Reachtain

An example of one of these submissions has been included in Appendix 3.

The preamble to these submissions outlined the disappointment within the Irish language community around how the Council has approached Irish language issues. It is noted that despite the Strategy being launched in 2018, and there being significant community and legislative developments since then, the first update of this is coming more than five years later. Reference is also made to what is described as "vague" or "general" commitments in relation to the promotion of the Irish language. The submissions also highlight the opinion within these groups that the Strategy points towards possible scenarios where the use or display of Irish would be "inappropriate" and that this calls the Council's commitment to the promotion of the language into question.

The submissions then outline the commitments towards the promotion of Irish in the Language Strategy and list occasions where this was not done. This includes the erection of English-only signage at Council facilities, the lack of Irish in the Council's City Matters magazine and the lack of reference to the Irish language and its history in the visitors' exhibition in Belfast City Hall. The submissions note that some positive steps have been taken, however, in relation to the language. These include: the appointment of the Irish Language Officer; the revision of the Dual Language Street Signage policy; setting up the Irish language community stakeholder forum; and, the commitment to bringing in an Irish language policy.

The submissions then make a number of specific recommendations in relation to the actions in the Draft Language Strategy Action Plan. Some of the specific recommendations are discussed below. These have been laid out below according to the section of the Action Plan they were in.

Access to Council services

Active Offer - The submission highlighted the concept of active offer, that is that members of the public will be informed that they can use Irish when dealing with the Council at their earliest interaction with the Council. The submission suggested that the webpage informing residents what services can be accessed through the medium of Irish be completely bilingual.

Standing Orders - The Irish language sector also suggested that the Council's standing orders be changed to allow for elected members to speak for longer in Council or committee if they are using both Irish and English.

Media output - Reference was made to the use of Irish in the Council's social media output and in press releases. The opinion of the respondents here was that this should not solely relate to Irish language issues but to the full scope of Council work and output. It was also suggested that an Irish speaking spokesperson be made available to the media where possible. The possibility of an awareness raising campaign to highlight the Council's Irish language services was also raised.

2. Signage and Branding

The significant ask in this section was that bilingual Irish/English branding should become the de facto branding for the Council. It was noted that any group or third party delivering services on behalf of the Council should also use the bilingual logo.

3. Community, Education and Business

One of the main recommendations here was that the Irish language be made a central facet of the Belfast Stories Programme and that the content of the programme is presented bilingually. It was also suggested that there is regular contact between the Belfast Stories programme team and the Irish language community.

It was suggested in the submission that the teaching methods course be a recurring yearly event and that any workshops aimed at schools delivered in Irish be held throughout the year and the summer. It was also suggested that the Council host a range of events and workshops aimed at combatting negative attitudes to the Irish language. Respondents also suggested that the Council examine the possibility of developing a Gaeltacht Bursary Scheme allowing for young people in the Belfast City Council area to attend summer courses in the Gaeltacht.

4. Staff Awareness and Training

The submission here suggested that the staff be allowed to attend weekly Irish classes during work hours, and that any informal discussion group meet once a week a be resourced adequately. The issue of staff training in relation to these issues was also raised, and the submission noted that staff should receive mandatory training on the European Charter for Regional and Minority Language and the relevant local legislation in relation to the Irish language.

5. Engagement

The response suggested here that any engagement with the Irish medium youth sector be conducted through Irish.

The above is not exhaustive and the full list of suggestions can be seen in Appendix 3 where a copy of the submission has been reproduced in English.

The submissions also highlighted what were felt to be a number of significant gaps in the information in the Draft Language Strategy Action Plan. These included a lack of contextual information about the Irish language in Belfast and clear time scales for the implementation of the proposed actions. The submissions also suggested that the Council undertake work to prepare for the implementation of the Language and Identity Bill through the development of Language Standards in conjunction with the Irish Language Stakeholder Forum. It was also suggested that the Council give regular reports and updates on the implementation of the Language Strategy and that a "language screening" process is developed allowing for the consideration of the impact or potential impacts on the Irish language and Irish language community.

The respondents here were also keen to see the further development of the Council's commitment to Seachtain an Gaeilge/Irish language week through the development of a specific funding stream for Seachtain na Gaeilge and that the Council increases the number of events it increases. The submission also suggests that the Council do more to highlight its Dual Language Street Signage policy and highlight the culture of townland names in Belfast, as well as outlining what steps it will take to deal with damage to these signs.

It should be noted, at this juncture, that at the time of consultation and writing this report (March 2023), work is ongoing on developing a corporate Irish Language Policy for Belfast City Council. A range of the suggestions made in the submission from the Irish language community would be resolved through this policy, if enacted. This Action Plan and the Irish Language Policy would be subject to review and change in light of any direction from central government under the Language and Identity Act.

5. Amendments to the Language Strategy Action Plan based on consultation feedback

Based on feedback from both the online consultation and written responses, Council officers have made some amendments to the draft Language Strategy Action Plan. These include the clarification of the wording of some points and other minor amendments such as actions relating to specific languages being changed to cover all languages.

A number of actions have been removed and new actions included. These can be seen in the Draft Action Plan itself but are summarised below. The following new actions have been added and amendments have been made to existing actions:

- The promotion of ESOL courses provided at Belfast Metropolitan College.
- Exploring provision of Makaton training for Council staff.
- The development of a recurring page in Irish in City Matters.
- The action committing to exploring linguistic diversity in business has been amended to include tourism.
- The action committing to the audit of staff capability in a language other than English
 has been amended to reflect that this audit will ask their willingness to provide
 services in these languages.
- The action committing to including young people on the Council's Language Fora has been amended to include a commitment to liaise with the Irish language youth sector through Irish.

The action committing to exploring bringing Oireachtas na Gaeilge to Belfast has been removed, as this is already agreed, and work is ongoing on this. The actions below have been removed as it is felt that officers will not have the capacity to deliver on these within the lifespan of this Action Plan:

- Delivery of a one-off course on teaching methods for those teaching Irish in the community.
- Exploration of tourism and cultural initiatives through Irish, including in the Gaeltacht Quarter.
- Creative writing competition for students in Irish-medium schools and those learning Irish.

A range of other recommendations were made in the submission from the Irish language community which have not been included in the Draft Action Plan. Some of these may not be deliverable within the lifespan of this Action Plan, while other will be dealt with under the Council's Irish Language Policy, which is currently being developed.

Members will also note that indicative dates have been included next to each action. Members are asked to approve or reject these additions to the Draft Language Strategy Action Plan.

6. Conclusions

The consultation into the Draft Language Strategy Action Plan has shown a spectrum of opinions within the public and language community and voluntary sectors. Whilst the majority of respondents are not entirely satisfied with the action plan as currently drafted, the comments received demonstrate that they welcome the Action Plan and the opportunity to communicate a range of proposed improvements and amendments across the various themes and specific actions.

While there have been a range of comments about the potential cost of rolling out the actions in the Language Strategy Action Plan and the perception that these are politically motivated, this has to be weighted against the commentary in support of various aspects of the Strategy and the Draft Action Plan.

These comments showed support for services for Deaf and Disabled people, services to support ethnic minority communities and the Irish language and Ulster Scots.

One of the most prominent themes, in fact, was the perception amongst the Irish language community that the Council was not doing enough and could do more. This was also matched by some, although admittedly fewer, comments that more the Council needed to make similar efforts in relation to the Ulster Scots as it is making in relation to Irish.

Appendix 1 British Deaf Association Submission

BDA Response to Belfast Language Strategy Consultation

Deadline Jan 22 2024

Consultation: <a href="https://yoursay.belfastcity.gov.uk/language-action-plan-draft/surveys/language-action-plan-draft/s

Each section in the consultation has a link to the relevant section in the draft Language Plan.

Access to Council Services

Q1 STRONGLY AGREE

Q2 Action 1.1 – Please contract with a VRS (Video Relay Service) provider to provide oncall BSL/ISL translation to enable Deaf signers to more easily contact and engage with Belfast council services. Several UK councils and local services (eg GP services etc) already use similar services for BSL. For ISL, VRS may not be available in the UK, but an Ireland provider may be able to cover this.

(BSL= British Sign Language, ISL = Irish Sign Language)

Actions 1.4, 1.7, 1.13, and 1.19 – please have a policy that BSL / ISL translations are carried out by Deaf translators whenever possible, and please make sure they are paid on an equal basis to hearing BSL translators for the same work.

Regarding action 1.7, please look at having a specific 'Festival of ISL and BSL' to showcase and highlight ISL and BSL.

Branding

Q3 STRONGLY AGREE

Q4 Action 2.5 on installing 'welcome screens' featuring BSL and ISL is a wonderful proposal. Please consider giving staff a short simple process for providing support when a Deaf signer approaches staff with a query.

Community, Education and Business

Q5 STRONGLY AGREE

Q6 Please consider taking similar actions to promote ISL / BSL eg appointing an ISL Poet Laureate and a BSL Poet Laureate, and promoting BSL / ISL – led creative activities led by Deaf people, eg visual storytelling or cultural events or Deaf-led arts and museum tours.

Staff Awareness and Training

Q7 STRONGLY AGREE

Q8 Regarding 4.4, establishing an informal Irish Language staff group, please consider doing the same for BSL / ISL – establishing an informal staff group for signing staff, and for staff who wish to practice their signing.

Regarding 4.5, please consult with Deaf staff and NI Deaf-led organisations on what barriers exist for Deaf signers who wish to work for Belfast Council and look at what can be done to remove these barriers.

Please consider specifically focusing on hiring Deaf and Disabled people into all areas associated with Belfast Council's services for Deaf and Disabled people.

Engagement

Q9 STRONGLY AGREE

Q10 Regarding actions 5.1 and 5.2, please consider doing similar for BSL/ISL, i.e. establishing a BSL/ISL stakeholder forum, and also including a young signer in the Council's external Language Strategy Engagement Fora.

Note that being the only signer in a non-signing environment is intimidating, especially when young. Please consider having two young signers to work together / provide mutual support, and please consider bringing in mentoring from an older Deaf signing professional to support the young signers.

Equality Screening and Rural Needs

Q11 Please consult with a NI Deaf-led organisation to check that the draft Section 75 Equality Screening / rural needs assessment has taken into account the equity needs of Belfast's BSL / ISL communities.

Other comments

Q12 The British Deaf Association's Northern Ireland team is happy to work with Belfast City Council on any matters relating to ISL and BSL.

ENDS

Appendix 2 Democratic Unionist Party submission

The Democratic Unionist Party group in Belfast City Council have read the draft Language strategy and wish to make the following remarks:

- 1. We have concerns that the Draft Action Plan is quite ambitious and without confirmation of a budget to deliver, we feel that the priority list **does not** best serve the overarching public interest or the ratepayer.
- Comments made from Council Officers during the Language Strategy Working Group meeting on the 1st September 2023, indicated that the Irish Language groups were putting significant pressure on Council for delivery of their agenda.

We note that the **Disability Working Group** was established to engage with groups who have additional needs and to ensure that Council plays its role in providing the best possible service for everybody, regardless of disability. Since it's conception in autumn 2022, the group has met on *less than 3 occasions*. We believe that greater attention priority should be given by Council to ensure:

- i. The times of these meetings are co-ordinated to suit members of the group to ensure that quorum is met;
- ii. Consideration is given to the provision of monthly meetings to meet with a variety of stakeholders with additional needs and broaden understanding of addressing the needs of those who use sign language and disability communications; and
- iii. Recommendations to improving these two strands of the Language Strategy should be made at pace to the Strategic Resource & Policy Communication for approval.
- 3. We feel that significant attention and council resources have already been provided to the provision of Irish Language, particularly with the Irish language sign monthly consultations, translation, creation, and installation of street signs, mostly in the Gaeltacht Quarter We continue to disagree with the 15% bilingual sign policy and note that the positive response rate to the provision of Irish language signs remains low.
- 4. Our focus will always be on providing the ratepayer with the best service possible, with the lowest possible rates. As a priority, basic council services such as the provision of smaller waste collection vehicles, street cleansing, upgrading our playparks and leisure facilities.
- 5. We believe that Council should give a wider consideration to implementing Disability Communications at pace. We acknowledge that there are a large number of

residents with Belfast City Council area who are neurodivergent or have communication difficulties.

In response to each of the subsections provided in the consultation, we note:

Access to Council Services:

Belfast has a real opportunity to take the lead on the *Language and Communications* needs for disabled people.

Makaton / Communication Boards

- 6. While welcoming the expansion of Sign Language Translation on popular pages, the increasing use of Makaton should be acknowledged and included within this draft policy. Sign Language is primarily used for those hard of hearing or with no hearing. Makaton is used for those with additional communication needs. The organisation Sign Simply have been engaging with Newry, Mourne and Down Council to train staff in Makaton.
- 7. Cllr. Sarah Bunting was successful in her proposal for the creation and placement of communication boards at Tommy Patton Park, located off the Holywood Road. This playpark is accessed regularly by the pupils of Mitchell House Special School. Significant work has been undertaken between Council and the Speech & Language therapists at the school, to ensure that the content of the boards is appropriate and useful. The understanding is that once these boards have been placed at Tommy Patton Park, additional boards can be replicated in other playparks across the city.
- 8. We welcome the proposal to expand the provision of 1.19 Sign Language translation on popular pages on the website and 1.20 To ensure all operating partners such as GLL provide appropriate language interpretation and translation services.
 - Under 1.4 To develop guidance to support departments in the accessibility to Council documents, services and facilities for a disability perspective, we believe that council could further expand on **visual supports** to enhance communication for those who are non-verbal. During People & Communities meeting in December 2023, Cllr. Ruth Brooks proposed that the Council website would be updated, mapping out playparks and the equipment that would be most appropriate to children with additional needs.

We believe this strategy could go further to expand on Cllr. Brooks successful proposal, providing short video clips of each council building and facility. This would allow those who are non-verbal or have neurodivergent conditions to **build confidence** and become familiar with council facilities ahead of visiting.

Within council buildings and facilities, a short video should be created that allow conversations with parents have highlighted that children who are non-verbal or have

additional neurological needs would benefit from short videos of facilities, to allow familiarity and prevent overwhelming anxiety, encouraging use of Council facilities.

Branding

9. We welcome the proposals under 2.5 and 2.6 and refer to the above points in relation to the expansion of signage that would reach a far-wide audience.

Community, Education and Business

- 10. In this section, we have concerns that 3.4 One-off external course, developed in consultation with stakeholders, delivered to community-based Irish language teachers on teaching methods, and 3.5 Delivery of Employment / Upskilling Academies for Irish-medium classroom assistances and others working in the Irish medium education sector are over-stepping the mark of what would be expected at local government level. Under the provisions of New Decade, New Approach, this would be the role of the Irish Language Commissioner. These items should not be considered or provided using Council resources.
- 11. Similarly, 3.8 Production of an Irish language booklet of basic Irish phrases, sayings and facts about the benefits of bilingualism would fall under the Office of Identity and Cultural Expression, not Belfast City Council.
- 12. With limited resources and no definitive budget for the implementation of the Language Strategy, we feel that these elements should be removed.

Staff Awareness and Training

- 13. In addition to the provision of Sign Language courses, we believe that Belfast City Council should include Makaton courses. We believe that this would be of much benefit to staff who have front-line engagement with the public and in addition, provide accessible means of communication with members of the public who have neurodivergent conditions or communication challenges.
- 14. Under 4.5, we believe that Belfast City Council should continue to provide as many job opportunities as possible within the Supported Employment sector.

Key Area of Work: Engagement

15. We believe that there could be better engagement with those who **do not have**English as their first language. We understand that many of the English classes are fully subscribed by those who need a certified standard of English in order to obtain further leave to remain for Home Office applications.

We want to ensure that everyone arriving into the Belfast City Council area has the opportunity to access English classes, so that can develop confidence in their ability to communicate within their communities.

Appendix 3 Submission from Irish Language Groups

Draft Language Strategy Action Plan 2023-2026 Belfast City Council

This submission is sent as part of Belfast City Council's consultation on the draft action plan which is currently out for consultation. Belfast City Council is invited to accept this document in its entirety as an official submission.

West Belfast Irish Language Network

For the first time ever, areas outside the Gaeltacht were granted official status as areas of particular linguistic importance. In 2018, Foras na Gaeilge granted special status to 'Irish Language Network Areas' and West Belfast was one of the five areas selected throughout Ireland. Funding was provided to develop a language plan for the area in 2018 and since then that plan has been approved by Foras na Gaeilge and given official status by the Irish Government. In September 2022, a language planning co-ordinator was appointed to oversee the implementation of that plan over the next 7 years.

The overall aim of the West Belfast Language Network (Fís an Phobail) is to support the development of a critical mass of speakers to foster and strengthen a sustainable language community over the years. The official recognition of this network provides a national status for our work and the additional resources associated with the project provide the space to implement an ambitious plan that identifies and assesses existing provision and develops an action plan to strengthen and expand them in the years ahead.

In an area of not more than 3 square miles, we have;

- 5 Irish-medium primary schools;
- 6 Irish-medium pre-school providers;
- the largest Irish-medium post-primary school anywhere in Ireland;
- 3 youth clubs and the regional Irish-medium youth body (Fóram na nÓg);
- 2 Irish-medium community organisations with support from Foras na Gaeilge's Language Scheme in the Community (Glór na Móna and Ionad Uibh Eachach);
- 2 childcare providers (Iveagh Centre and Grandma's House);
- an Irish-medium Cultural and Arts Centre (Culturlann McAdam Ó Fiach);
- a full-time community radio station (Ráidió Fáilte);
- a professional theatre company (Aisling Ghéar);

- an Irish Language GAA club (Laochra Loch Lao CLG);
- community learning and social hub (Cumann Chluain Árd);
- a training and careers' organisation (Gaelchúrsaí);
- a Business Agency that is driving the development of an Ceathrún Gaeltachta / Gaeltacht Quarter(Forbairt Feirste) located in the newly built Áras na bhFál along with other IM companies such as Iontaobhas na Gaelscolaíochta, Comhairle na Gaelscolaíochta and the national advocacy body, Conradh na Gaeilge;
- St Mary's University College, the only provider of third level teacher training for Irish-medium schools located in the area as well as a host of sports, heritage and community projects which will see West Belfast uniquely located to develop bilingual communities in the years ahead.

Introduction:

Belfast City Council has had a language strategy since 2018 with the aim, among others, of ensuring that linguistic diversity is respected by all and that those living, working or visiting Belfast have the opportunity to see the city in a holistic manner and to do so in their language of choice. However, it is not surprising that the Irish language community in the Council area has not always been, and is not always satisfied with the Council's use of the language; notwithstanding the general commitments to the Irish language contained in this language strategy, it is clear that they are not serving the Irish language community in Belfast appropriately. This language strategy was implemented in 2018 and has not been updated since then, despite significant community, statutory and political developments. In addition, it took the Council 6 years to publish a comprehensive action plan for this strategy, which casts doubt on the impact, power, and effectiveness of the strategy itself.

The commitments to Irish in the language strategy are very general and there is an inappropriately negative wording which contends that there are particular circumstances when the use of Irish would be inappropriate. As well as this, the Irish language community often feel that the Council is not operating in accordance with the language strategy and that the burden is on them to advance the case for Irish as the commitments in the language strategy are neither clear nor robust enough.

Commitment to Irish in the language strategy	Example(s) where the commitment has not been met
 Increase the visibility and use of the Irish language, as appropriate, through Council services, facilities and events; 	Monolingual, English language signage was erected on the community facility of the City Cemetery which is located in the heart of the Gaeltacht Quarter.
	2. In October 2023, the Belfast Bikes stall outside Coláiste Feirste was added

	with signage and facilities in English only.
	 Temporary signage through Falls Park was updated on the development of a new greenway but again, it was in English only.
	 In the Journal published quarterly by the Council, there are no regular Irish language columns. The Council promised that they would be happy to look at this, but it is still in English only.
To publicise that the Council will facilitate services, as appropriate, in the Irish language;	1. There is currently no service available in Irish from the Council outside of core Irish language services - the Council had a telephone line between 2006-2017 which was never made public, to deal with Irish language queries from the public. When the media inquired about the number of users, there was not a single user, not because of a lack of demand, but because people did not know the existence of the service. In addition, the service was secondary compared to the service in English. Any service in Irish must be on an equal footing with the equivalent in English and the 'active offer' must be used to indicate its availability.
	 The Council has wide ranging funding streams and is affected by many groups operating through Irish or providing services through Irish. However, all information is available in English only on the site and there is no publicity in Irish regarding these streams.
Encourage tourism and cultural initiatives through the medium of Irish;	 There was not a single reference to Irish, bilingual signage nor any representation from the Irish language community on a steering group, consultation documents or in the design of 'Belfast Stories'.
	In the majority of tourist attractions, parks and facilities under the responsibility of Belfast City Council, there is no bilingual signage to be specified.

• To normalise the use and visibility of the Irish language in general.

- 1. It is recommended that there is a derogation on bilingual signage in order to make it acceptable in shared, public spaces (for example, the Olympia Leisure Centre).
- 2. It took Belfast City Council 2 months to tweet about the 130th anniversary of Conradh na Gaeilge as there was no clear direction in any council policy. (For information, when this was sent out there were among the most successful postings ever by the council.)
- 3. The story or history of the Irish language is not evident in City Hall, which is one of the biggest tourist attractions in the city. There are multiple sculptures, pieces of art and more aimed at the city's personnel and history but no particular piece is devoted to the question or history of the Irish language.

It is as a result of this that the Irish language community has been lobbying the Council continuously and effectively for a number of years to adopt a comprehensive Irish language policy, which is based on best practice, and which will set out clearly and comprehensively how exactly the Council should treat the Irish language concerning visibility, services through Irish and others. We are delighted that the Council has now given a commitment that they are to adopt a comprehensive policy on the Irish language in the coming months and we look forward to having a central input from the Irish language community in that process.

We are hopeful that this will provide a particular boost to the Council's proactive approach to the Irish language after many years of dragging its feet. A good basis has been established for the significant, measurable and powerful developments Belfast City Council has made regarding the status, protection and development of the Irish language in recent years. Among the most significant developments:

- An Irish Language Officer was appointed for the first time in the Council's history in 2018;
- The Language Strategy, with specific items regarding the Irish Language 2018;
- Development and implementation of a street name precedent policy in 2022;
- The establishment of Fóram na Gaeilge and the appointment of representatives from the Irish language community to the panel in 2023;
- A commitment received from the council to develop an Irish language policy in 2023.

But those are not enough. The aforementioned problems and weaknesses and much more, besides the fact that there are still clear gaps in the protection and development of the Irish language by Belfast Council. Council officials have recognised that they are limited in what they can do in relation to the Irish language due to lack of policy. An Irish language policy is a priority, but in the vacuum of that policy, the action plan for this

language strategy will serve as a clear plan for the measures that the Council should take for the Irish language between now and 2026. To this end, it is necessary that all measures are clear, that they will stand the test of time and that they will cater appropriately for the Irish language community. We therefore call on the Council to accept all of the recommendations we have made below to strengthen the Draft Action Plan and to adapt it to the growing priorities and expectations of the Belfast Irish language community.

Key

Proposed Amendments: Text in red - Suggested wording to strengthen the proposed action Text with a line like this through - Suggestion that the word/sentence be removed

1.0 Access to Council Services

	Language	Action	Additional commentary
1.1	All Languages	Provision and promotion of translation and interpretation services across the Council. These services will be promoted through an active tender approach; at the earliest point of contact with the Council, the person will be informed that correspondence and communication with the Council is welcome, together with the option of interpretation, in the languages covered by this strategy. This is reinforced by a comprehensive, publicity campaign. The service in Irish must be on the same level and speed as its counterpart in English. No one should be disadvantaged because of their choice of language.	It should be remembered that Irish speakers are bilingual. That is, when not providing services in Irish, they can deal with English speakers.

1.5	Irish	Creation and promotion of a gaeilge@belfastcity.gov.uk email address and website page explaining how the public can contact us in Irish. This page on the website will be completely bilingual, with Irish as a priority as is clearly stated in the best practice. This new service and page will be publicised bilingually as appropriate across the Council's various platforms. This page should be accessible from the site's Home page. There will be no additional delay for residents who contact this email address because they are corresponding through Irish. Practices will be put in place to ensure that requests can be attended to appropriately, even in the event that the Irish Language Officer is absent.	This should not be the only bilingual page on the BCC website. This is not the only Council service that Irish speakers avail of. To that end, it should be a target that, over the three year period of this action plan, all pages on the website should be made available bilingually. We recommend this is done through progressive realisation, that the Council identifies the 5 most popular pages on the website and that it is aimed, during the lifetime of this strategy, that these 5 pages are totally bilingual. This should be done gradually. For example, the page relating to the Council's funding programmes, it would be worthwhile making this available bilingually soon.
1.6, 1.22	Irish	To codify the arrangements regarding the use of Irish at plenary meetings and committees of the Council. The standing orders will be changed to remove the time limit from Councillors if they want to have input through Irish. Investigate the provision of simultaneous interpretation for Members who wish to address the Council through the medium of Irish. In cases where they wish, an interpreter will be made available to elected members or members of the public who want to give a speech or have an input in the meetings through the medium of Irish. The interpreter will simultaneously translate the speech of the member(s).	While we understand there are costs associated with this, there are ways of doing this in a cost effective manner. For example, this resource may only be initially available at full Council meetings. Members can be surveyed in advance as to whether they intend to use Irish, and if not, an interpreter will not be needed. Software such as "Telegram" can also be used on elected members' phones. The Council can create its own Telegram page for translation services only and for it to be kept private for elected members and others.
		In cases where members of the public are invited to make a speech	

		at a plenary meeting of the Council, they will be informed, at the earliest point of contact with the Council, that simultaneous translation is available if they wish to make a speech through Irish.	
1.7	All languages	Ensure Council-run events and festivals have regard to the promotion of different languages and encourage the delivery of relevant events in City Hall. Priority should have been given to Irish language events and that there will be at least one Irish language event at each festival or other organised by the council.	It is not sufficient that Council events have "regard" to the promotion of languages; it should be done proactively at every opportunity. The Irish language community pay rates in the city and they are entitled to have access to Irish language events from the Council. the latest census figures show that Belfast is one of the strongest cities in Ireland in terms of daily use of Irish.

1.8	Irish	Develop a list of key strategic Council documents and publications to proactively be made available in Irish. These documents will be available in hard copy and digital form. This relates to historical documents and new/updated Council documents. In the case of new documents, the English version is not published before the Irish version.	We recommend that this translation is not limited to strategic documents only, they are rarely read. The Council should, as a starting point, develop a list of the 10 most read documents/publications and that these should be translated.
		Where a request is made for an Irish version of a strategic document or publication that has not been translated, the Council will provide an Irish version. Effective, comprehensive publicity must be made indicating that these documents are available.	We recommend that once these are translated, based on the concept of progressive realisation, that the 10 next most popular/used documents are translated and that this is done gradually across the lifetime of this strategy.
1.9	Ethnic Minority Communities Irish	To provide information on the website (and City Matters) on how to use the translation function on the website, how to telephone the council using BigWord and requesting an interpreter or documents in an alternative language.	This information should also be available on the Council website and City Matters for the Irish language community as well.

1.10	Gaeilge	Develop a protocol for the provision of Irish press statements where the subject relates to Irish or is related to a key strategic Council initiative where resources/timing permit. A spokesperson (in Irish, if possible) will be provided in these circumstances. The Irish and English versions of the press release will be made available on the Council's website and the English version will not be published before/without the Irish version. A comprehensive list of contacts in the Irish media sector will be developed and regularly updated.	In Derry City and Strabane District Council, there is a clear commitment to at least 24 press releases a year in Irish. We suggest the Council makes a similar commitment.
1.11	Irish	Irish Language content will be provided across the Council's social media platforms. on a regular basis when the post relates to a service to the public. That should not be restricted to posts about the Irish language itself. when the subject relates to Irish and where resources/timing permit. This applies to multimedia content and graphics, as well as the text of the content itself. Any graphic or image used in conjunction with any post on social media must also be available through Irish.	This commitment should in no way depend on resources or time.; material, especially material relating to Irish, should be issues regularly from the Council's social media outlets. The Council has access to the Central Translation Hub. The digital services/communications teams should be centrally involved in this aspect of the strategy.

Additi onal item	Irish	The Council will undertake a comprehensive awareness raising campaign, with the aim of promoting the Irish language on social media and advertising on the Council's internal and external platforms and publications.	
1.14	All languages	Develop an approach to provide regular content in other languages in City Matters. This will be developed in line with agreed parameters at Annex 1. A regular, recurring page will be established in City Matters about the Irish language, with comprehensive information about events, trivial facts, useful phrases and the Council's street name policy, for example.	Irish language groups already register their events with City Matters; this magazine could become a platform for the excellent Irish language events that happen across the city.
1.16		To audit the staff of the Council with language ability, to assess, together with their willingness to use that language in service provision and to assess the demand to increase their linguistic skills as part of their professional development.	It is hugely important that this audit should be carried out in a positive manner and that it is emphasised that Irish is an additional skill. The audit will also be a good way of assessing how many staff members wish to learn or improve their Irish.
1.17		Develop a corporate policy for the Irish language based on international best practice in collaboration with the external forum with the Irish language community, including an approach to signage.	Any actions emanating from this policy should be measurable and the stakeholder forum should have the opportunity to provide regular feedback on this and get feedback from the Council on

		implementation.
		Any Irish language policy should be based on best practice and this is a reasonable demand from the community. As has been repeatedly raised at the Irish language stakeholder forum, this policy should be represent the needs and demands of the Irish language community, and to that end, it makes sense that the Irish language forum would have a central role in the policy being designed.
		As is recommended in the European Charter, this policy should be designed in conjunction with the Irish language community, it should not be designed on their behalf
1.21	Ensure that operating partners such as GLL, Better or Belfast Bikes provide appropriate interpretation and translation services. The council cannot avoid its duties towards the Irish language by delegating services to an external body.	We recommend that the ability to provide services in Irish is included in any contractual agreements and tender processes with outside groups, and that this is borne in mind during the assessment process.

2.0 Branding

	Language	Action	Additional Commentary
2.2	Irish	Preliminary work on a bilingual corporate logo for consideration, discussion and agreement by the elected representatives in the future.	As has been recognised by BCC before now, and as stated widely in the best practice, Irish should be ahead of English in any bilingual version of the logo.
		The council should use the bilingual corporate logo as a matter of habit, not only in a story or other related to the Irish language only.	Elected members should have the opportunity to have input in each step of this process and Council officers should not make any decisions on behalf of the
		If external bodies are providing services on behalf of the council, the same approach must be applied to branding.	elected members.

3.0 Community, Education and Business

	Language	Action	Additional Commentary
3.2	All Languages	Support the implementation of language-related actions in the Belfast Stories Programme.	The Irish language community have made comprehensive submissions and had worthwhile meetings with the Belfast
Additional item	Irish	Support the inclusion of Irish as a core subject in the stories and the embedding of Irish as a core part of the bilingual experience by facilitating continuous communication between the Scéalta Béal Feirste team and	Stories team about the role of the Irish language in the project. To this end, we recommend that in the absence of a policy, the draft Action Plan and Irish Language Stakeholder forum to discuss

		the forum with the Irish community.	the community's needs and demands in relation to content and experience.
3.3	Irish	Develop and provide a range of workshops or information sessions and events on issues related to the council for example on recycling, biodiversity etc aimed at Gaelscoileanna during the school year and during the summer.	The Council organises important sport and book schemes throughout the year in English only. We recommend that the Council organise similar events in Irish to meet the needs of Irish medium pupils.
3.4	Irish	An external course once a year, developed in consultation with interested parties, made available to community-based Irish teachers using teaching methods.	Based on the growth of night classes in recent years, we do not see that having a workshop this valuable once only is sufficient. To this end, we recommend that this course is provided once a year for anyone thinking of teaching at community level.
3.8	Irish	Issue an Irish booklet containing basic Irish phrases, expressions and facts about the benefits of bilingualism and use the graphics to regularly raise awareness of the Irish language on the Council's social media pages.	These basic phrases would be easily transferred into social media content, especially at particular times of the year, Seachtain na Gaeilge for example.
			There are examples from Councils in the Republic which can be followed.

Additional Item	Irish	The Council will regularly organise events and workshops in the community, with the aim of increasing tolerance, understanding and awareness of the Irish language.	
Additional Item	Irish	To promote and distribute a booklet on Irish placenames of the north (People & Place by Conradh na Gaeilge) at the City Hall. A permanent map of the Irish place names in Belfast will be created and made available at City Hall to raise awareness of the language and the original meaning of the city's place names.	Placenames are exceptionally important in relation to Irish being made available to everyone in the community. knowledge and understanding of our placenames promote and understanding and positive attitude towards the Irish language.
Additional Item	Irish	Investigate the possibility of a Gaeltacht bursary scheme to support the cost for people under 18 to attend Gaeltacht courses, for a decision by the elected representatives.	Schemes of this nature are long established in other Councils such as Mid-Ulster and Fermanagh and Omagh. We recommend that the grant covers at least 50% of the course fees and that some of the scholarships awarded will be subject to means testing. The funding for the scheme should be raised every year according to demand.
			It should be noted that there has been a significant increase on the fees for Gaeltacht courses over the last few years and this prohibits children from the most deprived areas from attending these important courses. The majority of Gaelscoileanna in Belfast are in these

			areas.
Additional Item	Irish	A careers day will be organised once a year in the City Hall or another convenient location in the city centre for secondary school students regarding the employment opportunities available to people in the Irish language sector.	Days of this nature are organised in Newry and Mid-Ulster. These could be organised through the Council's Stakeholder forum.
Additional Item	Irish	A quarterly Irish newsletter will be created and sent via email and social media about funding opportunities, events, news from local community groups, number of street sign applications and significant Council stories each month.	

4.0 Staff Awareness and Training

4.1	Additional Item	The Council will provide Irish language classes for the staff (who are interested) once a week. The level of the classes will be based on the results of the inspection of the language ability of the staff. The classes will be organised during working hours.	A group such as Gaelchultúr could provide the classes. Again, this should be offered as part of the professional development of staff members, and that classes should be organised during work hours.
			See 1.16 regarding a staff audit.

4.4	Irish	An informal discussion group will be organised for staff who speak Irish and for staff who wish to learn Irish and to encourage the use of Irish among the staff at least once a fortnight to support formal learning and appropriate facilities will be provided to support them.	
Additional Item	Irish	The Council will raise awareness among Council staff of their duties under the European Charter and the Identity and Language Bill through an essential training course.	

5.0 Engagement

5.2	All Languages	Inclusion of young people in the Council's external Language Strategy Engagement Fora It will be ensured that any sessions with young people from the Irish-speaking community are facilitated through the medium of Irish.	We recommend these sessions are held in school hours, or at times when youth groups are being held to ensure that opinions and feedback are collected from a wide audience. There is an Irishmedium youth work sector in the city and they can help organise these sessions.

Missing items from the draft action plan

Lack of context in the language strategy itself

There is a fundamental problem in the language strategy in that there is a large gap in the context of the strategy in relation to current provision in the Council area as a whole. The language strategy itself should set out key figures for:

- a) the number of speakers;
- b) the number of people in the Council area for whom Irish is the main language;
- c) the number of young people in the Council area receiving education through the medium of Irish;
- d) the number of young people studying Irish at GCSE/A Level;
- e) number of adult learners outside formal education;
- f) the number of people directly employed by the Irish language in the city.

These figures would be readily available from NISRA, Comhairle na Gaelscolaíochta and many other organisations. The latest figures from the 2021 census were also recently published. The strategy itself should act as a map, with a clear baseline and ambitious targets that clearly reflect what the public can expect from each action each year.

Lack of clear time targets stated with each action

We recognise that all actions within the draft plan are ranked against immediate and longer-term priorities. However, it is not clear what immediate and long-term means in this case; we recommend adding an additional item to each table under each work area with a completion date for the action mentioned. In this way, it would be easier to assess the success of the language strategy and the draft plan. An action plan or strategy that does not have clear, measurable time targets has no merit; it means that not all strategy and action are merely ambitious.

In addition to a completion date, for some (but not all) policies, there will be resource implications for their effective delivery. Where there are resource implications, this must also be specified, together with a completion date and these developments are included in the report of the language strategy. Often, however, filling a gap or otherwise will incur upfront costs. Over time, these initial costs will fall significantly in the construction of bilingual infrastructure.

Preparing for the implementation of the Identity and Language Bill (2022)

The Council will draft language standards, as set out under the Identity and Language Bill. These will be used as a benchmark for the Current Provision of the Council with regard to the Irish language. These standards will be drafted in conjunction with the Council's external forum with the Irish language community, as well as other relevant stakeholders to ensure that the language standards meet the needs of the community.

Reporting on the success of the language strategy

The draft action plan or the language strategy itself do not mention how the success of the language strategy will be reported upon or assessed; currently, reports from meetings of elected representatives on the language strategy are not published and the public has no mechanism to assess the success of the policies. To this end, we recommend that an annual report be published bilingually setting out each action and how the Council has been successful in complying with those actions. As part of this reporting process, we recommend that the Council's Irish language community forum be consulted to obtain their observations on the success of the Council in implementing the various policies of the action plan and the success of the new services arising from the action plan.

Language Screening

There are plenty of examples of Belfast City Council treating the Irish language as an afterthought, which is frustrating for the Irish-speaking community in the council area. To this end, the Council's new/updated policies, projects or practices will be screened to assess their impact on:

- (i) opportunities for the use and visibility of the Irish language;
- (ii) the performance of the council's duties under the European Charter for Regional or Minority Languages and the Identity and Language Act (2022) and;
- (iii) the Irish language community itself.

This would mean that the Irish language and the Irish language community are taken into account at the earliest stage and as a result, the Council can take the appropriate steps to ensure that these policies, projects or practices do not have a negative impact on the Irish language nor on the Irish language community. If this is possible, the policy should not be adopted as it is.

Irish Language Week

Seachtain na Gaeilge is the largest Irish language festival in the world; it takes place every year from 1st-17th March with almost one million people taking part. Community groups are at the heart of the festival and communities and groups come together to celebrate the Irish language for the festival. To this end, we propose to meet some of the major goals of the language strategy as a whole;

- That a dedicated funding scheme for Seachtain na Gaeilge is created each year which is marketed and regularly publicised, bilingually on social media, email and newsletters. Applications should be invited from any groups interested in organising an event that promotes the Irish language.
- The Council compiles and publishes a comprehensive programme of events online, on social media and in its newsletter covering all the events taking place from community providers across the Council;
- The Council develops the number of events they organise themselves as part of Seachtain na Gaeilge.
- Particular emphasis is placed on Irish language branding, posters on social media, Irish language exhibitions in City Hall, use of Irish at council meetings etc. during this festival.

Streetnames' Strategy

It is clear that the Council's street names policy has been in high demand since the new policy was adopted in July 2022, with applications coming in from across the city. To this end, it is clear to us that the Council has an opportunity to celebrate the Irish language and to promote the street names policy by raising awareness of the placenames of Belfast. Therefore, we recommend;

- The Council undertakes an awareness raising campaign on the placenames of Belfast on the various platforms (as does Fermanagh and Omagh Council with Townland Tuesdays);
- That the Council initiates an awareness raising campaign on the policy itself and details of the best ways to access the policy;
- The Council clearly sets out how they will address any situation where bilingual street signs will be destroyed.

Suggested responses to the consultation questionnaire

Access to Council Services

- 1. To what extent do you agree with the draft acts in Section 1.0 Access to Council Services?
 - I strongly disagree.

2. Do you have any other views?

• I support the proposal to develop a corporate policy for the Irish language as it has long been recognised as a priority for the Irish language community throughout the city. However, it seems to me that there is an opportunity to reiterate that recommendation in that this policy should be clearly based on best practice and that it would be designed in conjunction with the Irish language community itself, rather than coming to them when it is already ready. The Irish language community will be the ones who will be most affected by this section of the action plan and the European Charter believes that they should play a central role in the development of the policy.

- I strongly commend the audit of Council staff contained in the draft action plan, but it is not entirely clear what the Council will do with the
 findings; to this end, I recommend that the audit itself be among the staff, with formal questions of the willingness and ability of officers
 to provide a service where they have a high level of competence in a particular language, and their interest in building on this potential
 as part of their professional development. This type of audit was carried out by the Education Authority last year with great success with
 considerable willingness shown by staff.
- We are pleased that the Council is now looking at and working towards permanent translations of certain documents and an Irish language page on its website. However, the proposed documents for translation (strategic documents and publications) are not among the most used and the Irish language section is not the only section within the Council with which the Irish language community has contact. This action plan has a lifespan of 3 years and it should be possible within that time to identify and translate the most popular 5/10 documents/pages. Then the translation would be completely proportional according to usage. The Council could gradually increase the number of documents and pages translated through progressive identification. This applies to new/updated Council documents and the English version should not be published in advance of the Irish version in any case.
- It is important not only that these new Irish language services are available from the Council, but people need to be aware that they exist in order to be successful. I recommend that the Council initiate a comprehensive publicity campaign on its various platforms announcing the changes and that they use the active offer when requesting a council document/service. At the earliest point of contact with the Council, the person will be informed if the document or service they are seeking is available in Irish.
- It is to be commended that material will now be released in Irish on the Council's social media, but this should not be restricted to the text on postings only; multimedia and graphics content should be translated into Irish or created and should be done regularly. In addition, there should be no further delays for residents contacting the Council on the e-mail address gaeilge@belfastcity.gov.uk; a protocol must be put in place to ensure that this email is appropriately and appropriately served according to correspondence received.

Branding

- 3. To what extent do you agree with the draft actions in Part 2.0 Branding?
 - I strongly disagree.
- 4. Do you have any other views?
 - The preparatory work should be carried out on a bilingual corporate logo but at the end of the day this is a decision to be taken by the

elected councillors. To this end, I recommend that preparatory work be carried out, that a new bilingual logo is designed and that all of this is submitted to the councillors to decide. Council officials should not take any decisions before proposals reach the elected representatives.

- As previously recognised by Belfast City Council and as widely embedded in best practice in relation to minority languages, Irish should be above English in any version of the new bilingual logo. Mid Ulster District Council has set a good example.
- The new bilingual logo should be adopted as the de-facto logo of the Council. If someone wants the English version, they can contact the Council itself.

Community, Education and Business

5. To what extent do you agree with the draft actions in Section 3.0 Community, Education and Business?

I strongly disagree

6. Do you have any other views?

- I think there should be a clear section under the 'Education' section to establish a Gaeltacht bursary scheme within the Council. The Irish language is going from strength to strength in the city, especially among young people and the Council has a role to play in supporting extra-curricular learning. The cost of the Gaeltacht is rising year on year and scholarships are now in increasing demand, more than ever before. A bursary scheme would be of great help to families across the city. The scholarships should be awarded on a needs basis and the total pot fund raised each year, as the cost of the courses themselves increases.
- Over 95% of placenames in the north come directly from the Irish language and the Council has an opportunity to celebrate and promote the native trees through this section of the action plan. Conradh na Gaeilge has produced a comprehensive booklet entitled 'People & Place Our Shared Placenames' which would be perfect as a booklet to be issued at City Hall to raise awareness of the Irish language.
- It is good that the Council is considering organising events aimed at Gaelscoileanna on issues relevant to the Council itself, but these are likely to be organised during the school year. There are many schemes, events and workshops organised by the Council during the summer and I recommend that consideration be given to the provision of these in Irish to Irish-medium students. This would be particularly important and advantageous for students who do not speak Irish at home.

I recommend that the booklet of basic Irish phrases, idioms and facts about the benefits of bilingualism be widely distributed to visitors,
Council staff and residents. As part of this, I recommend that the Council establish a recurring page in city matters magazine with these
phrases and phrases, as well as information on the Council's street names policy to raise awareness of the language and relevant policies
of the Council. I recommend that these idioms, phrases and mascots are adapted as graphics for dissemination on the various social
media pages of the Council.

Staff Awareness and Training

- 7. To what extent do you agree with the draft actions in Section 4.0 Staff Awareness and Training?
 - I strongly disagree.
 - I recommend that the discussion group of Council staff who can speak Irish, or who are interested in learning Irish, be organised during working hours, for example at lunchtime and that a session is organised at least once a week with graduate, accredited classes (by Gaelchultúr, for example) to enhance the officers' ability to provide a service through Irish. No member of staff should be at a time disadvantage because they would like to learn or practice Irish. This Council may offer as part of the professional development of staff.

Participation

- 8. To what extent do you agree with the draft actions in Part 5.0 Participation?
 - I strongly disagree.

9/10 Do you have any other opinion?

• It is vital that any engagement with the Irish language youth community is organised and facilitated through the medium of Irish. The Council could do this during pupils' school hours, in order to give them the best chance of attracting a wide audience, or by consulting with young people attending Irish language youth clubs.

11. Do you have any further comment on the draft Action Plan for the Language Strategy?

• We, as a community are deeply disappointed that it took the Council 5 years to publish a draft action plan for a strategy which came into effect in 2018. However, if the above recommendations are accepted, we will have a good basis in preparing for the introduction of the

Irish language policy, which has been our priority for a long time. This draft action plan will give us the opportunity to lay the foundations for a comprehensive Irish language policy based on best practice.

12. Do you have any views on the Draft Equality Screening and Rural Needs Impact Assessment?

• It is good to know that the draft action plan has been 'screened out' in equality screening, as the potential positive outcomes have been identified with all the policies mentioned therein. However, it raises questions about the findings of the Council's previous equality screening of Irish-language issues; would it be the same decision to 'screen out' this draft plan if it applied to Irish only, rather than the 5 languages covered by the language strategy? The terminology 'good relations' and 'adverse effect' are often misinterpreted when screening questions such as bilingual signage, but there has never been any basis or evidence to support the arguments put forward. To this end, we hope that this decision marks a new era in the Council where 'screening in' on all issues relating to the Irish language will end.