



Belfast City Council

Consultation Report on Draft Policy on Linguistic Diversity

Accessibility

The relevant documents are available, on request, in alternative formats - Braille, audio, large print, easy read. The council will also consider requests to produce it in other languages. If you require the documents in these or other formats please contact us:

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Introduction

This report is prepared in line with the commitments outlined in our Equality Scheme, to provide timely feedback to our consultees, on this occasion in relation to our Draft Policy on Linguistic Diversity. The report is structured under the following headings:

- A. Information on the policy consulted upon**
- B. Our approach**
- C. Consultees' comments**
- D. Emerging issues and preliminary recommendations**

A. Information on the policy consulted upon

Belfast aims to be a welcoming and inclusive city for all. To help achieve this aim and to meet other best practice guidance and legal requirements, we developed a draft Linguistic Diversity Policy.

Our draft Linguistic Diversity Policy outlined our approach to promoting different languages in the Belfast City Council area. It built on our 2006 Language Policy which needed to be revised to take account of the changing population and other developments.

The draft policy provided a background on the changing dynamics of the population of Belfast and also explained the legal framework, current central government strategies and details of previous engagement with stakeholders.

Based on this information, the draft policy recommended an approach which included:

- The development of an over-arching Language Framework, which articulated our commitment to supporting minority languages whilst allowing the different needs of speakers of Irish, Ulster-Scots and other minority languages to be addressed effectively.
- Develop an Irish Language Policy which focused primarily on the enhancement and protection of the language;
- Develop an Ulster-Scots Language policy which looked more to the promotion of the language and the cultural and heritage aspects of the language rather than the need for translation of documents and interpretation services.
- Develop a policy on other minority languages (including sign languages) which focused on ensuring good communication and increasing awareness and understanding of minority cultures

The draft Policy on Linguistic Diversity was subject to a formal consultation period which ran from 23 May 2017 to 18 July 2017, the approach to the consultation is outlined in the next section.

B. Our approach

The draft Policy on Linguistic Diversity was presented in full and a Citizens' Summary was also made available, along with a draft Equality Screening. In line with our Equality Scheme an accessibility statement highlighting availability of the document in different formats and languages, on request, was included on each document.

The draft Policy on Linguistic Diversity consultation document set out the context for the policy change and suggested there should be an overarching framework to establish broad principles governing the use of all forms of language in the City and within the Council, whether written, spoken or signed, and whether this was through need or choice. Beneath this framework it was further suggested that initially there should be three separate strands, dealing separately with Irish, Ulster-Scots and Other Languages (including sign language and new communities' languages). The consultation was structured with this tripartite or three dimensional approach in mind, to give clear opportunities for all interested stakeholders to have their opinion heard.

While there may be common issues and priorities attaching to all forms of linguistic diversity, equally there are particular concerns that are unique to specific language users and cultures, and the consultation aimed to capture these by seeking views from both staff and the general public, but then also holding separate meetings with interest groups associated with a particular language, including Irish, Ulster Scots, sign language (BSL and ISL) and minority languages linked to new communities.

The consultation was launched on 23 May 2017 with a press statement, article on staff intranet and an invitation on the Council's website to respond to the consultation, which was due to close on 18 July 2017, although short extensions were requested by a number of individuals and organisations and were granted.

For the **general public** different ways to respond were:

- An online questionnaire of public opinion on the Council's Consultation Hub, including information (hard copies were also available)
- Attendance at one of two engagement events, designed to gather the same information as the online questionnaire
- Attending any of four themed focus groups: Irish Language, Ulster-Scots Language, New Communities and Deaf or Partial Hearing, and / or Disabled people.
- Consultation comments could also be received by email and letter

For **staff** different ways to respond were:

- An online survey available (internally only) on the online Consultation Hub, including information and completion of an online questionnaire, available from 26 June until 18 July 2017 (hard copies were also available);

- One to one meetings with Dr John Kremer

Meetings with Trade Union representatives were planned as part of the consultation.

Further detail on the content of each consultation method is included in the next section, along with an outline analysis of the quantitative and qualitative information gathered from data collected through the consultation.

C. Consultees' comments

Comments from consultees have been arranged in the following order:

- C1. Public engagement events and focus groups
- C2. Correspondence from public and external organisations by email and letter
- C3. An online questionnaire of public opinion on the Council's Consultation Hub
- C4. Staff consultation

C1. Public engagement events and focus groups

Two information and engagement events were held on Tuesday June 20th (10.30 – 12.30, City Hall, Belfast) and Thursday June 29th (15.30 – 17.30) at NICVA HQ, Duncairn Gardens, Belfast). The sessions were designed to give members of the public an opportunity to learn more about the draft policy and proposed framework, and to provide feedback on these proposals, with questions structured around the online questionnaire. The first session was attended by two people, both from an Irish language organisation and the second event by one person, on behalf of the Deaf and partial hearing community.

Each session was guided by a series of prompts, however, as the attendees were representative of specific communities and the related issues, the Irish Language and Deaf community respectively, comments gathered at the engagement events are included within the focus groups for those two areas.

Four focus group discussions were held in the Reception Hall, Belfast City Hall with the following:

- Other Minority Languages and Newcomers to the City (Monday June 26th, 10.30 – 12.30 am)
- Ulster Scots Language (Monday June 26th, 2.30 – 4.30 pm)
- Irish Language (Wednesday June 28th, 10.30 – 12.30 am)
- Other Minority Languages and Deaf, Partial Hearing and/or Disabled Persons (Wednesday, June 28th, 2.30 – 4.30 pm)

All focus group discussions followed the same format; having established ground rules and further to a brief introduction on the draft policy, participants were asked briefly to reflect on the overarching framework and the proposal for three separate policies before spending the majority of

time considering the outline proposals for either Irish Language Policy, Ulster-Scots policy or Other Languages Policy, as appropriate to the theme of the group. This included both the aims and approach to service delivery.

At the request of participants, a single group was employed in three of the sessions while numbers attending the Irish language group meant that two groups were run in parallel. A note taker was present at each group together with either one or two discussion facilitators.

C1 (i) Other Minority Languages and Newcomers to the City

Four people attended the focus group and a wide ranging discussion highlighted the unique problems faced by those from new communities who may not have access to written English and who often struggled to fully engage with the Council and its services because of this deficit. This was often in very practical ways, such as bins and waste, and the group reported on mixed experience of dealing with the Council among their communities. While the Council's efforts were duly recognised it was felt that more could be done to be genuinely inclusive. In particular the group saw that the Council could play a lead role in coordinating activity across the sector to enhance engagement with marginalised language communities.

The use of the term minority was questioned, and instead it was suggested that linguistic diversity was a better alternative. The overarching framework was generally accepted although it was argued that the term 'promotion' required greater clarification, along with the need to coordinate with wider regional initiatives.

A previous campaign to translate into five languages was seen as unsuccessful as there were now so many new communities. Instead it was suggested that headlines or key phrases could be made available in many languages on the understanding that translation services could then be accessed in a timely and proportionate manner. This was viewed as particularly relevant when letters were sent from services in relation to compliance issues.

The important role played by young people in helping elderly relatives in new communities was discussed and seen as a valuable resource but with the caveat that this type of support could potentially nurture a dependency culture that may not be healthy or enhance well-being.

Seeing evidence on signs etc. that other languages are acceptable was seen as welcomed in order to increase the visibility of languages other than English. A database of drop-in support services across the voluntary sector was also mooted as a useful link for members of new communities who often struggled to know who to contact, or how.

A significant amount of time was taken discussing the merits of bilingualism, and how it should be seen as the norm rather than the exception in society, also aiding personal development and cognitive ability of children. It was felt the aims of the policy should extend to these benefits and more generally, an overt celebration of linguistic diversity.

The coordination of ESL classes was seen as problematic at present, and it was argued that the Council could play a significant role in sharing resources and partnering with other organisations, including colleges, would be helpful. In general there was a need for more outreach work, in which the Council could play a role alongside other sectors (e.g. voluntary, educational, health).

It was argued that a separate policy should be available for new communities ('heritage languages'), and to ally these with language attached to disability was inappropriate. This strand should focus on access and how to open the Council to those from new communities, for example including employment opportunities as well as facilities and services.

There was some support for a linguistic diversity forum to establish examples of good practice and to disseminate information across communities, however, the BCC Migrant Forum was seen as the best starting point to facilitate discussion, as many potential attendees would be present. Staff training was also highlighted, and the need to have specific contact points or gatekeepers with the skills and knowledge to assist particular groups.

Overall the group welcomed the new policy and broadly accepted the overarching principles, with the addition of reference to the positive benefits of bilingualism. It was felt that a separate policy strand should focus on heritage languages and apart from Irish, Ulster Scots and language forms attached to disability.

C1 (ii) Ulster Scots Language

The discussion, which four people attendees, began by a consideration of the wording of Parts 2 and 3 of the European Charter, highlighting the obligation to promote the Ulster-Scots Language, before moving on to consider practical ways in which the rights enshrined within the charter could effectively be put into practice for those from the Ulster-Scots community.

It was argued that one officer could not hope to deal with all facets of linguistic diversity but instead separate policies and resources should be established for different languages. The issue of what each policy should prioritise was highlighted, and it was felt that the priorities of the Ulster-Scots community may be quite different from other communities. It was argued that Ulster-Scots had enjoyed less support than Irish in the past, and yet it was argued that Part 2 of the European Charter did establish the basis for a range of positive action measures to protect Ulster-Scots, and this should be acknowledged by the Council in terms of resourcing.

The framework and separate policies for each language were welcomed as an opportunity to target resources proportionately at Ulster Scots, although the current outline of services in 7.3 was not seen as appropriate for this community, for example highlighting documents, translations etc. but not cultural activities or outreach measures. Instead it was felt that the focus should fall on promoting the language in contexts where it can be best understood and appreciated, and to generally raise the awareness and profile of the language, in written and spoken form, in a positive

way. One specific example which was cited was for the Council to promote a message of Happy Christmas in a range of language forms at the City Hall, including Ulster-Scots.

As a designated minority language within the European Charter it was argued that Ulster-Scots required special conservation measures, especially given its minority status in Belfast, for example by work within schools to help appreciate its influence on everyday language and culture in the City. It was argued that this should involve prioritising heritage work rather than translation work or documents, but only at the present time, and the policy should not be to the detriment of the availability of documents and signage in Ulster-Scots. Current examples of work being undertaken, which the Council should support include looking at the derivation of place-names, or branding and signage allowing the language to be enjoyed and celebrated in a positive way. It was argued that Section 7 of the policy should be rewritten to accommodate these views, and community engagement was seen as an essential element to make the work come alive.

Overall, there was support for the draft policy in principle on the understanding that adequate resources would be made available for the Ulster-Scots Language and that it should be addressed through a separate policy strand.

C1 (iii) Irish Language

Due to large numbers present (15), two focus groups were eventually held simultaneously, although early discussions involved a single combined group.

In early discussions, significant concerns were raised with regard to the factual accuracy of Section 3 of the policy, setting out the background, international comparators, guidance documents and relevant legislation. On the eventual understanding that these matters were to be addressed in subsequent drafts of the policy, the discussion moved on to consider the consultation process. Once more significant concerns were raised regarding available documentation, poor translations and various failings of the engagement process itself. Written communications were read to support opposing views before the groups split to discuss the overarching framework for the draft policy and the proposed strands. While discussions in both groups were generally quite distinct, one strong theme that emerged in both was the need for a dedicated Irish Language Unit within the Council with sufficient resources to turn principles into meaningful positive actions that were sustainable in the medium and long term.

In the first group, fears were expressed that the promotion of the Irish language could be constrained by it being placed under a good relations agenda, and instead it was argued that there was a clear and separate imperative to prioritise Irish given the European Charter on Minority Languages, and especially Part 3.

It was argued that equality in terms of language use was critical, and that one of the aims 'to publicise the fact that the Council will facilitate the use of the Irish language in its services as

appropriate', could actually be used to stifle language use. It was maintained that there was a need for more detail on the corporate approach to linguistic diversity but also that practical steps should be encouraged to increase the visibility of Irish, for example via signage, which should be changed to bilingual within 12 months in e.g. leisure centres and the City Hall. Also, it was suggested that the Council's webpage should include an Irish page and the overarching policy statement should make reference to Irish as part of the Belfast culture and heritage. In these ways the language should continue to be normalised, and the lead should come from Stormont but taken up by the Council.

Specific comments were made on the document itself, removing 'as appropriate' and ambiguous terminology. It was suggested that all Council letterhead should be bilingual, and the Christmas sign bearing the message 'Happy Christmas' in Irish should be moved from the side to the front of the City Hall. All application forms should be made available in Irish, and a database on Irish use in schools should be maintained by the Council. It was further suggested that there needed to be a focal point for new initiatives, i.e. an Irish Language Officer with appropriate support, and a clear job description that moves beyond providing translation services to the development and management of targeted projects and initiatives, both within the Council and in the wider community, with a support team spread across other departments and with identified points of contact within each. It was suggested that this should be encompassed within an Irish language plan for the Council, supported by a dedicated Irish language Unit, as exists in Newry, Mourne and Down Council. There was also an identified need to audit available resources within the Council, including Irish language speakers who could provide valuable support.

The second group felt that the framework contained within the policy was generally acceptable although there was a need to clarify terms such as indigenous and minority. It was argued that general principles should be enshrined in a framework that encompasses all language forms but it was felt that the present principles fell short of the mark. The policy should encourage greater visibility of the language, for example using bi-lingual signage in the city centre and around City Hall, and allow for applications to the Council in Irish. An audit of needs was also essential, extending to resources, offices/duties, advocacy work, support for local groups, and Irish speakers in the Council.

The group felt that priority should be afforded to young people, including language planning (e.g. education, youth provision, services), and outreach work should extend to those outside Irish speaking areas, to avoid identification of specific languages with geographic areas. The use of signage only to be 'seen primarily by users of Irish' likewise should be avoided and there should be an agreed approach to language on signage which promotes the entire city.

In general it was argued that the primary focus of the work of an Irish Language Officer or unit should be working with young people and encouraging outreach work in order that the language can become more normalised across Belfast, with bi-lingualism recognised as a positive, both personally and culturally.

Overall, while individual group members may have significant concerns with the draft policy, in general terms there was support for an overarching framework with separate strands dealing with particular languages, including Irish. Development of a measurable action plan which could be developed through engagement with key stakeholders was seen as the next positive step forward. Both groups felt the Council could be more proactive in taking more ambitious steps to actively promote the Irish language through signage and general use and visibility within the Council and across Council properties, although some acknowledged that this may not be welcomed by others; bi-lingual signage was supported as becoming the normal policy within the Council, with communities choosing to 'opt out' if they wished.

It was argued the work would be taken forward by a dedicated Irish Language Unit, although it was acknowledged the single Irish Language Officer, as outlined in the draft Policy was a positive starting point.

The two attendees at the first engagement event were both supporters of the Irish language in their personal and professional lives, working within the Irish language sector in Northern Ireland. Both were very positive about the overall aims of the draft policy, and could accept the logic for the overarching framework together with separate language strands and in particular Irish.

It was argued that each language brought particular issues and priorities and these could not be combined except under very broad overarching parameters. Within the policy there was an identified need to consider tailored ways in which the language could be promoted, celebrating linguistic diversity in appropriate ways, for example working in schools, community centres and Irish language groups, and with those without Irish.

The need to use appropriate terminology was stressed, for example prioritising indigenous languages such as Irish over other minority languages. Use of the term minority was also discussed, and it was felt that wherever possible it should be replaced with terms such as 'linguistic diversity' to avoid creating an artificial hierarchy of language forms.

Community development work was seen as a priority, and examples of good practice from other councils was referenced on a number of occasions. It was argued that this sort of work should take priority over, for example, translation of documents or minutes, except on those occasions where the document was of particular relevance. The goal should be to normalise the use of the Irish language, and to remove prejudice and lower barriers to acceptance across all communities. The dangers of only working in existing Irish speaking areas was mentioned, thereby running the risk of marginalising the language yet further.

The need for a dedicated Irish Language Officer was emphasised but that person's work should be carefully set out to ensure maximum impact, and the location and role of the officer would require considerable thought and careful planning.

Raising the profile of the language through events and displays was also discussed but in general, there was support for the main thrust of the draft policy, and in particular where adequate

resources could be made available to effect real change across the city in existing attitudes and behaviour.

C1 (iv) Other Minority Languages and Deaf, Partial Hearing and/or Disabled Persons

The seven attendees at this focus group were all members of the deaf and partial hearing community; two accredited BSL signers were present throughout. From the outset, the group collectively welcomed the draft policy and especially the inclusion of sign language and it was acknowledged that Belfast City Council were the first to address the needs of the Deaf community in a meaningful way.

All attendees were united in insisting that sign language (both BSL and ISL) has such unique qualities that it should be dealt with under an entirely separate policy strand. The overarching framework was seen as generally acceptable, so long as the particular needs of sign language users could be looked at as a separate group under that framework (i.e. apart from disability). This was especially true as there are so many sign language users in Northern Ireland (circa 5000), many without a disability, and this would be in keeping with impending legislation planned for introduction within the next 18 months.

It was argued that there should parity for sign language with Irish and Ulster Scots and particularly as many users had no alternative language available to them other than signing. Within the document it was felt that good relations should be extended to cover all grounds of identity, and this may also help address a perceived funding deficit for the signing community at present.

One priority was seen to be ready access to interpreters when engaging with the Council, not as a choice but a necessity, along with sign links via video. The provision of signers at Council events was welcomed but opportunities for extending the service were also suggested in order to actively encourage attendance among those with hearing loss, not merely on request. Repeatedly it was pointed out that interpreters needed to be qualified and operating at the appropriate standard otherwise the service became ineffective and potentially misleading.

Overall, the group was positive about many aspects of the draft policy and could see useful opportunities presenting themselves for their community should a dedicated resource be made available in the future.

The one attendee at NICVA advised that his primary concern was the interests of young people with hearing loss, and was conscious that new legislation was planned but stalled for sign language, legislation which he warmly welcomed. Discussion tended to focus on how the Council could make services and facilities more accessible and available for young people with hearing loss, and including in particular sport and leisure. The work that was needed to make competitive sport more accessible was emphasised, including training for coaches etc.

The draft policy was broadly welcomed and including the overarching framework. At the same time the need for more work was emphasised and including within the mainstream school system. The

aims of the policy were broadly accepted, and in particular the need to mainstream effectively within schools and leisure services and thereby remove hidden barriers. Practical techniques for providing information were outlined in some detail, including how websites could be made friendlier for those with hearing loss.

The respondent was keen to point out that users of BSL were not necessarily disabled, and sign language users should be set apart from other forms of communication given its unique identity. Also the use of plain English and easy read versions of documents was a priority and these could often be provided at minimal cost.

Overall this person was in support of the aims of the draft policy but felt that a separate policy tailored to users of sign language was important.

C2. Correspondence from public and external organisations by email and letter

C2 (i) Response from Community Relations Council

General Comments

- Believe that policies relating to languages should be developed on the basis of international and domestic law as well as best practice.
- Framework should be utilised to enhance the delivery of services to promote racial equality and fulfil the Councils section 75 duties.

Policy Context

- Suggest placing this framework development and associated policies in context of The Executive Office's "Together: Building a United Community" strategy , in particular under the priority heading " Our Cultural Expression"
- Final policy should also detail the relationship with other Council policies eg Good Relations; Belfast Agenda; Peace IV
- Provide detail as to what recent engagement has taken place with various language sectors on this current draft (since 2013), taking into account changes in infrastructure and funding climate. Recommend an audit update, both in terms of accessing services and developmental work
- Amend documentation to reflect correct status of previous consultation exercises

Good Relations

- CRC recommends that BCC adopts and make clear that the following principles will characterise all of its interventions in the area of language protection, development and promotion:

- 1) The principles of Equity, Diversity and Interdependence (EDI) should be used as a practical framework;
- 2) A commitment to the principle that any linguistic diversity policy must meet the international obligations for minority languages as set out in the Charter and the Framework and meet Human Rights standards.

Irish Language Policy

- Policy should implement the various recommendations from the Committee of Experts on the Charter for Regional or Minority Languages and the Advisory Committee on the Framework Convention for the Protection of National Minorities
- Helpful to include some practical steps in a final action plan that address the relational difficulties eg via arts and cultural activities
- Urges Council to engage with those who are, or have been involved in this work to create an inclusive atmosphere and outreach to the wider society in order to increase awareness and understanding
- Legacy of conflict and division needs to be factored into any policy

Ulster Scots Language Policy

- Welcomes focus on promotion of language and the cultural and heritage aspects of Ulster Scots

Other Minority Languages Policy

- Highlight best practice and promote understanding among staff as to why the use of interpretation services is important.
- NISRA stats on language use point to need to pay particular attention to those who have limited or lower levels of English Language proficiency
- Ensure council services are accessible ie include access to services of an interpreter and access to advice and written information
- Pay attention to heritage languages eg second generation children. Proposed Minority Languages Forum can over time support the Council in this.
- Ensure policy includes provision for the use of sign language and takes into account the substantial work already undertaken by DCAL

Implementation

- Develop an action plan with measurable short, medium and long term objectives
- Allow flexibility to alter and revise the policy in order to meet new demands/ challenges
- Replicate Minority Languages Forum within the Irish Language and Ulster Scots Languages Policy implementation.
- Continue to engage with relevant stakeholders, both statutory and community and voluntary in order to ensure final details/policies meet needs and demands of language users.

C2 (ii) Response from Equality Commission for Northern Ireland

The ECNI response was provided within the context of their remit on Section 75 and the provisions of anti-discrimination legislation and CRPD; not directly or primarily concerned with the promotion of languages. General comments included:

- Supportive of Council staff receiving awareness and language training
- Supportive of Minority Languages Forum with representatives from ethnic minority backgrounds and people with disabilities

Comments received on the key provisions of the draft Policy:

Irish and Ulster Scots

- Supports taking account of Executive strategies and best practice guidance from Foras na Gaelige and Ulster Scots Agency
- Supports use of minority languages where they are proportionate to the language needs of the situation and in a spirit of respect for the freedom of minority language speakers to speak or use their language of preference
- Use of minority languages (or any language) for common or official purposes be considered a neutral act that would not be discriminatory and should not be perceived, or intended, as a threat
- Speaking or use of the Irish Language or Ulster Scots does not diminish the entitlements of those who identify as British or Irish.

Sign Language

- Supports recognition of sign language as a language in its own right and commitment to address the needs of those who use British Sign language and Irish Sign Language as their principal means of communication
- Supports introduction of a BSL/ISL Bill as step towards meeting Priority 7 of the Northern Ireland Disability Strategy
- Recognises that adoption of provisions will enable BCC to contribute to the fulfilment of obligations under UNCRPD,
- In addition recognise that proposed sign language provisions are consistent with Article 5 of the Convention and in particular with the stipulation that in order to promote equality and eliminate discrimination, public authorities shall take all appropriate steps to ensure that reasonable accommodation is provided.
- Consider proposed provision is likely to enhance equality of opportunity and good relations between sign language users and non-sign language users
- Recommends Council involves deaf people and representative organisations in review process.
- As per Councils Equality Scheme, recommend consideration given to including specific reference to making information available in Easy Read and Makaton formats for those with

learning disabilities and in large print, Braille or by audio recording for those with visual impairment, in order to promote inclusion.

Minority Ethnic Languages

- Supports the focus of the policy strand on minority languages on ensuring good communication and increasing awareness and understanding of minority cultures as appropriate.
- Proposed provision likely to enhance equality of opportunity and good relations between persons belonging to Black and Minority Ethnic Groups who are minority language speakers and other citizens.

Section 75 of the NI Act

- Expected as per terms of our Equality Scheme that a screening document would have been issued with the consultation document or be available on Council website. Refer to SP&R minutes of 21st April 2017 which refer to draft screening of policy and recommend screening document made available asap.
- Recommend overarching policy and the resulting three policies should be screened and considered for EQIA, as per equality scheme commitments.

Anti-discrimination legislation

- Whilst recognising a draft they recommend that: final policies are considered within the context of the Council's equality policies, relevant anti-discrimination statutes and that Council should satisfy itself that its policies comply with the relevant provisions.
- Recommend that Council refers to its Section 75 statutory duties and the relevant anti-discrimination legislation in appendices

C2 (iii) Conradh na Gaeilge Questionnaire

Conradh na Gaeilge submitted 80 questionnaires based on the elements of the Council's consultation questionnaire which related to the Irish language. A summary of the key issues are presented below:

- (i) 92% agreed with the development of a Linguistic Diversity Policy. Of the remainder 5% disagreed with the development of a Linguistic Diversity Policy for Belfast, with 2% neither agreed or disagreed or did not answer the question.
- (ii) 26 comments argued for the need for a separate policy, reflecting the following statement, either exactly or with minimal changes: 'Although we strongly support the aims and objectives of the draft policy and the recommendations made for the development and safeguarding of Irish, it is our view that it would be more effective to develop stand-alone policies for each language and that an indigenous language should be given precedent – both of which are supported by the Council of Europe.'

- (iii) 95% agreed with the over-arching principles of the Language Framework. In regard to comments on how they could be improved 23 of the 26 responses ,included the statement, either exactly or with minor changes:

‘We strongly support the fundamental principles of the language framework, especially in terms of the implementation of the European Charter for Regional or Minority Languages. The Council of Europe has consistently criticised how the charter has been implemented and we welcome any attempt to fully comply with this important international charter. Irish is protected up to Part III of the Charter and the Council needs, therefore, to lay out a plan of work which gives a comprehensive breakdown of how all of the provisions under the Charter, as they pertain to Irish, can be implemented. For instance, the Council of Europe and COMEX (which monitors the implementation of the Charter) has made very clear recommendations on bilingual signage and street names. Currently, the Belfast City Council policy on street names contravenes this guidance and we would expect the Council's policy to change in order to comply fully with the charter, as stated above.’

- (iv) 99% agreed with the development of an Irish Language Policy which focuses primarily on the enhancement and protection of the language. All of the 27 comments received in the request for suggestions for improvement, regarding the proposed Irish Language policy, stated, either exactly or with minor changes: ‘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’. The statement continued with details of how the action plan should be implemented structured around engagement, visibility and funding.
- (v) 99% agreed with the recruitment of an Irish Language Officer (79 out of the 80 respondents, with 3 supporting recruitment only in Foras na Gaeilge part-funded the salary).

C2 (iv) Altram

Altram is the regional support group for Irish-medium early years projects. It was founded in 1990 by local preschools in Derry, Belfast, Armagh and Newry.

A summary of general comments:

- Disagree with BCCs statement in consultation document that 3,000 children receive education through medium of Irish in Belfast. They quote over 5,500 children attending Irish-medium educational settings.

- Altram has developed a State of the Sector report into Irish-medium early years education for further reference if required.
- Altram believes that BCC in considering the development of policy and programmes relating to linguistic diversity in NI should have due regard to the undertakings in respect of language (and the Irish language in particular) which the UK Government and NI Executive have entered into, particularly since the Good Friday Agreement 1998.
- Bilingualism gives added value in an early years setting and it is vital that this crucial area of work is supported, promoted and nourished at strategic policy and government levels.

Policy Content

- Welcomes consultation as positive attempt by Council to update its 2006 Language Policy and to respond to increasing linguistic diversity within the city, including a vibrant and burgeoning Irish language sector.
- NI only part of the UK without a specific language act and vital that a core aim within BCC Policy is to support a strategic underpinning Irish Language Act.
- Believe that a robust policy from BCC will send a positive message to other Councils to adopt, implement and promote similar policies.
- Believes that the effective implementation of this policy will assist local and national government to deliver on a wide range of policies.
- Need more than one reference in the policy document to Irish Medium education and more detail.
- BCC policy should embrace recommendations from the Languages for the Future – Northern Ireland Languages Strategy, a report produced by an expert working group for the Department of Education in September 2012, which recognized the positive and unique contribution of the Irish-medium sector to second language acquisition and set out recommendations for a Northern Ireland Languages Strategy.
- Need to include more support and development services alongside translation and interpretation services in the policy document.
- Protection and promotion of the Irish Language needs to be at the core of the document as a clearly stated aim and placed within a language development as well as a respect context.
- Supports approach to ensure that people for whom English is a second language are not disadvantaged in their communications with Council.
- Argue that circumstances and needs of indigenous languages and those of ethnic minority languages are different. Altram recommends that the principle of 'language of choice' should be embedded in the Council's policy.
- Welcomes inclusion of three different policies and specific needs of different language groups.

- Would welcome further information on what these policies will be based on, for example, objective need?
- Welcomes recommendation to appoint an Irish Language Officer
- Altram also supports the POBAL recommendations as a result of their audit of needs of Irish language groups in Belfast (2017).

C2 (v) Pobal

Pobal, the independent advocacy organisation for the Irish speaking community submitted two responses regarding the contextual information presented. The points in summary:

- Highlighted concerns that there appear to be a number of 'factual inaccuracies in the document which give a misleading impression of the statutory and policy basis for the Irish language and Ulster-Scots'.
- The contextual statement: 'Structural changes within central government have resulted in this work being taken forward by the Department of Communities' was identified as being misleading as: 'Unfortunately, in early 2016, the NI Executive rejected all proposals in relation to both the Irish language strategy and Ulster Scots strategy. It is therefore unclear what authority or standing, if any, the DCAL strategies have.'
- Emphasises that the current suspension of the NI Assembly raises further uncertainty on how and when progress will be made on this issue [language].
- A further example of an 'inaccuracy' in the document included: The NI Executive has adopted 20 year strategies on both Irish and Ulster-Scots.' As noted above, this is simply not accurate and shows an alarming lack of background awareness to the promotion and protection of Irish here.
- Provided details of key findings from the Committee of Experts (COMEX) on the implementation of the European Charter for Regional or Minority Languages and the Framework Convention for the Protection of National Minorities:
- In particular, we refer to the issue of interpretation of Section 75, the Equality Duty. The Committee of Experts (COMEX) on the European Charter state, (ECRML (2010)4, Strasbourg 21 April 2010, Application of the Charter by the UK, p. 19, parag 12) 123. The COMEX has been informed of several instances, especially within local councils where it was decided not to promote or use the Irish language within their services on the grounds that it would contravene Section 75 of the Northern Ireland Act, which states that public authorities should take due regard of the need to promote equality of opportunity, among others between persons of different religious belief or political opinion. The Committee of Experts emphasises that this undertaking states that the adoption of special measures in favour of regional or minority languages aimed at promoting equality between the users of these languages and the rest of the population or which take due account of their specific conditions is not considered to be an act of discrimination against the users of more widely-used languages.

In addition, the Advisory Committee on the Framework Convention also note, (Strasbourg, 22 Dec 2011, ACFC/OP/III/ (2011) 006)

147. [...] The Advisory Committee regrets that, in addition to a lack of clear legal guarantees for the use of the Irish language, there is a lack of promotion of the Irish language and culture. It understands that, in practice, very little is done to promote the use of Irish in the public sphere and that, although some Irish language officers have been appointed in a few municipalities, the possibilities to use this language in relations with local administrative authorities remain limited. It is also concerned that the overall climate in Northern Ireland does not encourage Irish speakers to use and develop their language freely. The Advisory Committee was disconcerted to hear that some representatives of the authorities consider that promoting the use of the Irish language is discriminating against persons belonging to the majority population. Such statements are not in line with the principles of the Framework Convention, and in particular with the provisions of Article 10. It also reiterates that, in line with Article 4.2 and Article 4.3 of the Framework Convention, implementation of minority rights protected under the Framework Convention are not be considered as discriminating against other persons.

- Pobal presented the findings of an audit and needs assessment of Irish language groups in Belfast. The audit focused ‘on Irish language groups located in the Belfast City Council area, whose core work has been created over time in a wide range of areas, from work in the arts, in education, in the media, in community development and more. They are all groups that are extremely active and who are high achieving in terms of the promotion of the diversity and vitality of the city. It is difficult for senior representatives to put aside time to participate in research when they are carrying heavy workloads on a daily basis. To ensure the validity of this audit, POBAL set a target of 8 participating groups as our goal. Ultimately, 17 groups participated in it, more than twice the target number. Early in the investigation, it became clear that the groups were proud of what they have achieved on behalf of the city, and that they want to contribute to efforts to drive Belfast forward into a vibrant, diverse society.’

The findings presented the extensive work that is undertaken by Irish language groups, often on a voluntary basis. The proposals presented were:

- Establishing a new department within the Council: Language and community development, tourism, arts and Good practice / Capacity building
- The creation of full-time post(s) of Irish Language Officer / Officers within Belfast City Council
- Developing criteria to recognize the added value of the Irish language within each funding scheme of the Council, including the multiple annual core funding scheme
- Making available Language Awareness Training courses to Council staff and Councillors

C2 (vi) Individual by letter

·One written response was received from an individual interested in Ulster-Scots and Irish, who has been trying in a very small way to promote Ulster-Scots. Her suggestions include:

- Provide books of stories/poetry for children.
- Offer short classes in school to raise awareness that Ulster-Scots language exists and that is in danger of being lost – use the sessions to introduce some everyday words for children to use.
- Run competitions for writers in English, Irish and Ulster-Scots poetry.
- Use of the media to promote language.
- Work in collaboration with libraries for courses, readings, books, and evenings of celebrations of the languages.

C3. An online survey of public opinion on the Council's Consultation Hub

The survey contained 31 questions, 15 capturing personal information (e.g. age, gender, postcode etc) while the remaining questions considered the draft policy itself. The bespoke self-completion questionnaire was completed on-line through the Council's Consultation Hub by 235 individuals, 23 people acting on behalf of organisations and 2 did not disclose the basis for completion. One hard copy in English was received was input into the online questionnaire, as were 2 in Irish, following translation.

In total 260 public questionnaires were completed and the Consultation Hub report is available on request. The information highlighted below includes the key information extracted from the full report, providing percentages of the 260 responses received, the question number is provided in brackets

- (vi) 92% understood the context and rationale for this policy change (Q5).
- (vii) 61% agreed with the development of a Linguistic Diversity Policy. Of the remainder 36% disagreed with the development of a Linguistic Diversity Policy for Belfast, with 4% neither agreed or disagreed or did not answer the question. (Q7).
- (viii) For those who disagreed with the development of a Linguistic Diversity Policy a list of options were also presented. The majority of respondents indicated that 'cost implications' were the main reason for not agreeing with the development of the Policy. If 'Other' was chosen as an option, space was provided for the respondent to provide detail on why they did not support the development of a Linguistic Diversity Policy; of

the 38 comments, many indicated the strength of feeling around the funding of languages and observations on the perceived politicisation of the two indigenous languages. (Q7)

- (ix) The themes of funding of languages and observations on the perceived politicisation of the two indigenous languages were further evident in the 104 responses received which were received regarding the improvement of, or any comments, regarding the Policy (Q8).
- (x) 64% agreed with the development of a Language Framework. Of the remainder 30% disagreed with the development of a Language Framework, whilst 6% neither agreed or disagreed or did not answer the question. Of the 93 comments received two areas dominated: cost implications (22%) and the need for a comprehensive plan (28%). (Q9)
- (xi) 63% agreed with the development of an Irish Language Policy, as one of the three proposed policies. Of the remainder 33% disagreed, whilst 4% neither agreed or disagreed or did not answer the question. (Q10a).
- (xii) A further question was asked regarding the level of agreement on the development of an Irish Language Policy which focuses primarily on the enhancement and protection of the language, to which 63% agreed. Of the remainder 32.31% disagreed, whilst 5% neither agreed or disagreed or did not answer the question. From the 83 comments provided, two key issues dominated: cost implications (25%) and the need for improved engagement with the Irish speaking community (33%). (Q13)
- (xiii) 26% agreed with the development of an Ulster-Scots Language Policy as one of the three proposed policies. Of the remainder 42% disagreed, whilst 32.31% neither agreed or disagreed or did not answer the question. (Q10b)
- (xiv) A further question was asked regarding the level of agreement on the development of an agreed Ulster-Scots Language policy which looks more to the promotion of the language and the cultural and heritage aspects of the language rather than the need for translation of documents and interpretation services to which 31% agreed. Of the remainder 29% disagreed, whilst 40% neither agreed or disagreed or did not answer the question. From the 68 comments provided, two key issues dominated: cost implications (22%) and the status of Ulster-Scots as a dialect (25%). (Q14)
- (xv) 60% agreed with the development of an Other Language Policy as one of the three proposed policies. Of the remainder 19% disagreed, whilst 21% neither agreed or disagreed or did not answer the question. (Q10c)

- (xvi) 58% agreed with the development of a Policy on other minority languages (including sign language) which focuses on ensuring good communication and increasing awareness and understanding of minority cultures. Of the remainder 29% disagreed with the development, whilst 22% neither agreed or disagreed or did not answer the question. From the 47 comments provided, two key issues dominated: cost implications (21%) and the need for sign language as a separate policy 32%). (Q15)
- (xvii) 51% agreed with our definition of “minority languages”. Of the remainder 28% disagreed with the definition, whilst 20% neither agreed or disagreed or did not answer the question. The comments gave an insight into some of the issues around the term ‘minority’, particularly around indigenous languages within a post-conflict environment. (Q12)
- (xviii) 61% agreed with the recruitment of an Irish Language Officer. Of the remainder 34% did not agree, whilst 5% weren’t sure or did not answer the question. (Q16)
- (xix) Regarding the first alternative presented to the recruitment of an Irish Language officer 28% agreed with the recruitment of a staff member dedicated to the promotion of all minority languages. Of the remainder 49% did not agree, whilst 22% did not agree nor disagree or did not answer the question. (Q17a)
- (xx) Regarding the second alternative presented to the recruitment of an Irish Language 53% agreed with the recruitment of two posts, one dedicated to the Irish Language and one dedicated to promoting all other languages. Of the remainder 40% did not agree, whilst 7% did not agree nor disagree or did not answer the question. (Q17b)
- (xxi) Comments or suggestions in response to the draft Equality Screening, which was provided as an attachment, were requested. Of the 70 responses received 36%, closely followed the wording: ‘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.’ Other dominant themes were regarding the density of the information presented in a complex format, cost implications and perceived tensions between equality and good relations implementation of the Policy may bring and their impact on different community backgrounds. (Q19)

C4. Staff consultation

A self-completion staff survey was available internally through the Consultation Hub and was promoted through interlink on three occasions, the full survey report is available on request. The survey contained nine questions, three capturing personal information (i.e. name, email, service/unit) while the remaining six considered awareness of the draft policy, experience of dealing with minority languages, and current knowledge of minority languages. A total of 35 surveys were completed and given the low sample size, the survey cannot be considered as a representative sample of staff views, although they may provide some insight into future analysis required. Key results are summarised below, with the question number stated in brackets.

- (i) Comments and suggestions on the implementation of the Policy includes concerns around cost, awareness realising sessions for staff, staff across the Council becoming involved in developing and implementing the Policy. (Q4).
- (ii) In response to the level of awareness of the 2006 Language Policy, 17% were fully aware, 46% were aware to some extent and 37% were not aware.
- (iii) 51% understood the need for a linguistic diversity policy, with 37% indicating they understood to some extent and 11% indicating they did not understand.
- (iv) Information on the frequency of encountering different languages was requested. The percentages below give an indication of the presence of the language within the work of Belfast City Council as they are based on a total of responses including often, sometimes, occasionally, and rarely:
 - Irish – 69%
 - Ulster-Scots – 23%
 - Sign Language – 63%
 - Chinese – 54%
 - Polish – 69%
 - Tagalog/Filipino – 31%
 - Slovak – 40%
 - Arabic – 34%
- (v) Information on individual knowledge of different languages was requested. The percentages below give an indication of any knowledge of the language as they are based on a total of responses including fluent, basic speaking skills and basic reading skills:

- Irish – 43%
- Ulster-Scots – 6%
- Sign Language – 26%
- Chinese – 0%
- Polish – 6%
- Tagalog/Filipino – 0%
- Slovak – 0%
- Arabic – 0%

Availability of staff engagement sessions with Dr John Kremer were promoted through interlink. The purpose of these 15-minute time slots was to afford members of staff, either individually or in small groups of up to five, an opportunity to air their views on the draft policy, face-to-face but in confidence. The structure of these sessions was designed to be more fluid than the public engagement session, to allow staff to focus on matters that were of greatest concern or priority to themselves. The turnout for the staff engagement session was likewise disappointing, with only one appointment booked and feedback reflected on themes including the potential role of staff with language skills in implementing the policy and staff relations around language issues.

Two meetings with Trade Union Representatives have taken place in relation to the draft Linguistic Diversity Policy. The TU Coordinators will want to be fully engaged in all potential industrial relations issues relating to the implementation of a Linguistic Diversity Policy. Going forwards, it was agreed that appropriate communication mechanisms with all Trade Union Representatives will be fully utilised, as the roll out of the action plans are agreed and implemented.

D. Emerging issues and preliminary recommendations

In identifying emerging issues and preliminary recommendations this report attempts to draw together the consultation findings and consider how the original consultation document: the draft Policy on Linguistic Diversity, may need to be revised to be 'fit for purpose'. More than anything, the consultation has revealed how extraordinarily diverse the needs and aspirations of the various language communities that currently exist in Belfast are, and how any single Linguistic Diversity Policy simply cannot ignore the different priorities and issues that each community has articulated. Nonetheless the steps the Council has taken to plan strategically for the diverse needs and aspirations were welcomed by many as a positive step forward in Belfast being a welcoming and inclusive city.

For some, the primary concern is the ability to be able to engage with the Council meaningfully, and to be aware of, and have access to, all its facilities and services. For these groups, and

including sign language users, those others with a sensory disability and those from new communities, the overarching framework attached to the draft policy was broadly welcomed, but with an understanding that the separate policy strands should be tailored more precisely to the needs and priorities of each particular language community.

For others, the focus fell not so much on a need to communicate in language forms because of no access to written and spoken English but instead a desire to actively promote a language form of choice. Here the priority may again be a tailored means by which a particular language can be best promoted, enhanced and protected.

This is not an attempt to establish an artificial hierarchy based on need or want but instead to be candid about, and mindful of, the different contexts that may underpin the linguistic diversity that now characterises the city and its communities. With concerns around the financial implications also being emphasised in many different comments, an approach delivered through co-design is further recommended to ensure that any monies spent will demonstrate investment against the strategic aims of the Council: to be a welcoming and inclusive city. In turn, this should help to tailor appropriate measures to deal with the array of language forms that may potentially fall under the approach. The resources required to implement such an approach may be considerable, hence the need for staged implementation, with a year on year action plan, developed in line with communities' priority needs and aspirations is strongly recommended.

In summary, the following preliminary recommendations are put forward for consideration:

- The draft Linguistic Diversity Policy should be re-branded as a Language Strategy, emphasising a strategic approach to the development of accessible and inclusive communications;
- The current Section 3 (Recent developments) should be amended to take on board consultees' comments and to ensure that the strategy is consistent with current legislation and guidance in Northern Ireland;
- The overarching principles should be reviewed in light of feedback, including further reference to the positive benefits attached to linguistic diversity and bilingualism;
- Terminology used within the strategy should be consistent throughout, avoiding use of labels such as 'minority' wherever possible;
- Separate strands of work should be established under the strategy, for example –Irish Language, Ulster-Scots Language, Sign Language, New Communities' Communications and Language, and Communications and Language Strand for those with a Disability;
- Each strand should be assessed fully to inform appropriate resourcing, for example with dedicated human and material resources that are tailored to the particular needs and priorities of that language community;

- The job description for the post of language officers attached to one or more strands should be precise and reflect on the needs and priorities of the language communities in question. Recruitment of an Irish Language officer is recommended as an identified need for the Irish language community;
- Further engagement with each sector should be used to fine tune the aims and implementation sections of each strand of work to reflect the needs and priorities of the relevant community in any agreed policy;
- Pilots of work identified through the consultation will provide a useful insight in to wider implementation and how it impacts on operational delivery;
- The principles of shared space should be considered in the development of actions within the strategy and its related strands of work;
- Resource implications associated with the strategy should be clarified at an early stage, and action measures put in place that reflect on best value principles of economy, efficiency and effectiveness;
- Further analysis of staff training and capacity building needs should be undertaken;
- To take forward these recommendations, an action plan should be put in place with immediate effect, setting out a staged approach to full implementation, with resources made available for each strand in order to provide continued momentum to the emerging strategy.