# Submission of Comhdháil Náisiúnta na Gaeilge on DkIT’s Scéim Teanga

*Translation note:
This submission was received in Irish only from Comhdháil Náisiúnta na Gaeilge in October 2013 and the full text is available on DkIT’s website (see* <https://www.dkit.ie/irish-language-office/documents>). *This translation skips or summarises some of the commentary, but gives a faithful translation of specific recommendations - pasting errors and all.*

**1.0 Introduction**

[Skipping over the first 3 paragraphs introducing their organisation …]

While Comhdháil agrees with the guidelines that the Minister issued under Section 11 of the Act, there is a special importance to Section 18(2) of the Act which stresses ‘additional policies to be implemented to promote official language status’ within the Office. It is necessary that DkIT acts accordingly, taking at least into account the experience of other public bodies that have implemented a scheme in recent years and the characteristics of successful schemes and other language policies.

More information about the work of Comhdháil is available on [www.gaelport.com](http://www.gaelport.com)..

**2.0** **Context of the Scheme**

DkIT is a Public Body under the Act and provides a wide range of services to the public, nationally and internationally. The specific responsibilities of the Institute are detailed on its website, which gives information on:

Student Life Enterprise & Innovation

Schools Institute Publications

Administration Recent News

Research Quality Assurance

‘*To increase the use of Irish on the campus, in publications and communications; to promote awareness of Irish; to provide further opportunities in Irish for staff’.*

(DkIT Strategic Plan 2011-16,

Indicative Actions, p 130).

DkIT’s central role with respect to Irish under the Act is confirmed. It is important that DkIT would demonstrate that role throughout its activities and at every level of bureaucracy in the Institute. Therefore it is recommended that DkIT would get a message from the President of the Institute to put in the scheme to demonstrate top-level support for the language and the operation of the scheme.

**3.0** **The Irish Speaking Public in Ireland - Overview**

DkIT needs to be aware of the number of Irish speakers in the country and the language expansion efforts currently under way, including the increase in number of gaelscoileanna and the services in Irish being provided voluntarily around the country.

According to the census results there has been a huge increase in the number of Irish speakers in the country from 1.43 million people in 1996 to 1.57 million in 2002 to 1.77 million in 2011. According to research from NUIM, more than 93% of the people of Ireland are in favour of Irish.

Comhdháil believes that DkIT has a central role in raising language awareness and also in strengthening Irish in the community. It is important that that the Institute would cater for the needs of Irish-speaking citizens. DkIT needs to take that into account and welcome them to receive service from DkIT in Irish. Each public body needs to cultivate demand for services and to always encourage the speaking public.

**4.0** **To Create a Bilingual Environment**

It is important that DkIT demonstrate through its scheme that it is fully committed to the promotion and development of Irish. Comhdháil believes that a bilingual corporate image is very important for public bodies in order to develop bilingual services. It is important that the environment in DkIT would be welcoming to those for whom Irish is their native language or preferred communication language. Comhdháil recommends strengthening support for the culture and for Irish in general in the Institute (see 4 & 5 below).

It is important that DkIT would provide bilingual service and also for that service to be evident to the public. For the scheme to be effective it must deliver a high level of service to the Irish-speaking public based on Quality Customer Service.

Comhdháil recommends that Irish speakers within the organisation be empowered and that that native speakers and fluent speakers of Irish on the staff be encouraged to operate through Irish (see 6(x) below). This will greatly add to DkIT’s ability to fulfil Section 12(2)(c) of the Act and ‘*to ensure that public services will be more widely available through Irish and of a higher standard’.*

Progress regarding Irish in DkIT should be based on structures and support systems being implemented as opposed to depending on particular individuals.

Comhdháil recommends the development of a scheme that is realistic but challenging, that demonstrates that DkIT recognises its obligations and role regarding Irish; the scheme should be used to strengthen the Institute’s ethos regarding Irish and should confirm that the Act will be complied with faithfully and in spirit too.

**5.0** **Recommendations of the Language Commissioner**

The Office of the Language Commissioner has recognised certain practises that help public bodies to provide schemes and quality Irish service to the public including:

* Planning and analysis regarding the capability of the public body to fulfil statutory commitments.
* Ownership of the scheme by senior management of the public body.
* Implementation plan with appropriate resources prepared.
* Communications strategy to share the commitments of the scheme with the staff charged with implementing them.
* Clarity of wording – it must be said that accurate wording is needed in the language schemes of public bodies to ensure that bilingual service of equal quality be provided to the public. This will give clarity to the public body and its staff in implementing the commitments.

These recommendations should be taken into account in preparing the second scheme of the Department of Jobs, Enterprise and Innovation [*sic*]

**6.0 The Current Context**

According to the Language Commissioner:

‘*Language rights are fundamental rights; these are not concessions or privileges given during prosperous times. There is not a lower value to the concept of rights and equality when in the context of language’*

(Language Commissioner, 2009, launch of his annual report 2008)

It is recognised that the current economic circumstances are difficult, and that all public bodies must accordingly review priorities, short-, medium and long-term. State bodies must therefore find ways to control costs without weakening the provision of quality services through Irish. Therefore it is recommended that economies of scale be better used to prepare resources/facilities and to improve value for money, in the following ways:

* To provide bilingual service to the public on-line or off-line as for as possible.
* To publish bilingual materials to the public electronically rather than via printing.
* To recruit bilingual staff, i.e. staff with ability in Irish and English rather than people with ability in one language.
* More cooperation between related organisations as they develop their service in Irish.

**7.0 Submission**

The commitment to Quality Customer Service demands a commitment to continuous improvement in the quality of customer care, of services and of customer consultation.

It is not enough for public bodies to cater for the language needs of the public (see section 3 – positive offer and cultivation of demand below). Every public body must cultivate demand for service and encourage the Irish-speaking public.

There is a need for wide public consultation that includes surveys among customers, staff and the general public, and regular focus groups to understand the public’s wishes and cater for them.

Comhdháil is happy to help DkIT to carry out that process.

**8.0 Recommendations**

**8.1 Current State of DkIT**

It is recommended to give a comprehensive account under *Summary of Organisation Services and Activities* on:

* Services in Irish available before the first scheme came into effect
* How these services were added to during the first scheme
* How these will be added to now in the second scheme.

Definite goals, timetables, assessment systems, regular feedback from the public (see 16-17 below).

 **8.2 Bilingual Capability of DkIT**

The following relates to the improvement of bilingual capability:

* Positive attitude from the top down
* Equal status to Irish and English in all aspects of DkIT’s work
* Aim to foster Irish internally within the staff and externally by catering for customer needs.
* Equal treatment of Irish and English so that no citizen would be disadvantaged by reason of their language choice.

Research on the following topics is recommended as a starting point towards bilingual administration and staff training:

* Number of bilingual speakers
* Number of bilingual writers
* Number of staff fluent in Irish
* Number of staff fluent in speaking Irish but without a high standard in writing
* Number of learners with fluent spoken Irish
* Number of learners with fluent spoken and written Irish
* Number of learners not currently confident in delivering service in Irish
* Number of staff with no Irish

It is a central part of the role of the Departments of HR and Training Centre in DkIT to carry out this research. Etc… [quote from page 17 of first scheme].

Indicate the increase in bilingual capability as a result of the first scheme and take into account in the second one.

Describe the training steps planned to increase the number of staff that have bilingual ability and willingness to provide service in Irish.

 **8.3 Positive offer and cultivation of demand**

According to Art 27 of the International Convention on Civil and Political Rights,

*In those States in which ethnic, religious or linguistic minorities exist, persons belonging to such minorities shall not be denied the right, in community with the other members of their group, to enjoy their own culture, to profess and practice their own religion, or to use their own language.’*

[http://www.unhchr.ch/tbs/doc.nsf/0/fb7fb12c2fb8bb21c12563ed004df111

The following, accordingly, are important:

1. Not enough to cater for demand. Obligation to always cultivate demand for services in Irish.
2. Public must know that services in Irish are being offered and are truly welcome to use them.
3. All physical evidence in DkIT should confirm that it is a bilingual workplace.
4. In this way a positive offer is given that aims to put the customer at ease when looking for services in Irish.
5. Comhdháil asks that the user is presented with a choice of language before entering DkIT’s website, e.g. [www.ahg.gov.ie](http://www.ahg.gov.ie). See 13, Website

[Quote from page 19 of first scheme.]

 **8.4 Improvement of DkIT’s Irish Capability**

[Quote from page 16 of first scheme followed by general comment.]

Recommend making staff aware of the range of high quality Irish courses available (e.g. European Cert [www.teg.ie](http://www.teg.ie), Cert/Diploma in Applied Irish provided by other third level institutes, Cert in Vocational Irish, [www.gaelchultur.ie](http://www.gaelchultur.ie)).

Recommendation on language awareness module as part of induction etc.

 **8.5 Bilingual Environment**

Recommendation to run social events in Irish, such as social nights and Irish lunches (events that would be open to officers and administrators of the organisation).

[Quote from page 17 of first scheme.]

Recommendation to increase staff understanding on language matters by running seminars and information days on bilingualism with guest speakers from Dept of the Gaeltacht or from Office of the Language Commissioner. Comhdháil will help any bodies wishing to run such events. Reminder and exhortation on importance of raising language awareness.

 **8.6 Ring-fencing positions – Placement and Recruitment Policies**

1. Request to name at least one officer with responsibility to provide service in Irish in each department of DkIT that deals with the public, i.e. the admin departments, and to publish the names and contact details of those employees.
2. The receptionist/switchboard operator should have ability in Irish so as to deal effectively with calls in Irish.
3. Irish should be recognised as a requirement for the above positions when recruiting staff. This requirement should be mentioned in every relevant job ad. DkIT should provide a training system for its employees, either internally or externally, to cater for this recommendation.
4. Applicants will be able to apply for a position through Irish or through English and they will be interviewed through Irish if they wish.
5. As DkIT’s scheme is implemented the services in Irish will be gradually increased. It must be ensured that promotion opportunities are made available to those who are providing service in Irish, as recognition of their service and to ensure their expertise in this area for the organisation in the future.
6. It is necessary to implement a monitoring and review system in DkIT to ensure that service provision is of equal quality in Irish as in English. (See 18 below).
7. DkIT must stress the role of employees, both those dealing with the public and those not directly doing so, in promoting the scheme/Irish in DkIT.
8. Request for an organisation chart that shows those employees that are willing and able to provide service in Irish.
9. DkIT employees have a right to use Irish internally. Therefore there will be a regular review of the admin system to ensure that staff members who wish, or are willing, to work through the medium of Irish have the opportunity to do so as a group/unit.
10. Recommend to establish the number of Irish speakers in the organisation, to acquaint them with each other and to encourage them to operate through Irish to strengthen awareness of Irish in DkIT.
11. DkIT will encourage employees who are in fluent in Irish and those who are learning it to wear a badge, such as the Fáinne, to let the public know that they can do their business through Irish with them. See [www.fainne.ie](http://www.fainne.ie)
12. Recommend to recruit and appoint an internal translator to ensure that material is published bilingually simultaneously, e.g. press releases.

Comhdháil recognises that there is currently a recruitment ban in the Public Service and that DkIT, as a result, will be unable to make any commitment to recruit extra staff. It is also recognised that the recruitment ban will not always be there. DkIT have an opportunity to systematically plan to provide improved services through Irish with reduced staff numbers through the operation of this scheme.

 **8.7 Role of Irish Language Office / Irish Language Officer**

General remarks on importance of role of Oifigeach na Gaeilge.

It is important that Oifigeach na Gaeilge doesn’t get added responsibilities, such as translation, but would have his own specific role in the following areas:

* To create DkIT’s Irish policy
* To organise and provide Irish classes as necessary for the staff (in conjunction with the Training Centre)
* To organise a social & cultural programme towards improving usage of Irish.
* To strengthen the visibility of Irish and to provide opportunities for staff who wish to learn and speak Irish
* To check other policies and all DkIT activities for language issues
* To monitor fulfilment of the scheme commitments and other provisions of the Act
* To participate in drafting any policy relating to Irish in the public sector
* To write articles for any magazines to do with DkIT

Therefore a representative from Oifig na Gaeilge should be present at meetings of the institute’s Management Advisory Committee to fulfil this recommended role.

Recommendation that Oifig na Gaeilge should provide language support aids to staff.

 **8.8 Access to documents**

Every form to be used by the public must be readily available bilingually. Recommend that application forms, information brochures and all DkIT documentation should be published bilingually within the same cover. In cases where this cannot be done, a process is needed to ensure equal access to both versions of the same document.

 **8.9 An Ghaeltacht**

[Quote from p.21 of first scheme]

DkIT must ensure that all services relating to the Gaeltacht are provided in Irish as a matter of course.

 **8.10 Stationery**

General remarks about obeying the statutory regulations.

 **8.11 Signage**

General remarks about obeying the statutory regulations.

 **8.12 Third Parties**

The terms of this scheme will be a condition for contractors and subsidiary companies of DkIT. Any agreement between DkIT and a third party will fulfil these terms – including any outsourced services. Contractors must monitor any service provision and report accordingly to DkIT. This necessary condition must be clearly stated in legal documents.

 **8.l3 Public Meetings**

Recommend that DkIT’s officers are aware of specific requirements of Irish speakers when organising public meetings. There should be a system to ensure that notices and other publicity about public meetings are issued bilingually. It should be ensured that participation in Irish and in English is welcomed at public meetings organised by DkIT.

 **8.14 Website**

[Quote from p.12 of first scheme]

Comhdháil praises the good work done by DkIT to develop a bilingual website since the first scheme came into operation. The importance is emphasised of welcoming customers who wish to do business with the Institute in Irish, as is their right, at the principal point of contact. DkIT’s efforts to provide service in Irish to the Irish-speaking public is recognised. Reminder that more development is needed under the second scheme. Recommend continuous development so that the Irish version is as comprehensive and as visible as the English version at all times (see 18 below).

DkIT must continue its policy and work plan towards gradually developing a bilingual website, beginning with the permanent sections, including:

* Reports and other publications
* DkIT policies
* DkIT regulations
* Application forms
* Other variable items, e.g. press releases

Recommend the following:

* Provide a language choice to the user before he/she enters the site (e.g. [www.ahg.gov.ie](http://www.ahg.gov.ie))
* Language choice must always be visible on the website
* Important not to mix languages (e.g. it should be certain that there is no English on the Irish version of the website and vice versa, except for names of organisations and people etc.)
* If the website is collecting information from users, e.g. if the user is asked to fill in a form, the user should be welcomed to fill in the details in his/her language of choice.

Need an agreed system for putting up new information on DkIT’s website to ensure easy access in Irish and in English.

 **8.15 New Media and Online Services**

General remarks on growth of online services by public bodies and praise for DkIT’s use of these and of new media.

Recommend to keep up the good work and reminder of need to be bilingual. Note the leading role of Irish in the new media and the central role of State organisations to use new media in catering for their customers’ language needs and fostering demand.

 **8.16 DkIT’s Strategic Plan**

Any amendments to the Strategic Plan must take account of the needs of the Irish-speaking public.

 **8.17 Assessment System**

Recommend:

1. to create an accounting structure for implementing the scheme and set out corresponding action plans
2. to assess impact of influence of equality in the promotion of Irish under the scheme to ensure that interested parties benefit from every commitment under the scheme
3. establish definite goals and timetables and identify a department responsible for monitoring the implementation of the scheme and reporting to senior management
4. demonstrate an assessment system to assess service provision and to ensure improvements are recognised
5. look for continuous feedback from staff and public on the operation of the scheme and write this procedure into the scheme
6. set out a clear complaints procedure to deal with complaints from the public about anything missing from the services available in Irish
7. set out, in case the bilingual service is of unsatisfactory quality, the steps to be taken to resolve the problem.

It must be remembered that absence of complaints is not the same as confirmation of the quality of services provided. Recommend not to set down the number of complaints as a performance indicator of the scheme. Feedback needs to be actively collected from customers to confirm the quality of services under the scheme.

 **8.18 Publicising the Agreed Scheme**

Recommend the following ways to inform the public of DkIT’s scheme and its aims:

* Press releases
* Official launch
* Regular notification
* Distribution to appropriate agencies
* Website

It is necessary to provide every member of staff with a copy of the scheme. Recommend a note from the President be distributed also to make clear that it is the duty of every employee, both English- and Irish-speakers, to implement the scheme. Internal information sessions should be organised for the Institute’s staff, so that every employee is informed of the principal policies in the scheme.

 **8.19 Monitoring and Reporting on progress**

1. Progress reports submitted to the Management Advisory Committee of Department of Jobs, Enterprise and Innovation [*sic*] should be published in a timely manner.
2. An annual report on the progress of the implementation of the scheme should be made available to the public and publicised widely.
3. Progress under the first scheme should be the reported starting point of the second scheme, demonstrating clearly in this way that the Department of Jobs, Enterprise and Innovation [*sic*] is working towards improvement in Irish.

**8.20 Provisions of the Language Act**

The Department of Jobs, Enterprise and Innovation [*sic*] has other policies to ensure compliance with all provisions of the Language Act. Although there is no requirement to report on compliance with provisions of the Act in the scheme, we recommend that the Department demonstrates that it is aware of its responsibilities by reporting on the policies implemented to fulfil these responsibilities.

**9.0 Last Word**

Comhdháil wishes to emphasise the need to willingly provide services in Irish to the public. It is very important to inform staff and public regularly about these services to demonstrate the commitment of the Department of Jobs, Enterprise and Innovation [*sic*] in catering for the public needs, and in cultivating demand for the Department’s services and also in encouraging the Irish-speaking public to make further use of these services.

**10.0 Summary**

According to best practise, these are the necessary steps towards creating and implementing a successful language scheme:

* Planning and analysis of the Department’s capability to fulfil statutory commitments, taking account of costs and the organisation’s human resources.
* Ownership of the scheme by senior management, line management and staff.
* Implementation plan using the appropriate available resources
* Suitable implementation and progress reporting structure
* Communication strategy to inform appropriate staff, charged with their implementation, of the commitments of the scheme.
* Suitable monitoring system
* Support for staff who don’t speak Irish – through regular language awareness training.
* Clear direction to staff about obligations under the Language Act.
* Marketing plan for bilingual services to develop demand for these services.
* Pro-active planning for service provision in Irish.