

**Consultation  
Response Form**

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Organisation (if applicable): Welsh Language  
Commissioner

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**1: Is it clear who this bereavement framework is for and why it has been developed?**

**YES**

**If the answer is no please tell us below what can we do to achieve this?**

**2. How can the provision of and access to bereavement services for people with protected characteristics (section 4) be improved?**

**Please provide your suggestions below**

No comment.

**3: Are there any other models / programmes of support (Section 6) which should be referenced in the Framework?**

**Is the framework clear in outlining responsibilities across all areas of health and social care for considering support needs and addressing gaps in bereavement provision?**

**YES/NO**

**Please provide details below:**

No comment but see our comments below in questions 6-13 on the responsibilities of different agencies in terms of Welsh language provision.

**4: Does the Learning from Covid-19 section (Section 9) sufficiently cover the lessons learned during the pandemic, and the action that needs to be taken to make sure that high quality bereavement care and support is available to everyone who needs it in Wales?**

**YES/NO**

**If no, please tell us below how this could be made clearer and what else should be included.**

We have no comments on specific lessons to be learned from Covid-19. However, please see our comments below in questions 6-13 on the steps needed to ensure that high quality bereavement care and support is available to Welsh speakers who need it in Wales.

**5: How can the provision of and access to bereavement services for Black, Asian and Minority Ethnic Communities be improved? (Section 10).**

**Please provide your suggestions below:**

No comment.

**6. Do you consider that the section on Training, Learning and Supervision for individuals providing bereavement support and for professionals who come into contact with people who are bereaved (Section 11) can be strengthened to address bereavement workforce, education and recruitment issues?**

**YES**

**Please provide details below:**

As is the case with the document in its entirety, no reference is made to the Welsh language at all in this section of the framework. This is disappointing and surprising, especially as people’s interaction with one another, be they professionals or volunteers, is fundamental to the success of the framework. A crucial element of this interaction is communication, and one of the fundamental aspects of communication is language. As explained in the *More than just words*<sup>1</sup> Action Plan, ‘For many families and individuals high quality care means the ability to use services through the medium of Welsh, because they feel more at ease in their own language.’ It is difficult to imagine a scenario where the ability to use services in Welsh is more important than when people are experiencing a bereavement. The framework itself on page 16 of the consultation document highlights the importance of good communication when someone has suffered a loss, ‘although grief can be complex whatever the last stage of the person’s life has been like, we know that experiences and perceptions of poor communication, of poor care, or of uncontrolled distress can make bereavement much harder’. One such example was an individual who lost a child during the 2020 lockdown. Welsh was the language spoken at home and they wished to discuss their bereavement through the medium of Welsh but those services were not available. As they stated: ‘I always think when getting help, support or counselling that I would much rather do this through the medium of Welsh. “I’ve lost my son and Welsh was our language. It just feels natural to talk about my son in his first language, and it helps me to connect with him more.”<sup>2</sup> [English translation]

This framework must ensure that there are enough professionals and volunteers available to provide bereavement services across Wales through the medium of Welsh in order to provide high quality bereavement care and support. Therefore, the recruitment of Welsh speakers and the development of skills within the bereavement workforce must lie at the very core of the framework. This section of the framework needs to be reviewed in its entirety to include specific steps to

<sup>1</sup> [More than just words Action Plan 2019-2020 \(gov.wales\)](https://gov.wales/more-than-just-words-action-plan-2019-2020)

<sup>2</sup> [‘Bu farw ein plentyn yn ystod y cyfnod clo’ - BBC Cymru Fyw](https://www.bbc.com/welsh/news/health-2020-11)

ensure that this happens. In particular:

- It is noted 'training needs should be established to ensure that staff and volunteers are equipped with the necessary skills and expertise, recognising that this may require training in other skills not just relating to counselling. All training should be monitored to ensure that it meets the requisite quality standard.' The ability to speak Welsh and to provide a bereavement service and bereavement care in Welsh should be identified as core training needs. Recognising the need to be able to provide these services in Welsh should also be part and parcel of the training given to everyone. This should include consideration of the suitability of providing a service in a language which is not an individual's preferred language, and how care providers who do not speak the individual's preferred language respond to such a situation.
- You highlight the Cruse Bereavement Care Service Standards. However, they do not make any reference to the importance of communicating in the preferred language of an individual. We urge you to consider standards which are therefore more aligned to Wales' specific needs in terms of providing services in Welsh, as well as in English.
- It is noted 'As part of the implementation and ongoing support of the Bereavement Framework, a forum will be established to share experiences, ideas, best practice, and learnings.' We would strongly urge you to ensure suitable representation amongst forum members which can reflect the experiences of Welsh speakers in accessing bereavement services and care in Wales.

See our response to question 9 below regarding Section 1 of the framework which is relevant to this section.

**7: Does the section on referral pathways (section 12) provide sufficient information about the route people can take to access bereavement support?  
NO**

**If the answer is no, please provide details of how this can be achieved.**

We wish to draw your attention to the example in our response to question 6 regarding an individual who suffered a bereavement last year who wished to access bereavement services in Welsh, but was unable to do so. We have already noted that this framework needs to address the need to ensure that volunteers and professionals are available to support people who have experienced loss. In this section, specific steps need to be included relating to how an individual can access bereavement support in Welsh. In that respect, the basic principle of the 'active offer' which means providing a service in Welsh without someone having to ask for it should be incorporated in full in the Framework, and there should be a core consideration of bereavement service planning. In particular, in this section of the Framework, we wish to highlight the following:

- It is noted 'Bereaved people and their families looking for support at a time of distress need to be able to access up to date information concerning the range of support available, in a format that works for them.' This should include

ensuring that bereaved people are able to access up to date information concerning the support available to them in Welsh.

- It is noted 'the means of referral into the service needs to be clear with an understanding of the range of services available, including an estimate of the waiting time for that support, where a waiting list exists.' It should be noted here that there needs to be clear means of referral to Welsh language services and that individuals must clearly understand that the services they need are available to them in Welsh. An essential part of that, of course, is ensuring that those services are indeed available in Welsh through suitable commissioning and recruitment. If they are not available from a specific provider, it must be ensured that there are alternative means of providing them in Welsh (e.g. through discussion with other providers locally and nationally in the short term) and strategic planning in order to meet future need nationally.
- It is noted 'The provider needs to ensure that the process of assessment for referral into their service is clear and comprehensible, collecting only the information needed to ensure a full assessment of the needs of the bereaved person.' It should be noted that this assessment needs to be provided in Welsh in order to ensure complete assessments of the needs of those who have been bereaved. Information on individuals' preferred language should be core information used to plan follow-up services.
- It is noted 'If after collecting this information and discussing the outcome of the assessment with the person, it becomes clear that their needs would be better served by another provider (in terms of complexity of need, specialism, type of service provision available, or more timely support), then onward referral to the alternative organisation should be offered to the bereaved person.' Here, the 'language of provision' should be a need which should be considered when deciding whether it is better to use an alternative provider and therefore that the person should be referred to an alternative organisation.
- It is noted 'it will be important in any cases of onward referral for both organisations (both referring and receiving) to ensure that the process is properly managed, that the bereaved person does not feel "forgotten", and that they are still able to access support in the intervening period.' A number of people do not request services in Welsh as they do not want to 'cause any trouble' or 'be a nuisance'. Therefore, anyone who has suffered bereavement and who wishes to receive services in Welsh should not be made to feel like that, nor that they have been 'forgotten' if they need to be referred so that they can receive services in Welsh.

**8: Are there other forms of self-management/self-care (section 13) that should be referenced in the framework?**

**YES**

**If the answer is yes, please provide details of the approaches below:**

In her introduction to *Galar a fi* (Y Lolfa, 2017), the editor, Eysyllt Maelor, notes 'In her preamble to that book (*Gyrru drwy Storom*) Alaw Griffiths states that she was unable to find sufficient websites nor material on mental health in Welsh. And there is hardly anything available in Welsh on grief either. If reading is one form of counselling, I wanted to read in Welsh' (English translation). In this section of the framework it is noted 'approaches which empower people to manage their own bereavement such as selfhelp guides can be highly effective' and 'Signposting to sources of support should be part of all bereavement after care'. In light of the lack of materials on grief referred to by Eysyllt Maelor above, we would like assurance that you have considered the extent to which there are culturally appropriate Welsh language resources available for use by Welsh speakers. If there is no suitable and sufficient guidance available, we would urge you to take steps to rectify this for the benefit of the operation of this framework.

**9. Do the Bereavement Standards (Annex 1) set out what areas need to be addressed in order for bereavement support services to be both safe and effective in meeting the needs of bereaved people? Is it clear who is responsible for delivering these standards?**

**NO**

**If no, please provide details of how this can be achieved.**

It does not appear to us that the bereavement framework/standards consider the need to provide bereavement care and services in Welsh. There is only one reference to the need for information 'in a range of formats and languages' in Appendix 1. The appendix refers to the government's role; the responsibilities of commissioners and providers; core standards for providers and Detailed Measures for Bereavement Support Providers referring to the resources available for bodies in these different roles.

- For example, reference is made to *A Guide to Commissioning Bereavement Services in England* and that it 'gives a description of what good local provision for bereaved children and their parents and carers looks like.' We do not see that this guide makes any reference at all to provision in the language of bereaved children. In Wales, of course, a number of children speak Welsh as their first language and many more receive Welsh medium education. We therefore believe that good local provision for bereaved children and their carers would mean that the provision is available in Welsh.

### **Section 1.2 (Commissioners)**

Implementing the active offer principle should be a core aspect of what is expected of commissioners in this section. We therefore urge you to consider the Welsh Government's *More than just words*<sup>3</sup> framework which provides further guidance

<sup>3</sup> [More than just words Action Plan 2019–2020 \(gov.wales\)](https://gov.wales/more-than-just-words)

on what is expected of commissioners and others. We should also state that a number of statutory bodies (including local authorities and health boards) who would be involved in the provision of bereavement services are required to comply with the Welsh language standards. These standards include matters relating to the delivery of Welsh language services, opportunities to use Welsh in the workplace and recruiting and training staff, as well as other matters<sup>4</sup>; these standards also extend to third party services provided on behalf of these bodies. We believe that the requirement to comply with these standards should be reflected in this section.

- It is noted ‘commissioners should ensure that the appropriate standard of care and support can be provided to children, young people and adults, so that their bereavement needs can be met taking into account their faith, culture, gender, economic status, and their location within Wales. This includes supporting bereaved people to understand how children grieve.’ Again we would like to emphasise that we believe that language should be one of the ‘bereavement needs’ referred to in the document in relation to children, young people and adults alike.
- It is noted ‘Commissioners should ensure that anyone experiencing a bereavement is provided with up to date, relevant information on the support available to them.’ As noted above, this information should be available in Welsh and the support should also be available in Welsh.
- On pages 19-20 there is a table outlining the responsibilities of commissioners and providers in responding to different categories of care which they should provide. Again, we would like to emphasise that a number of providers have a responsibility as a result of the Welsh language standards to provide much of what is mentioned here through the medium of Welsh, including information services. Furthermore, as already noted, the *More than just words*<sup>5</sup> framework puts in place actions which the Welsh Government, local authorities, health boards and others will take to provide Welsh language services within health and care beyond the standards. The Welsh Government, through this bereavement framework, should underline to providers the importance of providing bereavement services in Welsh, and commissioners should also ensure that their commissioning practices reflect their duties under the Welsh language standards and contribute to the *More than just words* vision.

### **1.3 Core Standards for Providers for Bereavement Services**

- Here you refer to the *Bereavement Care Service Standards, 2014*. These standards make no reference at all to providing bereavement care services in the bereaved person’s language. It is therefore not surprising that there is no reference to the Welsh language in the rest of this section in the Framework. We urge you once again to consider the Welsh language in this section. We would, for example, note that the provision of Welsh language services is aligned to the principles of respect; equality and diversity; quality and safety.

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<sup>4</sup> See [Law Wales - Standards \(gov.wales\)](http://gov.wales) for further information on the standards.

<sup>5</sup> [More than just words Action Plan 2019-2020 \(gov.wales\)](http://gov.wales)

#### **1.4 Detailed Measures for Bereavement Support Providers**

- There are also many instances in this section where reference should be made to Welsh language services and to a number of the considerations we have referred to in our responses to questions 6, 7 and 8 in terms of registration/referral; risk assessment; supervision and monitoring; and evaluation. In particular of course whether Welsh language services have been provided in accordance with the individual's wishes should be amongst the evaluation measures.

We urge you to look anew at these standards, taking into consideration how they can be enhanced in terms of providing bereavement services and care for Welsh speakers.

**10. We are interested in your views on how the Welsh Government can ensure that the bereavement framework/standards are appropriately monitored and evaluated? Is it clear how the implementation of the framework will be monitored to see if it will have a practical effect on the provision of bereavement care in Wales?**

**Please provide your suggestions below:**

Relating to our response to question 9 above, once you have incorporated standards which involve providing services in Welsh, they should be monitored in order to ensure that the Welsh language provision which is part and parcel of the revised framework/standards is truly provided. The provision of Welsh language services should be one of the quality measures of bereavement services.

**11. We would like to know your views on the effects that the Draft National Framework for the Delivery of Bereavement Care in Wales would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.**

**What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?**

As things currently stand, it does not appear that the Draft National Framework considers the need to provide bereavement care in Welsh at all. In our responses to questions 6-10 we have highlighted the importance of doing so, along with examples where people have noted a lack of Welsh language provision. We have also identified a number of areas where the Framework could be improved.

In section 14 of the consultation document it is noted: 'In order to optimise outcomes, bereavement resources will be required throughout all parts of the system. Strong inter-professional and partnership working throughout 17 health, social care, third and independent sectors will maximise the resource available to



support better outcomes' (pages 16-17). Bereavement resources through the medium of Welsh will be required across the system. In essence, however, we believe that you need to do the following in order to ensure that the Framework is implemented:

- conduct a root and branch review of the services proposed in this framework in order to understand the extent to which they are available in Welsh, identifying any gaps
- produce a long-term plan to fill those gaps with financial support provided to do that if needed
- that plan should identify ways of raising service user awareness of the active offer and the provision of services in Welsh
- identify steps in the short term to seek to meet the demand for services until the plan is in place
- in addition, we ask you to consider whether there are any moral considerations related to providing bereavement and end of life care in a language which is not the individual's preferred language.

Once you better understand these considerations, you should revise the Framework to consider how it can be achieved in order to provide bereavement care in Welsh across the system.

**12: Please also explain how you believe the proposed policy Draft National Framework for the Delivery of Bereavement Care in Wales could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.**

There is no reference to providing care for Welsh speakers in the Draft National Framework for the Delivery of Bereavement Care in Wales. We therefore do not know to what extent you have considered the needs of Welsh speakers in producing this Framework. It is therefore quite difficult to ask for comments on how it could be improved in any meaningful way in terms of the Welsh language. In that respect, we would like to remind you of the statutory duty as a result of the Welsh language standards to measure the impact of the proposals on the Welsh language prior to consultation, due to the requirement for Welsh Ministers to comply with the policy making standards<sup>6</sup> in accordance with the Welsh Language Measure (Wales) 2011. However, in our responses to questions 6-13 we have sought to draw attention to ways of improving this document in terms of consideration of the Welsh language.

**13: We have asked a number of specific questions. If you have any related issues**

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<sup>6</sup> See <https://www.legislation.gov.uk/wsi/2015/996/schedule/2/made>

**which we have not specifically addressed, including on any missing actions/next steps that you think the National Bereavement Steering Group should take please use this space to report them:**

You provide links to various bereavement standards in Appendix 3 and links to guidance documents/other frameworks in appendix 4. If they do not highlight nor promote the provision of services in Welsh we would encourage you to consider their suitability. If they do not consider the Welsh language, we would encourage you to work with the authors in questions to ensure that they are updated so that they do so.