Response form

1a	Do you think the model captures an appropriate vision of social prescribing within Wales?
	No
1b	If not, why not? Is there anything missing / not appropriate?
1b	 If not, why not? Is there anything missing / not appropriate? We believe that there are many things are missing from the vision that is proposed. We detail these considerations in our responses to the other questions in the form. In essence, however, we are not of the opinion that the vision of social prescribing has considered the Welsh language or Welsh speakers as would have been reasonably expected of it. This is because: There is no explanation of how social prescribing would be provided in accordance with the active offer of Welsh language services and the Welsh Government's action plan for realizing the active <u>offer More than words 2022-27</u> which was launched in August 2022. Please see our answer to question 4 for further explanation about this. It is not clear what attention and consideration has been given to the requirements of Welsh language standards in relation to the services provided by and on behalf of a number of public bodies that are part of referral and commissioning arrangements, including the police, fire and rescue services, local health boards and local authorities. There is no discussion about how activities provided by organisations that conduct community activities through the medium of Welsh and for the benefit of the Welsh language and Welsh speakers of all abilities, could be part of social prescribing. This includes, but is not limited to organisations such as the Urdd that mainly works with young people locally and nationally; the Mentrau lait that offer a range of community activities in communities across Wales for people of all ages through the medium of Welsh in communities across Wales for young Farmers who hold activities in Welsh for young People locally and nationally; the Mentrau lait that offer a range of community activities in community activities in community activities are apart of the 'community development' and 'community support provision' elements of the social prescribing service. There is no discussion of
	adults indicated that 'supporting their well-being' was one motivation for learning Welsh.

2a	What is your view of the language/terminology used in the model and supportive narrative? This may include the language and terminology used in both English and, if appropriate, Welsh.
	Please see below, the terminology used in both Welsh and English should be determined at the same time in discussion with users rather than translating into Welsh once a term has been determined in English.
2b	Do you have any suggestions on alternative language / terminology? This may include the language and terminology used in both English and, if appropriate, Welsh.
	As in all cases of developing Welsh and English terms that will be used in a specific area in Wales, it is good practice to develop and determine the suitable terms to be used in both languages at the same time. This means that it will be possible to ensure that the terms reflect the same concept in both languages and that they are consistent with each other and familiar to users. There are agreed <u>international procedures on standardization</u> and agreeing on terms that can be used in when agreeing on terminology.
3	How do we at a national level develop a common understanding of the language/terminology used to describe social prescribing for both professionals and members of the public alike? This may include the language and terminology used in both English and, if appropriate, Welsh.
	Please see above. The terminology used in both Welsh and English should be determined at the same time in discussion with users, rather than translating into Welsh once a term has been determined in English. This would be one way of developing a common understanding of the terminology used in the field.
4a	What actions could we take at a national level to help professionals (from healthcare, statutory and third sector organisations) know about, recognise the value of and be confident in referring people to a social prescribing service?
	The Welsh Government recognizes the importance of providing care in Welsh in accordance with the active offer. <u>More than just words 2022-27</u> , the Welsh Government's plan for Welsh in health and social care explains the active offer as follows 'An Active Offer simply means providing a service in Welsh without someone having to ask for it. It means creating a culture that places the responsibility on health and social care providers to provide a proactive language offer so that people can access care, as equal partners, through the medium of Welsh' (p.8). <u>More than just words 2022-27</u> identifies a number of priority groups to receive services in Welsh, including:
	children and young people

	 older people people with learning disabilities mental health service users people living with dementia people accessing stroke services people accessing speech and language therapy services. We assume that a number of people from these priority groups would use a social prescription service. The services should therefore be available to them in accordance with the active offer. We believe that professionals who understand the importance of providing health and welfare services in Welsh would be more confident in referring Welsh speakers to social prescribing if they knew that those services were available in Welsh.
4b	In the case of self referrals, what actions could we take at a national level to help members of the public know about, recognise the value of and be confident in contacting a social prescribing service?
	Ensuring that social prescribing services are available through the medium of Welsh to those who wish access those services in Welsh in accordance with the principle of the active offer (please see above our answer to question 4a) would be one obvious way of ensuring that members of the public are sufficiently confident to contact and use the services.
4c	In the case of targeted referrals, what actions could we take at a national level to help organisations identify specific populations/groups of people who might benefit from contacting a social prescribing service?
	At a national level it should be ensured that national guidance states that it is necessary to identify and record the language choice of all individuals who are referred or refer themselves to a social prescribing service. It must be ensured that this information is used in order to plan and provide social prescribing services locally in accordance with the active offer.
5	What actions could we take at a national level to support organisations/groups offering community based support to engage with social prescribing services?
	For many people, receiving health and care services through the medium of Welsh in accordance with their chosen language and which is consistent with their identity and culture can contribute to their well-being. We are not aware of specific research relating to social prescribing in this regard, however <u>'Language and Culture in the Caregiving of People with Dementia in Care</u> <u>Homes - What Are the Implications for Well-Being? A Scoping Review with a</u> <u>Welsh Perspective'</u> showed that the lack of cultural and linguistic congruity was detrimental to people in care homes living with dementia. Therefore, at a

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	national level it is necessary to support and facilitate organisations/groups that offer support in the community to do so through the medium of Welsh in order to meet the needs of Welsh speakers in accordance with the principle of the active offer. The consultation document should underline the importance of social prescriptions in Welsh and those that reflect the cultural identity of individuals. Facilitating this should therefore be a central part of this strategy. The consultation document does not consider how activities provided by organisations that conduct community activities through the medium of Welsh and for the benefit of the Welsh language and Welsh speakers of all abilities, could be part of social prescribing. This includes, but is not limited to organisations such as the Urdd that mainly works with young people locally and nationally; the Mentrau laith that offer a range of community activities in communities across Wales for people of all ages through the medium of Welsh; Merched y Wawr who hold activities for women of all ages through the medium of Welsh in communities across Wales; Young Farmers who hold activities in Welsh for young people mainly in rural areas. The work of these organisations needs to be considered as part of the 'community development'
	and 'community support provision' elements of the social prescribing service.
	At a national level these opportunities should be highlighted to local social
	prescription service.
6a	What actions could we take at a national level to minimise inappropriate referrals into a social prescribing service?
	No comment.
6b	What actions could we take at a national level to minimise inappropriate referrals from a social prescribing service into community based support
	No comment.
7	Which actions could be taken at a national level to support strong leadership and effective governance arrangements?
	In August 2022 the Welsh Government published the <u>More than just words</u> <u>2022-27 action plan for the Welsh language in health and social care</u> . The action plan underlines the importance of strong leadership to ensure that provision is available in Welsh in accordance with the active offer. The documents explains 'We'll need strong leadership to underpin the actions to transform Welsh language provision for the future, to drive the impetus for change and create a culture where people feel empowered to use the Welsh language each day at work. We'll deliver this within the compassionate leadership principles expected in all health and social care services' (p.12). We recommend that you incorporate the consideration given to leadership and the Welsh language in <i>More than just words 2022-27</i> in the development of this framework.

	Action 11 in <i>More than just words 2022-27</i> states 'The importance of the Active Offer in planning and delivering quality services to be included in the guidance and reporting requirements for the Duty of Quality and refreshed health and care standards. The Health and Social Care (Quality and Engagement) (Wales) Act ('the Act')2 became law on 1 June 2020 with its full implementation to be completed by spring 2023. This includes reframing and broadening the existing duty of quality on NHS bodies' (p.17). This framework for social prescribing should therefore be consistent with the duty of quality and the expected health and care standards which, according to <i>More than</i> <i>words</i> , will incorporate the importance of the active offer.
	We strongly recommend that you discuss how to ensure that this strategy is consistent with <i>More than words 2022-27</i> by discussing with those responsible for the Welsh language in health and social care within the Welsh Government.
8	What actions could we take at a national level to support the commissioning process and help engage the public in developing a local level model which meets the needs of their community?
	The consultation document states 'Regional Partnership Boards (RPBs) have a role to play in leading on the development and implementation of the model. They will be expected to work with the Public Service Boards (PSBs), connecting with their local well-being plans, along with clusters involved in health and care locally to ensure that there is clear direction and a co-ordinated approach'. These proposals appear to be appropriate as long as the area plans developed by the RPBs fully consider the needs of Welsh speakers; the same is also true of the well-being plans developed by the PSB's. In the past, the Welsh Language Commissioner has not been of the view that the assessments that the areas plans were based on adequately considered the Welsh language (please see for example our response to the consultation on Rebalancing Care and Support for more explanation in this regard). We understand that the RPB's are now in the process of drawing up their new area plans based on their recent population assessments and that PSB's are developing their well-being plans. By discussing with the Welsh Government in the case of the Regional Partnership Boards, and with the for Future Generations Commissioner in the case of the Public Service Boards we have emphasised the need for the area plans and the well-being plans to be consistent with the Welsh language promotional strategies of all local authorities. It is the duty of all local authorities and all national park authorities to produce, and publish a 5-year strategy that sets out how they propose to promote the Welsh language and to facilitate the use of the Welsh language more widely in their area. The Welsh Language Commissioner has published <u>A best practice guide for county and county borough councils and</u>

believe that it would be beneficial for you to consider the content of the document, which includes a sample list of stakeholders relevant to the promotion strategies, when taking steps at a national level to support the process of developing a local model that meets the needs of communities.

The consultation document also states 'The successful local delivery of the model will need to be underpinned by the intelligent commissioning of services based on robust population needs assessments, with the people using social prescribing services and community based support involved throughout the commissioning cycle'. As we note above, in the past we have been concerned that the population assessments have not considered the Welsh language sufficiently; we hope that the recent assessments give better consideration to the Welsh language. Local authorities, health boards, police forces and fire and rescue services are now required to comply with Welsh language standards. All these bodies are named in the document as being able to be part of the referral path of social prescriptions. The specific Welsh language standards that apply to these bodies derive from regulations applicable to their sectors and they vary somewhat. All relevant bodies will have a compliance notice (which can be seen on the Welsh Language Commissioner's website) which sets out the standards they are expected to comply with. They must all, however, comply with standards in the same areas which are standards relating to service delivery, policy making, operational standards (namely the internal activities of an organisation including the development of the workforce) and record keeping (and promotion as stated above in the case of local authorities and national park authorities). The Code of Practice for The Welsh Language Standards (No. 1) Regulations 2015 states 'if a third party carries out an activity or provides a service, which is: on behalf of the body which is under a duty to comply with the standards, and under arrangements made between the body and the third party, the body must ensure that the third party complies with the standards applicable to that service' (p.15). This requirement should be highlighted in any steps intended to be taken at a national level to support the commissioning process of social prescriptions by local authorities, health boards, police forces and fire and rescue services.

We understand that the Welsh Government is currently developing a National Framework for care and support following the publication of the <u>Rebalancing</u> <u>Care and Support White Paper</u>. The National Framework should include strong guidance on how to commission care and support in Welsh and in accordance with the requirements of the Welsh language standards and the active offer. The steps that are intended to be taken at a national level to commission social prescriptions should reflect this strong guidance that we hope to see in the future National Framework for care and support.

9a	Do the current online directories and sources of information provide you (in an easily accessible format) with the all the information you need to make decisions on the appropriateness and availability of community based support?
	We do not use the sources of information referred to in the consultation document as we are not involved in the process of providing community- based support. In accordance with our response to question 1 we believe that it is necessary to ensure that activities provided by organisations that carry out community activities through the medium of Welsh and for the benefit of the Welsh language and Welsh speakers of all abilities are included in the sources, as well as information about opportunities to learn the Welsh language. The Welsh Language Commissioner's 5 year report on the position of the Welsh language 2016-20 states 'As we move to a future of digital services, we must ensure not only the availability of services in Welsh, but that resources are also allocated to promote and facilitate their use' (p.168). Therefore, as well as ensuring that the online directories/sources of information referred to in the document are in Welsh as well as English, using the directories in Welsh should be facilitated by giving the active offer of the Welsh option when people use the directories.
9b	Are there other online directories / sources of information you use?
	We do not use the sources of information referred to in the consultation document as we are not involved in the process of providing community- based support. Information about activities held through the medium of Welsh gan be found in places such as lleol.cymru and <u>local websites of Golwg</u> <u>360</u> bro which in many areas include links to the local papurau bro which will also include information about local activities.
9c	What are the key features you think online directories should provide to help people access community based support?
	Directories should include information about activities that people can participate in in Welsh regardless of their level of confidence and fluency. They should include an explanation of the active offer of Welsh language services that users should expect to receive. They should include information about the benefits of speaking and using the Welsh language and encouragement to do so when taking advantage of support in the community if people so wish. Online directories should facilitate the opportunity to use them in Welsh, please see the guidance provided in the Commissioner's document <u>Technology, Websites and Software: Welsh Language Considerations</u> in this regard.
10a	What actions could we take at a national level to help address the barriers to access?

	Recent evidence gathered by the Welsh Language Commissioner shows that 41% of the Welsh speakers who were questioned would prefer to either use Welsh every time, or receive bilingual services from public bodies. From the perspective of Welsh speakers therefore, it should be ensured that social prescription services are available in accordance with the principle of the active offer so that individuals should not have to request services in Welsh. In the health and care field in particular, the actions and principles that are part of the <u>More than words 2022-27</u> plan should be incorporated at national and local level when drawing up and implementing this national framework for social prescribing. The services provided by relevant public bodies or on their behalf by third sector bodies should be provided in accordance with Welsh language standards (Please see our response to question 8 for further explanation). The Welsh language if organisations did more to facilitate the use of the Welsh language and were able to guarantee Welsh language services.
10b	What actions could we take at a national level to help address barriers to access faced by more vulnerable and disadvantaged groups?
	Please see above. The steps taken at a national level to help address barriers to access faced by more vulnerable and disadvantaged groups should facilitate the implementation of Welsh language standards by public bodies (or third party provider on their behalf), and facilitate the provision of public services in Welsh by other bodies that do not operate in accordance with Welsh language standards. It is possible that a number of Welsh speakers would be more likely to use services if they knew they were available in Welsh.
11a	Should the national framework contain a set of national standards for community support to help mitigate safeguarding concerns? Yes / No / Not sure
	No comment.
11b	If yes, what are the key things the national standards for community support should cover?
	No comment.
11c	If no or not sure, what are your main concerns around the introduction of national standards for community based support and how might these be addressed?
	Any national standards should recognise and facilitate the requirements of the Welsh language standards and the principle of the active offer.

40	What actions actually at a metional built to be a second to the
12	What actions could we take at a national level to help overcome barriers to using digital technology for community based support?
	A lack of internet connection in rural areas and a lack of technological skills are
	often barriers to using digital technology. Action needs to be taken at a
	national level to try to overcome these barriers. They have meant that some
	people have been deprived of the digital social opportunities which affect
	their opportunities to use the Welsh language.
13	What action could we take at a national level to support effective
	partnership work to secure long term funding arrangements?
	No comment.
14	What actions could we take at a national level to mitigate the impact of
	the increased demand on local community assets and well-being
	activities?
	No comment.
15	In your view what are the core things we need to measure to
	demonstrate the impact of social prescribing?
	The language choice of people being referred; the number of Welsh social
	prescriptions provided; the ability of the workforce to provide social
	prescriptions in Welsh; and the effect of providing social prescriptions in
	Welsh on the well-being of Welsh speakers should all be measured. Measuring
	these core aspects would be a means of measuring the impact of social
	prescribing in Welsh, as well as the need for Welsh prescriptions and the
	ability of the services to provide them in Welsh. Such information would be
	useful in the interest of increasing the capacity to provide social prescriptions
	in Welsh. We encourage you to incorporate the actions of More than just
	words 2022-27 in relation to the process of measuring the impact of social
	prescribing in this framework, see for example action 7, and section 4
	regarding monitoring progress.
16a	Do you have any research or evaluation evidence you'd like to share
	with us?
	No comment.
16b	Do you have any suggestions on how the implementation of the national
	framework in Wales can and should be evaluated
	Undoubtedly, the extent to which the national framework ensures that social
	prescriptions are available to Welsh speakers in all parts of Wales should be
	evaluated in accordance with the principle of the active offer. The impact of
	Welsh language prescriptions and those that are culturally compatible with
1 I	people's identity on the well-being of individuals should be evaluated in order

	to establish an evidence base for the well-being benefits of social prescriptions in the Welsh language, and in order to plan for the future.
17a	What are the key knowledge and skills the planned competency framework should cover?
	The proposed competence framework should include the Welsh language as a key skill. This would be a means of enabling the provision of social prescriptions through the medium of Welsh. Operational standards that health bodies, local authorities, police forces and fire and rescue services are expected to comply with relate to fostering the Welsh language skills of the workforce through planning and training the workforce. The proposed competency framework should reflect the requirements of these standards. Please see our response to question 19 for more information on the operational standards.
	Academically accredited Welsh language courses are available at all levels for people learning the Welsh language. Some employers in the public sector will offer language courses internally to their staff but courses are also offered by providers through the National Centre for Learning Welsh and many of them are available digitally. Many courses are available through the Centre's Learn Welsh scheme specifically to strengthen the language skills of individuals for work purposes.
	The framework should also include the need for linguistic awareness and understanding of the active offer so that employees understand the importance of providing services in Welsh. We would encourage you to discuss the framework with the officers responsible for implementing <u>More</u> <u>than words 2022-27</u> within the Welsh Government, as it includes specific actions in relation to learning the Welsh language and linguistic awareness for the health and care workforce (see actions 13-19 for the current workforce, and actions 20-28 for the future workforce) specifically in order to implement the principle of the active offer.
17b	How can the planned competency framework best complement existing professional standards?
	Please see our response to question 17a above.
18	Are there benefits and/or disadvantages of education and training to underpin the competency framework, that is academically accredited?
	Please see our response to question 17a above regarding language awareness training and learning Welsh.
19	What other actions could we take at a national level to support the development of the workforce?

	Please see our answer above to question 17a. There are actions within <i>More</i>
	<u>than words 2022-27</u> for developing the skills of the health and care workforce and raising their linguistic awareness. Actions related to developing the
	workforce within this framework should be consistent with <u>More than words</u> <u>2022-27</u> and Welsh language standards.
	As already stated, local authorities, health boards, police forces and fire services are required to comply with Welsh language standards. These standards include specific operational standards which are intended to develop the Welsh language skills of the workforce through planning and training the workforce. For example, these bodies are required to assess the skills of their workforce; give staff the opportunity to have Welsh lessons and training on using the Welsh language in certain circumstances; training courses on Welsh language awareness, an understanding of the duty to act in accordance with Welsh language standards and an understanding of how the Welsh language can be used in the workplace. In addition, when assessing the needs for a new job or a vacant post, the need for skills in the Welsh language must be assessed. They are also required to develop a policy on the use of the Welsh language internally, with the intention of promoting and facilitating the use of the Welsh language as well. Actions taken at national level should facilitate the implementation of these standards.
20a	What are your current experiences of using digital technology in the following areas of social prescribing?
	 Referral process Assessment process Accessing community based support Delivery of community based support Management of information and reporting of outputs / outcomes
	We have no experience of using digital technology in the above social prescribing areas. However, in order to ensure that Welsh speakers receive services in the Welsh language in accordance with the proactive proposal, the Welsh language must be part of each step above:
	 Each individual's linguistic needs/wishes should be part of the referral and assessment process. Each individual's language choice must be ascertained and recorded, and the information must be shared through technology (and otherwise) in order to plan and provide Welsh language services.
	• It should be possible to access social prescriptions through the medium of Welsh and the strategy should facilitate the provision of support in the community through the medium of Welsh, see our answer to question 1 in this regard.

	 Information about the linguistic needs of Welsh speakers should be collected in order to plan and provide social prescriptions in the Welsh language and should be part of the method of reporting on outputs and results. Information must be shared about the importance of social prescriptions in Welsh and good practice, as well as where and how they can be accessed in Welsh. More than words 2022-27 underlines the importance of sharing good practice about Welsh language services in the health and care sector.
20b	How could the use of digital technology enhance delivery of social
	prescribing in the following areas?
	 Referral process Assessment process Accessing community based support Delivery of community based support Management of information and reporting of outputs / outcomes
	As stated above, digital technology can enable the recording and sharing of information about the language choice of Welsh speakers between agencies and providers. This information must be passed on and used to ensure that Welsh speakers can follow social prescriptions in the Welsh language.
	Digital technology can also gather information about the provision of social prescriptions available in Welsh and the ability of the workforce to provide them through the medium of Welsh. This is information that can be used to plan services.
21a	We would like to know your views on the effects that the introduction of a national framework for social prescribing 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?
	It is possible that social prescribing could increase opportunities for people to use the Welsh language if it is ensured that those prescriptions are available in Welsh. We have referred in our response to question 1 and the following questions, to gaps in this framework from the point of view of the Welsh language. If the framework does not consider those aspects, we are concerned that the strategy will not provide opportunities for people to use the Welsh language. These matters include:
	 An explanation of how social prescribing would be provided in accordance with the active offer of Welsh language services. An understanding and appreciation of the requirements of Welsh language standards in relation to the services provided by and on

	 behalf of a number of public bodies that are part of referral and commissioning arrangements, including the police, fire and rescue services, local health boards and local authorities. The framework should facilitate compliance of organisations with the standards. how activities provided by organisations that carry out community activities through the medium of Welsh and for the benefit of the Welsh language and Welsh speakers of all levels of fluency, could be part of social prescribing. the benefits of learning Welsh from the point of view of well-being, self-esteem, confidence, social contact and especially in the context of community cohesion in addition to learning a new skill.
21b	Please also explain how you believe the proposed a national framework for social prescribing 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.
	Welsh Ministers are required to comply with Welsh language standards. These standards include policy-making standards which relate to the publication of consultation documents relating to policy decisions (<u>see standards 91-93 in</u> <u>the Welsh Ministers' compliance notic</u> e on the Welsh Language Commissioner's website). These standards are a means to ensure that consultation documents which relate to a policy decision consider and seek views on the potential effects that the decision will have on the Welsh language and opportunities to use it
	As we have already noted, there is evidence that shows the importance of providing care through the medium of Welsh for many Welsh speakers (see for example Language and Culture in the Caregiving of People with Dementia in Care Homes - What Are the Implications for Well-Being? A Scoping Review with a Welsh Perspective in relation to dementia; and The importance of mental health care in Welsh - Mind blog that underlines the importance of mental health care in Welsh). It is not clear to us whether the potential effects of the framework on the Welsh language and opportunities for people to use the Welsh language were considered when drawing up this consultation. In fact, there is no reference at all to social prescribing and the Welsh language in the consultation document. This is despite the emphasis in the Welsh Government's Welsh Language Strategy 2050 on increasing the opportunities to use the Welsh language in workplaces and in the community. We note in our responses to questions 1 and 21a above some of the obvious considerations in relation to the Welsh language which we think should be

part of the consultation on this framework so that it could have a positive effect on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Furthermore, the research documents in the field, which are referred to in the consultation document, do not discuss social prescribing in the Welsh language (see Social Prescribing in Wales (2018) published in 2018 by the Primary Care Hub in Public Health Wales and Understanding social prescribing in Wales: a mixed methods study., (September 2021) by Public Health Wales, University of South Wales, Data Cymru and the Wales School of Social Prescribing Research (WSSPR). It is explained that 'The work [Understanding social prescribing in Wales: a mixed methods study] aimed to outline the baseline from which a national framework could be developed, including an understanding of the interactions between service users and social prescribing projects, the social prescribing workforce in Wales, and also the impact of the COVID-19 pandemic'. We would have expected that an understanding of the Welsh language provision would be an essential part of trying to understand the 'baseline' for developing a national framework. This is as a result of the connected national well-being goals that incorporate the Welsh language; the objectives of More than just words 2022-27; the intentions of the Welsh Language (Wales) Measure 2011 and the relevance of the Welsh language standards' legal duties as well as the objective of the Welsh Language Strategy 2050 to increase by 10% the number people who use the Welsh language on a daily basis.

After considering this consultation document, the Welsh Language Commissioner is considering the Welsh Ministers' compliance with the Welsh language standards, and it is possible that further correspondence will follow from us in this regard

22 We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

No comment.