Comisiynydd y Gymraeg
Welsh Language Commissioner

Advice note to Welsh Ministers on increasing health and care services through the medium of Welsh

July 2026

1 **Executive summary:** Advice note to Welsh Ministers on increasing the capacity of health and care services to provide clinical services through the medium of Welsh

1.1 Purpose: This note provides advice to Welsh Ministers on the steps that need to be taken to increase the capacity of health and care sector to provide clinical services through the medium of Welsh.

1.2 The strategic challenge: Despite the introduction of Welsh language standards and the More than just words (MTJW) strategy, Welsh-medium clinical provision remains inconsistent and insufficient. Progress has been gradual and fragmented, and Welsh speakers still cannot be confident that they will receive care in Welsh.

1.3 Risk: Without a change in ways of working, it will not be possible to realise the vision that Welsh speakers are proactively offered health and social care services through the medium of Welsh in every part of Wales. This is likely to have an adverse effect on individuals' experience and health.

1.4 The proposed solution: Prioritise more intensive action and increase resources to expand the capacity of the health and care sector to provide clinical services in Welsh by:

- Focusing specifically on developing Welsh-medium clinical provision in priority areas
- Moving towards a more intensive and strategic approach by prioritising key areas and concentrating on action and embedding change on the ground
- Reviewing governance, accountability and collaboration arrangements across the health and social care system
- Placing greater emphasis on primary care services.

1.5 The steps that need to be taken by Welsh Ministers

- Set the strategic direction for reviewing and revising the MTJW plan, ensuring that the new plan focuses more specifically on clinical services and prioritises a smaller number of key issues.
- Establish a team of MTJW lead officers to work in priority areas.
- Ensure that the Welsh language is a specific, high-status responsibility at executive and non-executive level within every health board and national health trust, ensuring that Welsh is fully integrated into every element of these organisations' work.
- Make the fullest use of the Welsh Language Commissioner as a regulator and as an organisation that works directly with the sector to improve clinical services for Welsh speakers. As part of this, consideration should be given to how the 5-year plans of health boards and national health trusts which are prepared in accordance

with standard 110, could be aligned with MTJW commitments and the work of MTJW lead officers.

- Revise governance, accountability and collaboration arrangements across the health and social care sector with respect to improving Welsh language provision.
- As part of the Welsh Government's commitments to reform and improve primary care services in Wales, ensure that there is increasing strategic emphasis on developing primary care services through the medium of Welsh. As part of this, the primary care duties should be reviewed and revised, including processes for monitoring, evaluating and reporting on progress.

2 **The full advice:** increasing the capacity of health and care sector to provide clinical services through the medium of Welsh

2.1 Section 4 of the Welsh Language (Wales) Measure 2011 places a duty on me to provide advice and assistance to Welsh Ministers on any matter relevant to the Commissioner's functions, or to promoting and facilitating the use of the Welsh language. Under this provision, I am submitting this advice note to set out the steps I consider necessary to increase the capacity of health and care sector to provide clinical services through the medium of Welsh.

3 Our vision

3.1 Being able to use Welsh when receiving health and care services is vitally important, especially as individuals will often be in a position of vulnerability when receiving those services. By the end of the next Government term, we wish to see meaningful progress in the capacity of the health and care sector in Wales to provide clinical services through the medium of Welsh.

3.2 We wish to see the health and social care sector acting more intensively and effectively to increase its capacity to provide Welsh-medium clinical services. This is particularly the case in relation to the More than just words (MTJW) priority areas and the priority areas identified in the 5-year strategic plans of health boards and national health trusts. These areas include children and young people, older people, people with learning disabilities, users of mental health services, people living with dementia, people using stroke services, and people using speech and language therapy services.

3.3 In addition to the priority areas above, we wish to see greater emphasis on increasing the primary care sector's capacity to provide clinical services through the medium of Welsh.

4 The current position

The standards

4.1 The Welsh language standards place duties on health boards and trusts to provide several services in Welsh, including case conferences, inpatient admission processes, correspondence, websites, public events and forms.

4.2 The standards do not directly address the provision of clinical services through the medium of Welsh. However, standard 110 places specific requirements on bodies to prepare a 5-year plan outlining how they will increase their capacity to conduct clinical consultations through the medium of Welsh. Standards 23 and 23A also require them to ask an inpatient whether they wish to use Welsh to communicate and, if they do, to inform staff who are likely to communicate with that patient.

4.3 A number of other requirements in the standards are relevant in the context of increasing capacity to provide clinical services through the medium of Welsh. For example, health boards and trusts are required to provide training opportunities for employees to develop awareness of the Welsh language, understanding how Welsh can be used in the workplace, and opportunities to receive Welsh lessons. They are also required to record employees' Welsh language skills, to consider the need for Welsh language skills when recruiting, and to consider the effect of any policy decision on the Welsh language.

4.4 The Welsh language standards apply to NHS primary care services contracted by health boards. Health boards are also required to publish a policy on providing a primary care service (standards 78 and 78A).

4.5 At present, the Welsh language standards do not apply to independent primary care providers. However, since 2019 they have been required to follow 6 duties in relation to the Welsh language, covering matters such as notifying the local health board if they provide services through the medium of Welsh, establishing and recording the patient's language choice, and encouraging and supporting staff to use information and/or attend training courses provided by the local health board.

4.6 Local authorities which are responsible for care services are also required to provide some elements of their services in Welsh, but they are not required to provide full care packages in Welsh.

The More than just words plan

4.7 More than just words (MTJW) is the Welsh Government's strategy for increasing the use of Welsh in the health and care sector, and specifically for increasing clinical care in Welsh. It has been developed in accordance with the principle of the Active Offer, which places responsibility on health and social care providers to offer services in Welsh, rather than on the patient or service user to have to request them.

4.8 The plan sets many actions for national and local partners and focuses on themes such as culture and leadership, policies and service planning, developing workforce skills and capacity, and using data to monitor, learn and improve. A central principle of the plan is that the Welsh language needs to be integrated and mainstreamed into the existing processes of the health and care system.

4.9 At present, there is considerable overlap between the Welsh language standards for health and social care and some MTJW action points. In recent years, the Welsh Government and the Welsh Language Commissioner have collaborated more closely to focus on the central aim shared by the MTJW plan and standard 110: improving Welsh-medium clinical health and care provision.

The main challenges in securing improvement in the sector's capacity to provide clinical services through the medium of Welsh

4.10 The Welsh language standards and the MTJW plan provide firm foundations for improving health and care services in Welsh. It is also important to recognise the significant efforts made at national and local level to improve health and care services for Welsh speakers. There have been clear improvements in the sector's awareness of Welsh speakers' needs and in opportunities for health and care workers to develop their Welsh language skills.

4.11 Despite these positive developments, improving clinical services through the medium of Welsh has proved difficult. At present, there is no guarantee that a Welsh speaker will receive clinical care through the medium of Welsh, and this often has an adverse effect on individuals' experience and health. Even in priority areas such as dementia care, there is little evidence that Welsh-medium services have improved significantly over the past decade.

4.12 Some of the reasons for fragmented, limited and slow progress include:

- The ambition and objectives of the MTJW plan are welcome, but there is a risk that it is too broad and abstract in nature. It is not clear that the strategy's high-level objectives and commitments always lead to sufficient practical action on the ground.
- Although the principle of the 'Active Offer' is accepted and discussed as a policy concept across the health and care sector, it is less clear that this concept has permeated and had sufficient impact on the way care is planned, provided and funded.
- The focus on mainstreaming MTJW principles into the existing procedures of the health and care system means that the Welsh language is often everyone's responsibility, but also no one's. Too often, it is unclear who is truly responsible for implementing MTJW in specific areas. This results in weak accountability for action on the ground and in specific clinical areas.
- Resources are scarce and there has not been enough focus on prioritising areas that will have the greatest impact on the experience of Welsh speakers. The current approach tends to try to do a little bit of everything, rather than concentrating resources on specific and important areas where achieving meaningful progress would be realistic.
- There is a lack of clarity regarding responsibilities and ways of collaborating between different organisations leading on the Welsh language in the health and care sector, including the Welsh Government and the MTJW team, NHS Wales Performance and Improvement, and the Welsh Language Commissioner. Greater consideration needs to be given to which collaboration, governance and accountability arrangements will be most effective in securing improvement in the sector's capacity to provide clinical services in Welsh.

4.13 The Welsh Government has committed to reviewing the MTJW 2022-27 plan during the next financial year. This is a golden opportunity to consider the steps that need to be taken to secure faster progress in the capacity of Wales's health and care sector to provide Welsh-medium services.

5 **Our proposal:** prioritise, take more intensive action and increase resources to expand the capacity of the health and care sector to provide clinical services in Welsh

5.1 There is a significant challenge in improving health and care services through the medium of Welsh. If the experiences of Welsh speakers receiving health and care services are to change meaningfully over the coming period, the current approach must change.

5.2 Below, we outline a series of practical steps that could be taken to secure more intensive and specific action to increase the capacity of the health and care sector to provide clinical services in Welsh:

Step 1: Prioritise, focus resources, and take more intensive action in key areas

5.3 The Welsh Government's new MTJW plan should continue to set a high-level strategic direction for the Welsh language within the health and social care sector. While we accept that there is a wide range of issues that need attention, the new plan needs to focus on a smaller number of action points that have the potential to lead to practical and substantial change in the clinical experiences of Welsh speakers. It should avoid duplicating requirements that are already statutory duties under the Welsh language standards regime, as well as commitments that are so broad in nature that it is very difficult to measure their delivery.

5.4 The plan should continue to identify priority groups and areas, for example children and young people (especially in relation to additional learning needs provision), people with learning disabilities, users of mental health services, people living with dementia, people using stroke services, and people using speech and language therapy services.

Step 2: The new plan needs to be supported by more effective mechanisms for implementing and embedding change on the ground

5.5 The current MTJW plan places responsibility on different health and care organisations to implement many varied action points. Although this emphasis on integrating and mainstreaming Welsh into the existing processes of the health and care system is extremely important, this approach has not worked effectively to date.

More practical and specific mechanisms are needed to get things done. This could include:

Funding a team of lead officers who would be responsible for leading implementation of the MTJW plan and ensuring accountability within high-priority clinical areas

5.6 The main principle of this proposal is that additional, specific resource is needed to ensure that the MTJW plan is implemented and leads to real change in the clinical experiences of Welsh speakers. A practical way of doing this would be to fund a team of MTJW lead officers in specific priority areas.

5.7 These lead officers would:

- be responsible for ensuring that MTJW principles and commitments are implemented and embedded effectively within a specific priority area, with a focus on improving clinical services through the medium of Welsh.
- share good practice across the health and care service, working with professional bodies, regulators, inspectorates, health boards and trusts, social services and social care leaders, charities and others involved in patient care pathways in the specific priority area.
- give specific attention to developing social care pathways through the medium of Welsh in their priority area, ensuring that Welsh is a central consideration when needs are assessed and when social services are commissioned, provided and inspected locally.
- act as a key point of contact for health boards and national trusts as they implement standard 110 plans for increasing capacity to provide clinical services through the medium of Welsh.
- be part of developing and implementing strategies and action plans in their priority areas, ensuring that providing clinical services through the medium of Welsh is an integral part of those plans.
- identify workforce needs and collaborate with Health Education and Improvement Wales (HEIW) to ensure that programmes commissioned by HEIW contribute to achieving MTJW objectives and develop the workforce's Welsh language skills in line with the identified need.
- identify needs and opportunities to develop the Welsh language skills of the health and care workforce in a strategic and coordinated way, working with key partners to develop the workforce's capacity to provide clinical services through the medium of Welsh.
- ensure that the resources and technology needed to provide care in Welsh are available and ensure that Welsh is central to their development.

5.8 The vision is that these officers would ensure that the Welsh language is a central consideration when every element of care pathways is planned and provided in a specific clinical area. In effect, the officers would bridge the MTJW strategy and

action and delivery plans in their specific clinical areas, ensuring that MTJW commitments are implemented and embedded effectively within those areas.

Ensure that the Welsh language is a responsibility at an appropriate and high-status level within the governance structures of local health boards and national health trusts

5.9 The Welsh language should be made a specific responsibility of one of the strategic directors of every health board and national health trust. This director would be responsible for ensuring that Welsh is considered in every element of the board's work, especially in key areas such as workforce development and planning, and funding resources and technology. Given the importance of workforce development and organisational development, especially in the context of the requirements of standard 110, we believe consideration should be given to making Welsh the responsibility of the director responsible for workforce and organisational development. An important part of the strategic lead's responsibilities would be to ensure that the health board or trust plans and acts in accordance with MTJW commitments and collaborates effectively with MTJW lead officers. HEIW's decision to appoint an MTJW lead is a useful example in this context.

5.10 In addition to raising the status of Welsh within the responsibilities of the senior executive teams of health boards and national health trusts, it is also necessary to ensure that the Welsh language is a specific responsibility of non-executive board members. One non-executive member of each board and national health trust should therefore be appointed as a 'Welsh language advocate', responsible for providing oversight and accountability at non-executive level.

5.11 The executive and non-executive leaders above should be required to complete the 'Leading in a Bilingual Country' programme.

Aligning the 5-year plans prepared by health boards and trusts in accordance with standard 110 with MTJW commitments and the work of MTJW lead officers

5.12 We envisage that one of the lead's main responsibilities would be to ensure that the 5-year plans of health boards and trusts for increasing capacity to conduct clinical consultations through the medium of Welsh are powerful vehicles for implementing MTJW commitments at health board or trust level.

5.13 The potential of the statutory Welsh language standards regime needs to be used to the fullest extent to ensure that health boards and national trusts plan and act to improve clinical services for Welsh speakers. This is particularly true in relation to MTJW priority areas.

Reviewing and revising governance, accountability and collaboration arrangements

5.14 MTJW governance arrangements should be reviewed to ensure better accountability and more effective collaboration.

5.15 As part of this, consideration should be given to whether there would be merit in placing primary responsibility for ensuring the practical implementation of MTJW with

NHS Wales Performance and Improvement. Under such arrangements, the Welsh Government would be responsible for setting strategic direction and providing high-level oversight, while NHS Wales Performance and Improvement, through specialist lead officers, would be responsible for leading implementation across the health and care sector.

5.16 Governance and collaboration arrangements between the Welsh Government, NHS Wales Performance and Improvement, MTJW lead officers, health boards and national trusts, the Welsh Language Commissioner and other key partners will also need to be considered. We believe consideration should be given to establishing a National MTJW Ministerial Board to provide strategic direction and oversight, monitor progress, ensure accountability, and establish relevant sub-groups to address specific priorities.

Step 3: Ensure that the Welsh language is a central consideration in the Welsh Government's programme of work to reform primary care and GP services in Wales

5.17 As in the case of social care services, there has not been enough attention, nor enough practical action, to improve primary care services through the medium of Welsh.

5.18 Given the importance of primary care services to people's experience of the NHS, the Welsh language must be central to policy in this area. As the Welsh Government reforms and improves primary care services in Wales, it must place increasing emphasis on developing those services through the medium of Welsh.

5.19 As part of this, the duties placed on independent primary care providers should be reviewed. These duties should be consistent with the latest MTJW objectives and the Welsh Government's wider vision for the Welsh language within health and care services.

5.20 Consideration should be given to whether the duties need to be revised to reflect changes in the way patients engage with primary care services (e.g. an increase in telephone consultations and the use of technology).

5.21 The review should also consider developments such as multidisciplinary and integrated primary care centres that bring together primary care and other services such as pharmacy, therapy, housing and social care.

5.22 A central matter to be considered as part of the review is arrangements for monitoring and evaluating progress in relation to the duties that have been imposed. At present, it is not clear that there is sufficient scrutiny of, and reporting on, progress against those duties, and therefore any assurance that primary care services are complying with the duties and planning sufficiently to provide services through the medium of Welsh.

5.23 As in the priority areas above, a Welsh language lead officer in primary care should be appointed, responsible for leading the review of the primary care duties. They would also be responsible for ensuring that Welsh is central to the Government's policy developments in the field of primary care, including workforce development and access through digital and telehealth services in Welsh.

6 Illustrative case study: dementia care through the medium of Welsh

6.1 The Welsh Government's MTJW plan would set the strategic direction and priorities for the health and care sector in relation to improving clinical services through the medium of Welsh.

6.2 An MTJW dementia lead officer would be responsible for ensuring that MTJW's most important commitments and principles are implemented and embedded as effectively as possible in the field of dementia care.

6.3 The lead officer would work with the central MTJW team and the Welsh Government's dementia team and engage with the wide range of organisations responsible for planning and providing dementia services in Wales. In practice, this would mean ensuring that the Welsh language is a central consideration in relation to matters such as:

- Awareness-raising campaigns for reducing risk and preventing dementia
- Recording and sharing data on the language needs of people living with dementia
- Diagnosis, assessment and resources
- Developing bilingual care pathways
- Assessing needs, commissioning and providing social care services
- Workforce planning, the education and skills sector, and developing the Welsh language skills of the existing workforce
- Good practice and professional guidance for health and care workers
- Inspection, evaluation and monitoring
- Culture change and leadership

6.4 Such a lead officer could be responsible for developing and implementing a delivery plan for Welsh-medium dementia care, as part of the Welsh Government's dementia strategy and as a core part of the governance and accountability framework.

6.5 The strategic Welsh language lead in health boards and trusts would be responsible for ensuring that the health board or trust's 5-year plans align with and contribute fully to delivering action plans in the field of dementia care.