

Informing the Dementia Strategy 2026 to 2036 – Consultation Response Form

Personal information

<h3>Confidentiality</h3>
Responses to consultations may be made public on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: <input type="checkbox"/>

Your name Hywel Iorwerth
Your organisation (if applicable) Welsh Language Commissioner
Your interest in the strategy (drop down menu with lived experience, unpaid / family carer, member of the public, health care staff, social care staff, third sector staff, other professional role, organisational response, prefer not to say). Please tick all that apply. The post of Welsh Language Commissioner was established by the Welsh Language (Wales) Measure 2011, with the aim of promoting and facilitating the use of the Welsh language. The Measure provides that, in exercising their functions, the Welsh Language Commissioner may offer advice and/or comments to any person. In this context, and in line with the Commissioner’s role as an independent advocate on behalf of Welsh speakers, the comments below are provided on the draft Dementia Strategy 2026–2036.
Contact details and email address Hywel.iorwerth@cyg-wlc.cymru
Which version of the consultation document have you looked at? Please tick all that apply. (Draft Dementia Strategy, BSL, Easy Read) Draft Dementia Strategy

Question 1

How much do you agree or disagree that the following statement sets out an overall vision that is right for Wales?

Wales will be a nation where people living with dementia are respected, supported, and empowered to live independently and with dignity in their communities. We envision a society where stigma is not accepted and an increased awareness of dementia, supports people living with dementia and their families to live and socialise in inclusive and compassionate communities, that will empower people to live independently and with dignity in their communities through diagnosis, care, and treatment. Achieving this vision requires a united, cross-government and multi-agency effort, grounded in the voices and experiences of those living with dementia. Together, we will build a future where rights are upheld, support is person-centred, and no one faces dementia alone.

Strongly disagree	Disagree	Neither agree or disagree	Agree	Strongly agree
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question 1.a

Please explain your reasons for your answer to Q1.

We believe that reference should be made to the fact that Wales is a bilingual country. For example, Wales could be described as “a bilingual nation where people living with dementia, whether they are Welsh or English speakers, are respected and supported, and are empowered to live independently with dignity in their communities”

Question 2

2a) What is the single most important change you want to see for people living with dementia in the next 10 years?

We wish to see a significant improvement in dementia services delivered through the medium of Welsh. Welsh speakers need to be able to receive high-quality dementia services through the medium of Welsh, wherever they live. At present, the lack of Welsh-medium dementia services is having a significant and detrimental impact on Welsh speakers and their families.

Evidence from the evaluation of the previous dementia action plan, together with the wider evidence gathered by the Dementia and Welsh Language sub-group, highlights that there was very limited progress in terms of Welsh-medium dementia care over the period of the previous dementia action plan.

The new dementia strategy needs to reflect this lack of progress by setting out bold actions that will be implemented during the lifetime of the strategy to address it. The provision of health and care services through the medium of Welsh must be a priority in the new strategy.

2b) How much do you agree or disagree that the strategy is looking to achieve that change?

We believe that the strategy intends to deliver this change, and we welcome the fact that the Welsh language is given prominent consideration. Nevertheless, and as we elaborate in our responses to the subsequent questions, there are two main issues that need to be considered further to ensure that the strategy delivers the necessary changes:

1. **The Welsh language needs to be given more prominent and specific consideration in the section that discusses the principles to be considered across the strategy:** see our response to question 3.a.
2. **As the Government develops a more detailed strategy, it must include specific action points and commitments in relation to the Welsh language:** We understand that the purpose of this consultation is to provide an early opportunity for people to engage with the content and themes that will be included in the final strategy. We therefore expect the final strategy to be more detailed and to include specific commitments and action points setting out how the Government will deliver the vision. As the Government develops the final, more detailed strategy, we believe it is essential to include specific commitments and action points to improve Welsh-medium dementia services. As we set out in our responses to the remaining consultation questions, the Welsh language needs to be considered as an integral part of each of the priorities included.

Question 3

We have set out principles that we think are the building blocks of the new Dementia Strategy. These are:

- Person-centred.
- Rights-based approach.

- Co-production.
- Equity of access, experience and outcomes without stigma and discrimination.
- Recognising intersectionality.
- Timely and accurate diagnosis.
- Taking a preventative approach by focusing on brain health.
- Integrated and coordinated services.
- Providing support for unpaid carers and families.
- Developing our workforce.
- Supporting research and innovation.

How much do you agree or disagree these principles are the right ones?

Strongly disagree	Disagree	Neither agree or disagree	Agree	Strongly agree
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question 3.a

Please explain your reasons for your answer to Q3. If you think any principles are missing, include them here.

We do not disagree with the principles that are included, but we believe that the principles should include the provision of bilingual services. Although it could be argued that the provision of services through the medium of Welsh is linked to several of the principles, the Welsh language is not mentioned in this section. We therefore recommend that an additional principle be included which focuses on the provision of Welsh-medium dementia services, and that reference also be made to the importance of matters such as developing Welsh-medium assessments and developing a bilingual workforce.

As you are aware, the provision of health and care services through the medium of Welsh, particularly in key areas such as dementia, is a policy priority for the Welsh Government. We therefore believe that the strategy should make specific reference to the principle that Welsh speakers have the right to receive dementia services through the medium of Welsh, and that this is a matter of need and is essential in order to respect and ensure the dignity of the individual.

In questions 4 to 10, we've listed these key areas and provided space for you to share your views on each one.

Question 4

Section A outlines the areas that we will consider under 'Risk Reduction and Prevention in Dementia'.

How much do you agree or disagree that this section identifies the appropriate areas to consider for this key theme?

Strongly disagree	Disagree	Neither agree or disagree	Agree	Strongly agree
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Question 4a

Please explain your reasons for your answer to Q4.

We welcome the fact that this section refers specifically to Welsh speakers, and to the importance of the Welsh-speaking community in the context of supporting individuals to remain socially connected.

Question 4b

Is there anything else you think should be included in this section?

As the Government develops the more detailed strategy, we would encourage you to consider further how Welsh speakers and Welsh-speaking communities could be engaged, specifically when seeking to promote healthy lifestyles and prevent dementia. This could include developing targeted interventions aimed at Welsh speakers in different areas, encouraging charities and organisations working in the field to provide services in Welsh, and considering which charities and organisations already tend to serve Welsh speakers and Welsh-speaking communities and could contribute to the provision of Welsh-language services.

Question 5

Section B outlines the areas that we will consider under 'raise awareness and understanding of dementia.'

How much do you agree or disagree that this section outlines the areas that we should consider for this key area?

Strongly disagree	Disagree	Neither agree or disagree	Agree	Strongly agree
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Question 5a

Please explain your reasons for your answer to Q5.

We strongly welcome the fact that this section clearly sets out the Government's commitment to tailoring public health messages to different audiences and to consider the needs of Welsh speakers.

In the context of social prescribing, we fully agree that there is a need to consider specifically which community assets are most likely to reach, support and raise awareness among Welsh speakers.

Question 5b

If there are other population groups that you feel are at greater risk of dementia and should be drawn out here, please include these below.

Although there is no evidence that Welsh speakers are at greater risk of dementia, there is evidence that Welsh speakers tend to receive a diagnosis later in life. While the reasons for this are not entirely clear, consideration should be given to whether a lack of awareness, or factors such as many Welsh speakers living in rural and more isolated areas, may be a contributing factor.

Question 5c

Is there anything else you think should be included in this section?

We would encourage you to include more specific action points to identify these community assets and to set out how public health messages can be tailored and Welsh speakers targeted specifically.

It should be ensured that awareness-raising activities consider specifically how to reach and meet the needs of Welsh-speaking audiences, and that they are developed in partnership with organisations and charities that already operate bilingually and have experience of engaging with Welsh speakers.

As part of this, it should be ensured that any awareness-raising materials that are developed or used are available in Welsh by default.

Question 6

Section C outlines the areas that we will consider under 'dementia diagnosis, treatment, care and support'.

How much do you agree or disagree that this section outlines the areas that we should consider for this key area?

Strongly disagree	Disagree	Neither agree or disagree	Agree	Strongly agree
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question 6a

Please explain your reasons for your answer to Q6.

We agree that this section outlines several important areas that should be considered, and this includes considerations relating to the Welsh language. However, as it stands, the document provides a general outline of what the strategy hopes to achieve and offers very little detail as to how this will happen. For example, we fully agree that there is a need to develop and validate diagnostic assessments in Welsh to ensure a fair and high-quality service, but our main interest is how the new strategy will ensure that this actually happens. Similarly, the section on the Welsh language refers to the importance of providing dementia services through the medium of Welsh, but there is no detail on how this will be achieved, what the specific action points are, or who will be responsible for delivering this across different parts of the health service.

Question 6b. Below is a list of the key topics in this area. Please let us know if you think more information is needed for any of these

As you are aware, the Dementia and the Welsh Language sub-group has already provided very detailed advice on the priorities that the new strategy needs to focus on in terms of the provision of Welsh-medium services. In its current form, the strategy does little more than restate the importance of providing dementia services through the medium of Welsh. In our view, the final version of the strategy needs to respond to the advice of the dementia sub-group by setting out specific action points that will lead to improved experiences for Welsh speakers living with dementia

There is therefore a need for more information and for detailed action points in relation to the following areas:

Recording individuals' language preference and needs

- It is necessary to ensure that the language preference/needs of an individual living with dementia are recorded effectively, that this information is shared effectively between health and care services, and that it forms the basis for planning individuals' care pathways.

Collecting information on staff language skills

- Although significant work is already underway in this area as a result of the *More than Just Words* (Mwy na Geiriau) plan, the requirements of the Welsh Language Standards, and the work of Social Care Wales, there is a need to drive and prioritise this work of recording the language skills of the workforce within priority areas such as dementia.

Supporting a dementia diagnosis

- Further research work is required on the development and validation of assessments in Welsh, and there is a need to appoint a clinical lead with research experience to lead this work with the support of the Government.
 - There is a need to share good practice and resources in relation to assessment and diagnosis. As part of this, clear guidance, resources and workforce training need to be developed.

Providing information, advice and clarity on Welsh-medium care and support pathways

- Improved processes are needed for sharing up-to-date information with Welsh speakers about the types of services and support available locally through the medium of Welsh.
- Welsh speakers living with dementia and their families need to receive clear and accessible information about the extent of Welsh-medium provision within care services. Specific action points and commitments should be included to ensure that individuals and families are able to choose care pathways on the basis of valid and reliable information about the language of the service.

Improving inspection and quality assurance processes in order to address inequalities

- The Welsh language should be a central element of inspection and quality assurance processes. Greater emphasis is needed on the fact that a lack of care through the medium of Welsh is equivalent to poor care and may have a detrimental impact on individuals' wellbeing.

The need to improve and develop Welsh-medium care pathways within dementia care

- It is necessary to ensure a significant improvement in the extent to which Welsh speakers are able to access Welsh-medium care pathways—this includes every element of the experience of an individual living with dementia, as well as the needs of unpaid carers.
- The final strategy needs to set out mechanisms for improving Welsh-medium care pathways. This may include prioritising and allocating more resources to deliver some of the most important commitments of the *More than Just Words* plan, considering the relevance of health board plans in line with Standard 110, and also care service commissioning processes.
- As part of this, specific attention should be given to the importance of culture and identity, recognising that the needs of Welsh speakers extend beyond the language of the service alone. There is a need to ensure culturally appropriate experiences that demonstrate respect for the identity of Welsh speakers. This is something that could—and should—be delivered in the short term.

Beyond the issues outlined above, it should be noted that the section on 'The Welsh Language' in Section C is misleading. Although the Welsh Language (Wales) Measure 2011 establishes the principle that the Welsh language should not be treated less favourably and that people have the right to use Welsh, it is not correct to state that the Measure confers a right to Welsh-medium health and care services.

The Welsh Language Standards regime provides rights to certain types of services in Welsh, such as correspondence, publications, websites, telephone answering services, reception services, signage, consideration of the Welsh language in policy decisions, workforce development, and so on. Although Standard 110 relates to planning to improve the capacity of health boards to provide clinical services in Welsh, it does not establish an absolute right to Welsh-medium clinical services. The Welsh Government's *More than Just Words* plan is the main policy mechanism focused on securing Welsh-medium clinical services. We are of the view that the proposed strategy is absolutely critical in improving the experiences of Welsh speakers living with dementia and in ensuring that Welsh-medium services of an equivalent quality are available regardless of where people live.

Question 6c

Is there anything else you think should be included in this section?

See our response to question 6b above.

Question 7

Section D outlines the areas that we will consider under 'support for unpaid carers of people living with dementia'.

How much do you agree or disagree that this section outlines the areas that we should consider for this key area?

Strongly disagree	Disagree	Neither agree or disagree	Agree	Strongly agree
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question 7a

Please explain your reasons for your answer to Q7

Question 7b

Is there anything else you think should be included in this section?

It is necessary to ensure that support for unpaid carers is available in Welsh and takes account of the needs of Welsh speakers. For a significant number of people living with dementia and their carers, Welsh is their first language and the language they naturally use to communicate.

Question 8

Section E outlines the areas that we will consider under 'supporting the workforce.'

How much do you agree or disagree that this section outlines the areas that we should consider for this key area?

Strongly disagree	Disagree	Neither agree or disagree	Agree	Strongly agree
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question 8a

Please explain your reasons for your answer to Q8

Although this section refers to the fact that the Welsh Language Standards place duties on organisations to provide language training courses for staff in order to develop awareness of the Welsh language, there are many more issues that should be considered here, as we outline below.

Question 8b

Is there anything else you think should be included in this section?

As the Dementia and the Welsh Language sub-group has noted, developing the capacity of the health and care workforce to provide services through the medium of Welsh is absolutely critical.

Clear and ambitious plans are needed to increase workforce capacity to deliver dementia services through the medium of Welsh. This requires consideration of a wide range of issues, for example:

- recording the workforce's language skills
- language awareness
- strategic recruitment, with greater emphasis on identifying roles where Welsh language skills are essential
- strategic planning to make effective use of the Welsh language skills of the existing workforce
- language training
- developing Welsh-medium and bilingual education and training pathways

The Welsh Language Standards have a key role to play in the above context. The Standards include requirements to develop Welsh language skills through workforce planning and training, assessing the need for language skills when advertising posts, providing opportunities for staff to receive Welsh lessons, and keeping records of their language skills.

Standard 110 in particular requires health boards and NHS trusts to produce a five-year plan to increase their capacity to offer clinical services through the medium of Welsh. The close collaboration between the Commissioner's office and the Welsh Government's *More than Just Words* team is key in this context. Increasing the sector's capacity to offer Welsh-medium dementia services has been identified as a priority within health boards' Standard 110 plans and is also a priority within the Welsh Government's *More than Just Words* plan.

The final dementia strategy therefore needs to support and complement the implementation of these plans and to consider the key role of a range of organisations, including the Welsh Language Commissioner, the National Centre for Learning Welsh, Health Education and Improvement Wales, the Coleg Cymraeg Cenedlaethol, and Medr.

Question 9

Section F outlines the areas that we will consider under ‘dementia research and innovation’.

How much do you agree or disagree that this section outlines the areas that we should consider for this key area?

Strongly disagree	Disagree	Neither agree or disagree	Agree	Strongly agree
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question 9a

Please explain your reasons for your answer to Q9.

As we have noted in our response to question 6.b, specific research is required in relation to assessments and diagnosis through the medium of Welsh.

There is currently a lack of understanding regarding the impact of bilingualism (in this case Welsh and English) on responses to cognitive tasks. This also includes assessments that test speech difficulties and are therefore based on oral tests. As a result, there is insufficient understanding of the normative outcomes for a healthy sample of bilingual individuals to ensure that assessments conducted in Welsh or English with bilingual people living with dementia are valid and reliable.

Research is needed to understand how changes in responses within a single language can be an indicator of difficulties associated with certain types of dementia. Following the collection of data from bilingual individuals without a diagnosis of dementia, there will be a need to develop cognitive tests that are culturally appropriate and suitable for the bilingual nature of the population.

Question 9b

Is there anything else you think should be included in this section?

Question 10

Section G outlines the areas that we will consider under ‘governance and accountability arrangements that will monitor the impact of the strategy’.

How much do you agree or disagree that this section outlines the areas that we should consider for this key area?

Strongly disagree	Disagree	Neither agree or disagree	Agree	Strongly agree
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question 10a

Please explain your reasons for your answer to Q10

The consultation document does not refer to the future of the Dementia and the Welsh Language sub-group, and it is not clear what the monitoring and accountability arrangements will be specifically in relation to improving Welsh-medium dementia services.

It is difficult to provide meaningful comments on monitoring and accountability arrangements without fully understanding the nature and content of the final strategy, and whether specific delivery plans will be developed alongside the strategy or following its publication.

In general, however, we would emphasise that the Welsh language needs to be considered a responsibility of the National Ministerial Board for Dementia, the Dementia Advisory Board, and, most importantly, the strategic leadership and delivery arrangements at regional level.

This does not mean that there is no place for a Dementia and the Welsh Language sub-group to scrutinise the implementation of specific elements of the strategy, but it is essential that issues relating to the Welsh language are not sidelined. It is essential that those individuals and organisations responsible for delivering dementia services across Wales are held accountable for delivering the specific action points and firm commitments that will be set out in the final strategy in relation to improving Welsh-medium dementia services.

In this context, in June 2025 the Commissioner published a manifesto document for the Senedd Cymru election in 2026. One of the requirements included in the manifesto document was the need to fund a team of specialist senior lead officers in the *More than Just Words* priority areas and in priority areas identified by health boards in their five-year plans. We are therefore of the view that there is a need to appoint a Welsh Language and Dementia lead who would lead the work of implementing the final strategy in relation to the Welsh language.

Question 10b When reporting on progress against the strategy, what methods of communication do you think would be helpful so that you can keep track of progress? Choose the three most helpful resources:

Annual written update	Yes
6 monthly newsletter	yes
Easy read summaries of updates	
Video updates	
Ministerial written statement	

Ministerial Oral statement	yes
Other (please specify)	

Question 10c

Is there anything else you think should be included in this section?

The Strategy Overall

Question 11

In this consultation document we are setting out what we want to achieve. The full strategy and supporting delivery plans will set out more detail on how. Are there key areas that you want to see included in how we will achieve these changes?

Section A: Risk reduction and prevention in dementia.	
Section B: Raise awareness and understanding of dementia.	
Section C: Improving dementia diagnosis, treatment, care and support.	
Section D: Supporting unpaid carers of people living with dementia.	
Section E: Supporting the Workforce.	
Section F: Supporting dementia research and innovation.	
Section G: Suitable governance and accountability arrangements to ensure the strategy is delivered.	
Other areas not covered elsewhere.	

Question 12

The new strategy will have a number of measurable targets that will show how much progress has been made. What areas would you focus on developing these targets for?

We believe it is essential to include relevant indicators in relation to dementia services delivered through the medium of Welsh.

We are aware that the Welsh Government is currently undertaking substantial work in relation to data and indicators that will demonstrate progress against the *More than Just Words* action points. The findings of this work should be taken into account when developing indicators for the final strategy.

Question 13

We have prepared impact assessments to show how the strategy may affect Wales and its people, considering both positive and negative impacts. Are there any impacts or considerations you think are missing from these assessments? Is there anything specifically you would draw out into an integrated impact assessment?

Question 14

We would like your views on how the strategy could affect the Welsh language. How could the strategy give people greater opportunities to use Welsh? How could it ensure that Welsh is treated fairly and equally alongside English?

[See our responses to the remaining questions in this consultation.](#)

We understand that the intention of this consultation is to provide an early opportunity for people to express views on some of the main themes that will be included in the final strategy. We therefore assume that there is already an intention to develop a more detailed strategy that will include more detailed action points and firmer commitments, and that will set out clear responsibilities for delivery. We also understand that there is a possibility that supporting delivery plans will be developed.

In this context, we would encourage you to give careful consideration to the advice of the Dementia and the Welsh Language sub-group, and to include detailed and ambitious action points to ensure improved experiences for Welsh speakers living with dementia.

As we have already noted, the final strategy needs to consider carefully and build on what is already being delivered through the Welsh Government's *More than Just Words* plan and the requirements of the Welsh Language Standards.

We would also remind you that consideration of the impact on the Welsh language should continue as the final strategy is developed.

Question 15

Please use this section to share any other comments or suggestions you think we should consider when finalising the dementia strategy