

Consultation Response Form

Your name:	Lowri Wynne Williams
Organisation (if applicable):	Welsh Language Commissioner
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Your Address:	

Question 1: The Strategy sets out the areas we will prioritise in planning for our ageing society and why. Have we prioritised the right areas?

Comments:

We are not experts in planning for our aging society. However, the Strategy includes priorities and actions that we believe are sensible in light of the evidence you present and which we believe would contribute to strengthening the rights and well-being of Welsh speakers in our society. You refer specifically to the importance of accessing Welsh-language services in relation to well-being. We of course support this emphasis. We also believe that there is a great deal of work to be done to achieve this through the full implementation of the Social Services and Well-being (Wales) Act 2014 in relation to services for Welsh speakers as well as implementing Welsh language standards and the priorities of *More than just words*¹ in terms of delivery of health and social care services for Welsh speakers.

However, it is vital that the provision of Welsh language services, opportunities to use the Welsh language and the development of Welsh language skills are central to this Strategy and permeate all aspects of its implementation. We believe that it would be useful to highlight this in the Strategy. With this in mind, in our answers to questions 15 and 16 we offer some issues for you to consider which would hopefully strengthen your commitment to the rights-based approach that promotes equality and social justice.

Question 2: Are there any issues that are not reflected in the Strategy that you think should be considered when planning for an ageing society?

Comments:

As we note above we believe that further consideration needs to be given to Welsh speakers' opportunities to use the Welsh language fully in all aspects of their lives and that this should be an integral part of all of the priorities of this Strategy.

Question 3: Have we identified the key policies and mechanisms that can deliver real change in the lives of older people today and future generations?

Comments:

¹ [Welsh language in healthcare \(More than just words\): action plan 2019 to 2020 | GOV.WALES](#)

Please see our answer to question 15.

Question 4: Does the content amount to a sufficiently ambitious response to the major public policy issue of our ageing society?

Comments:

Please see our response to questions 1, 2, 15 and 16.

Question 5: Will the Strategy help to maximise the potential of the growing numbers of older people in our communities?

Comments:

Please see our response to questions 1, 2, 15 and 16.

Question 6: Do you agree with our ambition to work towards an age friendly Wales? If so, please state what you, as an individual or organisation, are doing to help us to create an age friendly Wales.

Comments:

Yes, we agree with your ambition.

Question 7: How has Covid-19 changed your ability to do things that matter to you, or the way you deliver services to older people?

Comments:

No comment.

Question 8: How can we involve older people in the re building our communities following the pandemic?

Comments:

No comment.

Welsh Government review of engagement **Questions for older people**

Question 9: Are you a member of a 50+ group or forum? If yes, how successful do you think the forum is influencing local and national policy decisions?

Comments:

No.

Question 10: Does the 50+ forum benefit your local area in other ways? (Eg. by reducing social isolation or building community resilience?)

Comments:

Not relevant.

Question 11: How do you think local and national government can better engage with older people?

Comments:

Not relevant.

Questions for local authorities

Question 12: Does a 50+ Forum still operate in your area? If yes, how successful is it in involving older people in local decision making?

Comments:
Not relevant.

Question 13: Does your 50+ forum benefit your local area in other ways? (Eg. by reducing social isolation or building community resilience?)

Comments:
Not relevant.

Question 14: If a 50+ forum is not active in your local area, how do you engage with older people?

Comments:
Not relevant.

Question 15: We would like to know your views on the effects that the *Strategy for an Ageing Society* for 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?

Comments:

We are not experts in planning for our aging society. However, the Strategy includes priorities and actions that we believe are sensible in light of the evidence you present and which we believe would contribute to strengthening the rights and well-being of Welsh speakers in our society.

The Strategy outlines that a 'rights based approach that promotes equality and social justice across a range of policy areas' was adopted. We would like to emphasize that Welsh speakers have rights to receive services in Welsh and that the Welsh language should not be treated less favourably than English in light of the Welsh Language (Wales) Measure 2011 and Welsh language standards. Specifically, public organizations need to consider the impact of their policy decisions on opportunities to use the Welsh language. It is therefore essential that the principle of the policy making standards and the opportunities of older Welsh speakers as well as their well-being are central to the implementation of this Strategy and the programmes and projects associated with it. The proposed directions of your vision (page 6) include the two references below which are essential with regards to aging Welsh speakers but really apply to Welsh speakers of all ages:

- A Wales where individuals can take responsibility for their own health and well-being **whilst feeling confident that support will be available and easily accessible if needed.**

We hear all too often about Welsh speakers not asking for services in Welsh because they are not confident that they will receive those services in Welsh, or that they do not want to be seen to be 'a nuisance' by asking for them. Many people prefer to receive services in Welsh and indeed this is one way of ensuring their well-being. Ensuring that Welsh speakers are not disadvantaged by wanting and choosing to receive services in Welsh is essential. There should be a move towards considering that the provision of health and well-being services in Welsh is a measure of the quality of those services, reinforcing the following reference in the Strategy:

- A Wales where ageism does not limit potential or **affect the quality of services older people receive.**

We are keen to know the extent to which the importance of providing Welsh language services to Welsh speakers in an aging society is at the heart of all the policies and mechanisms referred to in the Strategy. Our understanding of reading the Strategy is that it will be implemented in partnership with organisations from many sectors including the third, private and housing sectors. It would be good to know how the Government is ensuring that these bodies are mainstreaming the needs of Welsh speakers into funded projects and how this is monitored.

The Welsh Language Commissioner works with third and private sector organisations to develop Welsh Language Development Plans as a step towards receiving the Welsh Language Offer (Cynnig Cymraeg) which enables these organisations to demonstrate their commitment to the Welsh language and to ensure the quality of their Welsh language services. It is a scheme that the Commissioner has developed to assist businesses and charities to market the Welsh language services available. We believe that it would be very beneficial for you to ensure that the third and private sector organisations involved in implementing the objectives of this Strategy have a Welsh Language Development Plan as well as meeting the requirements of funded projects in terms of Welsh language provision in accordance with the Government's grant-making framework.

Question 16: Please also explain how you believe the proposed policy *Strategy for an Ageing Society* 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.

Comments:

We set out below some issues for you to consider in relation to the Welsh language when considering the national aims of implementing this Strategy:

National aim: Enhancing well-being

This section underlines the importance of the health and social care system in order to meet the needs of an ageing population. The Strategy sets out the Government's aim of creating 'a fully integrated health and social care system that supports people to take responsibility for their own health and well-being whilst feeling confident that

support will be available and easily accessible if needed.’ The following intentions are set out amongst others:

- a whole system approach where seamless support, **care or treatment is provided as close to home as possible**;
- services designed around **individuals, based on their unique needs and what matters to them**, as well as quality and safety outcomes;
- more **local services available in community settings** to allow people to access a wider range of advice and help more easily.

(our emphasis)

We support the above principles. However, the emphasis we have placed on some clauses underlines the need to plan health and care services for Welsh speakers so that people are confident that they will receive services in Welsh when they wish to receive them. Receiving health and care services for many older people is not an option but a matter of need and necessity. The Welsh Government underlines this in *More than just words*, and this is also emphasised in this Strategy (page 14) ‘we want to create an environment where everyone will want to use the Welsh language and feel comfortable to do so in all aspects of their lives. This is important for all services, but even more so in health and care as the quality of care can be compromised by the failure to communicate with people in their first language. For many older people the use of the Welsh language is not just a matter of choice but can be a matter of need, especially those suffering from dementia or stroke who may lose their second language.’ However, we know that this does not always happen at the moment.

In September 2020 Care Inspectorate Wales published a National review of care homes for people living with dementia.² The review found examples of good practice, however it states: ‘We saw Welsh-speaking people in homes where there were no Welsh-speaking staff and no Welsh language activities or resources. Less than half of care homes provide a bilingual service and it would appear many care homes do not identify people who are Welsh speaking. This could be harmful for people whose preference is to communicate in Welsh and an infringement of their individual rights’ (page 6). This reflects the finding of a joint report between the Welsh Language Commissioner and Alzheimer’s Society Cymru on dementia services to Welsh speakers that was published in 2018. It is not acceptable that Welsh speakers in an aging society do not receive services in Welsh despite the national recognition that this is a matter of need.

Whilst we acknowledge above that the Strategy does refer to the need to provide services in Welsh, there is no detail about which initiatives are already in place to achieve this, nor is there any detail as to what initiatives are to be implemented in light of this strategy. For example:

- We would of course wish that the provision of services in Welsh should be mainstreamed into all of the projects that are referred to in the Strategy on pages 14-18 that are already in place or are planned to be implemented. This includes for example all the projects funded by the Welsh Government’s

² [National review of care homes for people living with dementia | Care Inspectorate Wales](#)

Sustainable Social Services Third Sector Grant, 2020 - 23³ However, we do believe that it would be beneficial to consider if there is a need to develop projects that have the specific aim of improving services in Welsh in some priority fields. See for example the recommendations of our joint report with Alzheimer's Society Cymru. ⁴

- The importance of the Social Services and Well-being (Wales) Act 2014 in providing services to Welsh speakers is not highlighted in the Strategy. We are very keen to know more about how this Act meets the needs of Welsh speakers. We sincerely hope that the forthcoming evaluation referred to on page 17 will adequately address this and the arrangements that local authorities and health boards and others are putting in place to ensure that Welsh speakers receive Welsh language care services. We look forward to the Welsh Government acting on those findings. As we note above, several examples in our joint report with Alzheimer's Society Cymru suggest that it is not always adequately implemented in terms of providing dementia services for Welsh speakers. We hope also that the Performance and Improvement Framework to ensure all local authorities in Wales are collecting the same data to demonstrate their compliance with the Social Services and Well-being (Wales) Act 2014 will include the collection of data on the provision of services in Welsh.

National aim: Improving local services and environments

Housing

In this section the importance of planning housing for an aging population is highlighted and reference made to the three year £105 million Integrated Care Fund capital programme to support investment in accommodation that is integrated with health and care services. We would emphasize the need to ensure that health and care services are available in Welsh as a central part of the planning of these locations. Foremost in this regard is the availability of Welsh speaking staff to provide these services. In terms of future priorities reference is made to 'working closely with the health, social care and housing sectors as well as Regional Partnership Boards to deliver a scalable programme of capital investment to ensure housing plays a significant role in the work of the Boards.' We would therefore like to emphasize the need for the provision of Welsh language services for older people to be an essential element of this programme and that all partners working together as part of these initiatives, be they from the public sector, the housing sector or other sectors should be fully aware of the importance of Welsh language provision to an aging population.

Transport

We agree that it is essential to create an older people's transport system that is accessible to all older people. Such a transport system enables many older Welsh speakers in rural communities where there is a high density of Welsh speakers to continue to live there and access cultural and social services and opportunities. The Commissioner responded to the Welsh Government's consultation on a new Transport Strategy for Wales emphasizing the importance of ensuring fair

³ [Sustainable Social Services Third Sector Grant for 2020 to 2023: funded projects | GOV.WALES](#)

⁴ [Letter from the Welsh Language Commissioner and Alzheimers Society Cymru regarding Welsh Speakers .pdf \(senedd.wales\)](#)

opportunities for Welsh speakers when receiving services and developing a transport strategy that promotes opportunities to use the language and promote economic activity in Welsh speaking areas. The Strategy outlines the intention of 'developing a new national technology platform that will, in the future, allow us to implement an account based ticketing solution for bus, rail, cycle hire, park and ride and access to other forms of transport. This system will form the foundation of how people across Wales pay for and access buses across Wales in the future.' We would like to emphasize the need for this technology platform to be available and accessible to Welsh speakers. At the same time, it must be borne in mind that not all older people may, for various reasons, wish or be able to use technological platforms.

National aim: Building and retaining people's own capability

Community participation

The importance of volunteering is discussed in this section and the significant contribution that older people make to society through volunteering is noted. It is explained that 'many community groups are almost totally dependent on older people's contributions and have struggled to continue during the pandemic due to public health restrictions.' In this regard, we would encourage you to discuss with colleagues in the Welsh Language Unit of the Welsh Government that commissioned the Sub-group for Increasing the Use of Welsh to report on the effect of COVID-19 on Welsh language community groups⁵ which includes recommendation 6: 'Note the older age profile of many of the existing Welsh language societies. The next generation of community leaders should be actively nurtured to ensure leadership succession in community groups and societies. Volunteering opportunities could be offered in Welsh-medium societies, as well as apprenticeships, work experiences and skills development opportunities. Facilitating and supporting the arrangements could be part of the work of Mentrau Iaith and Welsh-language social organisations, but they also need to be integrated into schemes across the Welsh Government that develop community leadership across Wales.' We would encourage you to discuss internally what opportunities arise from the priorities of this Strategy and how the Government will respond to the findings of the above report including, in particular recommendation 6 which appears to be a golden opportunity for encouraging intergenerational contact, which is one of the priorities of this Strategy.

It is noted in this section that work is ongoing to improve access to information and advice and reference is made to DEWIS Cymru. We would encourage you to look for opportunities to expand this directory to show the public where they can access services through the medium of Welsh.

In terms of future priorities, it is noted that the Government will fund Cruse Bereavement Care Cymru to transform national and local bereavement services, through the development of a 'Bereavement Hub.' As Commissioner we have heard of the experiences of individuals who are unable to receive bereavement support through the Welsh language therefore we would urge the Government to ensure that

⁵ [Written Statement: The effect of COVID-19 on Welsh language community groups: recommendations of the Sub-group for Increasing the Use of Welsh \(16 December 2020\) | GOV.WALES](#)

this bereavement hub includes access to national and local bereavement services in Welsh.

One of the future priorities of this section is to 'encourage intergenerational contact' and the intention to 'encourage all local health boards across Wales to establish, embed and grow intergenerational practice.' We are aware of some projects that bring young children into contact with people living with dementia for example. We would encourage you to consider the potential of using older Welsh speakers in communities across Wales to support the Welsh language development of people of all ages, whether in schools, colleges or in the community. For many children and adults who are not from Welsh speaking homes opportunities outside the classroom would greatly help them to use their Welsh in informal contexts. In this, of course, there is room for you to discuss with the National Centre for Learning Welsh, Mudiad Meithrin, Urdd Gobaith Cymru, Mentrau Iaith and Merched y Wawr for example.

Civic engagement

We are of course supportive of the emphasis placed on civic engagement with older people. However, we would encourage you to ensure that your existing initiatives and future priorities include representation of Welsh speakers from communities across Wales to share their experiences. We would therefore encourage you to discuss this with the Mentrau Iaith and Merched y Wawr especially as those who work closely with people of all ages on the ground.

Lifelong learning and older workers

We would be interested in learning more about the commitment of the Minister for Education 'to exploring how the Welsh Government can deliver a new Welsh right to lifelong learning – to give everyone in Wales access and opportunity to learn throughout their lives.' We would encourage this right to include the right for people to learn and develop their skills in Welsh as many people did not have the opportunity to learn Welsh when they were younger. This would be a good way to upskill people which is one of your priorities for older workers. It would also be a positive step towards realizing the 2050 million Welsh Language Strategy and a means of meeting the growing need for Welsh speakers in the workforce.

National aim: tackling age related poverty

We have already noted the importance of giving people the opportunity to develop their Welsh language skills. We also believe that there is a need to ensure that Welsh speakers and those who wish to learn the language are aware of the importance of Welsh language skills to the workforce in Wales. Many people did not have the opportunity to learn Welsh when they were younger and need to be supported to do so. There are many others who have Welsh language skills but lack the confidence to use them. This should be part of the 'new employability advice service delivered by Careers Wales which secures enhanced advice and guidance and provides individualised support for those facing barriers to work.' We also believe that the Welsh Government needs to look further at the importance of Welsh language skills as part of developing the foundational economy. In this respect we would be interested to see the consideration given to the Welsh language as part of the Welsh

Government's Foundational Economy Challenge Fund which develops regional economies in order to spread prosperity more evenly across Wales

Question 17: 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:

Comments:

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: