



Comisiynydd y
Gymraeg
Welsh Language
Commissioner

Health and Social Care Committee
Welsh Parliament
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Dear Chair,

The Health and Social Care Committee's priorities for the Seventh Senedd

Thank you very much for the opportunity to take part in the above consultation.

Do the Welsh Government's health and care priorities reflect the most significant challenges facing communities across Wales?

The priorities identified by the Welsh Government reflect many of the greatest challenges facing the health and social care system. These include workforce planning, the integration of health and social care services, community-based care and the shift towards prevention, strengthening mental health services, and reducing health inequalities. In relation to all these priorities, however, we believe that much greater attention needs to be given to the ability of the health and care system to deliver clinical services through the medium of Welsh.

I recently published [a five-year report on the position of the Welsh language](#) which emphasises the importance of being able to use Welsh when receiving health and care services. The report recognises the significant change that has taken place in the Welsh-language policy and legislative landscape within the health and care sector in recent years. This includes the development of the Welsh Government's More than Just Words (MTJW) plan, the Social Services and Well-being (Wales) Act 2014, and the duties arising from the imposition of the Welsh language standards on health boards and national NHS trusts.

Despite these significant developments, the report concludes that Welsh-medium clinical provision remains inconsistent and inadequate. Progress in Welsh-language provision to date has been gradual and fragmented, and there is still no assurance that Welsh speakers will be able to receive care in their language. This is likely to have an adverse effect on individuals' experiences and health.

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Correspondence in Welsh and English is welcome

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I recently submitted an advice document to the Welsh Ministers outlining the steps that need to be taken to increase the capacity of the health and care service to deliver clinical services through the medium of Welsh. I attach that advice to this letter. The comments below largely reflect that advice and outline what the Government should prioritise in relation to the Welsh language in the health and social care sector. I look forward to discussing the advice with the Cabinet Minister for Health and Care shortly.

Are any important priorities missing?

The new Welsh Government has committed to improving the provision of health and care services through the medium of Welsh, including access to primary care, neurodiversity services, speech and language therapy, and mental health support. The work of reviewing and revising the More than Just Words (MTJW) action plan will be crucial in this context. The Committee should therefore include a specific priority relating to increasing the capacity of the health and care service to deliver clinical services through the medium of Welsh as part of its work programme during this Senedd. Please see our response to the final question in the consultation for further detail on how the Committee can do this.

Another important missing priority is the work of reforming primary care and GP services in Wales and, as part of that work, expanding Welsh-medium provision in these areas.

What are the main barriers to delivering these priorities and measuring progress?

The principal problem is no longer a lack of clear policy direction, but a lack of effective implementation, accountability and capacity.

The main barriers include:

- Although the ambition and commitments of the More than Just Words (MTJW) plan are to be welcomed, it is not clear that the strategy's high-level objectives and commitments always lead to practical implementation on the ground. There is currently a lack of practical mechanisms for translating high-level strategy into practical change.
- A lack of clarity and accountability regarding who is responsible for ensuring the practical implementation of the More than Just Words (MTJW) plan in specific clinical areas.
- Continuing challenges in relation to workforce capacity and the availability of workers with the necessary Welsh-language skills, including individuals' confidence in using their Welsh-language skills at work.
- A tendency for the current approach to encourage doing a little of everything, rather than concentrating scarce resources on specific priorities where securing meaningful progress would be realistic.
- A lack of sufficiently robust and effective governance arrangements. Greater clarity is needed regarding responsibilities and methods of collaboration between the different organisations that lead on the Welsh language within the health and care



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sector, including the Welsh Government and the More than Just Words (MTJW) team, NHS Wales Performance and Improvement, and the Welsh Language Commissioner.

What should the Committee focus on to make the biggest difference?

As well as focusing on the strategies, duties and legislation that relate directly to the Welsh language in health and care, the Welsh language must also be treated as a central part of the development and implementation of all legislation and policy in this field. We therefore believe that the Committee needs to mainstream consideration of the Welsh language across all the Government's priority areas and when scrutinising every element of legislation and policy that comes before it.

We suggest that the Committee should prioritise the following matters:

- Scrutinising the Welsh Government's review of the More than Just Words (MTJW) strategy, ensuring that the revised plan focuses on clinical services and Welsh-medium provision in primary care, prioritises a smaller number of key issues, and offers concrete mechanisms for embedding change on the ground.
- In connection with the point above, scrutinising governance, accountability and collaborative arrangements across the health and social care system in terms of planning and delivering services through the medium of Welsh.
- How the Welsh Government and Health Education and Improvement Wales are integrating the Welsh language as a core part of developing a long-term workforce strategy for the health and care sector.
- Examining how health boards and national NHS trusts use their strategic planning processes, including five-year plans under Standard 110, to increase the capacity of Welsh-language services and secure better outcomes for patients. The Committee should specifically scrutinise progress in increasing the capacity of the health and care service to deliver services through the medium of Welsh in priority areas such as mental health, dementia, learning disabilities, stroke, and speech and language therapy.
- As part of the Government's commitment to developing a ten-year digital and data strategy, the steps being taken by the Government and other relevant organisations to facilitate the recording of service users' language needs, as well as the Welsh-language skills of the health and care workforce.
- Examining how the Welsh Government is including the Welsh language as a central part of the work programme for reforming primary care and GP services in Wales.
- As part of establishing a National Care Service for Wales, particular attention should be given to the extent to which the Welsh language and the language needs of local populations are adequately considered when planning, funding and commissioning care services. As part of this, the Committee should scrutinise the extent to which the requirements of the Social Services and Well-being (Wales) Act



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2014 are being implemented effectively, particularly in relation to population needs assessments and the commissioning of services.

I hope that the comments above are useful as you plan the Committee's future work. I wish you every success in that work and would be pleased to contribute to it.

Yours sincerely

Efa Gruffudd Jones

Welsh Language Commissioner