Nicolette Sutton  
The Older People’s Commissioner for Wales  
Cambrian Buildings  
Mount Stuart Square  
Cardiff  
CF10 5FL

04/12/2012

Dear Ms Sutton,

The Welsh Language Commissioner’s Response to the Older People’s Commissioner for Wales’ Framework for Action 2013-17

The Welsh Language Commissioner welcomes the opportunity to comment on the current working draft of the Older People’s Commissioner for Wales’ Framework for Action 2013-17.

The principal aim of the Welsh Language Commissioner is to promote and facilitate the use of Welsh. This entails raising awareness of the official status of the Welsh language in Wales and imposing standards on organizations. This, in turn, will lead to the establishment of rights for Welsh speakers.

Two principles underpin the Commissioner’s work:

- In Wales, the Welsh language should be treated no less favourably than the English language
- Persons in Wales should be able to live their lives through the medium of the Welsh language if they choose to do so.

In due course, secondary legislation will introduce new powers allowing the setting and imposing of standards on organizations. Until then, the Commissioner will continue to inspect statutory Welsh language schemes through the powers inherited under the Welsh Language Act 1993.
The role of Welsh Language Commissioner was created by the Welsh Language (Wales) Measure 2011. The Welsh Language Commissioner may investigate failure to implement a language scheme; interference with the freedom to use Welsh in Wales and, in future, complaints regarding the failure of organizations to meet standards.

One of the Welsh Language Commissioner's priorities is to scrutinise policy developments with regard to the Welsh language. Therefore, the principal role of the Commissioner is to comment in accordance with these terms of reference acting as an independent advocate on behalf of Welsh speakers in Wales who may be affected by the proposed Framework for Action. Such an approach is employed to avoid any potential compromise of the Commissioner's regulatory functions and should the Commissioner wish to conduct a formal review of individual bodies' performance or the Older People's Commissioner for Wales' performance in accordance with the provisions made in the Measure.

The Commissioner will look at key legislation and strategies in considering the interests of Welsh speakers in Wales.

It is understood that equality and the Welsh language are implicit in the Commission's own values but since communication, in line with language preference or need, is such an inherent part of the treatment given to older people in terms of dignity and respect, the Framework for Action is expected to give the Welsh language more prominence.

The Welsh Language Commissioner's comments and the possible issues which the Older People's Commissioner could examine in developing the Framework for Action may be summarised as follows:

- The proposed Framework for Action is based on four key outcomes or themes. Under each of the four individual themes, you have identified the context and the challenges upon which you intend to concentrate. These, in turn, will steer your annual work programme. **What plans are in place to mainstream the Welsh language within the annual work programme?**

- The Framework refers to your intention to develop performance matrix which will measure the progress of the four key outcomes or themes. We welcome the opportunity to provide further comments on these matrix in due course. **In the meantime, we note the need to mainstream the Welsh language within the proposed performance matrix.**

- We agree that services must provide a better response to the needs of older people, ensuring that they are heard, respected and that their voices influence the way in which services are designed and developed. **Taking this into consideration, steps should be taken to ensure that accessible and timely information which is of a high standard is available to older people and their carers through the medium of Welsh.** Furthermore, any engagement between the Older People's Commissioner for Wales or public bodies and older people should be bilingual.
It is noted that the Older People’s Commissioner for Wales will work in partnership with older people in order to assess the quality and effectiveness of the advice and services provided by public bodies. Older people, their carers and their families should be able to respond in the most comfortable and familiar manner, which includes through the medium of Welsh.

I would like to thank you for the opportunity to comment on this framework. We ask that you give full consideration to the comments made above. We would also appreciate the opportunity to meet with the Older People’s Commissioner for Wales to discuss our comments in greater detail.

Yours sincerely,

Tomos Dafydd

On behalf of the Welsh Language Commissioner