



Dawn Bowden MS
Minister for Children and Social Care
Welsh Government

By email only:
Correspondence.Dawn.Bowden@gov.wales

UnpaidCarersPolicy@gov.wales

2 April 2026

Dear Dawn,

Draft National Strategy for Unpaid Carers: consultation response

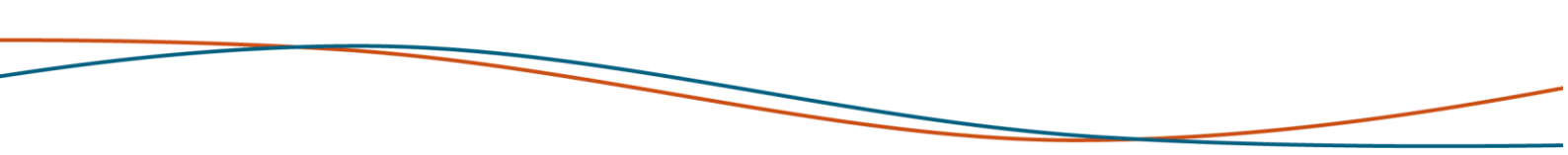
I was grateful for the opportunity to meet you on 23 March 2026, to discuss the Welsh Government's draft National Strategy for Unpaid Carers ahead of your stepping down from the Senedd.

I would also like to thank you and your officials for responding quickly and positively to my request for a "former carer" category to be included on the consultation response form for the draft National Strategy.

As we discussed at our meeting, I am writing to follow up our discussion about the draft National Strategy. Please accept this letter as my formal response to the consultation.

When I submitted my [written evidence](#) to the Senedd Health and Social Care Committee Inquiry into Improving Support for Unpaid Carers, I was conscious that the inquiry would run alongside the development of the Welsh Government's new Strategy for Unpaid Carers. I hoped that that response would help to inform both the Committee and the Welsh Government and lead to considerable improvements in support for older carers in Wales. I am currently reading the inquiry report with interest.

I broadly support the proposals set out in the current consultation document. However, I should like to offer comments and indicate additional matters for inclusion in the future strategy. I am also concerned that, without effective governance and accountability, the existing gap between policy and practice will continue.



General observations

It is vital that older people see themselves specifically represented throughout all aspects of the strategy and ensuing actions, including any campaigns or awareness raising activity or events. The final draft should be reviewed through an age inclusive lens to ensure it avoids ageist bias and does not make unfounded assumptions about older carers or older people more broadly.

Many unpaid older carers, like unpaid carers generally, often do not identify themselves as carers. This can be particularly true when an older person is providing care for a spouse or partner. The consultation document also highlights that Black, Asian and Minority Ethnic carers may also be less likely to recognise or describe themselves as carers, especially in communities where caring is viewed as a familial responsibility.

Given this, the strategy should pay close attention to the role that language and terminology play, as these can create barriers to self-identification. It will be important to consider how these barriers can be reduced, ensuring that older carers feel able to recognise their caring roles and access the support available to them.

Additionally, friends and neighbours who take on caring responsibilities may also fail to see themselves as carers, and this group should be considered within the strategy's approach to widening recognition and support.

Older people continue to tell me about the significant challenges caused by digital exclusion. My expectation of the Welsh Government - and of any public body - is that all communications, information about the strategy, and any future activities are made available in non-digital formats and options. This is essential to ensure that people without internet access (including those who choose not to use it), and those with limited digital skills or confidence, are fully included and able to participate.

Lack of focus on older people

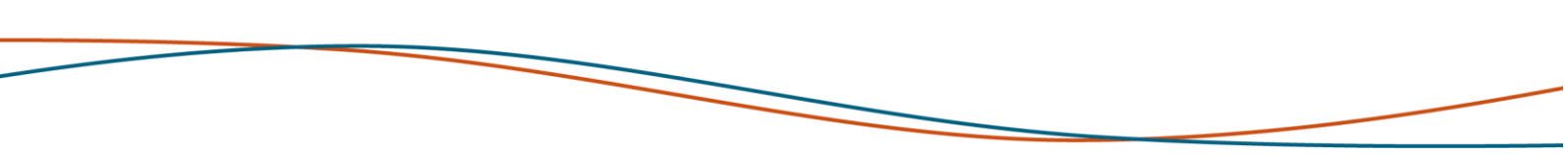
I am concerned that there is very little mention of older people as a population group in the consultation document, unlike young carers, who have their own section. Approximately 55% of carers in Wales are over the age of 55. This means that there are now roughly 275,000 older carers in Wales.ⁱ Unpaid carers are more likely to be female, older and living in more deprived communities.ⁱⁱ Wales has the highest proportion in the UK of older carers and of carers providing more than 50 hours' care a week.ⁱⁱⁱ

Despite this considerable contribution, older people with lived experience of caring have been under-represented on the Ministerial Advisory Group on Unpaid Carers. This omission should be rectified in the governance arrangements for the new strategy.

Data

The new strategy should ensure improved age-stratified, Wales-specific data on the specific needs of older carers in different age bands. The lack of good quality data on older carers is a major obstacle to accurate assessment of the need, met and unmet, for older carers' support services, and to appropriate provision. For example, the number of carers over the age of 60 in





Wales who receive a Carer's Assessment is not known, let alone how many people who are aged over 70, over 80 or older receive one.

Proactive outreach and support

My response to the Health and Social Care Committee Inquiry highlighted the potential for leveraging data systems to enable local authorities to be proactive in identifying and reaching out to carers in their communities. I am disappointed that this is not reflected in the draft strategy.

Given the Cabinet Secretary for Health and Social Care's announcement that Wales will become a Marmot nation, I should like to see the strategy set out how local authorities can leverage the wider determinants of health to offer proactive support to carers. It would be helpful to examine the approach of local authorities at the forefront of the Marmot agenda in Wales, such as Torfaen and Blaenau Gwent Councils, to outreach and support for carers.

Carers of people living with dementia

It is essential that the new Dementia Strategy for Wales dovetails with the new National Strategy for Unpaid Carers. My written evidence to the Senedd Health and Social Care Committee Inquiry provides several illustrations of the problems faced by unpaid carers of people living with dementia.

My report on [Ageing without Children](#) (published in June 2025) is also relevant to the strategy. While the report focuses on the benefits as well as the challenges of ageing without children or family, the assumption that everyone has family support on hand to help provide informal care needs to be challenged. The strategy should reflect the relevant recommendations of my report to ensure that the needs and circumstances of those who are ageing without children are specifically considered and referenced.

Governance and accountability

Robust governance arrangements are essential to provide oversight and scrutiny of implementation. The governance and accountability arrangements for the strategy should ensure:

- The involvement of older people with lived experience of caring from all parts of society at all levels of governance;
 - A co-production approach to further development and implementation of the strategy;
 - Ensuring the implementation of the new strategy makes a difference to the lives of unpaid carers and eliminating any disconnection between policy intentions and experiences;
 - Person-centred metrics alongside system metrics, to ensure that reporting reflects actual experience.
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Conclusion

I hope that you find this response helpful in the further development of the new strategy. My office would be happy to discuss these comments further.

With best wishes for the future,

A handwritten signature in black ink, appearing to read 'Rhian', followed by a long, horizontal, slightly wavy line that tapers off to the right.

Rhian Bowen-Davies
Older People's Commissioner for Wales