National Strategy for Unpaid Carers 2026 Consultation Response Form

Response to Welsh Government Consultation: Draft national strategy for unpaid carers 2026

Response submitted 13 April 2026

Personal information

Confidentiality

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: ☐

Your name
Sam Bowen

Your organisation (if applicable)
Medr – Commission for Tertiary Education and Research

Contact details and email address
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Please indicate your interest in the strategy:

- Unpaid carer
- Former carer
- Member of the public (not an unpaid carer)
- Professional responding as an individual
- Organisational response ✓
- Prefer not to say

Which version of the consultation document have you looked at? Please tick all that apply.

- Draft National Strategy for Unpaid Carers ✓
- Draft National Strategy for Unpaid Carers (British Sign Language version)
- Draft National Strategy for Unpaid Carers (Easy Read version) ✓
- Draft National Strategy for Unpaid Carers (Youth Summary) ✓

Question 1: Do you agree the eight priorities outlined in the draft strategy at page 1 are the right priorities?

- Yes ✓
- No
- Don’t know/ unsure

Medr agrees that the eight priorities present a strong and comprehensive foundation for improving support for unpaid carers. They reflect evidence from carers and stakeholders, and they align broadly with Medr’s statutory responsibilities, especially around equality of opportunity, participation, wellbeing and progression.

The document references further and higher education but could go further to recognise the diverse tertiary education landscape, including higher education, further education but also adult community learning and work-based learning.

The implementation of the eight priorities should be realistic and proportionate and require careful consideration for example clarity on roles, responsibilities and resource implications, otherwise there is a risk that providers within the tertiary education system are assigned expectations that are difficult to deliver with the absence of additional funding.

Question 2: Is there anything you would like to share about any of the priorities listed? **You can comment on as many or as few as you wish.**

1. **Recognition and awareness**

Medr supports the ambition to enhance identification of unpaid carers but stresses the importance of proportionate expectations for tertiary providers. The draft strategy references training for education staff, but it is unclear which staff, at what depth, and with what frequency. Expectations on the tertiary sector must remain proportionate and realistic.

Clarification is needed to ensure expectations are realistic and aligned with existing requirements within Medr’s Staff and Learner Welfare Condition.

2. **Access to services**

Tertiary providers support signposting but expectations related to information signposting should clearly state what is expected from Welsh Government, what Medr should oversee, and what providers are responsible for and this must be realistic.

3. **Young carers**

The strategy includes several actions that explicitly reference FE colleges and higher education. Medr supports these aspirations but emphasises the need for clear guidance to ensure consistency across very different learning environments. Any new expectations should not introduce additional unfunded burdens.

For Young Carer Identity Cards (YCID cards), to be recognised in education a consistent approach by all local authorities (LA) must be considered as any one further education provider will have learners from multiple LAs and could lead to unfair outcomes for learners where some have greater access to YCID schemes**.**

4. Financial hardship

Financial hardship is a barrier for carers within tertiary education. Medr supports the intent but emphasises that the strategy should acknowledge the limits of support without additional Welsh Government funding to offer provisions, for example, targeted grant streams.

5. Paid employment

Medr recommends clarifying how the tertiary sector will be expected to contribute, particularly where expectations overlap with Careers Wales, employers or DWP.

6. Replacement care (respite) and breaks from caring

No direct expectations are placed on tertiary providers, which is appropriate.

7. Mental health and wellbeing

This aligns with Medr's Staff and Learner Welfare Condition, but expectations must avoid duplicating existing duties or introducing new responsibilities that require resource not currently available.

8. Carers and care planning

No direct expectations are placed on tertiary providers, which is appropriate.

Question 3: Do you have any further comments, or are there any other priorities you believe should be included in the strategy?

Adult learning and apprenticeships pathways are essential for carers and could be implicit in the existing wording but could be considered as being currently omitted.

Medr recommends that Welsh Government include a priority relating specifically to having clearer delineation of roles across public bodies, particularly where strategies affect multiple sectors with differing statutory frameworks. This is essential to ensure consistency, avoid duplication and ensure that the tertiary sector receives realistic, proportionate expectations which recognise financial pressures on the sector.

Question 4: There are actions under each priority area. These are listed at P7-23 of the draft strategy document. Is there anything you'd like to say about any of these actions? **You can comment on as many or as few as you wish.**

These comments cross reference across multiple priorities and actions:

Many actions impose implicit expectations on tertiary providers primarily around staff training, awareness raising, student identification systems and transitions support.

Medr supports these aims but there are several risks:

- unclear boundaries risk tertiary providers being treated as responsible for functions outside their remit
- expectations to deliver additional training or pastoral support cannot be met within current funding
- some expectations presume data availability (e.g. identifying carers), but disclosure depends on learner choice and some actions depend on data not currently available
- further clarification is needed before any expectations relating to monitoring or reporting can be operationalised.

Medr strongly recommends that Welsh Government specify:

- who is responsible for each action,
- the level of expectation placed on tertiary providers is intended to be interpreted and operationalised,
- how capacity pressures will be mitigated.

1. Recognition and awareness
2. Access to services
3. Young carers
4. Financial hardship
5. Paid employment
6. Replacement care (respite) and breaks from caring
7. Mental health and wellbeing
8. Carers and care planning

Question 5: Do you have any further comments, or are there any other actions you believe should be included in the strategy?

Welsh Government action to work with bodies (including Medr) to co-develop guidance for the tertiary education sector that consolidates expectations for:

- staff training
- identification and disclosure pathways
- learner support principles
- data handling and privacy
- proportionality and reasonable adjustments

This would ensure that providers understand expectations clearly and consistently.

Question 6: Do you have any comment on how we can ensure the strategy continues to reflect the experience and priorities of unpaid carers?

As an all age strategy the views of learners across tertiary education should be considered in addition to young and young adult carers experiences and priorities.

Question 7: Do you think more could be done to improve partnership working across organisations involved in supporting unpaid carers?

- Yes
- No
- Not sure

If yes, what more do you think could be done?

Providing national definitions and baselines for terms such as “identification”, “data requirements”, “support”, and “good practice” would help to ensure consistency and allow for a common language to be used which could aid partnership working across Wales.

Medr would welcome clearer articulation of how Welsh Government, Medr, local authorities, Careers Wales, Regional Partnership Boards and education providers should collaborate, including:

- shared definitions
- expectations on data sharing
- roles in developing staff training
- joint approaches to addressing financial hardship

Equality Impact Assessment

The new National Strategy for Unpaid Carers is expected to have positive equality impacts across Wales. Developed in line with the Welsh Government’s Strategic Equality and Human Rights Plan 2025–2029, it aims to reduce inequality, improve access to support and embed a rights-based approach. The strategy responds to what unpaid carers and stakeholders told us, including the experiences of young carers, older carers, carers supporting people with complex needs, and carers from Black, Asian and minority ethnic backgrounds. It also considers the needs of underserved groups such as disabled and neurodivergent carers, people with sensory loss, BSL users, migrants and refugees, Gypsy, Roma and Traveller communities, and those living in rural or low-income households.

Unpaid carers are disproportionately likely to be female and women as more likely to reduce their working hours or give up employment to provide care, with consequent impact on career progression and household income.

The eight priorities set out in the strategy, improving recognition, widening access to information and assessments, supporting financial security, increasing employment

opportunities and improving access to respite, are designed to reduce long-standing inequalities in how carers experience services.

We have not identified any negative equality impacts. The main risks relate to variation in implementation across Wales, particularly if access to information, assessments, training uptake or respite options remain inconsistent. These risks can be reduced through clear national guidance, improved identification of carers, wider carer-awareness training, and continued co-production with unpaid carers.

The strategy also recognises potential barriers that may persist, including digital exclusion, limited connectivity in rural areas, and a lack of translated or accessible formats for carers who do not speak English or Welsh.

Question 8: Having read the draft National Strategy for Unpaid Carers, what do you think might be the positive impacts on unpaid carers with protected characteristics as covered by the Equalities Act 2010.

Protected characteristics include age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

Answer relates to Question 8 and 9:

Medr anticipates a positive impact on those carers with protected characteristics, particularly females, disabled learners and those experiencing socio-economic disadvantage. However, risks arise if increased processes and policies to increase self-identification of unpaid carers can not be met in terms of level of support available. It may create expectations for people that can not be met if they exceed available funding and resource or if disclosure processes create unintended consequences not least, raises expectations about the support unpaid carers will then receive.

Disclosures will likely trigger a range of responsibilities relating to recording, pastoral support, academic adjustments and safeguarding. Without additional resource or clear guidance, there is a risk that providers capacity to respond in a timely and consistent manner will be exceeded.

Question 9: What challenges or risks to unpaid carers with protected characteristics do you think we should consider more fully when producing the final version of the National Strategy for Unpaid carers?

See Question 8

Children's Rights Impact Assessment

Young Carers helped us develop a draft Children's Rights Impact Assessment through engagement sessions, representation on the Ministerial Advisory Group and feedback gathered across Wales, highlighting issues such as recognition in schools, emotional pressure, mental health support and financial hardship.

The assessment identifies key risks including identification by services, access to respite, cultural and linguistic barriers and the potential for children to take on inappropriate caring roles. These risks are relevant to the rights of children as defined by the United Nations Convention on the Rights of the Child.

In response, the strategy sets out actions with the intention of strengthening recognition and support for young carers. Actions in the strategy aim to ensure young carers are recognised, protected and supported; while monitoring and future delivery plans will seek to address implementation risks and promote more consistent support across Wales.

Question 10: Having read the draft Strategy for Unpaid Carers, what do you think might be the positive impacts on young carers and their rights under the United National Convention on the Rights of the Child.

Answer for Question 10 and 11

The strategy should strengthen the rights of young carers, particularly regarding recognition and educational participation. The main risks relate to inconsistent implementation across providers and potential burdens placed on staff without additional resource.

Question11: What challenges or risks to young carers and their rights under the United National Convention on the Rights of the Child do you think we should consider more fully when producing the final version of the National Strategy for Unpaid carers?

See Question 10

Welsh Language Impact Assessment

The draft strategy has been prepared in the context of the Welsh language standards and the More Than Just Words strategic framework. When people are receiving or trying to access care, it is usually when they are at their most vulnerable, so being confident in their own language is important. Wales is a bilingual country where the Welsh language has official status. Legally binding Welsh language standards have been placed on health and social care bodies to ensure that the Welsh language is treated no less favourably than the English. These standards

complement More Than Just Words which is our plan to strengthen Welsh language services in health and social care. At the core of More Than Just Words is the principle of 'the Active offer' which places a responsibility on health and social care providers to offer services in Welsh, rather than the patient / service user to have to request them. Our vision for More Than Just Words is for Cymraeg to belong and be embedded in health and social care services across Wales so that individuals receive care that meet their language needs, leading to better outcomes, without having to ask for it.

The draft Welsh Language Impact Assessment indicates the new National Strategy for Unpaid Carers is likely to have a positive impact on Welsh speaking carers by strengthening access to bilingual information, services and support. The strategy aligns with key legislation and frameworks such as the Welsh Language (Wales) Measure 2011, Cymraeg 2050, the Social Services and Wellbeing (Wales) Act 2014 and the More Than Just Words framework, helping to embed the Active Offer and ensure carers receive support in the language they prefer.

We have not identified any negative impacts for the Welsh Language as a result of this strategy and we have considered potential risks to ensure they will be appropriately managed through implementation. Across its eight priority areas, the strategy reinforces early identification of carers' language needs in line with the requirements of the Active Offer with delivery partners, in areas such as mental health, respite, financial guidance, employment advice and care planning. It is expected to strengthen the availability of access to information and advice and support in Welsh for young carers in Welsh medium education. While risks remain around regional variation and the delivery capacity of those who work with unpaid carers, these can be mitigated through delivery partners' responsibilities to uphold Welsh Language Standards and promote the Active Offer. The responses gathered during this consultation will help us identify any further impacts and will inform the final strategy.

Question 12: Having read the draft Strategy for Unpaid Carers, what do you think might be the positive impacts on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English.

Answer for Question 12 and 13

Medr supports the focus on ensuring bilingual support for carers. The tertiary sector will require clear expectations aligned with Welsh-medium priorities, but additional resources may be necessary to expand provision in a sustainable manner. There are some concerns whether there is sufficient workforce capacity and it may require additional funding to fully meet obligations.

Question 13: What challenges or risks to the Welsh Language do you think we should consider more fully when producing the final version of the National Strategy for Unpaid carers?

See Question 12

Final Question

Question 14: Thinking about this consultation overall, are there any issues that have not been addressed that you think are relevant? If so, please provide details in the space below.

All tertiary education providers registered or funded by Medr from August 2027 will be required to meet two core regulatory conditions which directly cover many of the areas referenced in the draft strategy.

First, the Equality of Opportunity Condition places a requirement on providers to identify, monitor and address barriers that prevent learners from accessing, participating in, being retained in, and successfully completing their studies. This encompasses social, cultural, financial and organisational barriers.

The Staff and Learner Welfare Condition requires providers to take account policies, procedures and services that promote and support staff and learner wellbeing and safety.

Together, these conditions already create a comprehensive regulatory framework for supporting unpaid carers within tertiary education. It is therefore essential that any new expectations arising from the final strategy are aligned with existing conditions.

Thank you very much for taking the time to complete this consultation.