



Older People's Commissioner for Wales
Comisiynydd Pobl Hŷn Cymru

Strategic Equality Plan

Annual Report 2013/14

An independent voice and
champion for older people

The Older People's Commissioner for Wales

The Older People's Commissioner for Wales is an independent voice and champion for older people across Wales. The Commissioner and her team work to ensure that older people have a voice that is heard, that they have choice and control, that they don't feel isolated or discriminated against and that they receive the support and services that they need.

The Commissioner and her team work to ensure that Wales is a good place to grow older, not just for some but for everyone.

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1. Introduction

As Commissioner, I am an independent voice and champion for older people aged 60 years and older, as defined in the Commissioner for Older People (Wales) Act 2006. My role is underpinned by the United Nations Principles for Older Persons and the promotion of equality and human rights is implicit to my statutory role.

This report details action I took in 2013/14 to comply with the statutory equality duties set out in the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011. It outlines how I am ensuring that my team and I - as we go about our business - engage with, understand and include older people in all their diversity.

When I took up post in June 2012, I made the decision to refresh the objectives set by my predecessor. I am therefore now reporting the progress that has been made against the Strategic Equality Objectives set out in my refreshed Strategic Equality Plan that still covers the period to 2016. My aspirations, as Commissioner, go beyond promoting and practicing mere compliance with legislation; fairness, respect, equality, dignity and autonomy are at the heart of my work and workplace.

Older people are not a homogenous group. They represent the full diversity of Wales - this diversity is what makes us the nation we are and it is to be celebrated. I am proud to be a Commissioner not just for older people, but for ALL older people. All have an equal right to lead lives that have value, meaning and purpose and to have choice and control over their lives.



Sarah Rochira

Older People's Commissioner for Wales

2. Summary requirements and structure of the report

The Commissioner is a listed authority under the Equality Act (Statutory Duties) (Wales) Regulations 2011 and must adhere to the general duty to promote equality laid out in the Equality Act 2010.

Other reporting requirements included the publication by April 2012, of a Strategic Equality Plan incorporating specific objectives and the publication annually of a progress report. This third annual report must be published no later than 31 March 2015.

This report focuses on the specific Welsh duties and the Commissioner's Strategic Equality Objectives:

- Section 3 explains the Commissioner's role
- Section 4 sets out the relevance of the Public Sector General Duty to the Commissioner's core business
- Section 5 sets out the Commissioner's refreshed Equality Objectives
- Section 6 outlines progress against the Strategic Equality Objectives incorporating the general duties
- Appendix A – Workforce profiles as at 31 March 2014
- Appendix B – Strategic Equality Objectives for 2014-16
- Appendix C – UN Principles for Older Persons

Copies of the Commissioner's Strategic Equality Plan and prior year annual reports can be found on the Commissioner's [website](#).

3. Role of the Older People's Commissioner for Wales

The Commissioner is a Corporation Sole created under the Commissioner for Older People (Wales) Act 2006, an independent legal entity in her own right and a listed authority for the purpose of the Equality Act (Statutory Duties) (Wales) Regulations 2011.

The Commissioner for Older People (Wales) Act 2006 sets out a number of statutory duties for the Commissioner.

1. Promote awareness of the interests of older people in Wales and the need to safeguard those interests

The Commissioner uses her status to help set the agenda amongst decision makers at all levels about issues affecting older people and promotes public discussion through the media.

A key role for the Commissioner is to be a powerful champion for older people leading and intervening in a wide and increasing range of debates and decision making across Wales.

2. Promote the provision of opportunities for, and the elimination of discrimination against, older people in Wales.

The Commissioner advocates changes to the law, guidance and practice in order to address inequality. She presents realistic and positive images of older people, recognising older people in all their diversity.

Older people are individuals and, whilst they might share some common concerns, their individual status remains undiminished. There should be no one view of older people and the Commissioner aims to reflect this in her work.

The Commissioner promotes understanding of the nature of discrimination against older people in its most evident and its more hidden – but equally damaging - forms and sees tackling discrimination effectively as key to making progress across all policy areas, not just health and social care.

3. Encourage best practice in the treatment of older people in Wales.

The Commissioner aims to achieve this through a variety of methods, including bringing together people and evidence and - where necessary -

carrying out research, to demonstrate effective practice.

Most importantly she presses for excellent services to be made widely and consistently available for older people. She encourages change to established practices where alternatives have been shown to work better. She encourages service providers to face the challenge of change so that the needs of older people can be better met, e.g. giving older people early support in order to prevent greater dependency at a later stage.

4. Keep under review the adequacy and effectiveness of the law affecting the interests of older people in Wales.

The Commissioner builds the case for change and makes this case to the Welsh Government and the National Assembly. She establishes what the issues and opportunities are through bringing together leading legal and other expertise and the experience and views of older people.

The law is a vital part of empowering and protecting older people and providing redress, and yet it is often complex, confusing, and hard to access and in need of reform. The Commissioner has already played a strong role in recommending changes that will benefit older people and others.

Illustrations of the types of activity that has or may be undertaken by the Commissioner are set out below:

- Providing leadership on the issues that matter to older people
- Raising the profile of older people within Welsh Public Services
- Making representation to Welsh Government
- Reviewing how devolved organisations discharge their functions
- Publishing guidance and standards
- Assisting individuals to make complaints or representations
- Commissioning research or assisting others in doing so
- Carrying out, commissioning or assisting others with educational activities
- Undertaking examinations (investigations)
- Issuing non-statutory guidance
- Advocating for changes to legislation, guidance and practice
- Speaking out publicly about service failures
- Promoting good practice

It is important to note that the Commissioner does not provide frontline services other than through direct advice and support provided to older people through our casework and the work led by the Communications and Engagement team in delivering events and producing publications. The majority of the Commissioner's business involves working with others to

affect changes in policies and practices.

The current and future work of the Older People's Commissioner for Wales is taken forward within her '[Framework for Action 2013-17](#)'.

Work on equality during the reporting period is covered in greater depth within '[Driving change for older people: Impact and Reach Report 2013-14](#)'.

4. The Public Sector Equality Duty and the Commissioner's core business

4.1. The Public Sector Equality Duty

The 3 aims of the general equality duty are to:

Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act.

Advance equality of opportunity between people who share a relevant protected characteristic and those who do not.

Foster good relations between people who share a protected characteristic and those who do not.

The general duty covers the following protected characteristics:

- Age
- Sex
- Race – including ethnic or national origin, colour or nationality
- Disability
- Gender reassignment
- Pregnancy and maternity
- Sexual orientation
- Religion or belief – including lack of belief
- It applies to marriage and civil partnership, but only in respect of the requirement to have due regard to the need to eliminate discrimination.

For the purposes of the Equality Act, language (including the Welsh language) is not a protected characteristic. However, the Commissioner considers language need on a par with other characteristics. The Commissioner is covered by the Welsh Language Act and has a [Welsh Language Scheme](#). Through her work, the Commissioner also considers the impact of poverty and rurality on equal access to services.

4.2. Core Business

The Commissioner has a range of core responsibilities as a public sector organisation which are tailored according to its size and the nature of its business. These functions include:

- Promoting the interests of older people, including challenging

discrimination, encouraging best practice and reviewing the law.

- Making the role known to older people across Wales.
- The recruitment, engagement, training, and management of staff and volunteers.
- The procurement of services including tendering for goods and services such as research.
- Reward, recognition, and payment of staff.
- Providing assistance to older people who wish to make a complaint or representation to public bodies or other service providers.

4.3. Casework

The Commissioner provides direct support to individuals through her casework. In 2013/14 approximately 800 people contacted the Commissioner through this service. This was by email, letter, telephone or – on occasion - face to face contact (usually as the result of reasonable adjustment being made to meet a person’s needs).

All enquiries by individuals to the Commissioner are managed through a Business Management System (BMS) by an administrator, who then refers the caller to the most appropriate Case Officer. The age of either the caller and/or the older person to whom the call applies is recorded on our BMS system as is both the gender and language preference of the caller so we can correspond or engage in people’s preferred language.

Previously, careful consideration has been given as to whether there should be formal and automatic seeking of information about additional protected characteristics of the callers and/or those that represent the subject matter of the calls. Whilst wanting to ascertain the reach of our service, it is clear that the majority of the callers contact the Commissioner at a time of acute crisis in their lives. Some of the callers can be worried, upset or so focused on the substance of their issue that any form of compulsory monitoring or questioning over and above the questions necessary to determine the issue could impose a barrier between the caller and the case worker.

On balance, it has been decided to limit our automatic monitoring of caller diversity to gender and language. However, in advising an individual, if a caller’s enquiry substantially related to a protected characteristic this would also be recorded on the BMS system. For example, if the call related to difficulties in obtaining a blue badge this would be recorded as disability.

The five most common issues we were contacted about in 2013/14 were

Residential Care (16%), Healthcare (14%), Community Services (5%), Financial Issues (5%) and Housing (5%). In many instances the team were able to direct older people to other agencies who were best-placed to provide them with help and support, ensuring that the Commissioner did not duplicate the work of others. This enabled the Commissioner to increase the support provided to individuals who are in situations of high vulnerability. Examples of such complex cases dealt with in 2013/14 include:

- Undertaking a Section 5 Review into the whistleblowing arrangements within a Local Authority, following concerns raised with the Commissioner in respect of the care and alleged abuse of an older person.
- Undertaking a Section 3 Review into the closure of a care home following significant concerns about the quality of care of residents.
- Providing Section 8 Assistance by representing the relatives of an older person at the Coroner's Court.

4.4. Protection and Scrutiny

4.4.1. Review of Health Board Reconfiguration

In February 2013, the Commissioner issued formal guidance, under Section 12 of the Commissioner for Older People (Wales) Act 2006, to all Health Boards in Wales, which set out the standards against which she would measure their actions when engaging and consulting with older people.

Following this, further evidence was requested from all Health Boards, under Section 3 of the Commissioner for Older People (Wales) Act 2006, to assure her that the interests of older people in Wales were sufficiently safeguarded and protected as proposals for reconfiguration were developed. The Commissioner requested evidence on the following:

- The extent to which Local Health Boards are involving older people in discussions about decisions being made and taking their views seriously.
- Whether they are taking proper account of the impact of proposed changes upon older people, ensuring that alternative provision is appropriate and effective and being used by the older people affected by the changes.
- Whether they are ensuring that older people will not be disproportionately affected by the changes.

All Health Boards submitted evidence detailing the actions they undertook

to engage with older people. The Commissioner reviewed the evidence and provided her assessment to each Health Board and requested that they share and discuss this feedback at a public session of the Health Board. This was intended to support and strengthen their engagement and consultation as they take forward significant changes in the way their services are provided.

The Commissioner has requested that a number of Health Boards provide her with further information and has made clear her expectation that Health Boards will continue to strengthen their on-going engagement with older people, paying regard to her Guidance.

Following receipt of the further information, the Commissioner will also meet with the Chief Executive of the NHS in Wales to ensure that the areas that need to be strengthened are acted upon.

Further details can be found on the Commissioner's [website](#).

4.4.2. Ageism and Discrimination

To help professionals to better understand the nature and impact of ageism and how it feeds discrimination, the Commissioner's team worked with Local Health Boards, Local Authorities, Care Homes, the Police and the Welsh Government to deliver a series of training seminars that included both practical activities and a range of detailed written resources to support the further development of better practice.

The training seminars explored ageing and its impact upon individuals, families and communities in Wales, as well as how negative attitudes towards ageing can impact upon good service delivery. The training also allowed delegates to think, in practical terms, about how to develop age-friendly public services and age-friendly communities, based on the World Health Organisation Framework, that will meet the needs of an ageing population.

147 professionals have completed the training to date and further training seminars will be made available to a wider group of participants throughout 2014. In addition, 'train the trainer' training and resource packs were provided to professionals across public bodies to enable them to deliver this training on the Commissioner's behalf.

Over the coming year the Commissioner will further build her work around helping public services to better understand the nature and impact of ageism to ensure that, as public services in Wales are redesigned and new ways of delivering care and support are developed, ageism and discrimination are continually challenged.

Further details can be found on the Commissioner's [website](#).

4.4.3. A Rights-Based Approach: Declaration of the Rights of Older People

The Older People's Commissioner for Wales has stated publicly many times that, all too often, older people in Wales face unacceptable discrimination and struggle to have their basic rights recognised and upheld.

The Commissioner was therefore pleased that there was cross-party support for her call to enhance the rights of older people and that the Welsh Government asked her to chair an Independent Advisory Group to consider and explore the merits of a Welsh Declaration of the Rights of Older People, which would be the first of its kind in the UK.

The Advisory Group found that a Declaration would provide a clear framework and standard that could be understood and used by older people to ensure that their rights are upheld when receiving the support and services they need to live fulfilled and independent lives. Drafted correctly, a Declaration would be more accessible than existing human rights legislation.

The Advisory Group subsequently worked with older people to develop a draft Declaration, which was based upon the issues that older people identified as most important to them, as well as the United Nations Principles for Older Persons. The Declaration clearly sets out its links to the Human Rights Act 1998 and the European Convention on Human Rights.

In December 2013, the Welsh Government launched a public consultation on the Declaration, reaffirming its commitment to promoting the interests of older people in Wales and a commitment to equality and human rights. The Welsh Government then published a Welsh Declaration of the Rights of Older People in July 2014.

Over the next year the Commissioner will work with, and provide practical support to, the Welsh Government and public bodies to develop a rights-based approach to the provision of public services that both upholds the rights of individuals and supports the delivery of better public services.

Further details can be found on the Commissioner's [website](#).

4.5. Communications and Engagement

The Commissioner continues to be focused on engaging with a wide variety of older people and the work of the Communications and Engagement team has been of critical importance in:

4.5.1. Continuing to meet and speak with older people in communities throughout Wales through the Commissioner's 'Engagement Roadshow' during which the Commissioner and staff meet with older people and others who work with and for them.

This year the Commissioner's Engagement Roadshow had an even greater focus on reaching out to the full diversity of older people in Wales. The Engagement Roadshow Equality Impact Assessment provides a full breakdown of the diverse groups (including those with protected characteristics) that the Commissioner and her team have met with. This is the first year that this level of statistical analysis has been undertaken and it will enable more direct comparison to be made next year.

The Commissioner was also awarded Diverse Cymru's Excellence in Equality Public Sector Award 2013.

4.5.2. Ensuring that the Commissioner's work includes those who are seldom heard because they are socially excluded. These would include care home residents, people dependent on home based social care, people who are hospital in-patients, and people with protected characteristics.

4.5.3. Producing a quarterly newsletter which is made available to stakeholders both electronically and in hard copy together with accessible versions.

4.5.4. Maintaining a website which follows accessibility guidance (AAA compliance). We have refreshed our website so that it is even easier to navigate and access information. The refreshed website now contains information hubs on equality, human rights and adult protection, which can be used both by older people and professionals.

4.5.5. Producing publications that are in appropriate languages and formats and that follow plain language standards.

4.5.6. Ensuring that all staff are aware of the Commissioner's approach to communications including training on style guides and accessibility issues.

4.6. Wellbeing and Empowerment

The Commissioner's Wellbeing and Empowerment Team influence policy and decision-making at the highest level in Wales. They represent and promote the interests of older people to public bodies and service providers, including Local Authorities, Health Boards and the Welsh Government.

The Wellbeing and Empowerment Team keep themselves informed of developments not just in relation to age but also in issues concerning other protected characteristics. In 2013/14 they were involved in informing work relating to:

- Commission on devolution: A joint response from the Children's Commissioner for Wales and the Older People's Commissioner for Wales
- Equality Impact Assessment of the 2014-2020 Rural Development Plan for Wales
- Renting Homes White Paper
- National Assembly for Wales Health and Social Care Committee - The work of the Healthcare Inspectorate Wales
- Welsh Government - Tackling Hate Crimes and Incidents: A Framework for Action
- A framework for delivering integrated health and social care
- Blue Badge Scheme in Wales: Changes to the eligibility criteria
- Consultation on the Housing (Wales) Bill
- National Assembly for Wales' Inquiry into Public Libraries in Wales
- Draft Planning (Wales) Bill and Positive planning: proposals to reform the planning system in Wales
- Social services complaints and representations procedures
- Consultation on 'Revising the national framework for Continuing NHS Healthcare (CHC)'
- Revision of Weekly Maximum Charge for Non-Residential Social Services
- Welsh Government Review of Council Tax Support

In promoting the interests of older people with protected characteristics, the

Wellbeing and Empowerment Team listen to what a broad cross section of people have to say so that they provide an accurate representation and do not make unfounded assumptions. They proactively seek out the opinions of those older people who may be affected by a proposed or actual policy or practice.

Further details can be found on the Commissioner's website.

5. The Commissioner's Equality Objectives

The Commissioner published a refreshed Strategic Equality Plan in March 2014 following consultation with older people and stakeholders, replacing the Strategic Equality Plan that was published in March 2012.

The refreshed Strategic Equality Plan identifies specific equality objectives and sets out the way ahead for future years. The refreshed strategy was published to ensure that equality and human rights are embedded in the thinking and working practices of the Commissioner and her staff.

The Commissioner set out the following objectives for 2012-16:

1. To ensure that in my employment of staff I am non-discriminatory, promote equality of opportunity for all and foster good relations between staff members.

- I will aim to increase the diversity of my workforce.
- All staff will have development and advancement opportunities to ensure they equally maximise their potential.
- I will ensure that all staff are rewarded and remunerated on an equal basis regardless of protected characteristic.
- I will ensure there is a culture within my organisation in which all staff feel comfortable to be open about their protected characteristics and feel that they are a person of value to me as an employer and across the organisation.

2. To ensure that my procurement policies and practices and associated tender documentation take account of the need to meet legal equality requirements.

- I will review all of my procurement policies, practices and tender documentation to ensure they meet the public sector equality duty.
- I will ensure that contractors are made fully aware of my equality duties by writing this into tender specifications and testing their understanding at selection process.

3. To ensure that my work is relevant to, and is seen as being relevant to, all older people.

- I will significantly increase my engagement with older people across the breadth of protected characteristics and through this ensure that their voices inform and guide my work.
- I will make sure that the reporting of the impact and reach of my work makes specific reference to groups with protected characteristics.
- I will strengthen the impact assessment that underpins my work to ensure my work takes full account of the impact of protected characteristics upon the outcome sought for older people.

4. I will ensure that my work is underpinned increasingly by a rights based approach and that across Wales a rights based agenda is developed.

- I will provide on-going human rights training to all my staff.
- I will equip my staff to understand and promote what a human rights based approach means in practice.

5. To empower and equip older people to challenge the discrimination they face.

- I will strengthen our partnership working with other equality and human rights based organisations to strengthen our voices and the impact of our work.
- I will equip older people with the knowledge and tools to fight discrimination.
- I will provide support and assistance to older people who have been victims of discrimination.

6. To promote an accurate and balanced view of older people in all their diversity, grow understanding about older people and their needs and to challenge unfounded and derogatory stereotypes, both within my organisation and amongst other organisations.

- I will, through my work, empower and assist older people to challenge discrimination and secure their human rights.
- I will increase the depth of understanding amongst my staff about the diversity of older people and the extent to which protected characteristics impact upon their access to services and their wider lives

- I will increase the depth of understanding amongst key public services about the diversity of older people and the extent to which protected characteristics impact upon their access to services and their wider lives
- I will on an on-going basis challenge negative stereotypes and myths about older people and lay down clear expectations for change

7. To encourage and support other public bodies to comply with their own duties under the Equality Act 2010 as they apply to older people and to challenge significant breaches of legal duties.

- I will provide guidance to public bodies undertaking key service changes to assist them in ensuring they comply with their statutory duties in relation to engagement, impact assessment and proportionality
- I will keep under review service changes that have the potential for significant impact on older people, and where I believe that significant detriment or significant disproportionate impact is likely I will hold public bodies to account
- I will keep under review Welsh Government, Local Government and Health Board equality and other key strategic plans to ensure that they reflect a robust understanding of the impact of protected characteristics upon older people and the way in which services and support are delivered.

6. Progress during 2013-14

Progress against the objectives is set out below:

Objective 1: To ensure that in my employment of staff I am non-discriminatory, promote equality of opportunity for all and foster good relations between staff members.

I will aim to increase the diversity of my workforce (By March 2014)

- The Commissioner has aimed to increase the diversity of the workforce through her recruitment processes which have been reviewed and tested in 2013/14. Workforce data is reported in Appendix A.

All staff will have development and advancement opportunities to ensure they equally maximise their potential (By March 2015)

- Whilst good practice is currently applied, the Commissioner has in 2013/14 become a Stonewall Champion and will continue to work with Stonewall to make further improvements and apply any additional good practice to all protected characteristics.

I will ensure that all staff are rewarded and remunerated on an equal basis regardless of protected characteristics (By March 2014)

- During 2013 the Commissioner implemented a restructuring process which amended pay spines and banding. During the restructuring process, employees were consulted on the new pay spine.

I will ensure there is a culture within my organisation in which all staff feel comfortable to be open about their protected characteristics and feel that they are a person of value to me as an employer and across the organisation (By March 2014)

- The Commissioner has ensured that there is a culture within the organisation in which all staff feel comfortable to be open about their protected characteristics and feel that they are a person of value. This has been reflected in feedback from an internal staff survey, and through independent Investors in People and Corporate Health Standard assessments.
- Staff have accessed training relating to Human Rights legislation and the Commissioner's Equality Objectives during 2013/14.

Objective 2: To ensure that my procurement policies and practices and associated tender documentation take account of the need to meet legal equality requirements.

I will review all of my procurement policies, practices and tender documentation to ensure they meet the public sector equality duty.

- During 2013/14 the Commissioner has reviewed all procurement policies, practices and tender documentation to ensure they meet the public sector equality duty.

I will ensure that contractors are made fully aware of my equality duties by writing this into tender specifications and testing their understanding at selection process

- The terms and conditions for all future contracts greater than £15,000 per annum with the Commissioner will place explicit additional requirements on suppliers to notify the Commissioner of any complaints relating to the Act and comply with any specific requirements set out in the Commissioner's Strategic Equality Plan. These new terms and conditions will be published with the tender specification.
- The Commissioner is making steady progress to achieving Living Wage status, the requirements of which extend to key suppliers.

Objective 3: To ensure that my work is relevant to, and is seen as being relevant to, all older people.

I will significantly increase my engagement with older people across the breadth of protected characteristics and through this ensure that their voices inform and guide my work (By March 2016)

- In 2013/14 the Commissioner and her team met with more than 150 groups of older people in local communities across Wales, reaching more than 5,300 older people as part of her [Engagement Roadshow](#).
- The Roadshow, has allowed older people to share information about their experiences, the things that matter most to them and the things that worry them most about growing older in Wales.
- The Commissioner's [State of the Nation: The Voices of Older People](#) briefing, published in 2013 is based on what older people have shared with the Commissioner and highlights key challenges that must be addressed if Wales is to be a good place to grow older for everyone.

- The Commissioner also published her ‘[A Thousand Little Barriers](#)’ report to give a voice back to older people and highlight the importance of everyday services and support that they rely on to remain healthy, safe and independent.
- In order for older people and stakeholders to be able to access information about the Commissioner’s work more easily, the Commissioner has refreshed and restructured her website, making it more user-friendly and accessible.
- The newly refreshed website now contains information hubs on [equality](#), [human rights](#) and [adult protection](#), which can be used by older people and professionals to access an extensive knowledge base and a wide range of useful resources.
- The Commissioner has ensured that the [Residential Care Review](#) (which looks at the quality of life of older people living in care homes) includes a broad range of older people. This has been achieved through the Commissioner’s Advisory Panel that includes an Equality and Welsh Language Advisory Group.
- In addition to a widely circulated questionnaire and engagement events around Wales for friends and family of older people living in residential care, the review has involved a series of focus groups with minority or marginalised groups, or organisations that represent them. The purpose of the focus groups was to gain an understanding of how a diverse cross section of the Welsh population perceive and engage with residential care. Focus groups were held with the Muslim Council of Wales, Royal National Institute for the Blind, African Caribbean Elder Society, Action on Hearing Loss, Somali Integration Society, Dyfed Diners, Trans, Swan Gardens Chinese Sheltered Accommodation and the Hindu Council of Wales.

I will make sure that the reporting of the impact and reach of my work makes specific reference to groups with protected characteristics (By March 2015)

- This year the Commissioner’s Engagement Roadshow had an even greater focus on reaching out to the full diversity of older people in Wales and the Commissioner was awarded Diverse Cymru’s Excellence in Equality Public Sector Award 2013.
- The Commissioner’s [Impact & Reach Report 2013-14](#) was launched at the Senedd on 4 June. An Equality Impact Assessment was completed for the event.

I will strengthen the impact assessment that underpins my work to ensure my work takes full account of the impact of protected characteristics upon the outcome sought for older people (By March 2014)

- A new equality and human rights impact assessment tool was developed and published in the refreshed [Strategic Equality Plan 2012-16](#) in Appendix 3.
- The tool has been used within the Commissioner's office to produce Equality Impact Assessments for:
 - The Commissioner's Framework for Action 2013-17
 - The Engagement Roadshow
 - Impact and Reach Report 2013-14 launch event
 - Various HR policies including maternity, flexible working and recruitment policies.
- We continue to use the checklist taken from the Disability Wales toolkit, entitled '[Planning an accessible event](#)'.

Objective 4: I will ensure that my work is underpinned increasingly by a rights-based approach and that across Wales a rights-based agenda is developed.

This objective is to be delivered during 2014-2016, see Appendix B. However significant progress has been made in developing a rights based agenda across Wales:

- The Commissioner chaired an Independent Advisory Group to consider and explore the merits of a Welsh Declaration of the Rights of Older People.
- The Advisory Group found that a Declaration would provide a clear framework and standard that could be understood and used by older people to ensure that their rights are upheld when receiving the support and services they need to live fulfilled and independent lives. Drafted correctly, a Declaration would be more accessible than existing human rights legislation.
- The Advisory Group subsequently worked with older people to develop a draft Declaration, which was based upon the issues that older people identified as most important to them, as well as the United Nations Principles for Older Persons. The Declaration clearly sets out its links to

the Human Rights Act 1998 and the European Convention on Human Rights.

- In December 2013, the Welsh Government launched a public consultation on the Declaration, reaffirming its commitment to promoting the interests of older people in Wales and a commitment to equality and human rights. The Welsh Government then published a [Welsh Declaration of the Rights of Older People](#) in July 2014.
- Over the next year the Commissioner will work with, and provide practical support to, the Welsh Government and public bodies to develop a rights-based approach to the provision of public services that both upholds the rights of individuals and supports the delivery of better public services.

Objective 5: To empower and equip older people to challenge the discrimination they face.

This objective is to be delivered during 2014-2016, see Appendix B.

- However, during November 2013, the Commissioner provided free training sessions on ‘ageism’ designed to explore how ageing impacts upon the lives of older people, their families and communities in Wales. The training also explored the unconscious prejudices that we can hold and how this affects the way we design and deliver services for older people and carers. The sessions were attended by 147 delegates who came from all seven Local Health Boards, eighteen Local Authorities, care homes, the Police and the Welsh Government. During 2014-15 the Commissioner is offering further training sessions for a wider range of people.
- Ageism and discrimination is included in the 2014-15 work programme and includes the continued provision of ageism training, a report on the nature of ageism, its link to discrimination, and the impact of discrimination faced by older people, a series of workshops around Wales and work with Welsh Government, health and social care bodies to improve their Impact Assessments and Public Sector Equality Strategies.

Objective 6: To promote an accurate and balanced view of older people in all their diversity, grow understanding about older people and their needs and to challenge unfounded and derogatory stereotypes, both within my organisation and amongst other organisations.

I will, through my work, empower and assist older people to challenge discrimination and secure their human rights (By March 2014).

- The Commissioner's website was updated at the end of March 2014 and a new section of the website is dedicated solely to **equality and human rights**. It contains:
 - A series of equality factsheets that cover the overlap between age and other protected characteristics, as well as rurality, poverty and the Welsh Language
 - A range of useful resources relating to each of the protected characteristics covered by the Equality Act 2010

I will increase the depth of understanding amongst my staff about the diversity of older people and the extent to which protected characteristics impact upon their access to services and their wider lives.

- All employees are encouraged to attend engagement events with older people who have a range of protected characteristics.
- All employees receive training regarding equality and protected characteristics during their first year of employment as part of their induction programme.
- During 2013/14 staff received equality and human rights training in the following:
 - Specific human rights related training was conducted in April 2013 in addition to employee involvement throughout 2013/14 in the further development and implementation of the equality objectives as well as completion of Equality Impact Assessments.
 - An internal workshop focused on the Equality Plan objectives.
 - Targeted internal training session on 'Care Home and Human Rights' during 2013/14, linked to the Commissioner's Review into the Quality of Life in Care Homes in Wales.

- In addition, the Commissioner published multiple Equality Factsheets during 2013/14 which are available on the Commissioner’s website and which all employees were required to read in order to further develop their own understanding of protected characteristics.
- The Commissioner’s employees received training relevant to their roles on mental health awareness, making information easy to read and attended Stonewall Cymru events, including their [Annual Workplace Conference 2013](#).

See Appendix A for further detail.

Objective 7: To encourage and support other public bodies to comply with their own duties under the Equality Act 2010 as they apply to older people and to challenge significant breaches of legal duties.

This objective is to be delivered during 2014-2016, see Appendix B however the Commissioner has encouraged and supported other public bodies to comply with their own duties during 2013/14 in the following ways:

- To help professionals to better understand the nature and impact of ageism and how it feeds discrimination, the Commissioner worked with Local Health Boards, Local Authorities, Care Homes, the Police and the Welsh Government to deliver a series of training seminars that included both practical activities and a range of detailed written resources to support the further development of better practice.
- In addition, ‘train the trainer’ training and resource packs were provided to professionals across public bodies to enable them to deliver this training on my behalf.
- Responded to the following relevant consultations:
 - [Equality Impact Assessment of the 2014-2020 Rural Development Plan for Wales](#)
 - [Blue Badge Scheme in Wales: Changes to the eligibility criteria](#)
 - [The Welsh Government Tackling Hate Crimes and Incidents: A Framework for Action](#)

- The Commissioner provided evidence to the Silk Commission, discussing the ways in which increased powers to Wales could enable improved outcomes for older people particularly around equality law and justice.
- Following extensive influencing work around the Social Services and Wellbeing Bill, the right to advocacy and the UN Principles for Older Persons (Appendix C) have been included within the Bill, which should significantly strengthen the rights of older people in Wales.
- The Commissioner undertook detailed scrutiny of the first Annual Quality Statements published by Health Boards, providing feedback to Health Boards, the Welsh Government and a range of professionals. The Commissioner also provided advice to Welsh Government in the further development of Annual Quality Statements and supporting guidance. The Commissioner considers the strengthening of accountability of Health Boards to the public to be a significant driver for improvements in the quality of care of older people.
- The Commissioner issued formal guidance, under Section 12 of the Commissioner for Older People (Wales) Act 2006, to all Health Boards in Wales, which sets out the standards against which she would measure their actions when engaging and consulting with older people. The Commissioner has requested that a number of Health Boards provide her with further information and have made clear her expectation that Health Boards will continue to strengthen their on-going engagement with older people, paying regard to her Guidance which includes better use of Equality Impact Assessments.
- Not previously reported but in February 2013 the Commissioner undertook a review of all the Strategic Equality Plans (SEPs) in place across Welsh Local Authorities and Welsh Government, focusing on how their objectives addressed issues of importance to older people. Further assessment will be made during 2014-15 and used to inform the Commissioner's work around Community Services.

Appendix A: Workforce profiles as at 31/03/14

1. A listed body in Wales must collect and publish on an annual basis the number of people employed by the authority on 31 March each year by protected characteristic:

- Age
- Gender reassignment
- Sex
- Disability
- Pregnancy and maternity
- Sexual orientation
- Race – including ethnic or national origin, colour or nationality
- Religion or belief – including lack of belief

The Commissioner undertakes an annual staff survey to gather regular equality data. This survey is confidential and responses are anonymous. For the reporting year 2013/14 the Commissioner received 18 responses out of a possible 26. However, due to the size of the organisation, where figures account for less than 10%, details are removed to prevent individuals from being identified.

Number of people employed by protected characteristic:

Age	
16-24	-
25-35	9
35-44	5
45-54	-
55-64	-
65 & Over	-
Prefer not to say	-

Gender / Sex	
Male	5
Female	13
Prefer not to say	-

Is your gender identity the same as the gender you were originally assigned at birth	
Yes	18
No	-
Prefer not to say	-

Sexual Orientation	
Bisexual	-
Gay Man	-
Gay Woman / Lesbian	-
Heterosexual / Straight	14
Other	-
Prefer not to say	-

Religion or Belief	
No religion or belief	8
Christian (all denominations)	8
Buddhist	-
Hindu	-
Jewish	-
Muslim	-
Sikh	-
Any other religion or belief	-
Prefer not to say	-

Race (inc. ethnic or national origin, colour or nationality)	
White English	-
White Scottish	-
White Welsh	15
White Northern Irish	-
White British	-
White Gypsy or Irish Traveller	-
White Irish	-
White Other	-
Mixed/Multiple Ethnic Group – White & Black Caribbean	-
Mixed/Multiple Ethnic Group – White & Black African	-
Mixed/Multiple Ethnic Group – White & Asian	-
Other mixed/multiple ethnic background	-
Asian – Indian	-
Asian – Pakistani	-

Asian – Bangladeshi	-
Asian – Chinese	-
Asian – British	-
Other Asian Background	-
Black – Caribbean	-
Black – African	-
Black – British	-
Black – Other (please specify)	-
Other ethnic group (please specify)	-
Prefer Not to Say	-

Disability	Yes	No	Prefer not to say
Do you consider yourself to have a disability?	-	15	-
Do you have a disability as defined by the Equality Act?	3	14	-
At least one of my dependents has a disability.	-	17	-

The below data below is drawn from HR records rather than via the annual staff survey.

Pregnancy & Maternity	
Number of pregnant employees during 2013/14	-
Number of employees taking Maternity Leave during 2013/14	4

2. A listed body in Wales must collect and publish on an annual basis the number of men and women employed, broken down by the following categories:

Job	Men	Women	Total
Administrator	1	1	2
Support Officer/Assistant & Officer	5	11	16
Lead	2	1	3
Director	-	4	4
Commissioner	-	1	1
Total	8	18	26

Pay and Grade	Men	Women	Total
16,100 – 19,800/ A	1	1	2
20,550 – 25,000 / B	3	4	7
26,200 – 31,850 / C	2	7	9
33,450 – 40,600 / D	2	1	3
43,050 – 54,350 / E	-	2	2
51,300 – 72,750 / F	-	2	2
60,000 – 117,800* / Commissioner	-	1	1

* Pay Level set by Senior Salaries Review Body

Contract Type	Men	Women	Total
Permanent	6	16	22
Fixed Term	2	2	4
Temporary	-	-	-

Working Pattern	Men	Women	Total
Full Time	7	17	24
Part Time		1	1
Compressed Hours	1	-	1

Recruitment

3. A listed body in Wales must collect and publish on an annual basis the number of people who have applied for jobs with the organisation over the last year.

The Commissioner is committed to increasing the diversity of her staff by reviewing the Commissioner’s recruitment processes including the application form, how, and where we advertise.

Application forms are already available in alternative formats and recruitment adverts are placed widely using a variety of media. The Commissioner has a formal Equal Opportunities and Diversity Policy and adopts good practice regarding its recruitment process; all information containing protected characteristics within application forms is seen by HR only and is not shared with the selection panel. In addition, reasonable adjustments are available to all candidates requesting them and reasonable adjustments have been provided for candidates during 2013/14.

The Commissioner will also give consideration to make further changes to the recruitment strategy and application processes to assist in diversification of the workforce; this may include development of a more targeted recruitment approach to candidates who have protected characteristics. However, opportunities to further broaden the staff intake will be limited due to budgetary constraints on additional posts, the size of the organisation, and the low turnover of staff.

During 2013/14 the Commissioner recruited for, and filled, ten posts via external recruitment methods and one post via an internal recruitment process. All internal and external candidates are provided with the opportunity to complete a Diversity Monitoring form at point of application, however not all candidates choose to complete and submit a form. The Commissioner received 127 completed Diversity Monitoring Forms associated with external recruitment conducted during 2013/14.

Number of applications for jobs within 2013/2014 received from the following protected groups:

Age	
16-24	7
25-35	42
35-44	28
45-54	37
55-64	11

65 & Over	2
Prefer not to say	-

Gender	
Male	42
Female	85
MTF Transgender	-
FTM Transgender	-
Prefer not to say	-

Sexual Orientation	
Bisexual	1
Gay / Lesbian	8
Heterosexual	108
Other	-
Prefer not to say	10

Religion / Belief	
No religion or belief	59
Christian (all denominations)	53
Buddhist	-
Hindu	-
Jewish	-
Muslim	1
Sikh	-
Any other religion or belief	3
Prefer Not to Say	11

Race (inc. ethnic or national origin, colour or nationality)	
White English	10
White Scottish	7
White Welsh	75
White Northern Irish	0
White British	23
White Gypsy or Irish Traveller	-
White Irish	-
White Other	2
Mixed/Multiple Ethnic Group – White & Black Caribbean	1
Mixed/Multiple Ethnic Group – White & Black African	-
Mixed/Multiple Ethnic Group – White & Asian	1

Other mixed/multiple ethnic background	2
Asian – Indian	-
Asian – Pakistani	-
Asian – Bangladeshi	-
Asian – Chinese	2
Asian – British	-
Other Asian Background	-
Black – Caribbean	-
Black – African	2
Black – British	-
Black – Other (please specify)	-
Other ethnic group (please specify)	1
Prefer Not to Say	1

Disability	Yes	No	Prefer not to say
Do you consider yourself to have a disability?	9	116	2

No data relating to pregnancy and maternity was collected in relation to recruitment activity for 2013/14.

4. A listed body in Wales must collect and publish on an annual basis the number of employees who have applied to change position within the authority, identifying how many were successful in their application and how many were not.

The Commissioner recruited for, and filled, 1 post via internal recruitment methods during 2013/14.

One application was received from an internal candidate for this post. The internal candidate was successful.

Due to the size of the organisation, as this figure accounts for less than 10%, details are removed to prevent individuals from being identified.

Learning & Development

5. A listed body in Wales must collect and publish on an annual basis the number of employees who have applied for training and how many succeeded in their application.

The Commissioner holds Silver Award Investors in People status and, as stated in the Commissioner's Learning and Development Policy, the Commissioner aspires to be a learning organisation and will nurture the skills and knowledge that staff will need to succeed in their roles. This policy therefore supports a culture of learning and developing excellent staff at all levels. Employees are encouraged to take advantage of learning and development opportunities which are relevant to their jobs and personal development.

The Commissioner is committed to being an exemplar employer, supporting staff to maximise their performance and ensure staff have competencies and skills aligned to business priorities.

The Commissioner will:

- Provide a challenging work environment, where staff are encouraged to develop and acquire new skills and experience.
- Provide a range of development opportunities for staff consistent with the strategic and operational needs of the Commissioner.
- Deliver to all new staff a basic understanding of the role, function, policies and procedures of the Commissioner at induction.
- Assess Commissioner and individual learning and development needs and draw up a Commissioner training and learning needs analysis.
- Undertake and agree with all staff individual training and development plans as part of the performance appraisal process.
- Review individual and Commissioner plans at least annually; assess effectiveness of training interventions and feed this back into subsequent planning.

All employees have equality of opportunity regarding training and the Commissioner approved all employee applications for Learning and Development (training) activity during 2013/14.

6. A listed body in Wales must collect and publish on an annual basis the number of employees who completed the training.

Employees attended a broad range of training, including general topics such as Welsh language, personal safety and computer software training, alongside role specific training such as adult protection and coaching for line managers. All training undertaken during 2013/14 by the Commissioner's employees was completed.

All employees receive training regarding equality and protected characteristics during their first year of employment as part of their induction programme. This is naturally biased to age due to the nature of the organisation.

Specific human rights related training was delivered to employees in April 2013. Employees also attended an internal training session focused on Equality where employees were split into teams and explored improvements that could be made to various practical aspects of how the organisation operates, such as the layout of our reception area and entrance/exit signage. Employees also attended an internal training session on 'Care Homes and Human Rights' during 2013/14. In addition, the Commissioner published multiple [Equality Factsheets](#) during 2013/14 which are available on the Commissioner's website and which all employees were required to read in order to further develop their own understanding of protected characteristics.

The Commissioner's employees received training relevant to their roles on mental health awareness, making information easy to read and attended Stonewall Cymru events, including their Annual Workplace Conference. The Commissioner is also a member of the Stonewall Diversity Champion's scheme and submitted the organisation's first application to the Stonewall Workplace Equality Index in 2013 (published in 2014). The organisation was ranked 262 out of the participating 369 UK employers and with the support of Stonewall Cymru, the Commissioner plans to improve this ranking by putting in place various improvements, such as the language used in HR policies when referring to same sex couples.

A number of training sessions are also scheduled for the current year (2014/15) to raise awareness of different protected characteristics, age discrimination, equality, deprivation of liberty and Human Rights issues.

All employees are also widely encouraged to attend engagement events with older people who also have a range of protected characteristics.

Grievance Procedures

7. A listed body in Wales must collect and publish on an annual basis the number of employees involved in grievance procedures either as complainant or as a person against whom a complaint was made.

The Commissioner had no employees involved in grievance procedures either as complainant or as a person against whom a complaint was made during 2013/14.

Disciplinary Procedures

8. A listed body in Wales must collect and publish on an annual basis the number of employees subject to disciplinary procedures.

The Commissioner had 1 employee subject to disciplinary procedure during 2013/14.

Due to the size of the organisation, as this figure accounts for less than 10%, details are removed to prevent individuals from being identified.

Leavers

9. A listed body in Wales must collect and publish on an annual basis the number of employees who have left an authority's employment.

During 2013/14 eleven employees left the Commissioner's employment and an additional two people left the Commissioner due to the end of their fixed-term secondment agreements.

As all employee equality data is anonymised, no specific data relating to the protected characteristics of these employees is available. However, the Commissioner does hold information relating to age and gender for HR purposes relating to these specific employees; this information is provided below.

Due to the size of the organisation, where figures account for less than 10%, details are removed to prevent individuals from being identified.

Age	
16-24	-
25-35	4
35-44	4
45-54	-
55-64	3
65 & Over	-
Prefer not to say	-

Gender	
Male	6
Female	7

Appendix B: Strategic Equality Objectives for 2014-16

Objective	Lead	Timescale	Means of measurement
1. To ensure that in my employment of staff I am non-discriminatory, promote equality of opportunity for all and foster good relations between staff members.			
All staff will have development and advancement opportunities to ensure they equally maximise their potential.	Director of Finance and Performance	By March 2015	<p>Performance management:</p> <p>New learning and development needs and opportunities are identified and made available to all staff.</p> <p>Training opportunities are taken up.</p> <p>Staff report in appraisals that they have grown and developed in their roles and there is evidence of staff successfully undertaking new and more challenging work.</p>
We will conduct an equal pay audit.	Director of Finance and Performance	By March 2015	We will have considered the evidence from the audit and reviewed pay and reward policies to guard against direct or indirect discrimination.

2. To ensure that my procurement policies and practices and associated tender documentation take account of the need to meet legal equality requirements.			
I will review all of my procurement policies, practices and tender documentation to ensure they meet the public sector equality duty.	Director of Finance and Performance	By March 2016	Evidence that all policies and documentation have been updated
I will ensure that contractors are made fully aware of my equality duties by writing this into contracts and of their responsibility to provide or deliver goods and services in a way that will not breach those duties.	Director of Finance and Performance	By March 2016	Evidence that contractors have signed an acknowledgement of the changes
3. To ensure that my work is relevant to, and is seen as being relevant to, all older people.			
I will significantly increase my engagement with older people across the breadth of protected characteristics and through this ensure that their voices inform and guide my work.	Director of Communications and Engagement	By March 2016	Evidence that: The groups I engage with are representative of the wider diversity of older people and that I have sought out and visited groups that are often ignored.

<p>I will make sure that the reporting of the impact and reach of my work makes specific reference to groups with protected characteristics</p>	<p>Director of Communications and Engagement</p>	<p>By March 2015</p>	<p>My annual 'Impact and Reach' report demonstrates that:</p> <p>The work I have done on issues that affect the interests of older people is always informed by what older people across the breadth of protected characteristics tell me matters to them.</p> <p>The work I have done has had positive impact for a broader range of older people than in 2008-2013.</p> <p>The older people I have supported through my case work and examinations are representative of older people in all their diversity.</p>
<p>4. I will ensure that my work is underpinned increasingly by a rights-based approach and that across Wales a rights-based agenda is developed.</p>			
<p>I will provide ongoing human rights training to all my staff</p>	<p>Director of Protection and Scrutiny</p>	<p>By March 2015</p>	<p>Evidence that:</p> <p>Staff have attended training sessions that cover human rights in relation to each of the protected characteristics and policy development in these areas.</p>

			Staff have benefited from these training sessions and have a better understanding of how human rights work in practice.
I will equip my staff to understand and promote what a human rights based approach means in practice	Director of Protection and Scrutiny	By March 2016	Evidence of: Staff integrating a human rights based approach into their work. Staff helping others outside the organisation understand how human rights work in practice, particularly for older people.
5.To empower and equip older people to challenge the discrimination they face.			
I will, through my work, empower and assist older people to challenge discrimination and secure their human rights.	The Commissioner	By March 2015	Evidence of: Older people being assisted through our casework. Older people being empowered through various tools to challenge discrimination and secure their human rights.

<p>I will strengthen our partnership working with other equality and human rights based organisations to strengthen our voices and the impact of our work</p>	<p>Director of Well-being and Empowerment</p>	<p>By March 2015</p>	<p>I can demonstrate that:</p> <p>Where I am in agreement with the stance of other organisations who uphold the rights of older people, my responses to public consultations and inquiries have supported and built upon their position so that we speak with one voice.</p> <p>In conducting major reviews of public service provision, other equality and human rights based organisations have been involved as advisors and expert contributors.</p> <p>Working in partnership with other organisations has made a greater impact than not doing so.</p>
<p>I will equip older people with the knowledge and tools to fight discrimination</p>	<p>Director of Protection and Scrutiny</p>	<p>By March 2015</p>	<p>Evidence that:</p> <p>My website has templates and helpful information that can be used by older people to challenge age discrimination and that they are using them to do so.</p>

			<p>Older people understand more about discrimination as a result of training I have provided for them and are using this knowledge to challenge discrimination.</p> <p>Older people are achieving positive results when challenging age discrimination because they are equipped to do so.</p>
<p>I will provide support and assistance to older people who have been victims of discrimination using, where appropriate, my legal powers</p>	<p>Director of Protection and Scrutiny</p>	<p>By March 2016</p>	<p>Evidence of:</p> <p>Older people who have been victims of discrimination being effectively assisted by me and my team to challenge discrimination and achieve positive results in the majority of cases.</p> <p>Public bodies who are discriminating against older people, either directly or indirectly, being challenged by me and changing policies or practices as a result.</p>

			Wider benefit for other older people as the result of individual cases being resolved and resulting in changes in policies or practices.
6. To promote an accurate and balanced view of older people in all their diversity, grow understanding about older people and their needs and to challenge unfounded and derogatory stereotypes, both within my organisation and amongst other organisations.			
I will increase the depth of understanding amongst key public services about the diversity of older people and the extent to which protected characteristics impact upon their access to services and their wider lives	Director of Protection and Scrutiny	By March 2015	<p>Sharing of knowledge with outside agencies through external training and our website that results in:</p> <p>Positive feedback from those working in key public services who receive the training.</p> <p>Feedback that public services have adapted their ways of working as a result of training and/or information received.</p> <p>Evidence of public services contacting me for training or information because they recognise my organisation as authoritative on equality issues and older people.</p>

<p>I will on an ongoing basis challenge negative stereotypes and myths about older people and lay down clear expectations for change</p>	<p>Director of Protection and Scrutiny</p>	<p>By March 2016</p>	<p>Evidence that demonstrates:</p> <p>Fewer instances when negative or derogatory language about older people is used by the media and more instances of positive language and stories about older people.</p> <p>That older people are successfully challenging both direct and indirect discrimination on a day-to-day basis.</p> <p>That public services and documents talk less about older people as a homogenous group and more about the needs and aspirations of older individuals and how these will be met.</p>
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7. To encourage and support other public bodies to comply with their own duties under the Equality Act 2010 as they apply to older people and to challenge significant breaches of legal duties.

<p>I will provide guidance to public bodies undertaking key service changes to assist them in ensuring they comply with their statutory duties in relation to engagement, impact assessment and proportionality</p>	<p>Director of Protection and Scrutiny</p>	<p>By March 2015</p>	<p>Evidence that:</p> <p>Guidance I have issued is being followed</p> <p>I have publicly challenged public bodies who do not comply with my guidance or their statutory duties</p> <p>Public bodies have more effective impact assessment processes in relation to older people as a result of guidance and/or challenge</p>
<p>I will keep under review service changes that have the potential for significant impact on older people, and where I believe that significant detriment or significant disproportionate impact is likely I will hold public bodies to account</p>	<p>Director of Well-being and Empowerment</p>	<p>By March 2016</p>	<p>Evidence that:</p> <p>I have reviewed public services and made recommendations for positive change</p> <p>Public bodies respond to and implement the majority of my recommendations</p> <p>I hold to account – using legal powers where necessary - those public bodies that refuse, without good reason, to implement my recommendations</p>

<p>I will keep under review Welsh Government, local government and health board equality and other key strategic plans to ensure that they reflect a robust understanding of the impact of protected characteristics upon older people and the way in which services and support are delivered</p>	<p>Director of Protection and Scrutiny</p>	<p>By March 2015</p>	<p>Plans have been reviewed for evidence of understanding of the diversity of older people and I have given feedback to the relevant organisations</p> <p>Organisations respond positively to my feedback and make improvements to their plans</p> <p>Services and support delivered to older people take better account of the needs of individual older people and do not stereotype</p>
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Appendix C: UN Principles for Older Persons

The United Nations Principles for Older Persons were adopted by the UN General Assembly (Resolution 46/91) on 16 December 1991. Governments were encouraged to incorporate them into their national programmes whenever possible. There are 18 principles, which can be grouped under five themes: independence, participation, care, self-fulfilment and dignity.

Independence

1. Older persons should have access to adequate food, water, shelter, clothing and health care through the provision of income, family and community support and self-help.
2. Older persons should have the opportunity to work or to have access to other income-generating opportunities.
3. Older persons should be able to participate in determining when and at what pace withdrawal from the labour force takes place.
4. Older persons should have access to appropriate educational and training programmes.
5. Older persons should be able to live in environments that are safe and adaptable to personal preferences and changing capacities.
6. Older persons should be able to reside at home for as long as possible.

Participation

7. Older persons should remain integrated in society, participate actively in the formulation and implementation of policies that directly affect their wellbeing and share their knowledge and skills with younger generations.
8. Older persons should be able to seek and develop opportunities for service to the community and to serve as volunteers in positions appropriate to their interests and capabilities.
9. Older persons should be able to form movements or associations of older persons.

Care

10. Older persons should benefit from family and community care and protection in accordance with each society's system of cultural values.
11. Older persons should have access to health care to help them to maintain or regain the optimum level of physical, mental and emotional well-being and to prevent or delay the onset of illness.
12. Older persons should have access to social and legal services to enhance their autonomy, protection and care.
13. Older persons should be able to utilize appropriate levels of institutional care providing protection, rehabilitation and social and mental stimulation in a humane and secure environment.
14. Older persons should be able to enjoy human rights and fundamental freedoms when residing in any shelter, care or treatment facility, including full respect for their dignity, beliefs, needs and privacy and for the right to make decisions about their care and the quality of their lives.

Self-Fulfilment

15. Older persons should be able to pursue opportunities for the full development of their potential.
16. Older persons should have access to the educational, cultural, spiritual and recreational resources of society.

Dignity

17. Older persons should be able to live in dignity and security and be free of exploitation and physical or mental abuse.
18. Older persons should be treated fairly regardless of age, gender, racial or ethnic background, disability or other status, and be valued independently of their economic contribution.

Further information on United Nations Principles for Older Persons can be found here: http://www.un.org/en/ga/search/view_doc.asp?symbol=A/RES/46/91

