



Comisiynydd Pobl Hŷn Cymru
Older People's Commissioner for Wales

Strategic Equality Plan

■

Annual Report 2024-25

**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 throughout Wales.

The Commissioner wants Wales to lead the way in empowering older people, tackling inequality and enabling everyone to live and age well.

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Accessible formats

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Mae'r ddogfen hon ar gael yn Gymraeg // This document is available in Welsh

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Summary requirements and structure of the report

The Older People's Commissioner for Wales 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.

This report focuses on specific Welsh Duties and the Commissioner's Strategic Equality Objectives for 2024-26:

- Section 3 explains the Commissioner's role
- Section 4 sets out the Commissioner's Strategic Equality Objectives for 2024-26
- Section 5 outlines the Commissioner's progress during 2024-25
- Appendix A – Workforce profile as of 31 March 2025

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

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 role of the Older People's Commissioner for Wales is to protect and promote the rights of older people aged 60 and over throughout Wales, scrutinising and influencing a wide range of policy and practice to improve their lives.

The Commissioner provides help and support directly to older people through the Advice and Assistance service and works to empower older people and ensure that their voices are heard and acted upon.

The Commissioner's remit is set out in the Commissioner for Older People (Wales) Act 2006, which established the role.

The Commissioner's remit is to:

- Promote awareness of the interests of older people in Wales and of the need to safeguard those interests;
- Promote the provision of opportunities for, and the elimination of discrimination against, older people in Wales;
- Encourage best practice in the treatment of older people in Wales; and
- Keep under review the adequacy and effectiveness of law affecting the interests of older people in Wales.

The Commissioner's Equality Objectives for 2024-26

1. Promote an internal culture that is welcoming and supportive, ensuring equality of opportunity for all employees

Year 1 Actions:

- Produce an Anti-Racist Action Plan
- Provide further organisational wide equalities training
- Review the effectiveness of the equality module of the induction programme and develop as required
- Develop and publish a Modern Slavery and Human Trafficking Statement
- Monitor the gender pay differences within the workforce

2. Increase the awareness and reach of the Advice and Assistance Service

Year 1 Actions:

- Capture equality data from enquiries to the Advice and Assistance Service
- Analyse the diversity profile of older people in contact with the Advice and Assistance Service
- Increase the awareness of the Advice and Assistance Service amongst older people with protected characteristics
- Promote the Advice and Assistance Service to partner organisations who support older people (statutory and third sector) to reach the diversity of older people

3. Strengthen engagement, communication, and involvement with older people with protected characteristics to ensure their voices inform wider work

Year 1 Actions:

- Develop the best communications channels for reaching older people
- Ensure the voices of older people inform the Commissioner's priorities
- Engage with the diversity of the older population throughout Wales

4. Continue to ensure that the experiences of older people influence and inform public services and systems, as well as planning and practice

Actions:

- Reporting on and taking forward recommendations from areas of work including older people's experiences of GP services; lived experiences of Black, Asian, Minority and Ethnic older people; the links between ageism and abuse

Commissioner's work on Embedding Equality

As a publicly funded body, the Commissioner and her staff have a range of statutory functions and other administrative responsibilities, these 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
- 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

The Commissioner's work to embed and further equality in her work for 2024-25 is outlined below:

Objective 1: Promote an internal culture that is welcoming and supportive, ensuring equality of opportunity for all employees

Action: Produce an Anti-racist Plan

Through consultation with staff, an internal Anti-racist Action Plan was developed for 2024-25.

The plan detailed four commitments:

- Promoting diversity within the Commissioner's workforce and ensuring equality of opportunity for all employees
- Ensuring that equality guides internal processes, including within strategic decision making
- Strengthening engagement, communication and involvement with Black, Asian and Minority ethnic older people to ensure their voices inform wider work
- Providing help and support to a diverse range of older people to ensure their rights are upheld and they are not discriminated against

Learning from the development and implementation of the plan will be taken forward when agreeing Equality Objectives for 2026-30.

Action: Provide further organisational wide equalities training

Throughout the year, team meetings were dedicated to specific learning areas such as:

- Sexual harassment – bystander intervention
- Creating a world without racism: positive conversations around race
- Mental health awareness
- Unconscious bias - systemic advantages and allyship
- Neurodiversity awareness
- The role of carers

Action: Review the effectiveness of the equality module of the induction programme and develop as required

The module was reviewed by the Rights and Equality Lead. A structured approach was introduced that followed the format below, which the Lead will talk through with the new member of staff:

- Equality Act 2010 – the statutory origin of the PSED
- OPCW Strategic Equality Plan
- Annual Reporting – how this works in practice
- Learning and Development

Action: Develop and publish a Modern Slavery and Human Trafficking Statement

The Modern Slavery and Human Trafficking Statement was published on our website in September 2024.

The statement details our commitment to the principles of the Modern Slavery Act 2015; confirms we are a Living Wage Foundation accredited employer; and details our compliance with the Procurement Act 2023.

As a small organisation and due to the nature of the Commissioner's work, we assess ourselves to have a low risk of modern slavery in our organisation and supply chains.

Action: Monitor the gender pay differences within the Commissioner's workforce

The Commissioner continues to monitor the gender pay gap of her workforce. As of 31 March 2025, the median wage for men was higher than women. However, the mean salary of females is higher as the Senior Leadership Team are all female. This means that the gender pay gap for 2024-25 is -1.81%, and that for every £100 men earn, women earn £101.81.

Objective 2: Increase awareness and reach of the Advice and Assistance Service

Action: Capture equality data from enquiries to the Advice and Assistance Service

The Commissioner's Advice and Assistance Service continued to capture equality data from enquirers to the Advice and Assistance Service through feedback forms. Forms are issued to all enquirers and responses are anonymous.

Whilst completion of equality and diversity data remains optional, work has taken place to increase the return rate of feedback forms. This includes providing feedback forms in a variety of formats and ensuring that enquirers are aware of the reasons for collecting equality data and how we will use such information.

Action: Analyse the diversity profile of older people in contact with the Advice and Assistance Service

For the period April 2024 to March 2025, enquirers that contacted the Advice and Assistance Service and provided equality data revealed that:

- 38% of enquirers stated that they identified as male, 61% identified as female, 1% declined to answer this question
- 95% of enquirers identified as White, 2% Mixed/Multiple ethnic groups, 2% Black, African/Caribbean and 2% of people preferred not to say
- 46% of enquirers stated that they consider themselves to have a disability, 29% did not consider themselves disabled and 5% preferred not to say
- 66% of enquirers stated that their religious identity was Christian, 20% had no religion or belief, 8% had any other religion or belief and 7% preferred not to say.
- 96% stated that their gender identity was the same as assigned at birth, 2% stated that it was different from assigned at birth and 2% preferred not to say.
- 48% of enquirers stated that they were married, 28% were widowed, 13% were single, 7% were divorced, 3% were co-habiting and 2% preferred not to say.
- 80% of enquirers stated that they were heterosexual, 2% as bisexual, 2% gay/lesbian and 17% preferred not to say
- 64% of enquirers stated that they identified as Welsh, 23% as British, 11% as English and 2% as Irish
- 3% of feedback forms were completed in the Welsh Language

Action: Increase awareness of the Advice and Assistance Service amongst older people with protected characteristics

The Commissioner has sought to maximize awareness of the Advice and Assistance Service through updating the information available to promote the Service in the following ways:

- An updated section on the Commissioner's website to advise people on their rights and the ways in which the Advice and Assistance Service can assist them
- A new promotional leaflet and promotional materials have been produced, which has been distributed through the Commissioner's ongoing engagement work
- Wales wide newspaper advertising
- Social media advertising, using X and Facebook
- Targeted engagement with a diverse range of older people throughout Wales

Action: Promote the Advice and Assistance Service to partner organisations who support older people (statutory and third sector) to reach the diversity of older people

The Head of Advice and Assistance has led a programme of engagement with key organisations that support older people. These activities provided opportunities to share information about the Commissioner's role, the Advice and Assistance Service, and referral pathways.

Engagement has taken place through a combination of organisation-wide presentations, meetings with advice and assistance teams, and one-to-one discussions with key individuals.

This has resulted in older people contacting the Advice and Assistance service through referrals from partner organisations.

This work will continue in 2025-26, with the Advice and Assistance team working alongside the Engagement Lead to identify events where shared information spaces can be hosted with partner organisations.

Objective 3: Strengthen engagement, communication and involvement with older people with protected characteristics to ensure that their voices inform wider work

Action: Develop the best communications channels for reaching older people

A variety of platforms are used such as:

- Social media (X, Facebook)
- Newsletters (hard copy and online)
- Website updates
- Hard copy publications
- Print media (national and local newspapers)
- Radio
- TV
- Face to face engagement

To reach out to older people who are not online, paper copies of information guides and other helpful resources have been distributed across Wales, in addition to newsletters and posters providing information or encouraging older people to get in touch for advice and assistance or to share their feedback, views and ideas.

Newspaper articles in national and local publications have also been used, highlighting the Commissioner's position on key issues and her calls for action, as well as the issues and concerns being raised at engagement events. Alongside this, information about the Commissioner's work and a wide range of resources have reached thousands of older people and stakeholders social media channels - particularly Facebook, which is used by a large number of people aged 60+.

Action: Ensure the voices of older people inform the Commissioner's priorities

The Commissioner's 'Have Your Say' Consultation, launched in December 2024, invited older people to get in touch to share their experiences and highlight the action that would make a positive difference to their lives.

Older people could make their voices heard by completing a short questionnaire, which was based around four key national outcomes focused on ensuring that older people:

- Can access the information, services and support they need
- Feel safe in their homes, communities and relationships
- Are treated fairly and their contribution is recognised
- Can make their voices heard and have choice and control over their lives

The questionnaire could be completed in English or Welsh, online or hard copy. The online version was distributed widely, and paper copies, which could be returned by Freepost were also distributed at engagement events and via stakeholder organisations across Wales. In addition, older people could contact the Commissioner's Office by telephone to share their experiences, views and ideas if that was their preference.

Information about the consultation and questionnaire was shared via the Commissioner's social media channels and newsletter (which is distributed to over 1612 individuals both electronically and in hard copy), as well as with stakeholder organisations so they could circulate through their networks.

The Commissioner also promoted the questionnaire and encouraged older people to respond in a number of TV and radio interviews during the consultation period, and shared information about how older people could get in touch with her office as part of stories about her engagement visits shared with local press.

Alongside this, a series of adverts was also run in newspapers across Wales to target older people who may not be online or have contact with stakeholder organisations, encouraging them to respond and make their voices heard.

The response to the questionnaire was very positive, with 432 responses received in total.

Action: Engage with the diversity of the older population throughout Wales

Meeting and speaking with older people across Wales remained a key priority during 2024-25, with visits to a wide range of groups and settings throughout the country.

This included visits to social and activity groups and clubs, support groups (such as those for carers and people living with dementia), extra care housing schemes and care homes. The Commissioner and her team also met with older people's forums across Wales, as well as other groups such as Windrush Elders, Men's Sheds and Merched y Wawr.

Regular meetings also continued with the Chairs of national older people's organisations - Active Wales, Cymru Older People's Alliance, National Pensioners Convention and Wales Senior Forum - to examine key issues, hear about the experiences of their members and share key information and updates.

To complement the information and evidence captured from older people through the 'Have Your Say' questionnaire, we met and spoke with over 1,000 older people at a wide range of engagement visits and events throughout Wales. This engagement was invaluable, providing important opportunities to hear about the issues that matter to older people, as well as about the change and improvements that would make a positive difference to their lives.

In addition to this engagement, a series of focus groups and meetings were also arranged, targeted at older people whose voices often go unheard, including older people living with dementia, unpaid carers and the Windrush Elders.

Objective 4: Ensure the experiences of older people influence and inform public services and systems as well as planning and practice

Action: Report on and take forward recommendations from areas of work including older people's experiences of GP services; lived experiences of Black, Asian, Minority and Ethnic older people; the links between ageism and abuse

Older people's experiences of GP services

A new guide for older people was published in July 2024, which provides a wide range of information, including:

- Older people's rights to key medical services
- Options when contacting a practice and making appointments
- The practice team and common roles
- Making your voice heard
- Raising concerns or complaints

The guide also includes information about organisations that can provide information and support if older people are facing difficulties accessing the services they need from their GP practice or making their voices heard.

Paper copies were sent to every GP practice in Wales, working with NHS Shared Services, as well as shared with community partners and older people at events.

Lived experiences of Black, Asian, Minority and Ethnic older people

A report was published in May 2024 based on the lived experiences of Black, Asian and Minority Ethnic older people, to highlight the particular issues affecting their lives and how these can be addressed.

People's experiences were gathered by working with the organisations and individuals that Black, Asian and Minority Ethnic older people regularly engaged with, who facilitated engagement across Wales. The older people who took part were able to determine the level of information they wanted to share, responding through face-to-face interviews and focus groups or via written questionnaires.

Ahead of the publication of the report, follow up engagement events were arranged with the older people and organisations who had taken part, in the format which best suited them. Some of these took place as face-to-face events, whilst other groups received a video message or written feedback.

These follow ups allowed the older people and organisations who enabled the research to hear about the findings and discuss how the report captured their views and experiences. During face-to-face follow ups, older people were interested in what the research had found, and the

action taken as a result, which, included work focused on digital exclusion and access to GP practices, both key issues raised as part of this research.

The links between ageism and abuse

Building on a successful roundtable event held in 2023, which brought together key stakeholders to examine the role that ageism can play in enabling the abuse of older people, a working group was established to raise awareness of this issue more widely.

The group developed a briefing paper for practitioners, which highlighted the growing body of research on this issue and explored how ageism often relates to the abuse of older people, as well as how ageist attitudes within health and social care systems can adversely shape the action taken when concerns about abuse are raised or when abuse is identified.

The briefing paper was widely circulated to key stakeholders and their networks, including members of the Commissioner's Stopping Abuse Action Group, Social Care Wales and the National Safeguarding Service.

Appendix A Workforce profiles as at 31/03/25

Headcount Information

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 2024/25, 17 responses were received out of a possible 17. 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	-
25-34	-
35-44	4
45-54	9
55-64	3
65 and over	-
Prefer not to say	-

Sex	
Male	3
Female	14
Prefer not to say	-

Is your gender identity the same as the gender you were originally assigned at birth?	
Yes	17
No	-
Prefer not to say	-

Sexual Orientation	
Bisexual	-
Gay Man	-
Gay Woman / Lesbian	-
Heterosexual / Straight	17
Asexual	-
Other	-
Prefer Not to Say	-

Relationship Status	
Married	11
Divorced	2
Civil Partnership	-
Single	2
Co-habiting	2
Separated	-
Widowed	-
Prefer not to say	-

Religion or Belief	
No religion or belief	9
Christian (all denominations)	7
Buddhist	-
Hindu	-
Jewish	-
Muslim	-
Sikh	-
Any other religion or belief	-
Prefer not to say	-

National Identity	
Welsh	16
Scottish	-
English	-
Northern Irish	-
Irish	-
British	-
Gypsy or Irish Traveller	-
Prefer not to say	-

Ethnic Origin	
White	17
Mixed/Multiple ethnic groups	-
Asian	-
Black/African/Caribbean	-
Other – please specify	-

Dependents	
None	9
Children under 18	5
Children under 25 and in full time education	2
Person aged 60+	-
Prefer not to say	-

Disability	Yes	No	Prefer not to say
Do you consider yourself to have a disability?	2	15	-
Do you have a disability as defined by the Equality Act?	3	14	-
At least one of my dependents has a disability	6	11	-

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

Pregnancy & Maternity	
Number of pregnant employees during 2024/25	0
Number of employees taking Maternity Leave during 2024/25	0

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	0	0	0
Support Officer/Assistant	0	1	1
Officer	0	5	5
Head / Lead	3	5	8
Director / Chief Operating Officer	0	2	2
Commissioner	0	1	1

Pay and Grade	Men	Women	Total
24,437 – 27,947 / A	0	0	0
29,668 – 32,697 / B	0	1	1
35,806 – 41,307 / C	0	5	5
46,005 – 52,774/ D	3	4	7
58,946 – 62,246 / E	0	1	1
65,967 – 72,332 / F	0	2	2
90,000* / Commissioner	0	1	1

*Pay Level set by the Welsh Government

Contract Type	Men	Women	Total
Permanent	3	13	16
Fixed Term	0	1	1
Temporary	0	0	0

Working Pattern	Men	Women	Total
Full time	3	10	13
Part time	0	4	4
Compressed hours	0	0	0

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 monitors her recruitment process on an on-going basis to ensure that all measures are undertaken to try and increase the diversity of her staff.

Application forms are already available in alternative formats and recruitment adverts are placed widely using a variety of media. The Commissioner has a formal Dignity at Work 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.

During 2024/25, the Commissioner recruited for three posts via external recruitment. The table below details the number of candidates who applied for each role:

Role	Number of candidates
Team Support Administrator	1
Head of Advice and Assistance	17
Head of Finance and Resources	10

All 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 18 complete Diversity Monitoring Forms associated with external recruitment conducted during 2024/25.

Number of applications for jobs within 2024/2025 received from the following protected groups:

Age	
16-24	-
25-34	3
35-44	5
45-54	4
55-64	4
65 and over	-
Prefer not to say	2

Sex	
Male	6
Female	11
Prefer not to say	1

Is your gender identity the same as the gender you were originally assigned at birth?	
Yes	16
No	-
Prefer not to say	2

Sexual orientation	
Bisexual	-
Gay / Lesbian	-
Heterosexual	15
Asexual	-
Other	-
Prefer Not to Say	3

Relationship status	
Married	11
Divorced	-
Civil Partnership	-
Single	3
Co-habiting	1
Separated	-
Widowed	-
Prefer not to say	3

Religion or Belief	
No religion or belief	9
Christian (all denominations)	4
Buddhist	-
Hindu	1
Jewish	-
Muslim	-
Sikh	-
Any other religion or belief	1
Prefer not to say	1

National Identity	
Welsh	13
Scottish	-
English	-
Northern Irish	-
Irish	1
British	2
Gypsy or Irish Traveller	-
Other	1
Prefer not to say	1

Ethnic Origin	
White	15
Mixed/Multiple ethnic groups	-
Asian	1
Black/African/Caribbean	-
Other – please specify	1
Prefer not to say	1

Disability	Yes	No	Prefer not to say
Do you consider yourself to have a disability?	2	14	2
Do you have a disability as defined by the Equality Act?	2	13	2

Dependents	
Children under 18	5
Children under 25 and in full time education	2
Person aged 60+	-
Other dependents	-
None	8
Prefer not to say	3

At least one of my dependents has a disability	
Yes	1
No / Not Applicable	14
Prefer not to say	3

No data relating to pregnancy and maternity was collected in relation to recruitment activity for 2024/25.

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

No members of staff applied to change position within the organisation.

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

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 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.
- 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 equal opportunity regarding training. The Commissioner approved all employee applications for learning and development (training) activity during 2024/25.

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

All employees completed the training, which was undertaken either as individual training or as corporate training where all employees attended.

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

No employees were involved in grievance procedures.

Disciplinary Procedures

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

No employees were subject to disciplinary procedures.

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 2024/25, four employees left the Commissioner's employment.

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.

Age	
16-24	1
25-34	1
35-44	2
45-54	-
55-64	-
65 and over	-

Sex	
Male	1
Female	3





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