



Senedd Equality and Social Justice Committee:

Anti-Racist Wales

October 2023

Introduction

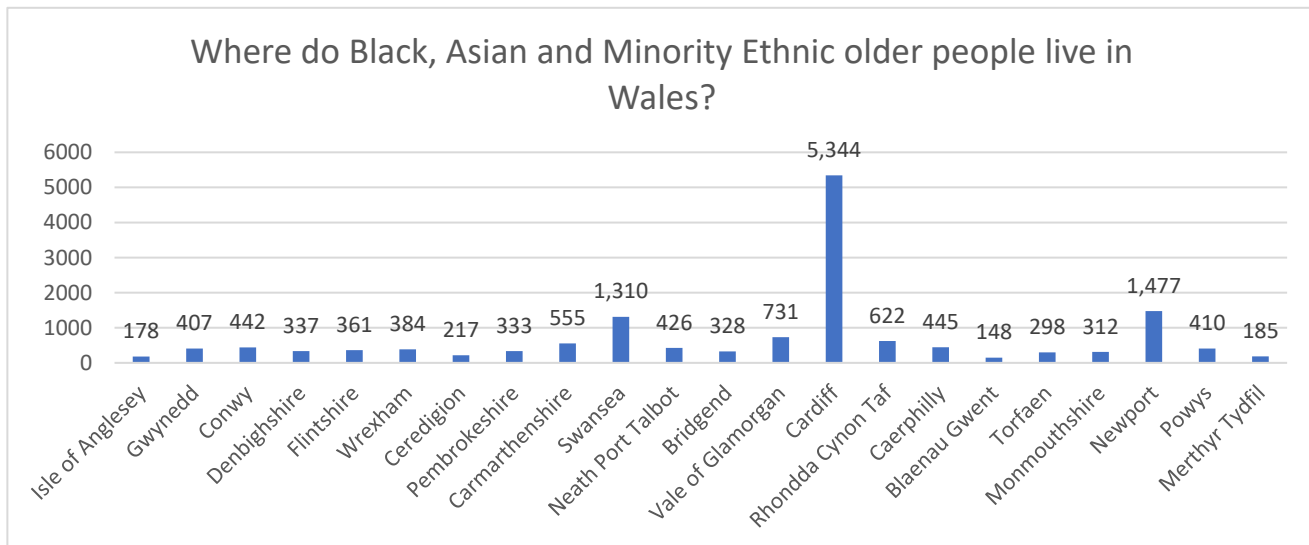
The Older People's Commissioner for Wales (OPCW) welcomes the opportunity to respond to the Senedd Equality and Social Justice Committee's consultation on an Anti-Racist Wales.

The Commissioner actively supports the Welsh Government's goal of making Wales an anti-racist country by 2030 and the Anti-Racist Wales Action Plan is a positive step. However, despite an emphasis on intersectionality and how different forms of discrimination combine to create greater disparity, the Plan itself contains little specific to older people.

For this reason, it is important to not simply consider the effectiveness or implementation of the Plan as it stands, but the gaps in addressing how Black, Asian and Minority Ethnic older people should be meaningfully included in anti-racist measures. The below contribution sets out demographic information before highlighting key issues raised previously that remain in need of attention or further consideration.¹

Demographics

According to recent census data, the number of older Black, Asian, and Minority Ethnic people living in Wales ranged from 148 in Blaenau Gwent and 178 in Anglesey, to 5,344 in Cardiff and 1,477 in Newport.²



The number of older people in Wales is expected to grow in the years ahead and this will mean an increase in the number of Black, Asian, and Minority Ethnic older people. The overall number (across all races) of over 75s in Wales is projected to rise to 361,000 (11.2% of the population) in 2026 and to 384,000 (11.8% of the population) by 2031.³

Ageism

Ageism is the stereotyping, prejudice and/or discrimination against people on the basis of their age or perceived age. Ageism can apply to any age group.⁴ The World Health Organisation estimates that globally, one in two people are ageist against older people, highlighting the scale of the challenge that needs to be addressed.⁵

In response to the original consultation on the draft Plan in June 2021, the Commissioner raised concerns that the issue of ageism was not addressed. Additional action is needed to ensure that Black, Asian and Minority Ethnic older people do not face greater disparity as a result of the combination of ageism and racism, or indeed other protected characteristics. The Plan's focus on the lived experience of Black, Asian and Minority Ethnic people remains welcome but this must also include coverage of the specific circumstances of older people to ensure that their lived experiences do not become invisible.

Data and evidence

The emphasis on the importance of good quality data in the Plan was welcome. It is important that the goal of 'Boost[ing] our use and understanding of data and evidence to underpin anti-racist policies and measure progress' is achieved and that progress is made quickly. The intention for data on ethnicity to include disaggregation by gender, disability and all other protected characteristics where possible will provide opportunities to better understand the lived experience of Black, Asian and Minority Ethnic people and measure progress.

The establishment of the Welsh Government's Race Disparity Evidence Unit is important, but data needs to be collected on age, alongside race, and broken down into 5-10 year age bands. There is often a general lack of data on the experiences of older people in Wales, with everyone over the age of 60 or 65 placed in the same category. The creation of the Welsh Government's Equality, Race and Disability Evidence Units provides an opportunity to improve data on older people more broadly, but in particular about race.

Improvements in publicly available data on age and race are still awaited. This data is essential to understanding the experiences of Black, Asian and Minority Ethnic older people and development of policies to promote healthy ageing while tackling specific challenges and barriers. It would be helpful to add or include equality data into existing data collections, for example data on social services and carers.

Digital inclusion and communication

Recent work undertaken by the Older People's Commissioner to better understand the experiences of Black, Asian and Minority Ethnic older people raised a number of themes including language barriers, problems accessing services, discrimination and digital exclusion. Digital exclusion is increasingly raised with the Commissioner by older people from a variety of backgrounds. Research shows that one in three people aged over 75 do not use the internet so it is positive that the Plan's engagement strategy includes 'traditional marketing methods such as leaflets'.⁶

These will be key to communicating the Plan and relevant progress to older people who cannot or choose not to use the internet. It is vital that such communication methods are maintained, taking into account the specific needs of Black, Asian and Minority Ethnic older people.

Use of existing legislation and powers

It remains important to note that many of the actions set out in the Plan could and should be achieved by more effective implementation of existing legislation such as the Social Services and Well-being (Wales) Act 2014 or by making better use of the Public Sector Equality Duty (PSED), especially appropriate Equality Impact Assessments. This was also a point made in the original response to the draft Plan and is worthy of re-examination.

Key gaps in the Anti-Racist Wales Plan

The original response of the Older People's Commissioner to the draft Plan highlighted that there were important issues in need of addressing or further development. These include:

- Independent advocacy

Specialist independent advocacy for older people has been a consistent ask from Black, Asian and Minority Ethnic older people. Tailored independent advocacy for older people that can respond to cultural sensitivities as well as provide advocacy in a range of languages is required. The Plan should reflect this need and set out how it will be met.

- Abuse of older people

The published Plan has little to say on domestic abuse. The needs of Black, Asian and Minority Ethnic older people must be part of ongoing discussions on domestic abuse, with specialist support services developed and highlighted.

- Access to dementia services

While the Plan has a focus on mental health and reducing health inequalities, there is no reference to dementia in the published Plan. Action on dementia needs to be embedded throughout the goals and action on healthcare.

- Older workers

The Plan makes reference to ethnic minority workers in relation to fair work but there is no recognition of the additional challenges and discrimination faced by older Black, Asian and Minority Ethnic workers. It is important that the Plan addresses the specific issues that older workers face both whilst in employment and when seeking it. Improved data on Black, Asian and Minority Ethnic older people would also help to assess the effectiveness of certain areas of work, such as access to apprenticeships.

Disappointingly, these areas are not adequately reflected in the existing Plan. Even if the Plan overall is making effective progress, the rights and advances needed to improve the experiences of Black, Asian and Minority Ethnic older people will not necessarily take place without additional action.

Where additional action is taking place, this should be reflected in an updated version of the Plan.

Conclusion

The Commissioner remains concerned that the Anti-Racist Wales Action Plan risks not delivering for Black, Asian and Minority Ethnic older people due to the lack of specific focus on older people and a failure to adequately consider the impact of ageism. The issues raised in the Commissioner's original response to the draft plan remain relevant and need to be addressed in additional Welsh Government activity if a Wales where everyone can age well is to be reality for Black, Asian and Minority Ethnic 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 is taking action to protect older people's rights, end ageism and age discrimination, stop the abuse of older people and enable everyone to age well.

The Commissioner is working for a Wales where older people are valued, rights are upheld and no-one is left behind.

¹ A copy of the OPCW response to the original consultation can be found at: [Consultation Response – Race Equality Action Plan: An Anti-racist Wales - Older People’s Commissioner for Wales](#)

² Census 2021 data

³ Older People’s Commissioner for Wales, May 2023, [Understanding-Wales-ageing-population-May-2023.pdf \(olderpeople.wales\)](#)

⁴ For more information on ageism, see: [Taking Action Against Ageism - Older People’s Commissioner for Wales](#)

⁵ [Ageism \(who.int\)](#)

⁶ Older People’s Commissioner for Wales, May 2023, [Understanding-Wales-ageing-population-May-2023.pdf \(olderpeople.wales\)](#)