

SP21

Blaenoriaethau ar gyfer y Pwyllgor Cydraddoldeb,
Llywodraeth Leol a Chymunedau
Priorities for the Equality,
Local Government and Communities Committee
Ymateb gan: Comisilynydd Pobl Hyn Cymru
Response from: Older People's Commissioner

About the Commissioner

The Older People's Commissioner for Wales is an independent voice and champion for older people across Wales, standing up and speaking out on their behalf. She works to ensure that those who are vulnerable and at risk are kept safe and ensures that all 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 they need. The Commissioner's work is driven by what older people say matters most to them and their voices are at the heart of all that she does. The Commissioner works to make Wales a good place to grow older - not just for some but for everyone.

The Older People's Commissioner:

- Promotes awareness of the rights and interests of older people in Wales.
- Challenges discrimination against older people in Wales.
- Encourages best practice in the treatment of older people in Wales.
- Reviews the law affecting the interests of older people in Wales.

Priorities for the Equality, Local Government and Communities Committee

1. As the Older People's Commissioner for Wales I welcome the opportunity to respond to the Equality, Local Government and Communities Committee consultation¹. There are two areas that I would like to highlight with the Committee.

Access to Community Services for Older People

2. Community services are key enablers that allow older people to live healthy and independent lives and contribute towards local economic growth. Removing key community services, such as the provision of public buses, toilets, libraries, lifelong learning and community/day centres, risks preventing older people from doing so, damaging local economies and impacting on the quality of life of older people across Wales.
3. Keeping older people active and engaged through the provision of community services enables them to leave their homes to work, volunteer and meet friends and family. Older people can also visit

¹ <http://www.senedd.assembly.wales/mgConsultationDisplay.aspx?id=218&RPID=1507570123&cp=yes>

local shops and businesses and spend on local services, strengthening local economies by doing so.

4. My 2014 report on community services and the 2015 Wales Audit Office report on the independence of older people demonstrate the importance of community services to older people² ³. The reports also questioned whether Local Authorities are doing enough to ensure that these services continue to provide 'lifelines' to the people that access them.
5. During a period of financial uncertainty for Local Authorities, many community services are at risk of a reduction in operations or, at worst, closure⁴. Without foresight, decisions made by Local Authorities to close these preventative services could have negative consequences on the quality of life of older people and actually cost the public purse even more, with an increasing number of older people requiring statutory packages of health and social care.
6. The Committee may wish to look at whether Local Authorities and other service providers are doing enough to ensure that the services, facilities and infrastructure that support older people in their communities are being protected, and that alternative models that promote creative, innovative and cost-effective delivery are being fully considered. This could include the support that they are providing for community groups and other organisations to take over the running/management of services through Community Asset Transfer schemes and other models of delivering community services⁵.

Consultation with Older People and the quality of Equality Impact Assessments

² The Importance and Impact of Community Services within Wales; Older People's Commissioner for Wales; 2014

³ Supporting the Independence of Older People: Are Councils Doing Enough?; Wales Audit Office; 2015

⁴ Supporting the Independence of Older People: Are Councils Doing Enough?; Wales Audit Office; 2015; 29

⁵ <http://gov.wales/topics/people-and-communities/communities/community-asset-transfer/?lang=en>

7. When community services and facilities face possible closure, Local Authorities should be consulting with the users and potential users of these services as well as properly assessing the impact that these closures could have on different groups within the community. I have however seen inconsistencies across Wales in the way in which Local Authorities reach their decisions, and older people have told me that they feel that decisions are made on their 'lifeline' community services with little or no consultation, and that impact assessments are seen as 'tokenistic' or a 'tick-boxing exercise'. As regular users of community services, older people are often disproportionately impacted when a service closes down, and yet in some instances the needs, concerns and priorities of older people are not fully taken into consideration, with alternative models and delivery options not explored in sufficient detail.

8. As a result of these inconsistencies I have published three Section 12 Guidance documents for Local Authorities in this area: Best Practice for Engagement and Consultation with Older People; Equality and Human Rights Impacts Assessments; and Scrutinising Changes to Community Services⁶⁷⁸. These documents are designed to help Local Authorities in fulfilling their duties under the Equality Act 2010, to ensure that changes to community services are done with older people rather than to older people, and to take the forward the rights-based approach, ensuring that the rights of older people are fully incorporated and reflected in decision-making processes.

9. The Committee may wish to examine this issue in further detail, reviewing consultation and engagement processes with older people and other groups in society, as well as a review of Equality Impact Assessments and how they influence service provision and proposed changes to community services.

⁶ Best Practice Guidance for Engagement and Consultation with Older People on Changes to Community Services in Wales; Older People's Commissioner for Wales; 2014

⁷ Equality & Human Rights Impact Assessments: Guidance for Local Authorities; Older People's Commissioner for Wales; 2016

⁸ Scrutinising Changes to Community Services: Guidance for Local Authorities; Older People's Commissioner for Wales; 2016

Other areas for consideration

10. Regarding the Committee's proposals following informal discussions, I would draw attention to the following areas:

- **In-work poverty, Poverty and welfare reform:** Working families and young people in Wales are at greater risk of poverty now than they were a decade ago, however older people should also be considered. Recent research by the Bevan Foundation found that poverty amongst older people in Wales is on the rise after fifteen years of decrease⁹. This is a real concern, particularly amongst the 'oldest old' who experience stagnant incomes and rising living costs. The traditional retirement model is also no longer relevant and an increasing number of older people need to work for longer in order to supplement incomes. Whilst remaining in or returning to employment is an important route out of poverty for older people, I am concerned that older people are also affected by in-work poverty and I welcome the Committee's proposals in this area. Regarding welfare reform, I welcome the Committee's proposals to measure the impact of measures such as universal credit on older people and others. I am also interested in how older people have been affected by the transition from Disability Living Allowance to Personal Independence Payment. Claiming financial entitlements is another key route out of poverty for older people, and I would suggest the Committee examines this issue in further detail, building on the 2015 Committee Inquiry into Poverty in Wales and the need to ensure that older people are claiming, for example, Pension Credit, and other entitlements in order to improve their financial resilience¹⁰. On a related note, I would be interested to see how poverty issues facing older people have been addressed in the **Communities First** programme, for example financial inclusion services.

⁹ <https://www.bevanfoundation.org/commentary/wales-poor-still-us/>

¹⁰ <http://www.assembly.wales/laid%20documents/cr-ld10252/cr-ld10252-e.pdf>

- **Local government reorganisation and reform:** I have been clear from the outset that any reform of local government must not lose focus on the quality of services for the end user, including older people, regardless of the shape, size and number of Local Authorities. I am also keen to ensure that the voices of older people are not lost within fewer, larger Local Authorities and that the needs, concerns and priorities of older people are fully reflected in any new local government structure. Furthermore, I support efforts to introduce more diversity in local government, with an increasing number of older women and older people from BME groups being encouraged to participate. Given that new proposals for local government reform are expected in the autumn, it would seem sensible for the Committee to scrutinise these proposals.

11. I hope that these issues provide the Committee with useful information. I look forward to working with the Committee and others on these issues over the coming months and years. Should you require any further information then please do not hesitate to contact me.