



Consultation Response

Strategic Equality Objectives 2020 – 2024

Welsh Government

November 2019

Introduction

Age Cymru is the leading charity working to improve the lives of all older people in Wales. We believe older people should be able to lead healthy and fulfilled lives, have adequate income, access to high quality services and the opportunity to shape their own future. We seek to provide a strong voice for all older people in Wales and to raise awareness of the issues of importance to them.

We are pleased to respond to Welsh Government's consultation on their Strategic Equality Objectives 2020 – 2024.

Question 1: Do you agree with the proposed draft Equality Objectives in Chapter 5?

We are supportive of the Welsh Government draft Equality Objectives. Comments relating to specific Objectives are provided below:

- WG Equality Objective 1: 'By 2024, we will improve outcomes for those most at risk of living in low income households, particularly those with protected characteristics, by mitigating the impact of poverty, improving opportunities and reducing the inequalities by those living in poverty'.

120,000 pensioners in Wales live in poverty.¹ Furthermore, older people are the group most likely to suffer from fuel poverty, where having to spend a disproportionate amount on fuel takes money away from other essentials. It is estimated that there were 56,000 households in Wales inhabited by an older person that experienced fuel poverty in 2017-18.² It is estimated that 80,000 households in Wales that are eligible for Pension Credit are not claiming it.³

¹ JRF (2018) Poverty in Wales 2018 <https://41ydv1cuyvlonsm03mpf21pub-wpengine.netdna-ssl.com/wp-content/uploads/2018/03/Wales-briefing.pdf>

² Figure cited in the Older People's Commissioner for Wales' 'State of the Nation' report (2019).

³ Independent Age (2019) Credit where it's due: Ending the £3.5 billion Pension Credit scandal. https://independent-age-assets.s3.eu-west-1.amazonaws.com/s3fs-public/2019-07/Credit%20where%20its%20due%20report_0.pdf

We believe there is still a lot that the Welsh Government can do to mitigate the impact on people living in poverty and those in fuel poverty by ensuring that people receive all the financial support and income that they are entitled to, and that houses in Wales are as energy efficient as possible. We believe that public services must be proactive in informing older people when they become eligible for entitlements.

We believe that Welsh Government should invest in services that ensure that older people have the support they need to access benefits and entitlements such as Pension Credit and Attendance Allowance. Recent years have seen funding for the advice, support and home visits that would help older people access the benefits they're entitled to cut and we know that services that are currently available are at risk and support is likely to further diminish. We are also aware that support for people to access tribunals to appeal decisions on benefits is not consistently available across Wales and we believe this sort of support should be available wherever it is needed.

- WG Equality Objective 2: 'By 2024, we will complete investigations into ways the Welsh Government can ensure an integrated equality and human rights framework which promotes equality of outcome and opportunity and can help eliminate discrimination for all groups of people with one or more protected characteristic'.

Awareness of rights

It is essential that older people are aware of their rights and are able to exercise them. We look forward to the new Strategy for an Ageing Society which 'adopts a rights based approach' as we believe that work is needed to increase knowledge and raise awareness of the rights of older people across Wales.

For example, the Social Services and Well-being (Wales) Act requires local authorities to consider whether an individual may need Independent Professional Advocacy (IPA) from their first point of contact. Carers may find it difficult to disentangle their own concerns and interests from those of the person they care for, and may therefore need advocacy support to ensure that their own rights are upheld and that they are supported to challenge social services to obtain the right services. An IPA has the training and knowledge to help an older carer navigate complex systems, make their voices heard and build the confidence and resilience to speak up for themselves and take control of their own lives. However, in our experience, advocacy is often the last resort after other channels have already been tried.

We believe that advocacy should be more widely provided to support older people reaching crisis point before they receive any help or support.

Age Cymru made a Freedom of Information request to local authorities in October 2017, and found that there was a disparity in the numbers of assessments carried out by local authorities, which appears to bear no relation to

population, demography, health profile or disadvantage in communities. This may be because carers often do not identify themselves as carers, as they view care as a normal part of their relationship with the individual they are helping. This means they may lose out on the support that is available to them. We believe that awareness should be raised of the right to an independent carer's assessment under the Act, and carers should be encouraged to take up this opportunity. Until people know about their rights they won't be able to exercise them.

Age discrimination in employment

Unjustified age discrimination is still rife in employment, despite it being illegal under the Equality Act 2010. Polling by YouGov commissioned by Age UK in 2017 found that 36% of over 50s felt they had been disadvantaged at work because of their age. We believe that more must be done to tackle age discrimination in the workplace. This includes educating employers and managers to avoid discrimination and to challenge stereotypes. We believe that everyone should be able to remain in work for as long as they desire and are capable of doing so, and that no-one should be disadvantaged because of their age. Ensuring that older workers are not forced out of the labour market, and providing appropriate support to those who do find themselves unemployed, is increasingly crucial as a result of demographic change and the rising State Pension Age.

- WG Equality Objective 3: In order to work towards fostering equality of opportunity and outcomes for all in Wales, we will continue to ensure the Welsh Government has implemented the Public Sector Equality Duty (PSED) and Welsh specific equality duties in all we do and work to encourage other Public Sector organisations to follow our example. By adopting an approach based on removing barriers which prevent people fulfilling their potential (including, for example, equality of pay, or following the example of the Social Model of Disability), we will create better policy and better services for everyone.

We have concerns about the commissioning of services for 'all adults' that potentially fail to recognise the needs of older people. For example, advice and advocacy services and the development of generalist services may not offer the same amount of accessibility or cover the issues and concerns in depth for older people that more specialist and targeted services could.

We would also reiterate here our concerns regarding barriers in the built environment in terms of accessing public transport and a lack of public toilets in communities (see Question 2), and digital exclusion among older people as more information and services are made available mainly or exclusively online (see Question 3).

- WG Objective 5: 'By 2024, we will ensure victim who experience abuse, harassment, hate crime or bullying as a result of having one or more protected characteristics have access to advice and support to live without fear or abuse'.

The abuse of older people is largely a 'hidden problem', and it is important that the different forms of abuse are recognised and addressed. The abuse of older people can take many forms including: financial abuse, neglect and acts of omission, physical abuse, sexual abuse, and emotional or psychological abuse.⁴ There are also additional types of abuse that may be a factor in elder abuse cases: institutional / organisational abuse; discrimination and hate crime; domestic violence / domestic abuse, and abuse by a stranger.⁵

The financial abuse of older people includes fraud, which is a growing area of concern (rogue doorstep traders, postal, telephone and online fraud). We believe that if a person is being targeted by fraudsters because of their age and perceived vulnerability, then consideration should be given as to whether this may qualify as an aggravating factor, whereby a conviction could potentially receive enhanced sentencing (an uplift) as a hate crime.

Advocacy services are essential to ensure that every older person has a voice and receives the support they need. Advocacy services are also vital in protecting people and preventing abuse. However, the latest edition of Age Cymru's 'Advocacy Counts'⁶ reports a continued fall in the number of specialist advocacy providers and advocates for older people in Wales. It is of vital importance to ensure that the provision of services is sufficient to enable people to access an independent advocate when and where they need one.

Question 2: Do you think there are any areas of inequality that are not addressed by draft Equality Objectives and that are of particular importance to you?

Public transport

A key finding of EHRC's 2018 'Is Wales Fairer' report was that loneliness, isolation and a reduced sense of belonging are some of the most significant issues facing particular groups, including older people.⁷ The report highlighted that poor transport and digital infrastructure in rural areas is affecting people's ability to participate in all aspects of life, particularly households without cars, older people in rural areas, and disabled people.⁸

Public and community transport are vitally important in helping people to maintain independence and wellbeing as they age. Such transport networks can ensure that communities are well connected and that services, facilities and amenities are accessible to older people. Without these, there is an increased risk that isolation and loneliness will impact upon people's wellbeing. It is essential that

⁴ Age Cymru (2018) Safeguarding older people in Wales from abuse and neglect. Factsheet 78w. November 2018.

⁵ Ibid.

⁶ Age Cymru (2018) Advocacy Counts 6. <https://www.ageuk.org.uk/cymru/our-work/golden-thread-advocacy-programme/advocacy-counts/>

⁷ EHRC (2018) Is Wales Fairer? Summary report 2018.

⁸ Ibid.

older people in all areas have the means to get out to buy food, get medical attention, get money and pay bills, and have social contact.

We are extremely concerned that local bus services remain vulnerable to spending cuts or commercial decisions. There is a danger that reductions in bus services mean that access to a whole range of services and amenities can become impossible for some older people. We believe that the Welsh Government must work with local authorities to support a sustainable network of bus services across Wales. The provision and maintenance of bus routes to access key services and facilities must be protected, including vital routes to access healthcare.

Accessing public transport can present problems for many older people. For older people with limited mobility, getting to the bus stop and on and off the bus are significant physical barriers, which are compounded by a lack of facilities at bus stops. More bus stops with shelter and seating would make public transport more accessible. Accessibility problems at railway stations include stairs to platforms, a lack of lifts, and difficulties in negotiating the gap between the train and the platform edge. We welcome the publication of Welsh Government's accessible and inclusive public transport objectives,⁹ and it is important that these objectives are implemented.

Public toilets

Poor toilet provision and access disproportionately affects some groups including older people and disabled people.¹⁰ Poor public toilet provision impacts upon many older people as it restricts how often, and for how long, they are able to leave their homes. Despite the importance of these facilities, public toilets are disappearing from our communities at an alarming rate, and assertive action is needed to halt this decline. We believe that there should be a statutory duty on local authorities in Wales to provide public toilets.

Question 3: Are there any emerging trends / issues / evidence regarding inequality in Wales that you feel should be addressed as a priority?

We believe that digital exclusion should be addressed as a priority. As more information and services are made available mainly or exclusively online there are real risks of increasing exclusion amongst older people. Technology can offer a vital portal to information and advice for older people but access and take-up

⁹ Welsh Government (2017) Policy Statement – Accessible and Inclusive Public Transport Objectives. <https://beta.gov.wales/accessible-and-inclusive-public-transport-objectives>

¹⁰ Welsh Government (2014) Welsh Government White Paper. Listening to you: Your health matters. Consultation on proposal for a Public Health Bill. Number WG20703 <http://wales.gov.uk/consultations/healthsocialcare/white-paper/?lang=en>

remains low amongst older age groups. The National Survey for Wales reports that 49% of people aged 75 or over were internet users in 2018-19.¹¹

We believe that older people must be supported and encouraged to acquire digital skills and get online, if they are able to and can afford to do so. Those who cannot or do not want to do so should continue to access services and support in a way that best suits them. Services provided online need to be high quality and easy to use, whilst offline services should be of equal quality and fully accessible. Service providers must ensure that the provision of online information is not to the detriment of the provision of information in other formats.

We hope these comments are useful and would be happy to provide further information if required.

¹¹ Welsh Government, National Survey for Wales 2018-19 Internet use and digital skills
<https://gov.wales/sites/default/files/statistics-and-research/2019-09/internet-use-and-digital-skills-national-survey-wales-april-2018-march-2019-207.pdf>