



Commissioner for **Older People**
for Northern Ireland

Programme for Government 2016-2021

Consultation response from the
Commissioner for Older People
for Northern Ireland

December 2016

Executive Summary

1. This consultation is complex and constantly evolving, and prioritises those with online access, which will have made it more difficult for individual older people to respond.
2. The Commissioner is extremely disappointed that the Programme for Government still does not include a specific Outcome for older people. This does not reflect the demographic changes that are occurring and raises concerns that the PfG will not adequately support older people across the 2016-2021 term. COPNI has produced a suggested outcome, that would 'respect, value and protect' our older people.
3. A summit held in December 2016 revealed strong support for this 15th Outcome, and revealed more information about Scotland, which also uses the Outcomes Based Accountability (OBA) model, and an additional Outcome specific to older people was latterly inserted into their National Outcomes.
4. Issues and proposed actions in the PfG relating to employment and the economy do not show substantive consideration of the needs of older people relating to skills development or economic inactivity. Some of the Indicators supporting these Outcomes will not adequately reflect the experience of many older people if they are not changed.
5. It is surprising that Outcome 4, 'We Enjoy Long, Healthy Active Lives', and the associated Delivery Plans, do not include reference to the Active Ageing Strategy. There is also not enough detail on how relevant actions set out in the PfG will work with initiatives progressing from the Bengoa Review and the Minister for Health's strategy, Delivering Together.
6. It is concerning the 'modal shift' proposed for transport appears to be targeted at urban areas and major routes, and it is unclear how this will benefit older people in rural areas.
7. While a commitment to expand the supply of housing for older owner occupiers is welcome, it would be more effective if the Outcome also considered ways older people can be better supported to remain in their own homes.
8. There are many other areas of this Programme for Government where more extensive consideration of how the issues affect older people, and relevant Actions proposed in the Active Ageing Strategy, would be beneficial.

9. The revised version of the PfG produced for this consultation contains unchanged Outcomes from the previous consultation, and still lacks a specific Outcome about Older People. The Commissioner is disappointed that his key comments made in the response to the first consultation on the Programme for Government (PfG) Outcomes Framework do not appear to have been taken onboard within this updated consultation document.
10. The failure to prioritise older people in the document is not preparing for an ageing population, and gives the Commissioner doubts that the PfG would adequately support older people. This is in contrast to the position in other jurisdictions that already have been using the Outcomes Based Accountability approach, most notably Scotland.
11. The Commissioner also identified specific issues with Indicators that support each Outcome, believing some would be inadequate at reflecting the experience of older people at all.
12. The Commissioner suggested the introduction of a 15th Outcome for older people, emphasising that the Executive commit to a 15th Outcome which would be to 'Respect, Value and Protect our Older People'.
13. Comments made previously by The Executive Office have stated that "*when you lift an OBA up to population level, you find that the needs of individual groups can be very clearly accommodated in the outcomes framework that we have.*" ¹ As comments by the creator of the Outcomes Based Approach to Government, Mark Friedman indicate, for the Framework to operate effectively, there needs to be a continuous process of setting priorities within the agreed outcomes. ² The Commissioner would question this approach, particularly when other 'Age' groups have a specific Outcome. If older people are not in the high level outcomes, and are missing from many Indicators, it will lessen the chances of them being prioritised when choices need to be made between Outcomes as implementation begins and resources are allocated.
14. Over the term of this Programme for Government, NISRA Population projections forecast the older population will increase from 396,000 to 445,000, an increase of 10%, and making up nearly a quarter of the population. ³ Older people will be users

¹ Committee for the Executive Office/Northern Ireland Assembly, 'Official Report (Hansard), Draft Programme for Government Framework 2016-2021: Executive Office', 14th September 2016.

² Committee for The Executive Office/Northern Ireland Assembly, 'Official Report (Hansard), Outcomes-Based Approach to Government: Fiscal Policy Studies Institute, Clear Impact, National Children's Bureau, State Representative Diana Urban', 11th October 2016.

³ NISRA, 'Northern Ireland Level Projections', <http://www.nisra.gov.uk/demography/default.asp20.htm>

of services in larger numbers, contributing more, and must have a formal place in the high level part of the Programme for Government.

15. COPNI has not seen changes in the Indicators that we highlighted in the first consultation, that would make them more effective at reflecting the experience of older people, and ‘allow the impact of programme delivery on older people to be clearly identified’.
16. The Commissioner is concerned about the position of the Active Ageing Strategy within the Programme for Government. The PfG and Delivery Plans lack detail of how programmes in the Active Ageing Strategy will interact with relevant Delivery Plans in the Programme for Government. The Commissioner is also concerned that if implementation of policies to benefit older people is limited to the Active Ageing Strategy, large parts of the PfG will not effectively support older people.
17. The AAS includes a commitment to “*developing and consulting on proposals to extend age discrimination legislation on the provision of goods, facilities and services.*” Although this PfG includes a commitment to implement the Active Ageing Strategy, it does not mention Age, Goods, Facilities and Services (AGFS) legislation. Does that mean the AGFS legislation will be implemented?

The Consultation Process

18. The process has been difficult for older people to respond to, with Delivery Plans changing frequently during the consultation period, the methods for replying being skewed to online, and it being difficult for older people to find out about Department consultation events.

The Commissioner’s Summit – Is This A Programme for Government for An Ageing Population?

19. On the 13th December, the Commissioner hosted an event with representatives from the Executive Office, political parties, Academia and from the Scottish Older People’s Assembly, where individual older people could give their feedback on the PfG. There was strong support for the Commissioner’s proposed Outcome from participants and from older people, and The Executive Office representative said these calls would be reflected in feedback to Ministers.

20. The Office of the Commissioner for Older People for Northern Ireland is an independent public body established under the Commissioner for Older People Act (Northern Ireland) 2011.

21. The Commissioner has an extensive range of general powers and duties which provide the statutory remit for the exercise of the functions of the office. In addition the Commissioner may provide advice or information on any matter concerning the interests of older people. The wide ranging legal powers and duties include amongst others:

- To promote and safeguard the interests of older people (defined as being those aged over 60 years and in exceptional cases, those aged over 50 years);
- To keep under review the adequacy and effectiveness of law and practice relating to the interests of older people;
- To keep under review the adequacy and effectiveness of services provided for older persons by relevant authorities (defined as being local councils and organisations including health and social care trusts, education boards and private and public residential care homes);
- To promote the provision of opportunities for and the elimination of discrimination against older persons;
- To review and where appropriate, investigate advocacy, complaint, inspection and whistle-blowing arrangements of relevant authorities;
- To assist with complaints to and against relevant authorities;
- The power to bring, intervene in or assist in legal proceedings in respect of relevant authorities;
- To issue guidance and make representations about any matter concerning the interests of older people.

22. The Commissioner's powers and duties are underpinned by the United Nations Principles for Older Persons (1991) which include Independence, Participation, Care, Self-fulfilment and Dignity.

Older People and Their Inclusion in The Programme for Government

23. The revised version of the PfG produced for this consultation contains unchanged Outcomes from the previous consultation, and still lacks a specific Outcome about Older People. The Commissioner is disappointed that his key comments made in the response to the first consultation on the Programme for Government (PfG) Outcomes Framework do not appear to have been taken onboard within this updated consultation document.
24. In the response to the first consultation on the Draft Framework, the Commissioner particularly noted that it contained no specific outcome for older people, and indeed did not mention older people. The failure to prioritise older people in the document is not preparing for an ageing population, and gives the Commissioner doubts that the PfG would adequately support older people. This is in contrast to the position in other jurisdictions that already have been using the Outcomes Based Accountability approach, most notably Scotland, where a 16th Outcome, *'Our people are able to maintain their independence as they get older and are able to access appropriate support when they need it'*.⁴
25. The Commissioner also identified specific issues with Indicators that support each Outcome, believing some would be inadequate at reflecting the experience of older people at all. Examples of these were Indicators 16, 17, 32, and 34, which only quoted economic activity and employment for 16-64's. This would miss out on increasing numbers of older people working and starting their own business and does not even fully overlap the rising State Pension Age over the term of this PfG. Indicators 23 and 24 rely on absolute numbers for key journey times and Internet Connectivity. By doing this, they would tell us little about accessibility, an important issue for older people.
26. The Commissioner suggested the introduction of a 15th Outcome for older people, emphasising that the Executive commit to a 15th Outcome which would be to 'Respect, Value and Protect our Older People'. This would be supported by Indicators COPNI proposed, all of which would be available during the term of the Programme for Government.

⁴ Scottish Government 'National Outcomes', <http://www.gov.scot/About/Performance/scotPerforms/outcome>

27. Comments made previously by The Executive Office have stated that “*when you lift an OBA up to population level, you find that the needs of individual groups can be very clearly accommodated in the outcomes framework that we have.*”⁵ As comments by the creator of the Outcomes Based Approach to Government, Mark Friedman indicate, for the Framework to operate effectively, there needs to be a continuous process of setting priorities within the agreed outcomes.⁶ The Commissioner would question this approach, particularly when other ‘Age’ groups have a specific Outcome. If older people are not in the high level outcomes, and are missing from many Indicators, it will lessen the chances of them being prioritised when choices need to be made between Outcomes as implementation begins and resources are allocated.

28. Over the term of this Programme for Government, NISRA Population projections forecast the older population will increase from 396,000 to 445,000, an increase of 10%, and making up nearly a quarter of the population.⁷ Older people will be users of services in larger numbers, contributing more, and must have a formal place in the high level part of the Programme for Government.

29. This version of the PfG states that “*Some considered that the Programme was not explicit enough on respecting, valuing and protecting older people. The wellbeing of older people is of huge importance to the Executive, and we are determined that they, along with all other groups in our society, should share in the progress towards each of the outcomes.....We intend to provide for this by ensuring that data on performance is gathered and reported on across all Section 75 categories wherever possible. This will allow the impact of programme delivery on older people to be clearly identified.*” The Commissioner would like to know more detail about this aspect of the operation of the Programme for Government. While the additional detail in the main documents and the Delivery Plans produced for this version of the consultation is noted, COPNI has not seen changes in the Indicators that we highlighted in the first consultation, that would make them more effective at reflecting the experience of older people, and ‘allow the impact of programme delivery on older people to be clearly identified’.

30. The Commissioner is concerned about the position of the Active Ageing Strategy within the Programme for Government. The Delivery Plan for Indicators 19 and 28 include a programme called ‘Active Ageing Inclusion’ which will include the implementation of the Active Ageing Strategy. Despite this, the PfG and Delivery

⁵ Committee for the Executive Office/Northern Ireland Assembly, ‘Official Report (Hansard), Draft Programme for Government Framework 2016-2021: Executive Office’, 14th September 2016.

⁶ Committee for The Executive Office/Northern Ireland Assembly, ‘Official Report (Hansard), Outcomes-Based Approach to Government: Fiscal Policy Studies Institute, Clear Impact, National Children’s Bureau, State Representative Diana Urban’, 11th October 2016.

⁷ NISRA, ‘Northern Ireland Level Projections’, <http://www.nisra.gov.uk/demography/default.asp20.htm>

Plans lack detail of how programmes in the Active Ageing Strategy will interact with relevant Delivery Plans in the Programme for Government. The Commissioner is also concerned that that if implementation of policies to benefit older people is limited to the Active Ageing Strategy, large parts of the PfG will not effectively support older people.

31. The AAS includes a commitment to “*developing and consulting on proposals to extend age discrimination legislation on the provision of goods, facilities and services.*” Although this PfG includes a commitment to implement the Active Ageing Strategy, it does not mention Age, Goods, Facilities and Services (AGFS) legislation. Does that mean the AGFS legislation will be implemented?

The Consultation Process

32. While the Commissioner acknowledges The Executive Office’s attendance at individual events, the Commissioner remains disappointed by aspects of the consultation process. The Commissioner’s office has not been made aware of all the events relevant to informing the different Indicators, and therefore has not been able to attend all events. There appeared to be no centralised mailing lists, for these which made it difficult for the Commissioner’s office to be aware of all the events. For an individual older person it would have been even more difficult to be aware, let alone attend, all the events relevant to older people.
33. The Commissioner recognises that a consultation with the scope of an entire Government programme will be naturally lengthy and welcomes that there were Easy Read versions of the consultation documents. However the way in which the consultation has been managed and the methods for reply made it more difficult for older people to reply themselves. The Commissioner is not aware of any hard copies of the documents being distributed, outside of PfG departmental events, which meant that in practice respondents needed to have online access, with responses only encouraged via the Survey Monkey system.
34. This process of using the online reply system was very time consuming for someone who wants to make short comments, or only comment on a specific Outcome. It was also made more complex by the separation between the PfG and Delivery Plans, with comments requested to be sent directly to the SRO’s for the Delivery Plans. It is very unlikely that the average older person in Northern Ireland had the time or ability to meaningfully engage with this process.
35. The practicalities of replying to the consultation also made it harder for older people to respond. The Delivery Plans have been continually updated during the PfG consultation period, making it difficult for respondents, having to check and re check Delivery Plans they had written comments for, if they wanted to be

completely sure that all their comments were valid. After only 3 weeks of the consultation, there had been changes to 12 of the Delivery Plans. At most times during the consultation Delivery Plans have not been available to comment upon – with 4 weeks left of the consultation 4 of the Delivery Plans displayed ‘Holding Pages’. In the last week of the consultation being open, 4 Delivery Plans were changed, and with 3 days left, 1 Delivery Plan was still displaying a Holding Page, and another Delivery Plan had become inaccessible through the website. The frequent changes and unavailability of documents would be a difficult process for an individual older person to navigate and to send a reply. It is not a genuine and meaningful engagement with older people.

The Commissioner’s Summit – Is This A Programme for Government for An Ageing Population?

36. On the 13th December, the Commissioner hosted an event with representatives from the Executive Office, political parties, Academia and from the Scottish Older People’s Assembly, where individual older people could give their feedback on the PfG. Themes emerging from speakers and older people at the event were:
37. **Katrina Godfrey from The Executive Office** stated that each Outcome required an inter departmental approach to working, which in turn requires a culture change. She also said that the Delivery Plans have to be treated as live documents, where the Executive must take the opportunity to try new things. Colleagues in Scotland had pointed out the need for The Executive Office to change Indicators when they were not working adequately.
38. She said that she had heard the strong calls at the event from older people for an Outcome for older people, and will be reflecting them in feedback to Ministers, and that an Outcome for older people will be discussed.
39. **Professor Deirdre Heenan** said that the PfG should look to the Scottish Outcomes for the appropriate level of detail to include, especially over Health and Social Care. She stated that she could not understand how older people did not have a separate Outcome in this PfG, when other groups were represented in this way. Professor Heenan have her support to Commissioner’s 15th Outcome, which makes sense given the demographic projections of increasing amounts of older people.
40. **Glenda Watt** from the Scottish Older People’s Assembly described the background to the insertion of a separate Outcome for older people in Scotland’s National Outcomes, four years after the first publication. She described how this had facilitated monitoring of the Scottish Government’s policies for older people,

and how having an Outcome for older people needs to be accompanied by commitment to implementing policy, such as in the Health and Social Care field.

41. The **Political Panel** unanimously agreed that older people should have their own Outcome in the PfG.

- **Nichola Mallon from the SDLP** said that older people make a huge contribution, projected to be over £24 billion over the next 50 years. Therefore it was not logical that they should not be referenced in the PfG.
- **Mike Nesbitt from the UUP** said there was a robust case for including an Outcome for Older People, and worried that The Executive Office was being selective over parts of the Outcomes Based Accountability Model that agreed with this PfG,
- **Stewart Dickson from the Alliance Party** said that the omission of older people from much of the PfG was glaring, and it was a document that the ageing sector can not see themselves in.
- All agreed that it was important that older people's voices were heard both before and after this PfG being passed.

42. The Commissioner will now comment upon different themes of the Programme for Government, and how they relate to older people:

Outcome 1:

43. Research suggests that skills policy plays an important role in shaping the evolution of work capability as individuals get older. ⁸ The ‘key drivers’ of this Outcome are identified as *“innovation, research and development (R and D) and improving the skills and employability of those in, and those wishing to join, the workforce so that people can progress up the skills ladder, supporting higher levels of productivity.”*
44. Policies with a particular focus on older people have not been a priority in the development of skills policy in Northern Ireland. There is a symbiotic relationship between workers remaining longer in the labour force, and increasing the time this gives employers to recover training costs. ⁹ Policies directed towards older people should form a key part of any skills agenda seeking to drive economic growth. Older people offer considerable skills and experience, and have not historically benefited as much as younger generations from relatively recent expansions of Further Education and apprenticeships.
45. In COPNI’s *Valuing an Ageing Workforce* report, the Commissioner recommended that resources should be rebalanced to give more older people access to training and apprenticeships to match the changing skill requirements of the labour market. The skewed ratio of resources allocated to lifelong learning should be rebalanced, and skills and learning policies in this Delivery Plan, in the rest of the Programme for Government, and in the general activities of government, should not continue to cite learning and development as mostly for young people.
46. As was outlined to COPNI last year by the then Department for Employment and Learning, there has been a clear disparity in apprenticeships policy for younger and older people – on the job training was 100% financed by the Department for 18-24 year olds in all sectors, and 50% financed for apprentices aged 25 or over in defined economically important sectors. *The NI Strategy for Apprenticeships, which was scheduled to be introduced from September 2016, will be open to all*

⁸ Marco Paccagnella, ‘Going Grey, Staying Skilled’, <http://oecdeducationtoday.blogspot.co.uk/2016/04/going-grey-staying-skilled.html>

⁹ OECD, ‘Skilled for Life? Key Findings From the Survey of Adult Skills’, http://www.oecd.org/skills/piaac/SkillsOutlook_2013_ebook.pdf

ages, and should have age neutral financing. Encouraging people from all age ranges to take part in the Apprenticeships system is very important, and some element of direct marketing to older people of the benefits could assist this programme.

47. COPNI remains concerned that one of the Indicators supporting this Outcome, Employment Rate by council area, is at present confined in the dataset to employment rates and economic activity rates for 16-64 year olds. The related Delivery Plan states, *“job availability, coupled with a workforce that is properly equipped and ready for employment, with appropriate skills for the marketplace, will be required in tandem.”* However, if data development is focused on a cohort which does not include most older people, these policies will not be working in a beneficial way for older people. Surprisingly, the dataset for this Outcome and Indicators will not even match the rise of State Pension Age to 66 by 2020. Elsewhere in the Programme for Government it states that data development will be further progressed to better reflect a wider range of Section 75 groups, and this is one example where data development would need to be urgently undertaken.
48. The work with local councils on a new programme for Business Start Up Support should include specialised support for older entrepreneurs. They are a group that Entrepreneurship policy has traditionally not targeted, and the Commissioner would like to see the devolution of Entrepreneurship policy to Councils as an opportunity to produce Entrepreneurship programs that are more tailored to including older people.

Outcome 3 - We Have A More Equal Society:

49. The Commissioner notes that this outcome is defined as including recognition of *“our responsibility to deliver better equality outcomes across all areas of this PfG. In particular the data for all outcomes will be collated and reported across all Section 75 categories. Where gaps in data for equality groups exist, we will require these to be addressed wherever possible.”* The Commissioner perceives an urgent requirement to address gaps in data for older people with some of the proposed Indicators that support this Outcome. Two of the proposed Indicators relating to this Outcome, the ‘Employment Rate of 16-64’s by Deprivation Quintile’ and ‘improved regional balance of economic prosperity through increased employment’, would generate data that would not capture the experiences of older people. As the Commissioner has outlined, older people are an increasingly diverse group, and will form an increasing proportion of Northern Ireland’s society over the PfG term. The Commissioner believes this would undermine the application of this Outcome to older people, if the supporting data remains as

proposed. How would the Commissioner and other stakeholders be able to monitor the success or not of this Outcome for older people?

50. The Commissioner also believes that in the substantive analysis of the ‘important issues’ in the Outcome, there are missed opportunities to include older people. Improving the regional balance of our economy, and increasing opportunities for our most deprived communities would benefit from consideration of how older people are disproportionately affected by lower skills, lower qualifications and long term unemployment (once older people fall into long term unemployment, it lasts proportionately longer than for other age groups).
51. The Commissioner acknowledges that the respondents emphasised the importance of legal protections for rights, and several made reference to introducing protection against discrimination on the grounds of age in the provision of goods, facilities and services (Age GFS). The Commissioner believes that, as stated in the COPNI response to the Draft Framework, there is an opportunity to include reference to this legislation in the actions to be progressed under this Outcome? The Commissioner also welcomes the recognition in these documents that *“health inequalities can be driven by unequal access to services....it is essential to identify and address systemic and attitudinal barriers to equity of access. People must have access to high quality care when they need it and, when possible, early intervention to help prevent or delay illness.”*
52. The Commissioner notes the plans to develop a comprehensive Social Inclusion Wraparound Service. The development of this Wraparound Service should provide the impetus for a comprehensive mapping exercise to generate accurate data about the levels of loneliness among older people in Northern Ireland. It would assist reaching and assisting older people if the true scale of loneliness among older people is known.
53. The Commissioner also notes there is a commitment to *“match those without entry level skills for work to relevant provision through local colleges, community and contracted training providers.”* Additionally the Outcome talks of providing a work coach support in the first twelve weeks of a new job, and establishing an employability forum in each council area to *“better match supply and demand for work, through the Community Planning process.”* Given the importance of older workers to future economic growth, the Commissioner would strongly urge that the Indicators for this Outcome should be urgently rebalanced to include older people. If this does not happen it would be the actions proposed under this Outcome will have any impact at all on *older people*.

54. The Commissioner welcomes the statement that there will be the provision of *“financial support and guidance for self employment, to include social enterprise business models,”* and to *“work with local councils on a new programme for business start-up support.”* This should include support for older people pursuing entrepreneurship, which is an area which focuses most of its initiatives at younger age groups.

Outcome 6, We Have More People Working In Better Jobs:

55. As this section of the PfG correctly points out, *“access to a better job is important in addressing inequalities, combating poverty and is a vital component in building successful communities.”* The document points out the need for an ‘holistic approach to the skills pipeline’, but the section specifically mentions young people and omits older people. The Commissioner believes this is a serious omission, as the emphasis put on this Outcome on skills pathways, progression through further study, and supporting and enabling people to remain in the workforce are issues that are highly relevant to older people.

56. The Commissioner is also surprised that nowhere in this Outcome or the whole Programme for Government document, is the impact of the rising State Pension Age referenced in terms of impacts on older people. Ensuring older people can continue to work for longer is increasingly important, as the State Pension Age will be rising over the term of this Programme for Government. Given that this Outcome states *“access to a better job is important in addressing inequalities, combating poverty and is a vital component in building successful communities,”* on what basis are older people omitted from the Delivery Plan?

57. Older people, especially older women, will experience the most acute pressure from rises in State Pension Age. This Outcome states that older people have had less benefit than other age groups from the expansion in size of further and higher education. Although there are higher numbers of young long term unemployed, figures show that older people suffer longer spells unemployed when they ‘slip into’ long term unemployment, and are the age group that are impacted most.

58. The description of the groups in this section most impacted by economic inactivity does not include older people, which is at odds with the Economic Inactivity strategy published during the term of the last PfG. The Commissioner is concerned that, if economic inactivity policy deviates in this Assembly term from designating older people as a priority group, as they were in the Economic Inactivity strategy *Enabling Success* published in 2014, this will damage the prospects of long term unemployed older people, just as they face the impact of a rising State Pension

Age. It is essential for their well being and the fortunes of the economy that older people are given sufficient priority.

59. As with other Outcomes in the PfG, the Commissioner believes that the scope of the data gathered for some of the Indicators which are to support this Outcome, like 'Improved regional balance of economic prosperity through increased employment', and 'Increased proportion of people in work', will not reflect the experience of older people by excluding the majority of them. This omission must be remedied.

Outcome 12 - We Have Created A Place Where People Want To Live and Work, To Visit and Invest:

60. The Commissioner would disagree with the characterisation in this section of the PfG that "*the role of business in creating opportunity, in particular for young people, was viewed as important,*" and mentioning the jobs of the future. As outlined previously in this response, the Commissioner believes that business is important in creating new opportunities for older people as well, and the jobs of the future can be pursued by older people as well, especially with better skills development.

Indicators 16, 18, 34:

61. COPNI is concerned that the Indicators that support this Delivery Plan will not adequately reflect the experiences of older people, and therefore this Delivery Plan will not be able to either improve the position of older people, or allow stakeholders like COPNI to adequately assess whether it has done so.

62. Stratifying the 'employment rate by deprivation quintile', the 'seasonably adjusted employment rate', and 'Employment rate by council area' by 16-64 year olds misses the experience of the increasing amounts of older people who are working, and also does not even, at a bare minimum, line up with the way State Pension Age will be increasing during the term of this Programme for Government. The Commissioner is disappointed that the rising State Pension Age (something that is happening and will continue to happen over the term of this Programme for Government) has not even been considered across the Programme for Government and the Delivery Plans. In a Programme for Government that is supposed to promote synergies between different Executive Departments to improve people's experiences, the Commissioner would be disappointed if these Indicators were not supplemented by other Indicators or augmented in order to address these concerns.

63. COPNI has also noted the reference to the economic inactivity rate in this Delivery Plan, and the description of it as a "*prime factor in determining the employment*

rate.” COPNI is concerned that, unlike in the strategy concerning Economic Inactivity which was published in 2014, *Enabling Success*, there is no reference to older people, which were identified as a priority group in this document. The Commissioner is concerned that policy in this area is deviating from the original aims of this Strategy, which included implementing one of COPNI’s previous recommendations, or a public campaign outlining the benefits of employing older workers. COPNI would emphasise that if the focus of policy as defined in this Delivery Plan defines ‘turning the curve’ as a statistically significant change in the employment rate for 16-64’s, but does not address some of the unique challenges that face older (prospective) workers, the measures will not assist older people, nor (with older people making up an increasing part of the population) be optimal in ‘Turning the Curve’.

64. The Commissioner believes that data development of the ‘Better Jobs Index’ provides an opportunity to expand what could be an effective Indicator. The Commissioner believes earnings quality, job security and job satisfaction are all valid areas of assessment for a Better Jobs Index, but what could be added to this is ‘Job Flexibility’, where respondents can feedback how much flexibility they want from their job, and what they need, if they want to ‘downsize’ their hours. This offers an opportunity to build upon increasing numbers of older workers that have formed part of the workforce in the last few years. ¹⁰

Indicators 17,32,33:

65. This Delivery Plan states that it will build upon two frameworks from the last term of the Assembly – *Making Life Better*, and the Economic Inactivity Strategy, *Enabling Success*. Like the Delivery Plan for Indicator 16, 18 and 34, older people are not included in the groups most impacted by economic inactivity, although reference is made to the numbers of older people that are part of the long term sick and disabled.

66. This Delivery Plan makes reference to building on the ‘Enabling Success’ strategy, but the Commissioner believes that in order to truly do so, the Delivery Plan should incorporate key aspects of ‘Enabling Success’ which are missing from this documents, including:

- Separate consideration of the challenges of older workers
- Commitment to improve employment outcomes for older workers, and put in place new measures to address wider barriers to the labour market for older workers.

¹⁰ Department for the Economy, ‘Labour Force Survey Tables – November 2016’, <https://www.economy-ni.gov.uk/publications/labour-force-survey-tables-november-2016>

- Measures to include an *“age-positive public awareness campaign to highlight the benefits of employing older workers and to promote age-positive recruitment practices,”* would highlight *“how more active measures can be achieved in the context of current equality legislation. Such initiatives.....allow for targeting of people in certain age groups for specific opportunities where an employer can objectively justify such an action.”*
- The strategy was to put in place a *“range of initiatives to highlight and reward positive practices in the workplace and to increase public awareness levels of the positive contribution older workers and individuals with mental health conditions can have in the labour market.”*
- Given that the whole focus of the Delivery Plan is on turning the curve of low levels of economic opportunities in deprived communities, by reducing levels of economic inactivity, the Commissioner is concerned that specific consideration of the unique employment challenges older people seem to have been omitted from this Indicator. The Commissioner also notes that proposals in the first version of this Delivery Plan, to build upon the existing research and analysis in Enabling Success and Making Life Better, by conducting new research by academics, including the Ulster University Economic Policy Centre, have since been dropped from the updated versions posted online. The Commissioner would like to know the reasons for this and would welcome a response from the Department.
- The Commissioner would like to see the proposed Work, Health and Wellbeing Service reflect what the Commissioner has been saying about older people and work, and the Commissioner will welcome the chance to outline these views in more detail when there is the *“full and public engagement”* on the type of programmes and services that would be appropriate. As this programme will involve regional and local government and private sector partners, the Commissioner expects to see the needs of the older unemployed, especially those who are long term unemployed being prioritised, and would further expect references to working with employers to generate opportunities for those older people who want to stay in work, but may want to change or ‘downsize’ their hours.
- As the Section 75 screening part of this Delivery Plan states, *“availability of suitable employment opportunities may be an issue”* for the numbers of 50-64’s long term sick economically inactive, and this programme could help improve this situation. The Commissioner hopes that the commitment to undertake a ‘step change’ in the *“quality of our engagement with people who are inactive in the labour market”* will apply to all age groups.

Indicator 14:

67. This Delivery Plan states that skills will impact strongly on the other economics related Outcomes in the PfG, and they are integral to the success of Northern Ireland.
68. The Commissioner welcomes the objective of the draft PfG to improve the skills profile of the population and raising the proportions of the workforce in employment with higher level qualifications. The Commissioner also welcomes that this section recognises the need for interventions with the ‘professional development of people already engaged in the workplace’, and for those ‘furthest away from work’. During engagement for the *Valuing an Ageing Workforce* project, the Commissioner heard from older people in long term unemployment, and the difficulties they had re entering employment. Older people experience long term unemployment for longer periods, and more time out of the workforce means they can be less familiar with developments in technology or working practices.
69. The Commissioner would agree with the assertion made in this Delivery Plan that skills development can enhance earnings, help people move into work, stay in work and progress in work, and help build social inclusion by providing opportunities for people of all abilities and from all backgrounds to contribute to and benefit from economic success. The Commissioner expects that as a result, more resources will be put into developing the skills of older people, many of whom, due to a rising State Pension Age and other factors, need to work longer. COPNI found in research for *Valuing An Ageing Workforce* that budget percentages for Lifelong Learning across the UK were less than 5% for those over 60, and COPNI believes that for the economy of the future it would be deeply damaging for disparities like this to persist.
70. The Commissioner hopes this will be integrated with the proposal in the Active Ageing Strategy to encourage Higher Education Institutions to target adult learners as an under represented group.¹¹ Older people are already making use of Further Education. In year figures for 2014/2015 show that there have been 6,941 enrolments in non regulated courses by people aged 60 or over, and 2,480 in regulated courses.¹² Older people make up over 20% of the total enrolments in non regulated courses. Older people are already an important target group for Further Education colleges, and demographic and economic trends are likely to further this trend in the coming decades. COPNI noted with concern in a response to the Further Education strategy consultation last year that that none of the 19 policy commitment themes in the document directly mentioned older people, and many emphasise youth training specifically. While this is a very important role that

¹¹ Northern Ireland Executive, ‘Active Ageing Strategy 2016-2021’.

¹² Department for Employment and Learning, In Year Figures.

Further Education Colleges play, the Commissioner would like to see more emphasis upon the increasing part Further Education has to play in the lives of older people.

71. The Commissioner expects that the Economic Social Inclusion Framework will reflect the concerns of older people, maintain a proper place for them in the framework, and also carries through the commitment to implement sector specific initiatives to help the economically inactive onto the skills ladder. The Commissioner particularly notes the development of a *“blended ‘seamless’ pre and post-employment employer solution, to optimise support from all relevant organisations,”* and hopes this makes adequate assessment of what is appropriate for older people entering and exiting work. The Commissioner also notes the proposal to develop apprenticeships at higher levels and in a wider range of occupations. The Commissioner believes this proposal should be integrated with the proposal in the Active Ageing Strategy under ‘Self-Fulfilment – Apprenticeship’ to considering how the new model of apprenticeship is promoted and the language used, as this is *“critical in order to appeal to older people.”*¹³

¹³ Northern Ireland Executive, ‘Active Ageing Strategy 2016-2021’.

Outcome 4 – We Enjoy Long, Healthy Active Lives:

72. Given the title of this Outcome, the Commissioner is surprised and disappointed that nowhere in the narrative of the Outcome is the Active Ageing Strategy (AAS) even mentioned. The Commissioner strongly believes that this must be reconsidered. The Commissioner is also surprised that the AAS is not mentioned in all the Delivery Plans which should in theory support this Outcome apart from the Delivery Plan for Indicators 2,3,4 and 7, where the AAS is cited in a list of ‘other policies with a bearing on this policy’, but with no detail on how it will impact upon the objectives cited in the Delivery Plan.
73. The Commissioner agrees with the statement that *“People must have access to high quality care when they need it. Health inequalities can be driven by unequal access to services and it is therefore necessary for us to identify and address systemic and attitudinal barriers to equality of access.”* The COPNI responses to reports like the Donaldson Report over the last few years, have emphasised that older people experience many barriers to a range of health services, and to accessing health and social care services effectively. Issues ranging from difficulty accessing hospitals through available public transport, the lack of clarity over who to make complaints to, and the inability of staff to devote adequate time to provide person-centred care, have all prevented older people from accessing the services best suited to their needs. For improvements to be seen on these issues, the Commissioner believes there needs to be proper resourcing, supported in many cases by thorough training for staff, and the Commissioner believes that this overarching priority should be evident within the Programme for Government.
74. Additionally, the Commissioner notes that the Actions proposed for this Outcome state that *“services must be designed and delivered in ways that support people to manage their own care, as far as possible, and enable early intervention to prevent and delay illness. This is particularly relevant for people living with long term conditions and those with ongoing care needs.”* The Commissioner would welcome further information and details on how the PfG Delivery Plans intend to monitor and report on this specific objective.
75. The Commissioner believes that whilst there are valuable suggestions for actions in this outcome, they still reflect the systematic issues with health and social care policy that the Commissioner has observed and previously made

recommendations to Government on. Although the social and domiciliary care system is an important part of supporting people to live longer healthier lives, none of the actions proposed in this Outcome are specific to this important part of the system. This Outcome would benefit from making social and domiciliary care a key priority within it. A rebalancing of resources and a renewed emphasis on social care would be more relevant and appropriate to this policy area.

Outcome 8 – We Care For Others and We Help Those In Need:

76. The Commissioner believes that this Outcome would benefit from more discussion about the position of older people and their needs. There is potential in developing products to support under represented groups (for example older people and those with disabilities) into home ownership or other affordable housing options.
77. The suggested actions to improve the quality of life for people with disabilities and their families also have potential. The numbers who have difficulty with travel due to physical disability increase with age – 38% for those aged 60 and over, compared to 6% of 16-29 year olds.¹⁴ Disability is an issue which disproportionately affects older people. Establishing a central regional disability forum involving people with disabilities would be a step forward, as would implementing social clauses in services contracts to create opportunities for people with disabilities to secure paid employment.
78. A public awareness raising initiative designed to counter negative attitudes would be beneficial, and the Commissioner hopes that this can be applied to other groups like older workers as well. COPNI would also draw attention to the proposed 'second phase action' in the Active Ageing Strategy of 'Housing Accessible Homes – Public Sector', which proposed to *"meet the housing needs of older people and those with disabilities by implementing an Accessible Housing Register for Social Housing"* to support allocation of suitable properties.¹⁵ This proposal in the AAS was marked as an action 'for which funding is still to be secured'. The Commissioner believes securing this resource and implementing this project would directly positively impact on the wider objectives stated in this Outcome.
79. This Outcome outlines that in the social care sector *"demands and expectations are growing and needs are becoming more complex and diverse."* This needs to be met by appropriate resourcing and also training. The Commissioner would like to see a re-prioritisation of resources within the Health and Social Care system - for too long Acute Care has been seen as the main priority without focusing on how

¹⁴ Office of the First Minister and Deputy First Minister, 'A Profile of Older People in Northern Ireland – Annual Update (2015)', <https://www.executiveoffice-ni.gov.uk/sites/default/files/publications/ofmdfm/a-profile-of-older-people-in-ni-annual-update-2015.pdf>

¹⁵ Northern Ireland Executive, 'Active Ageing Strategy 2016-2021'.

people can end up in Acute Care, or how they can be supported to remain in their own homes. The Commissioner is concerned that this Outcome does not make reference to this issue, but instead discusses the *“hugely challenging”* environment *“given budgetary restraints and increasing demand.”*

80. There are other options, such as those identified in COPNI’s *Changing the Culture of Care* report, that would be low cost but would contribute to better services for older people. Among the suggestions COPNI made in this report were more rigorous inspection procedures for care homes, the introduction of a rating system for care homes and domiciliary services, and new legislation to protect older people from abuse, all of which would not require increases in resource investment.

81. The Commissioner notes the proposals to mainstream the regional reablement model and the self directed support approach across all the HSC Trusts. The report of the HSCB on the Regional Review of Care Services identified the advantages of a sustained reablement policy, but detailed that investment in the policy so far has *“been comparatively modest and reasonably premised on the availability of demographic funding”* and the *“scale of the challenge was probably underestimated.”* There was still substantial progress to be made in achieving 100% service coverage in each Trust area, establishing single points of access, and targeting interventions at the users with social care rather than therapeutic needs. Mainstreaming this model must be supported by appropriate levels of investment for it to be successful.

82. The Commissioner agrees with the proposed establishment of a Healthier Lives programme, including a Healthier Lives programme for people with long term conditions, and a Healthier Workplaces Programme. One of the recommendations in the COPNI report entitled *Valuing an Ageing Workforce* was that there should be more programmes in the workplace assisting staff to lead healthier lifestyles and make sustained improvements in their health. The Commissioner also agrees with the commitment to *“ensure that people living with long term conditions are supported to remain or return to the workforce.”*

Outcome 3, We Have A More Equal Society:

83. This section raises the issue of reducing health inequalities. This is an important issue for older people, growing numbers of whom will access health services in the future. The commitment to *“develop capacity for information and analysis of health outcomes which can inform priority setting in health and social care”* is one that the Commissioner would like to understand more detail. What health Outcomes are

proposed? Will they follow Outcomes that are used in other health systems around the world?

84. As the Outcome states *“health inequalities can be driven by unequal access to services,”* and *“In delivering public services, it is essential to identify and address systemic and attitudinal barriers to equity of access.”* The Commissioner’s office has identified issues for older people in terms of physical accessibility, as well as in terms of being able to make complaints. The process by which a formal complaint needs to be made can be overly complex and difficult for older people to navigate. The Commissioner’s casework has demonstrated that this can be off-putting to older people and their families. More effort needs to be made in providing clear signposting, direction and support to older people and their families who wish or need to complain if they have any concerns.

85. There is also the wider issue of Acute Care being continually prioritised over Social Care when it comes to budget as well as strategic reforms. This impacts on the many numbers of older people who are users of social care, and COPNI believes this Outcome should work to rebalance the priorities given to different forms of care. Not even 20% of the total HSC budget is allocated to Social Care. Is this realistic when 81% of the 12,368 care packages in effect¹⁶ in Northern Ireland this year were in the Elderly Care Programme of Care, and 77% of the clients receiving intense domiciliary care services are in the elderly client group. ¹⁷

Outcome 11 – We Have High Quality Public Services:

86. The Commissioner notes the commitment under this Outcome to deliver quality improvements in the health service and schools. The Commissioner notes the similarity of the commitment here to *“transform the health and social care system to provide better access for people to high quality, integrated services through new models of care, resulting in better outcomes for people.”* This is similar to the language used in the Bengoa review, and the Commissioner hopes that, unlike other large scale HSC reports in the last Assembly term, the recommendations are driven through by appropriate resources and leadership. The proposal to develop the Quality Healthcare Experience Framework to establish consistent standards, and to measure progress using an Indicator of the percentage of people satisfied

¹⁶ Department of Health, ‘Statistics on Community Care for Adults in Northern Ireland 2015-2016’, <https://www.health-ni.gov.uk/sites/default/files/publications/health/cc-adults-ni-15-16.pdf>

¹⁷ Department of Health, ‘Domiciliary Care Services for Adults in Northern Ireland (2015)’, <https://www.health-ni.gov.uk/sites/default/files/publications/dhssps/dcs-adults-ni-2015.pdf>

with Health and Social Care would be welcome if implemented in a robust and evidence-based manner.

87. Limited uptake of Direct Payments here, *“particularly among older people, with many individuals being put off by the additional responsibilities that accessing direct payments can entail, for example, the management of the payments and the duties.....The ongoing rollout of managed budgets will benefit individuals who want to exercise more choice and control over their own support but are reluctant to take on a role in the management of their care services and how they are purchased.”* The Commissioner agrees that the process of self directed support can give service users more flexibility and control to design a support package around their own requirements. But feedback to the office has also indicated problems can occur when individuals are not given enough support to make these decisions effectively. The commitments in terms of managing a budget can be excessive and too burdensome for older people who are already in need of care and support.

Indicators 2,3,4,7:

88. The Commissioner is surprised that given this Outcome is linked to Outcome 4, ‘We enjoy long, healthy, active lives’, that it contains no mention of the Active Ageing Strategy. There are many points of the Delivery Plans and the Programme for Government where inclusion of the Active Ageing Strategy would benefit the documents, and make it clearer how the AAS and the PfG are going to need to interact.
89. The Commissioner is encouraged to see that programmes for Healthier Lives, Healthier Places and Healthier Workplaces are included in this Delivery Plan as part of the proposals to ‘Turn The Curve’. The Programmes have the potential to help the increasing numbers of older people be healthier, and be more able to realise opportunities to work, access services, or play a part in society.
90. The proposed ‘Healthier Places’ programme states that one of the key themes for action already identified is ‘active ageing and age friendly communities’. The Commissioner is eager to see more Active Ageing policies implemented across Councils, especially through the growing interaction of Councils with the ‘Age Friendly’ approach, which the Commissioner is interested in. The Commissioner would welcome further detail on how this part of the Delivery Plan will integrate with the ‘Active Ageing (Age Friendly Environments)’ part of the Active Ageing Strategy, which aim to further assist the new Councils to become Age Friendly environments. ¹⁸

¹⁸ Northern Ireland Executive, ‘Active Ageing Strategy 2016-2021’.

91. The Healthier Workplaces programme is also a programme that the Commissioner believes could be valuable. In the *Valuing An Ageing Workforce* report the Commissioner recommended that there be more initiatives in workplaces to promote healthy lives, and notes that the Healthier Workplaces programme will “focus on valuing staff and on the advantages that a diverse workforce can bring to organisations,” and that it will be piloted in the HSC sector.

Indicator 5:

92. Given that this Delivery Plan is linked to Outcome 4, ‘We enjoy long, healthy, active lives’, the Commissioner is surprised that the Delivery Plan does not consider how the many relevant Actions in the AAS will work alongside the commitments in this Delivery Plan.

93. It is striking that this Delivery Plan does not make any reference to the Active Ageing Strategy at all. This is especially surprising given the high number of relevant programmes listed in the Action Plan of the AAS - ‘Care – Dementia Services’, ‘Dignity – Decision Making (Mental Capacity)’, ‘Care – My Home Life’ and ‘Carers Support (Short Breaks)’.¹⁹ These are actions in areas that will undoubtedly influence older people’s satisfaction with Health and Social Care, and the Commissioner believes that there should be consideration of them in this Plan.

94. The proposals for further Carers Support in the Active Ageing Strategy are particularly worthy of consideration, given that there is little detail on how the Department plans to better support older carers in this document. There is also no consideration of how the recently announced Reform of Adult Care (and Social Care Commission) review will impact upon the implementation of this Delivery Plan, especially in terms of related policy on supporting carers.

95. COPNI has highlighted many specific ways the HSC system can be improved, including:

- The Commissioner believes a key aspect that should be identified in this Delivery Plan is the split of resources between Health and Social Care. COPNI and others have identified a bias towards acute care in the system, which, if there is to be a diversity of high quality care that meets older people’s needs at different stages of their lives, needs to be rectified. Health

¹⁹ Northern Ireland Executive, ‘Active Ageing Strategy 2016-2021’.

has perennially taken the lion's share of resources - a 2013 study by the Kings Fund finding nearly half of expenditure being devoted to it.²⁰ The lack of integrated practices between health and social care in initial training, poor representation for social care on Integrated Care Partnerships and local commissioning groups has been criticised.²¹

- In the 2015/2016 draft Budget, we saw that immediate pressures on Acute services intensified this trend – out of total budget of £4.8 Billion, £2.5825 Billion (53.8%) was devoted to 'Hospital Services' and £870.6 Million (18.1%) to 'Social Care Services'.²² The 5% shift of budget from hospital services to primary and community and social care services by 2014/2015 envisaged in the Transforming Your Care Implementation Plan²³ did not happen and has not as yet happened, as bids to find the £83 million this 5% shift envisaged have been unsuccessful.
- Allied to this, there multiple actions which should be taken that the Commissioner believes would create a HSC system that works well for older people:
 - More emphasis on prevention - a focus on problems in Acute Care must be accompanied by a vision of how admissions to Acute Care can be reduced in the first instance.
 - A preventative type of Support Visit, similar to that offered in Scandinavia, to all over 75's, would enable information and support to be shared and assessments conducted in a more proactive way, informed by the individual person.
 - A strong district nursing system, with more Community Nurses. COPNI have highlighted previously that the best possible care for older people must be planned and implemented alongside improvements in acute care – referencing the need for *“more investment and support for community-based care services”* to reduce avoidable hospital admissions.
 - Another common theme running through COPNI's comments on HSC policy is that changes to programmes or policies must be accompanied by a robust legislative framework, and a strong leadership that drives change.
 - Legislative reform, which is person centred and based on human rights principles. A new framework, which could either be new or consolidated legislation, could provide clarity on eligibility, entitlement to services, assessment of need, duties of Trusts, overlap with existing frameworks, and entitlement to other services.

²⁰ Chris Ham et al., The King's Fund, 'Integrated Care in Northern Ireland, Scotland and Wales: Lessons for England', http://www.kingsfund.org.uk/sites/files/kf/field/field_publication_file/integrated-care-in-northern-ireland-scotland-and-wales-kingsfund-jul13.pdf

²¹ Ann Marie Gray and Derek Birrell, 'Integrated Commissioning and Structural Integration: The Experience of Northern Ireland'.

²² DHSSPS, 'Draft Budget 2015/16 Consultation', http://www.nicva.org/sites/default/files/d7content/attachments-resources/dhssps_budget15-document.pdf

²³ HSCB, 'Transforming Your Care: Strategic Implementation Plan', October 2013, <http://www.transformingyourcare.hscni.net/wp-content/uploads/2013/11/Transforming-Your-Care-Strategic-Implementation-Plan.pdf>

- Northern Ireland has the lowest average hourly rate paid for domiciliary care in the UK, and no independent economic modelling has been carried out to establish the real costs of delivering domiciliary care (or nursing / residential care).
- There must be more openness in the system, both internally and externally, to ensure older people are safeguarded against abuse or serious incident.
- Reporting of Serious Adverse Incidents (SAI's) reflect a culture which tended to not report incidents and learn from them, including under reporting due to staff concerns about consequences, inconsistent definitions, and a tendency to isolate learning within single departments. The excessively complicated procedures in place to make a complaint also deters the kind of external scrutiny from older people and their families which can bring about service improvements, and stop mistreatment as early as possible.

96. As this Delivery Plan states, the 10,000 Voices user feedback project was mostly focused on acute care – the Commissioner expects that this framework and the satisfaction survey will be focused on all kinds of care, because the forms of care older people are and will be experiencing are diverse and wide ranging. As the equality screening for this Delivery Plan identifies, older people can face age related discrimination in accessing some HSC services. The Commissioner welcomes that the Framework notes support for staff as key to achieving the Framework aims, but believes that this must be backed by adequate resourcing and training, and this should also be referenced in the Delivery Plan.

Indicator 9:

97. The Commissioner agrees with the statement in this Delivery Plan that *“it is important that we can offer support to assist individuals with care needs to remain living in their own homes for as long as it is safe and beneficial for them to do so.”* However, the implementation of policies designed to do so has stalled, and COPNI has called for stronger leadership on this issue.

98. The Commissioner agrees that the process of self directed support can give service users more flexibility and control to design a support package around their own requirements. However feedback to the COPNI office has also indicated problems can occur when individuals are not given enough support to make these decisions effectively. The commitments in terms of managing a budget can be excessive for some older people, and indeed this section acknowledges that not all individuals may not be willing or able to take on these responsibilities, and points towards the continuing rollout of managed budgets.

99. This Delivery Plan details some of the past Health strategies which have been pursued over the last Assembly term, and specifically focuses on the progress of introducing a Reablement Model of Care, telemonitoring and the rollout of self directed support. As the Plan details, TYC recommended that a Reablement Model of Care should be introduced across Northern Ireland from 2012. The Commissioner notes the proposals to mainstream the regional reablement model and the self directed support approach across all the HSC Trusts.

100. The report of the HSCB on the Regional Review of Care Services identified the advantages of a sustained reablement policy, but detailed that investment in the policy so far has *“been comparatively modest and reasonably premised on the availability of demographic funding”* and the *“scale of the challenge was probably under estimated.”* Given the progress that needs to be made in achieving 100% service coverage in each Trust area, establishing single points of access, and targeting interventions at the users with social care rather than therapeutic needs, finance must be made available as part of the Delivery Plan.

Outcome 5 – We Are An Innovative, Creative Society, Where People Can Fulfil Their Potential:

101. The Commissioner notes that in this section, a plan is outlined to increase engagement amongst those groups with consistently lower levels of engagement, which includes older adults. In the first term of office the Commissioner undertook a research report to ascertain how to better engage older people whose voices are harder to be heard. A process that robustly and comprehensively mapped, where people who find their voice harder to be heard are, and what common barriers to engagement they share, which could be then used to inform all Government departmental activities, would be very valuable. The Commissioner's internal research has revealed that a number of different groups and individuals are prevented from engaging in different ways, by multiple barriers. Some may be put off by excessive jargon, others from attending events by mobility issues, or others simply by a lack of motivation to contribute based on a belief their voice will not be listened too. Being able to accurately map these groups would also offer a sound evidence base for the development of the Social Inclusion Wraparound Service.
102. There is a commitment made to 'implement the Active Ageing Strategy' within this Outcome. There is also a commitment to continue to develop, implement and review equality strategies for individual Section 75 groups, including the Active Ageing Strategy. In the Delivery Plan for Indicators 19 and 28, implementation of the Active Ageing Strategy is proposed as part of a programme of 'Active Ageing Inclusion'. This programme includes the full implementation of the Active Ageing Strategy, as well as considering "*how best to support older people and ensure their financial well being.*" COPNI is quoted as one of the organisations involved in this implementation, where costed plans are cited as being in place by the end of December 2016, with pilots to be in place by March 2017.
103. There is also a commitment in this section to support the implementation of the Active Ageing Strategy. COPNI reported to Government the Commissioner's grave reservations that adequate data would be generated by all the Indicators throughout the duration of the strategy. Through the process of drafting the strategy, the Commissioner expressed concern that projects relevant to these Delivery Plans such as Dignity (Discrimination) and Transport (Improved Rural Transport) have been removed. It is a matter of serious concern that if implementation of policies to benefit older people across the entire PfG is limited

to the Active Ageing Strategy, large parts of the PfG will not effectively support older people.

104. The Commissioner acknowledges there are individual commitments of interest in this section. These include a commitment to support a culture of innovation and entrepreneurship. The Commissioner would hope that as part of this, entrepreneurship programmes are rebalanced away from an almost exclusive focus on younger people and given a more broad remit, with specific programmes targeted at older people, and language and style refined to appeal to more older people.

105. The Commissioner believes the commitment to establish a Data Analytics Research and Exploitation Centre is potentially significant, as more accurate and robust data about older people would better support the work of government for older people. Any policies introduced from this Programme for Government should be supported by comprehensive data appropriate to all age groups, and there are still Indicators that do not fulfil this requirement. COPNI would also recommended that the data being generated by the NICOLA project which is a rich source of data that is informative about the experience of older people across a wide range of areas, including, health, earnings, living situation and (relevant to this outcome) levels of isolation, could all support Indicators in this PfG.

106. The Commissioner notes the commitment to *“design and build a programme to improve digital literacy and inclusion.”* However on reading the detail of this commitment in the relevant Delivery Plan, the Commissioner is concerned that it mostly discusses a Digital Learning in School Programme, which has 3 main objectives including to *“develop the skills pipeline for generations of young people.”* The Commissioner believes, that as older people have the lowest levels of digital access, (latest figures show 69% of 60-69’s and 40% of 70+’s have Internet access, compared to an average of 80% of all 16+) ²⁴ they should be prioritised by a proposed Digital Literacy Programme, especially as other initiatives like the Go On NI programme which are discussed elsewhere in this PfG depend on making it attractive for larger numbers of older people to use Government services online.

Outcome 9 – We Are A Shared Society That Respects Diversity:

107. The Commissioner welcomes the general aim of the Outcome to *“create a community which promotes mutual respect and understanding, is strengthened by its diversity and where cultural expression is celebrated and embraced.”* However like other parts of this PfG, the Commissioner is concerned that this Outcome is

²⁴ Office of the First Minister and Deputy First Minister, ‘A Profile of Older People in Northern Ireland – Annual Update (2015)’, <http://www.ofmdfmi.gov.uk/a-profile-of-older-people-2014-update.pdf>

overly focused on the relationship between the main religions and not the diversity of society that is reflected by a range of groups, including older people.

Indicators 26, 31 and 35:

108. The Commissioner notes that the current version of the documentation cites COPNI, along with the other Commissioners, as a ‘key delivery partner’ in this Delivery Plan through ‘statutory responsibilities’. At no point has the Commissioner’s office been involved in discussions about this and COPNI would welcome more information in order to consider how this can link into the operation of this Delivery Plan, as well as co-aligning with the Commissioner’s emerging Corporate Plan for his term of office.
109. The Commissioner agrees with the assertion in the Delivery Plan that it is *“important that all public services and shared spaces are seen as accessible to the whole community.”* However the Commissioner would emphasise the need for a wider definition of accessibility than facilities such as leisure centres, parks, libraries and shopping centres being ‘shared and open’ to both Protestants and Catholics. Accessibility issues can also be created by a number of design factors, including poorly maintained pavements, location of traffic lights or a lack of accessible public toilets.²⁵ Accessibility should be for all older people, especially those with reduced mobility.
110. As the Delivery Plan indicates, in neighbourhoods, *“inadequate infrastructure (for example for pedestrians and cyclists) and transport links can prevent spaces from being accessed and shared by different communities. Planning policies and regulations, regeneration programmes and other new investments can influence design, access and use of shared spaces.”* Given the reduction in routes across rural and other areas by Translink, it is important that the PfG explores ways of keeping travel access to these spaces for older people open.
111. The Delivery Plan states that *“Respect may be experienced differently by individuals across the range of Section 75 and other groups in a range of scenarios including education, health services, public spaces, employment and communities.”* COPNI agrees with the assertion that a lack of respect may be experienced particularly by groups including older people. The Commissioner supports the commitment to *“carry out additional policy development work to develop a more thorough understanding of what is meant by respect and to consider how the respect agenda could be mainstreamed across the work of the Executive.”*

²⁵ International Longevity Centre, ‘Getting Out and About’.

112. COPNI attended a workshop on this Indicator during the first phase of consultation, and was part of the calls by stakeholders to see *“shared space pursued with reference to the full range of Section 75 groups and in respect of a wide range of public and private/commercial spaces.”*
113. The Commissioner notes with interest the commitment to delivery of a *“programme of public realm investment, to support the creation of spaces that are better used, have greater footfall, and where possible, are equally welcoming to people from all backgrounds/ Section 75 groups.”* COPNI also notes that the Programme appears to be financing schemes all around Northern Ireland, in nine different cities or towns.
114. The Commissioner further notes that there is a commitment to continue to develop, implement and review equality strategies for individual Section 75 groups, including the Active Ageing Strategy. In the Delivery Plan for Indicators 19 and 28, implementation of the Active Ageing Strategy is proposed as part of a programme of ‘Active Ageing Inclusion’. This programme references the full implementation of the Active Ageing Strategy, and considering *“how best to support older people and ensure their financial well being.”* COPNI has been quoted as one of the organisations involved in the implementation, where costed plans would be in place by the end of December 2016, and pilots to be in place by March 2017. These references appear to have been made in the delivery plans in the absence of any communication on this with the Commissioner or his Office.
115. COPNI, in its analysis of the final version of the Active Ageing Strategy and the Indicators proposed to support the implementation of the Strategy, expressed a number of strong reservations that appropriate data would be able to generated for all the Indicators throughout the duration of the strategy. Through the process of drafting the strategy, the previous Commissioner expressed concern that projects that are relevant to these Delivery Plans such as Dignity (Discrimination) and Transport (Improved Rural Transport) have been removed, and the Commissioner remains concerned that if implementation of policies to benefit older people is confined to the Active Ageing Strategy, the PfG will not effectively deliver for or support older people.

Indicators 19 and 28:

116. COPNI welcomes that the Department of the Communities invited COPNI to an engagement event about this Delivery Plan, and appreciates the levels of engagement from the DfC generally through this Programme for Government process.

117. COPNI notes with interest the measures proposed in this Delivery Plan, and believes they have potential to improve the lives of older people, but has concerns about how they will be implemented, and in some places needs more detail about implementation and how programmes will be resourced.
118. The Commissioner notes with special interest the proposal for a programme named Active Ageing Inclusion. This programme includes “*seeking the full implementation of the Active Ageing Strategy,*” as well as putting an emphasis on progress on “*benefit uptake, tackling financial abuse of older people, fuel poverty and digital inclusion.*” There is a commitment to put pilots in place by March 2017 “*subject to resources.*” It is important that the implementation of the Strategy is supported by adequate resources, and certainly this should be secured as soon as possible for the pilots. COPNI is quoted as being one of the Delivery Partners for this programme, with initial costed plans to be in place by the end of December 2016, and pilots in place by March 2017. Given the imminent start of implementation, COPNI would like there to have been prior communication with the Commissioner or the Office prior to developing and publishing these delivery plans.
119. The Commissioner has raised issues with the Active Ageing Strategy, about programmes that have been removed from the final version of the Strategy and issues with the availability to support the data needed for the Indicators. COPNI also believes that it is important to consider that the ‘Fuel Poverty’ and ‘Digital Inclusion’ programmes the Active Ageing Strategy are relevant to the aims to Turn The Curve under this Delivery Plan.²⁶ It will be important generally to integrate the work of the PfG and the AAS, and COPNI believes this is missing generally from many areas of the PfG. COPNI have also observed that the ‘Poverty (Benefit Uptake)’ programme in the AAS is marked as a second phase action for which finance is still to be secured. Securing this financing for this PfG term is essential in order to help benefit older people.
120. The proposal to introduce a Digital Literacy Programme could be beneficial to older people, but the Commissioner believes that the Department should reconsider the scope of the programme, which in this Delivery Plan is defined as improving digital literacy and inclusion, developing the “*skills pipeline for generations of young people,*” and focus on the inclusion of young people who are living in poverty. Older people do not enjoy the nearly universal access that the 16-

²⁶ Northern Ireland Executive, ‘Active Ageing Strategy 2016-2021’.

19, 20-29 and 30-39 age groups do to the internet.²⁷ Given that many older people experience digital exclusion, and in the current environment (which is quoted in another Delivery Plan) of government services moving online, it is in the Commissioner's judgment more necessary than ever that appropriate resources are devoted to digital literacy and inclusion plans for older people, and this is referenced in this Delivery Plan.

²⁷ OFMDFM, 'A Profile of Older People in Northern Ireland – 2015 Update', <https://www.executiveoffice-ni.gov.uk/sites/default/files/publications/ofmdfm/a-profile-of-older-people-in-ni-annual-update-2015.pdf>

Outcome 7 – We Have A Safe Community Where We Respect The Law, And Each Other:

121. The Commissioner agrees with the assessment in this section that *“confidence in the justice system is also important as it helps demonstrate legitimacy and respect for the rule of law.”* The Commissioner also agrees with the overarching aim of the Outcome that it is important to create safe environments, and give people the *“confidence they need to live productively and well.”* People should *“feel safe and to encounter no barriers to engaging with society.”* This is particularly relevant to older people, as they have been found to report greater levels of fear of crime than younger age groups.
122. The NISRA 2010 Perceptions of Crime survey demonstrated that respondents aged up to 54 years were most likely to be very worried about violent crime while those aged 55 and over were more likely to worry about being burgled. 19% of 65-74 year-olds, stated burglary was their biggest fear. There was a relevant action proposed in the Active Ageing Strategy to address the fear of crime and promote community safety by engaging with and understanding the concerns of older people. ²⁸This Outcome and the associated Delivery Plans would consider further how the work of the AAS will integrate with these plans.
123. Further research is needed to establish why crime clearance rates for older people are lower than for other groups who are victims of similar crimes, how crime affects older people and what steps need to be taken by which agencies to mitigate the impact and to improve clearance rates. There are limitations to using either the NI Crime Survey and Police Recorded crime as a measure of activity to reduce crime, and that *“we consider there is a need to refocus instead on reducing the harm caused by crime, and in so doing, would support further data development to enable the measurement of the harm caused through crime and anti-social behaviour.”*
124. COPNI believes that the focus of this Outcome and the associated Indicators are too skewed towards tackling relationships between the two largest religious communities in Northern Ireland, and in accordance with the commitment to

²⁸ Northern Ireland Executive, ‘Active Ageing Strategy 2016-2021’.

provide adequate data for all Section 75 groups, should be expanded to include attitudes to older people as well.

Indicator 1:

125. The Commissioner agrees with the assertion in this consultation that when working to reduce crime *“it is imperative that victims of crime, particularly the most vulnerable, are encouraged to report crime.”* The Commissioner supports the data development proposed to enable the measurement of harm caused through crime and anti-social behaviour, as older people can be profoundly affected by the experience of being a victim of crime.
126. The NISRA 2010 Perceptions of Crime survey shows that respondents aged up to 54 years were most likely to be very worried about violent crime while those aged 55 and over were more likely to worry about being burgled. For 65-74 year-olds, burglary was the biggest fear for 19%. While the figures from crime surveys in Northern Ireland show that older age groups are less likely to be victims of crime, the fear of crime is higher amongst older people. There is a relevant programme in the Active Ageing Strategy to address the fear of crime and promote community safety by engaging with and understanding the concerns of older people.
127. Further research is needed to establish why crime clearance rates for older people are lower than those for other groups who are victims of similar crimes, how crime affects older people and what steps need to be taken by which agencies to mitigate the impact and to improve clearance rates. There are limitations to using both the NI Crime Survey and recorded crime as a measure of activity to reduce crime, and that *“we consider there is a need to refocus instead on reducing the harm caused by crime, and in so doing, would support further data development to enable the measurement of the harm caused through crime and anti-social behaviour.”*

Outcome 11 – We Have High Quality Public Services:

128. The Commissioner agrees with the proposal to continue to support GoOn NI and other initiatives to increase people’s ability to use online services, as part of the wider digital transformation projects. However the Commissioner is concerned that these projects must not become a ‘digital by default’ strategy. While it is a good thing more older people are supported online, there needs to be a continuation of offline access for those who are not able to do so.
129. The Commissioner notes the comment in this section of the PfG that public services can be more “*effectively and efficiently*” provided through online channels. While COPNI does not argue against the advantages of digitisation, such as widening access to services outside normal working hours, and reducing back office costs, taking digitisation too far too quickly may restrict access for many older people. As this Outcome itself states, an impediment towards providing more Government services online is the ability of Government to provide more assisted digital services that then assist people to use these services.
130. COPNI would add that maintaining services for those who cannot, or do not, want to use digital services should be a priority as well, as even with education programmes and assisted digital services the idea of 100% online usage of services within the term of this PfG, when a substantial minority of older people do not even have online access at home, is unrealistic and simply not feasible. The Commissioner is concerned that the Indicator supporting this Outcome will be ‘the use of online channels’. All this data would indicate is a rising level of Internet access, without reflecting anything about real accessibility issues or real positive impacts.
131. The Commissioner has also noted that the ‘Digital Inclusion’ programme in the Active Ageing Strategy states that its aim is to “*ensure older people are not excluded from accessing information and services,*” and “*providing information in alternative formats,*” as well as commitments to provide tuition and detail help available to assist older people.²⁹ This Outcome must consider how the AAS interacts with the programmes outlined for delivery under this Outcome.

²⁹ Northern Ireland Executive, ‘Active Ageing Strategy 2016-2021’.

Indicator 24:

132. The Commissioner believes more older people having access to the internet, and to high speed internet, would have social and economic benefits, and make it easier for more older people to access services. However the Commissioner believes it is important to distribute the gains of faster broadband equally across urban and rural areas, as the higher proportion of older people that live in rural areas have in some cases not been able to access the high speed internet revolution. This is especially important given slightly higher proportions of older people live in rural areas. In 2012/2013, 32% of households in rural areas had at least one adult of a pensionable age, this compared to 27% in urban areas, and Northern Ireland as a whole.³⁰

133. The Commissioner believes that it could be of benefit for the NI Executive to deliver a more ambitious measure than the UK Universal Service Obligation of 10Mbps by 2020, but only if this does not conflict with the objective of providing the Universal service Obligation speed to everyone, including older people in rural areas. As this section states, private sector led investment tends to be focused in lower cost urban and suburban areas. The Commissioner agrees that pursuing this Indicator should not result in increasing any digital divide between rural and urban communities, and hopes progress towards Turning The Curve in this Plan does not do so.

Indicator 46:

134. The Commissioner agrees with the proposal to continue to support GoOn NI and other initiatives to increase people's ability to use online services, as part of wider digital transformation projects. However the Commissioner believes that these projects must be supported strongly, and it must not become a 'digital by default' strategy. While it is a good thing more older people are supported online, there needs to be a continuation of offline access for those who are not able to do so.

135. Older people's access to the internet is less than the average for other age groups, and this is particularly pronounced among those over 70. 77% of all individuals 16 or over in Northern Ireland had access to the internet. For the 16-19, 20-29 and 30-39 age groups access is nearly universal (95% or above). For the group adjacent to 60 on the age scale, the 50-59's, this decreases to 82%. For

³⁰ OFMDFM, 'A Profile of Older People in Northern Ireland – 2015 Update', <https://www.executiveoffice-ni.gov.uk/sites/default/files/publications/ofmdfm/a-profile-of-older-people-in-ni-annual-update-2015.pdf>

60-69's this decreases to 67%, and for 70 and over it decreases markedly to 31%.

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136. The Commissioner notes the comment in this section of the PfG that public services can be more “*effectively and efficiently*” provided through online channels. While COPNI do not argue against the advantages of digitisation, such as widening access to services outside normal working hours, and reducing back office costs, taking digitisation too far too quickly may restrict access. As this Outcome itself states, an impediment towards providing more Government services online is the ability of Government to provide more assisted digital services to assist people in using these services. COPNI would add that maintaining services for those who cannot, or do not, want to use digital services should be a priority as well, as even with education programmes and assisted digital services the idea of 100% online usage of services within the term of this PfG, when a substantial minority of older people do not even have online access at home, is unrealistic. The Commissioner is worried that the Indicator supporting this Outcome will be the use of online channels only. The only thing that this data could indicate is a rising level of numbers of Internet users, without telling a lot about accessibility. The Commissioner has also noted that the ‘Digital Inclusion’ programme in the Active Ageing Strategy states that its aim is to “*ensure older people are not excluded from accessing information and services,*” and “*providing information in alternative formats,*” as well as commitments to provide tuition and detail help available to assist older people.³² It would be helpful if this Delivery Plan would include more detail about how activity will be integrated with the Digital Inclusion programme in the Active Ageing Strategy.

137. The Commissioner notes that the Estonian Government has been listed in this Delivery Plan as one of the Delivery Partners and is aware that Estonia is one of the leading Governments in the world for integration of digital technology into the provision and access of Government services. It has supported this by a specific program for older people, with nation wide classes and subsidies for purchasing computers.³³ The Commissioner would draw attention to the fact that Estonia has become a world leader in digital government by centralising citizen ID identification in a way that multiple departments can use, so separate interactions with departments do not have to be logged by the citizen.³⁴ The scale of change which

³¹ OFMDFM, ‘A Profile of Older People in Northern Ireland – 2015 Update’, <https://www.executiveoffice-ni.gov.uk/sites/default/files/publications/ofmdfm/a-profile-of-older-people-in-ni-annual-update-2015.pdf>

³² Northern Ireland Executive, ‘Active Ageing Strategy 2016-2021’.

³³ Anna Savina, ‘How Estonia Became the Most Modern Digital State in the World’, <https://medium.com/@annasavina/how-estonia-became-the-most-modern-digital-state-in-the-world-f777d853aaa6#.ulbi48bqk>

³⁴ Rachel Cunliffe, ‘Is There Anything Estonians Can’t Do Online?’, <https://capx.co/is-there-anything-estonians-cant-do-online/>

has happened in Estonia may not be possible here due to the need to coordinate ID policy with the UK Government, which the Department should bear in mind.

Transport and Accessibility

Outcome 13 - We Connect People and Opportunities Through Our Infrastructure:

138. The Commissioner notes the reference in this section to the view of respondents that there should be continuation of free travel passes for older people, and that there is a commitment to enhance transport infrastructure and *“develop in partnership with Translink, community Transport and Private Operators’ feeder services linking rural communities to regional public transport services.”*
139. The Commissioner welcomes the commitment to expand the supply of housing and *“find ways of stimulating demand for and supply of appropriate, smaller, affordable accommodation for older owner-occupiers and supporting those who want to downsize.”* The Commissioner believes schemes like co-housing that have been more extensively employed in nations like Sweden and Norway show promise in giving higher numbers of older people the opportunity to live in housing appropriate to their needs and wishes.³⁵ Schemes like Equity Release have potential to assist with these steps, although as organisations like the International Longevity Centre (ILC) have advised, this will require an element of backing from Government. The ILC have proposed what they call the ‘Equity Bank’ which would differ from commercial equity schemes as it would be owned by the state, because they think that the current equity release market is not meeting its potential and costs are high.³⁶ Barriers to Equity Release have been identified as attitudes towards housing wealth, mistrust, advice on planning, welfare benefits, regulation and commercial viability.³⁷ The Commissioner also believes more support should be available for older people to remain in houses appropriate to their needs – the introduction of support services, such as a Care and Repair service, would greatly assist with this.

³⁵ ‘Report of the Independent Commission on the Future for Housing in Northern Ireland’.

³⁶ Les Mayhew and David Smith, ‘The UK Equity Bank: Towards Income Security in Old Age’, http://www.ilcuk.org.uk/images/uploads/publication-pdfs/The_UK_Equity_Bank._web.pdf

³⁷ <http://www.hanover50debate.org.uk/wp-content/uploads/2013/04/Smith-Institute-full-think-piece.pdf>

Outcome 2 - We Live and Work Sustainably – Protecting the Environment:

140. The Commissioner would echo the views of respondents to the first consultation, who responded that that *“there is a need to develop rural transport links and infrastructure and, in particular, community transport services,”* and *“emphasised the value of free travel passes for the elderly...in enabling access to services.”* Older people use the freedom the Senior SmartPass brings for a wide variety of travel. Among older men, 31% use public transport for shopping, 22% for commuting and 20% for personal business. Among older women, 36% used transport for shopping and 24% for personal business.³⁸ The Senior Smart Pass enables older people to access more services and play a fuller part in community life. The Commissioner was concerned that reference to the retention of the Senior Smart Pass was removed from the final draft of the Active Ageing Strategy, and would like to see a statement of commitment that the Senior Smart Pass will be retained.
141. The Commissioner recognises that achieving a shift from car journeys to bus or rail services, or walking and cycling for shorter journeys will reduce demand on the road network allowing it to work more efficiently, especially when operating at capacity. However the Commissioner believes that there has been a significant point missed in this Outcome and associated Delivery Plan (Indicator 25) which would strengthen policy for older people. This is the issue of accessibility.
142. Practical accessibility is one element of this. Step free public transport vehicles, especially on longer routes, would be a significant improvement for older people who have mobility issues. Older people do not find coaches easy to use and these are frequently being used for longer journeys.³⁹
143. Secondly, there must be fair access to routes. At a time when rural routes, which are an important facilitator of access for older people in rural areas, are being restricted, the Commissioner believes that community transport is a vital support, enabling many older people to access services as well as staying close to their communities. In the absence of adequate public transport routes or community transport services, there will be even more older people relying on transport from family, friends and others, further diminishing their independence. The Commissioner has said it is important that these services are maintained and the wider value of them is recognised by Government. This reflects direct feedback that COPNI has had from older people.

³⁸ Conor Breen, CARDI, Public and Community Transport for Older People in Rural Ireland – North and South’, <http://www.cardi.ie/sites/default/files/publications/cardi-ruraltransport-final.pdf>

³⁹ Imtac, ‘The Accessible Transport Strategy (ATS) 2025: Our Views on the Vision, Strategic Priorities and How to Measure Success for a New ATS’, <http://www.disabilityaction.org/news/item/990/imtac-publishes-views-on-new-accessible-transport-strategy/>

144. The Commissioner notes that there is a commitment to “*engage employers, schools and hospitals to develop travel plans and enhance active travel and public transport linkages, including by integrating rural and accessible transport services with health and education passenger transport.*” The Commissioner hopes this is pursued as older people, especially in rural areas, rely on public and community transport to access services. The Commissioner hopes that this commitment in the Programme for Government changes transport policy from the last PfG term, when both resources for rural public transport and community transport routes were reduced. Integrating rural and accessible transport services with health and education passenger transport, as proposed in this Outcome would improve the access of older people to health services. This is especially pertinent as the numbers of older people increase over the next PfG term from 396,000 to 445,000, and more older people will be needing to access health services.

Indicators 23,25 and 47:

145. Older people tell COPNI about the many challenges they encounter in terms of accessing the transport they need. For those aged 60 and over, the car is still the most commonly used main mode of transport.⁴⁰ Those aged 60 or over represent the largest proportions of the population who have difficulty with travel due to a physical disability or a long standing health problem - 36%. This is higher than other age groups and increases among the people aged 70 or over – 46% of whom report mobility difficulties. Older people on low incomes who do not drive depend the most on public and community transport to access essential services.⁴¹ Older people have to rely on more lifts from family or friends because of increased accessibility issues in rural areas. In practical terms this can mean older people find it difficult to conduct essential tasks, for example shopping.⁴²

146. The Commissioner welcomes a portion of the content of this Delivery Plan, especially the references to having a transport network that is accessible to all, and that planning will move away from being ‘overly car centric.’ However, the Commissioner has concerns about the focus of the Delivery Plan on major transport routes, and urban areas.

⁴⁰ OFMDFM/NISRA, ‘A Profile of Older People in Northern Ireland – 2015 Update’, <https://www.executiveoffice-ni.gov.uk/sites/default/files/publications/ofmdfm/a-profile-of-older-people-in-ni-annual-update-2015.pdf>

⁴¹ Conor Breen, CARDI, ‘Public and Community Transport for Older People in Rural Ireland – North and South’, <http://www.ofmdfmni.gov.uk/cardi-research-public-and-community-transport-for-older-people-in-rural-ireland.pdf>

⁴² Conor Breen, CARDI, ‘Public and Community Transport for Older People in Rural Ireland – North and South’, <http://www.ofmdfmni.gov.uk/cardi-research-public-and-community-transport-for-older-people-in-rural-ireland.pdf>

147. The Commissioner notes that Rural Community Transport Partnerships and IMTAC are listed as key delivery partners for these Indicators, and is hopeful that community transport forms an integral part of the solutions developed under this Indicator, and that as stated in the consultation *“accessibility for disabled people and older people is a major consideration in the development of transport policy and transport services.”*
148. The Commissioner is concerned that the priorities outlined for ‘shifting the curve’ for the Indicator for ‘Average Journey Time on Key Economic Corridors’, focus on reducing journey times on key economic corridors and among specified commuter groups, such as those travelling to schools, colleges and university, along the *“largest bottlenecks on our routes.”* This is not inclusive of older people living away from the main bottleneck routes, although the Commissioner is encouraged that the proposals to shift the curve include looking at opportunities to *“develop key sites on the strategic network which can operate as public transport interchanges, linking local services including community transport to regional bus services. This has the potential to make public transport a more viable alternative for commuters travelling from and to rural areas in particular.”*
149. The Commissioner notes that another key aim is to have a transport network that is *“inclusive and accessible to all,”* and the means of taking this forward will be through the Department’s Accessible Transport Strategy. COPNI has already commented on the framework for the Accessible Transport Strategy, raising concerns about the place of community transport and design of vehicles in the framework. COPNI expects that these concerns will be addressed in subsequent versions of the Strategy which contain the Action Plans, as well as the other Transport Plans which will be produced. The Commissioner also notes that it is stated in this Delivery Plan that ‘turning the curve’ may *“take beyond 2020 and there is a need to develop a longer term programme to support that.”*
150. The Commissioner also agrees with assertion in this delivery plan that until recently, *“planning of major developments and networks, including within urban centres, appeared to have adopted a car centric approach.”* Not prioritising other forms of transport, especially public transport, will reduce access and lengthen journey times for all types of vehicles. The Commissioner is pleased that one of the proposals to shift the curve in this Delivery Plan is to *“deliver a more integrated approach to land-use planning and transport with higher priority in urban areas attached to active travel and public transport.”* This is especially important for older people given that the distribution of older people is slightly weighted towards rural areas. In 2012/2013, 32% of households in rural areas had at least one adult of a

pensionable age, this compared to 27% in urban areas, and Northern Ireland as a whole.⁴³

151. However, the Commissioner is concerned about the statement that *“in terms of key areas to target, the focus for public transport in the short to medium term must be on urban areas and inter-urban travel. It is on these routes where there is the greatest potential for modal shift and the critical mass required to deliver frequent, reliable public transport connections.”* Extending the focus on urban and inter urban areas neglects the considerable transport challenges faced by older people in rural areas, and because the challenges are very different, in terms of access to routes, access to facilities and the role needed for community transport, the Commissioner is unconvinced that modal shifts in urban areas can be easily applied to older people in rural areas at a later date.
152. COPNI also notes that the Equality Impact Assessment has identified the potential for the Delivery Plan to have beneficial impacts for older people *“who may face barriers at present in accessing the public transport system.”* As the equality Screening correctly points out, in the timeframe to 2025, the population aged 60 and over will increase by 28%, while the population 60 and under will decrease by 1%. As the Screening states, an *“older population is likely to have more mobility issues hence improvements in the transport infrastructure, including the public transport system and in accessibility to this is likely to”* have a beneficial impact on older people. The screening also states older people are *“much more likely to experience difficulty in accessing goods and services resulting in higher levels of social exclusion and deprivation”* and the *“availability and accessibility of public transport/the transport infrastructure are important when addressing mobility issues.”* However the Commissioner believes that the focus of this Delivery Plan does not reflect enough on older people given the future demographic shifts.
153. Interaction of Delivery Plans with the Active Ageing Strategy will be important in this Programme for Government, as the terms of the Programme for Government and present Active Ageing Strategy overlap. Therefore in other comments to SRO’s and in the response to the PfG consultation the Commissioner has commented on relevant areas of the Active Ageing Strategy. One of the programmes mentioned elsewhere in the Delivery Plans lists Active Ageing Inclusion, which includes implementing the Active Ageing Strategy. The Commissioner does not agree that the only programmes in the PfG for older people relate to the implementation of the Active Ageing Strategy. During the development of the Active Ageing Strategy, COPNI expressed concerns that programmes around Transport (especially a programme concerning Improved Rural Transport, which proposed increasing the flexibility of RCTP’s or extending rural bus services)

⁴³ OFMDFM, ‘A Profile of Older People in Northern Ireland – 2015 Update’, <https://www.executiveoffice-ni.gov.uk/sites/default/files/publications/ofmdfm/a-profile-of-older-people-in-ni-annual-update-2015.pdf>

had been removed. Therefore, COPNI would be concerned that Delivery Plans like this one appear to avoid areas which are relevant to older people, when there are no relevant plans in the Active Ageing Strategy.

Indicator 42:

154. The Commissioner approves of the plan to consider the existing legislative framework to provide people with a disability with the same levels as those in Great Britain. The proposed public awareness raising campaign would have a beneficial impact. The suggested actions to improve the quality of life for people with disabilities and their families may also have potential. Disability levels range from 17% among 16-64's, compared to 60% among those aged 65 and over.⁴⁴ The numbers who have difficulty with travel due to physical disability increase with age – 38% for those aged 60 and over, compared to 6% of 16-29 year olds. ⁴⁵ 2014 figures show disability causes 38% of older people a problem with travel and getting where they want.⁴⁶
155. An OFMDFM 2012-2015 Disability Strategy committed the Executive to delivering on the requirements of the UN Convention on the Rights of Persons with Disabilities by a rights based approach.⁴⁷ The strategy commented that the prevalence of disabilities in adults aged 60 to 74 was four times greater than in those aged between 26 and 44, and that it was not clear public services had fully recognised the importance of this reality in shaping service provision.
156. Disability is an issue which disproportionately affects older people. Establishing a central regional disability forum involving people with disabilities would be a step forward, as would implementing social clauses in services contracts to create opportunities for people with disabilities to secure paid employment. A public awareness raising initiative designed to counter negative attitudes would also be beneficial, and the Commissioner hopes that this could be applied more generally to older people in other areas.
157. This Delivery Plan also includes reference to ensuring the *“actions associated with the Active Ageing Strategy reflect the needs of people with disabilities.”* COPNI would also draw attention to the proposed ‘second phase action’ in the

⁴⁴ NISRA – ‘2011 Census Results’.

⁴⁵ OFMDFM, ‘A Profile of Older People in Northern Ireland – Annual Update (2015)’, <https://www.executiveoffice-ni.gov.uk/sites/default/files/publications/ofmdfm/a-profile-of-older-people-in-ni-annual-update-2015.pdf>

⁴⁶ OFMDFM, ‘A Profile of Older People in Northern Ireland – 2014 Update’, <http://www.ofmdfmi.gov.uk/a-profile-of-older-people-2014-update.pdf>

⁴⁷ OFMDFM, ‘a Strategy to Improve the Lives of People with Disabilities’, https://www.communities-ni.gov.uk/sites/default/files/publications/ofmdfm_dev/disability-strategy-2012-2015.doc

Active Ageing Strategy of 'Housing Accessible Homes – Public Sector', which proposed to 'meet the housing needs of older people and those with disabilities by implementing an Accessible Housing Register for Social Housing' to support allocation of suitable properties.⁴⁸ This proposal in the AAS was marked as an action 'for which funding is still to be secured'. The Commissioner believes securing this financing and implementing this project would be beneficial to the wider objectives stated in this Outcome.

158. The Commissioner particularly welcomes the proposed work to identify disability access issues and ensure they are taken into account in community planning. Aside from transport, issues like badly designed or maintained pavements, a lack of benches or accessible toilets can create physical barriers to some disabled older people.⁴⁹ The proposals to improve public realm access is one particular area where this can work well – ensuring "*our streets and highways are accessible, safer and reduce the risk of unnecessary injury*" is an issue that the Commissioner has commented on previously, and where improvement would assist older people.

⁴⁸ Northern Ireland Executive, 'Active Ageing Strategy 2016-2021'.

⁴⁹ ILC, Age UK, 'Getting Out and About'.

Indicators 8 and 48:

159. The Commissioner appreciates that COPNI was invited to attend a Department of the Communities event about the issues raised in this Delivery Plan, and thanks the Department of the Communities for their open attitude to engagement throughout the PfG process.

160. Substantial numbers of older people are owner occupiers, but numbers of older people are across all different housing types. In 2011, the percentage of older households (measured as consisting of at least one older person who is 65 or over if a man and 60 or over for women) who were owner occupied were 145,060 or 73.2% of the total number of older households. 19.3% of older households were in social housing, with 7.5% of older households in private rented houses.⁵⁰ The Housing Executive and Housing Associations provide over 10,000 homes for older or disabled people in sheltered housing projects. In 2013, 13% of low income pensioners lived in Northern Ireland Housing Executive or housing association accommodation in 2010/2011, compared to 17% of the entire pensioner population.⁵¹

161. In 2011 it was found that households headed by older people were much more likely to be living in fuel poverty than other households. Fuel poverty was found to be 66.3% for households with a Household Reference Person of 75 and over, 52% for 60 to 74's, comparing to 36% for 17-59's. 60.8% of older households were in fuel poverty, compared to 36.8% of adult households and 31.9% of households with children.⁵² Therefore the Commissioner is encouraged to see that one of the commitments in this Delivery Plan is to review the effectiveness of the current Fuel Poverty Strategy and develop a new strategy. This Strategy needs to attempt to further energy efficiency policies for homes, including retro fitting older buildings. The area based approach is also worthy of building on.⁵³

⁵⁰ NISRA, 'Northern Ireland Housing Statistics 2013-14', https://www.dsdni.gov.uk/sites/default/files/publications/dsd/northern_ireland_housing_statistics_2013-14.pdf

⁵¹ OFMDFM, 'A Profile of Older People in Northern Ireland – 2013 Update', <http://www.ofmdfmi.gov.uk/a-profile-of-older-people-2013-update.pdf>

⁵² OFMDFM, 'A Profile of Older People in Northern Ireland – 2014 Update', <http://www.ofmdfmi.gov.uk/a-profile-of-older-people-2014-update.pdf>

⁵³ Christine Liddell and Susan Lagdon, 'Tackling Fuel Poverty in Northern Ireland: An Area-Based Approach to Finding Households Most in Need', https://www.executiveoffice-ni.gov.uk/sites/default/files/publications/ofmdfm_dev/tackling-fuel-poverty-in-ni-liddell-lagdon.pdf

162. The Commissioner welcomes that the Delivery Plan makes it an objective of policy that older people will make up a higher proportion of owner occupiers, and provide 9,600 social homes and release more public sector land for housing development. COPNI was encouraged to hear at the engagement event that the implementation of this part of the Delivery Plan will incorporate both the design of housing products, and the design of financial products. The Commissioner also believes that schemes like Equity Release provide potential to assist with this, although as organisations like the ILC have said, this will require an element of backing from Government. The ILC have proposed what they call the ‘Equity Bank’ which would differ from commercial equity schemes as it would be owned by the state, because they think that the current equity release market is not meeting its potential and costs are high.⁵⁴ Barriers to Equity Release have been identified as attitudes towards housing wealth, mistrust, advice on planning, welfare benefits, regulation and commercial viability.⁵⁵

163. This Delivery Plan has identified under supply of housing for appropriate groups, including older owner occupiers, and the need to *“find ways of stimulating demand for and supply of appropriate, smaller affordable accommodation for older owner-occupiers and supporting those who want to downsize.”* The Commissioner believes schemes like co-housing that have been more extensively employed in Scandinavian nations show promise in giving higher numbers of older people the opportunity to live in housing appropriate to them.⁵⁶ The Commissioner also believes more support should be available for older people to remain in houses appropriate to them, such as the introduction of support services like a ‘Care and Repair’ service, and would welcome these type of programmes being referred to explicitly in this Delivery Plan.

⁵⁴ Les Mayhew and David Smith, ‘The UK Equity Bank: Towards Income Security In Old Age’, http://www.ilcuk.org.uk/images/uploads/publication-pdfs/The_UK_Equity_Bank._web.pdf

⁵⁵ <http://www.hanover50debate.org.uk/wp-content/uploads/2013/04/Smith-Institute-full-think-piece.pdf>

⁵⁶ ‘Report of the Independent Commission on the Future for Housing in Northern Ireland’.

164. COPNI also notes that in this EQIA, it states the data underpinning the Indicator set is *“generally disaggregated on the basis of Section 75 identifies,”* and the commitment in the PfG to invest in increasing the power of the data available will mean that *“more detail and in more areas can be disaggregated.”* As the EQIA states, effectively disaggregating the data enables:

- *“Assessment by the Executive of the differential experiences and key inequalities experienced by people based on their identity and active management of the set of policies and programmes aimed at delivering Programme for Government Outcomes in support of achieving better equality outcomes at a strategic level not previously possible.”*
- Effective scrutiny by the Assembly, media, statutory advisory and scrutiny bodies of the progress being made by the Executive.
- More effective evaluation at a strategic population level of the work of the Executive.

165. The EQIA also states that in *“establishing policies and programmes to make progress on the achievement of population level outcomes and in particular in the development and implementation of Delivery Plans, Government Departments will establish performance level evaluation methodologies that will enable a direct assessment of the impact of policies and programmes directly on their participants, including any differential impact on different individuals and groups based on their identity.”*

166. The EQIA lists 18 different Indicators and states they are *“gathered in relation to the differential experiences of people of different ages in respect of,”* and that *“other potential differentials will be explored through the data development agenda for the PfG.”* They include:

- The proportion of the workforce in employment qualified to Levels One – 4 and above
- Seasonally adjusted employment rate (16-64)
- Economic inactivity rate excluding students
- % of population living in (absolute/relative) poverty (BHC)
- The employment rate of 16-64 year olds by derivation quintile.
- Employment rate by geographic area.

167. The Programme for Government commits to invest in increasing the power of the data available, *“so that further disaggregation can be made, in more detail and in more areas, increasing understanding of the differential experiences and key inequalities affecting people in respect of each of these important measures.”* COPNI believes this needs to be urgently done for the Indicators listed above, as they do not capture the experience of older people sufficiently.

Conclusions

168. Assessment of the individual Outcomes, Indicators and Delivery Plans has reaffirmed the Commissioner's belief that this Programme for Government as currently constituted is not a Programme for Government for an ageing population. The main document has very few (about 5%) specific references to older people (nearly a quarter of the population at the end of this PfG) as a share of the references to specific age groups.
169. The references that there are class older people as a Section 75 group, when the Commissioner believes the Strategy should be going beyond this, defining the needs of older people and coming up with actions for government to fulfil them. The Delivery Plans do not have enough key detail in areas like Health or Social Care, Digital Inclusion Employment for the Commissioner to be confident that the Plans will make a real difference for older people. Likewise, the Commissioner is surprised that Plans in these areas, and other areas like Housing, Crime, Education or Apprenticeships, do not reference the Executive's recently published Active Ageing Strategy (which was also cited as being an 'Outcomes-based strategy').
170. The Commissioner has also found throughout this process, *and from feedback from individual older people both at the event and elsewhere, that it has been very difficult for them to effectively read and respond to the multiple documents that are part of this consultation.* The Commissioner has been concerned by what a difficult process it has been for older people to engage with government and feed their views into this consultation, and believes lessons can be learnt for how the process is conducted in future.
171. The Commissioner's event, 'Is This A Programme for Government for an Ageing Population?' confirmed these thoughts and threw up some other considerations. At this event Katrina Godfrey from The Executive Office told the event that she heard the calls for a separate Outcome for older people, and would be reflecting them in feedback to Ministers. The verdict of the over 100 older people that attended the event, and the expert speakers, was that there should be a separate outcome, and that older people should be recognised much more in the PfG documents. The Commissioner expects that this call will be taken on board by Ministers. Paying heed to it would make a better, more rounded, more cohesive PfG, that works in a proactive way to fulfil the challenges and opportunities presented by our changing demography over the next few years. COPNI believes Government should take heed of the expert calls for a 15th Outcome (attached in Appendix One below) and more inclusion of older people in the document.

172. (First produced in response to the consultation on the Draft Programme for Government Framework which closed in the summer)

Suggested New Outcome - Programme for Government 2016-2021

“We respect, value and protect our older people.”

Context

173. The document contains no specific reference to older people, or the changing demographics of Northern Ireland over the span of this Programme for Government. It also does not mention the Active Ageing Strategy, despite the fact that (after being launched in January 2016), the AAS will overlap with the Programme for Government, to 2021.

174. By contrast, the document contains 20 mentions of the specific term ‘young people’, and the 14th outcome is exclusively focused on younger people – ‘We give our children and young people the best start in life’. It contains 6 commitments under ‘The Role of the Executive’ and 20 Indicators where progress will contribute towards the achievement of this outcome.

175. Therefore COPNI would recommend that a further, additional outcome should be added to the PfG framework that would specifically focus upon older people: *“We respect, value and protect our older people.”* In line with the current draft structure, this could be included without affecting other outcomes.

176. As the new Programme for Government has moved to an outcome based model, it is imperative that any new outcome is supported by relevant indicators that will show if progress is being made. COPNI analysis has shown a number of the Indicators do not properly include older people, or do not presently have supporting data available. Therefore, Indicators COPNI suggest which should include older people, or which are already being gathered, and which we expect to be updated during the term of the Programme for Government, are outlined for review and consideration.

Suggested 'The Role of The Executive'

177. This section is included for all the outcomes in the draft PFG Framework, and outlines at a general level how the Executive will contribute towards achieving the outcome.

178. 'We will make a contribution by':

- Supporting and promoting better health among older people.
- Promoting positive attitudes towards older people.
- Supporting safe, secure environments for older people to live in.
- Promoting opportunities for older people to be economically and socially involved, and not isolated.
- Promoting opportunities for older people to increase their income security and supporting them from falling into poverty.

Suggested Indicators

Indicator	Data Controller / Owner	Note: Measurement (frequency & availability)
Percentage who reported their general health as good over the last twelve months (by age)	DHSSPS, Health Survey NI	Runs every year, last data published November 2015 – 2014/2015 results
Disability Free Life Expectancy, Healthy Life Expectancy (at 65)	DHSSPS, Public Health Information and Research Branch	Published biannually. Results for 2011-2013 published in October 2015. Would need to make request for relevant data at 60.
Percentage achieving Chief Medical Officer's recommendations for physical activity, by age	DHSSPS, Health Survey NI	Published in 10 year age bands – 55-64 band overlaps age group COPNI would want – would need to request breakdown. Runs every year, last data available for 2013/2014
Do you have any long-term health problems, illness, disability or infirmity?	NICOLA Project	The NICOLA project completed Wave One of fieldwork this year and is generating results, preparing for Wave Two. The Personal Interview is conducted every two years and the health assessment every four years, meaning there would be new data available during this PFG term. The project surveys people aged 50+ but request could be made for breakdown by age
Percentage of respondents experiencing mobility difficulties	DHSSPS, Health Survey NI	Published in 10 year age bands – 55-64 band overlaps age group

		COPNI would want – would need to request breakdown.
How often do you have contact with any of your children/other relatives/close friends	NICOLA Project	
Percentage of respondents involved in groups, clubs and organisations	NICOLA Project	
Percentage of respondents with caring responsibilities	DHSSPS, Health Survey NI	Runs every year, last data published November 2015 – 2014/2015 results.
Indicator	Data Controller / Owner	Note: Measurement (frequency & availability)
How often do respondents feel lonely	NICOLA Project	
In Employment - Receive the recognition I deserve for my work	NICOLA Project	
Relative low income percentages for population groups (after housing costs)	Households Below Average Income Report – Department of the Communities	Report updated annually, 2013-2014 data published September 2015. Gives data for pensioners and those of working age so would need to make request for age breakdown
Percentage of those in fuel poverty, by age	NIHE, House Condition Survey	<i>Is being conducted in 2016 for the first time since 2011, data is likely to be available in 2017. But only likely to be conducted again in 2021 at the end of the PFG term – with results in 2022</i>
Percentage living in decent homes, by age	NIHE, House Condition Survey	<i>Is being conducted in 2016 for the first time since 2011, data is likely to be available in 2017. But only likely to be conducted again in 2021 at the end of the PFG term – with results in 2022</i>
Percentages at risk of becoming a victim of any household or personal crimes	DOJ, NI Crime Survey	Operates annually, 2014/2015 finding published in February 2016
Percentage of respondents worried about becoming a victim of crime	DOJ, NI Crime Survey	Operates annually, 2014/2015 finding published in February 2016
How often do you find you have too little money to spend on what you feel you and your household's needs are?	NICOLA Project	

Employment Rates of older people (by age)	NI Labour Force Survey	<p>Published quarterly, the tables for February – April 2016 were published on the 15th June 2016.</p> <p>Data is published in 50-64 and 65+ bands, but COPNI has successfully requested a breakdown by 60 and over before.</p> <p>This would address the disparity that in the consultation document, employment data only covers 64 year olds</p>
Indicator	Data Controller / Owner	Note: Measurement (frequency & availability)
Essential Skills enrolments and qualifications (by age)	Department for the Economy – published annually	<p>The data partially contained in 56-65 and 66-75 age bands, but COPNI has requested the data for 60 and over before.</p> <p>Relevant data in the consultation document was restricted to younger age groups</p>
Enrolments at higher and further education institutions	Department for the Economy – published annually	Data is publically available for 'over 25's', however, last year COPNI was able to successfully request 5 year age breakdowns from what was then the Department for Employment and Learning.

Notes

179. There are Indicators within the Attitudes to Older People module in the Northern Ireland Life and Times Survey, which is conducted every few years, most recently in 2014. Answers to some of the questions posed in that survey would also make suitable Indicators for this Outcome, such as:

- Do respondents think older people are treated better or worse according to their age?
- Are people are treated with more respect as they get older?
- Do you think society recognises the contribution that many older people are able to make? and the percentage who think the
- Do the authorities do all they should for older people?

180. However, as COPNI referenced in our response to the public consultation exercise on the Active Ageing Strategy, this module is commonly conducted every few years, and there is no certainty it would be even conducted once during the term of the Programme for Government.