



Commissioner for **Older People**  
for Northern Ireland

# **Active Ageing Strategy 2014-2020**

## **Consultation Document**

**Consultation response from the  
Commissioner for Older People  
for Northern Ireland**

**May 2014**

# Contents

- Executive Summary..... 3
- Background ..... 6
- Pre-Consultation Work on the Draft Strategy ..... 7
- The Context of the Draft Strategy..... 8
- About the Draft Strategy..... 8
- Strategic Aims ..... 10
- 1. Independence ..... 11
- 2. Participation ..... 13
- 3. Care ..... 14
- 4. Self-Fulfilment..... 15
- 5. Promote Dignity ..... 16
- Conclusions ..... 17

## Executive Summary

The following is a summary of the Commissioner for Older People for Northern Ireland's (COPNI) views on the consultation document *Active Ageing Strategy 2014-2020* (hereafter referred to as the 'draft strategy'). The other sections of this document set out her views in greater detail.

### **GENERAL COMMENT**

1. The Commissioner welcomes the launch of the draft strategy, and the positive ageing tone and approach emphasised in it.
2. The Commissioner chaired the Ageing Strategy Advisory Group (ASAG) and worked closely with the group and officials from OFMDFM. The role of the ASAG was to provide advice to enable government to develop a policy direction for Northern Ireland that promotes active ageing in a society which values the fact that more people are living longer, leading active and fulfilled lives, and making a positive contribution to society.
3. The Commissioner highlights the importance of protection of vulnerable older people, and the need for increased public confidence in care and treatment of older people.
4. Active ageing is a very important concept that, in the words of the World Health Organisation (WHO), can optimise "*opportunities for health, participation and security in order to enhance quality of life as people age.*" By enhancing the quality of life of older people, many positive impacts will follow for them, and for Northern Ireland.
5. A comprehensive and coherent Active Ageing Strategy can be a valuable tool in helping older people enjoy more freedom to contribute to society and enjoy the benefits of participation and interaction. It is welcome that the draft strategy recognises the positive contribution older people make to our society.
6. Active ageing frameworks welcome and value older people as diverse individuals with their own views, experience, values, beliefs and rights to inclusion and equality.
7. The number of older people in Northern Ireland is increasing and will continue to do so. Given the diverse range of issues and interests of older people, the draft

strategy can provide a focal point for positive policies towards older people across government.

8. It is essential that the actions to be delivered through the draft strategy have a clear baseline, that clear targets for delivery of the activities are established and enable measurement of actual change throughout the term of the draft strategy.

### ***Strategic Aim 1. Independence***

9. The Commissioner welcomes the recognition in this draft strategy of the importance of independent living and the significance of participation to older people.
10. The draft strategy does not outline clear actions to assist older people to contribute in leadership positions on issues that affect them.

### ***2. Participation***

11. Participation in all aspects of community, faith, family and civic life is a vital part of active ageing, allowing older people the opportunity to maximise their potential, and to engage with a wider variety of people of all ages.
12. The Commissioner supports the active involvement of older people in the process of developing and monitoring delivery of the draft strategy, but would emphasise that is not an end in itself, in terms of encouraging more participation. Further consideration should be given to including actions that support increased involvement of older people actively in social, economic, cultural and civic affairs. This would increase the chances of more older people assuming leadership positions.
13. Beyond older people having involvement in the process of producing this draft strategy itself, it is not clear how the draft strategy intends to increase the participation of older people.

### ***3. Care***

14. The Commissioner welcomes the broad objectives of this theme, although it appears that many of the actions are taken from existing Departmental commitments, and it is unclear what additional value their reference in the draft strategy brings.

15. It is not clear what new and additional care measures are in this part of the draft strategy, and how this section contributes to the development of existing policies. High quality treatment, care and support are essential to older people. The draft strategy should directly address the need for certainty that high quality care and support will be available to all older people who need it.

#### **4. Self-Fulfilment**

16. It is noticeable that this section of the draft strategy has only two proposed targets in the Action Plan, one of which is explorative. For a component that forms an important part of other active ageing strategies, this section is relatively brief and contains few proposed actions.

17. The draft strategy and the Action Plan appear to be at odds on who the signature programme targeted at older workers is being aimed at.

#### **5. Promote Dignity**

18. The Commissioner welcomes the focus on the diversity of older people and protection of their rights in this section.

19. It is positive that the importance of involving older people in decisions over care and introduction of legislation ending unfair age-related discrimination in the provision of goods, facilities and services are recognised.

20. Many of the objectives in this section are taken from existing Departmental commitments, and additional new objectives in this area would develop the promotion of the dignity of older people.

## Background

21. The concept of “active ageing” can be traced back to the 1940’s and 1950’s, when it was mostly used to encourage recognition of the importance of an active lifestyle in later life. The World Health Organisation (WHO) adopted the term “active ageing” in the late 1990’s and played a significant role in the popularisation of the term. It was also adopted by other prominent international organisations like the OECD, UN and EU.
22. The WHO have produced a detailed policy framework for active ageing, notable for the depth of policies it thinks a comprehensive active ageing strategy should follow. They describe an active ageing strategy as important for two reasons:
- i) Firstly, an ageing population will put increased economic and social demands on countries.
  - ii) The potential of older people to contribute need to be considered and most importantly, maximised. “Older people are a precious, often ignored resource that make an important contribution to the fabric of our societies.”<sup>1</sup>
- A comprehensive and coherent active ageing plan can be a key tool in helping older people enjoy more freedom and make a bigger contribution to society.
23. The term “active ageing” has since been used by many researchers, groups and policymakers, who use a range of different interpretations. Some interpretations focus on the importance of promoting longer working lives, others on promoting the regular participation of older adults in physical activity.
24. Increasingly, a broader approach is supported, which focuses on a variety of measures that enhance the inclusion of older people, that are not confined to an economic or physical framework. More narrowly focused definitions of active ageing are in danger of excluding groups of people, such as those not in paid employment or suffering from severe physical limitations.
25. Some definitions often fail to recognise the circumstances of many of those aged over 85, whose numbers are increasing proportionally faster than other parts of the population, and who are more vulnerable to experiencing health or mobility

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<sup>1</sup> World Health Organisation (WHO), ‘Active Ageing: A Policy Framework’, (2002).

problems. Active ageing strategies should recognise the increasing diversity of older people. An integrated and comprehensive Active Ageing Strategy can work in many different ways, providing opportunities for individuals to contribute, but also giving them adequate protection, security and care when they need it.

26. As this draft strategy recognises, *“older people fall in to a wide variety of categories and have many different and varying needs. People’s identities are complex and can vary in many different ways such as gender, age, religion, disability, ethnicity, sexual orientation and the locality they grew up in.”*

27. A wide variety of measures are needed across the different dimensions of an Active Ageing Strategy in order to adequately monitor change and implementation across each theme. The benefits to society are greatly increased if the Active Ageing Strategy is relevant and delivers benefits to all older people.

28. A broad scope of measures increases the applicability of a strategy to different groups of individuals. The strategy should be broad in scope, with careful consideration of how different measures will integrate and work together to make such a strategy coherent and workable.

## **Pre-Consultation Work on the Draft Strategy**

29. The Commissioner has chaired the Ageing Strategy Advisory Group (ASAG) that informed the development of the draft strategy. This group includes older people, groups that represent older people and organisations with specialist expertise. Through the ASAG regular review meetings, the Commissioner has been able to provide direct feedback as the document has been developed.

30. Feedback has been provided to the Junior Ministers, through written communication, and in the form of advice points to officials in OFMDFM.

## The Context of the Draft Strategy

31. Population projections demonstrate that Northern Ireland is an ageing society, and that there will be much larger proportions of older people in our society in the future. In particular there will be rapidly increasing numbers of those aged over 85.
32. Economic and social progress can be made when older people have more opportunities to participate. Research carried out by COPNI in areas like employment, or the positive contributions older people make to society, illustrate that there is not one simple measure that can increase participation and quality of life. The research emphasises the need for many measures to work together to achieve an overall aim.
33. The fact that demographic projections so clearly demonstrate future increases in the number of older people mean that it must be a key consideration for policymakers in future planning. Given that older peoples' interests span so many areas, adequate policy development and planning needs to be coordinated and implemented through many different areas of government.
34. An Active Ageing Strategy can act as a focal point and a roadmap so that government policies maximize the quality of life for older people. It is the detail and the quantity of new and relevant measures contained in this draft strategy that will dictate whether it can deliver real impactful change.

## About the Draft Strategy

35. The Commissioner welcomes the overall vision of the draft strategy, which is for Northern Ireland to be *“an age friendly region in which all people, as they get older, are valued and supported to live actively to their fullest potential; with their rights and dignity protected.”*
36. The Commissioner confirms that ‘actively’ should mean ‘participation’ in society and in all walks of life, as well as physical activity. The Commissioner welcomes

the use of the WHO definition at 1.9 of 'active' to include participation, and would advise greater reflection of this in the balance of the draft strategy.

37. There is a lack of clarity throughout this draft strategy about the balance between existing programmes and how proposed measures are being funded. The *Delivering Social Change (DSC)* framework is described in the Strategic Context. It does not make clear how DSC relates to the draft strategy and what specific funding will be directed through DSC.
38. At 2.18 it is stated that the "*Strategic Aims are being implemented through the Executive's Delivering Social Change initiative.....This Strategy will guide departments, agencies and health and social services to shape their own strategies, policies, programmes and services to deliver the strategic aims of the Active Ageing Strategy.*"
39. At 2.20 it is also stated the "*Strategy would be delivered through the specific government departments and agencies that have the resources and expertise to deliver the key programmes and services that improve the lives of older people.*"
40. Strategic aims will be "*implemented*" through DSC, but "*delivered*" through specific departments. The two terms are similar enough to lead to confusion. This naturally raises questions about how policies in the draft strategy will be put into action, and from where exactly additional resources for full implementation will come.
41. The graphic at 2.22 summarising the key aspects of the draft strategy does not make this any clearer – 'Delivering Social Change' is in between 'New projects'/'Shaping the policies of departments' and the Strategic Aims, but not linked to them on the graphic.
42. It is unclear whether the budget provision for implementing measures in the draft strategy is to be found in existing departmental budgets, is additional to these budgets, or is 'new money' direct from DSC budgets.

## Strategic Aims

43. The draft strategy 2014-2020 is built around five strategic aims which follow the five themes of the *United Nations Principles for Older Persons* which were adopted in 1991. These themes help to give the document a clear structure. This is followed throughout and provides a matching structure for the draft strategy. Given that the draft strategy needs to be clear on how its principles and proposed actions link together, it is welcome that there are clear themes that guide both important sections of the document.
44. The Commissioner welcomes the fact that the draft strategy has been guided by a set of principles and a clear structure. Maps of active ageing by organisations like the WHO have shown that determinants of active ageing are interrelated, and an active ageing strategy needs to show how the different elements work together, and interact with influences like individuality, culture, gender and identity.
45. At 1.8 the draft strategy refers to how *“poverty, ageism, prejudice, disrespect and negative stereotyping are root causes of the disadvantage older people face on a daily basis.”* But these issues are referred to in isolated parts of the draft strategy. The segment about Section 75 issues highlights equality considerations that are not referred to in other parts of the document – for example gender or lesbian, gay, bi-sexual or transgender considerations.
46. The statement on Page 78 cites that the ASAG, chaired by the Commissioner, *“are content that the key issues and challenges facing older people are addressed in the Strategy and Early Actions Plan.”* Engagement with the ASAG and the Commissioner is used as part of the explanation for a full Equality Impact Assessment (EQIA) being *“not required at this stage.”* Neither the Commissioner nor the ASAG have provided such endorsement. The Commissioner feels this is not an accurate interpretation of the role and contribution of the ASAG to date, and is particularly concerned that this is linked to a decision not to carry out an EQIA at this stage. The Commissioner thinks that a full EQIA should be completed given the impact of proposed policies in relation to Section 75 groups.
47. This draft strategy does not go beyond the five themes of the UN Principles for Older Persons and explain the inter-relationships between the different parts of

the draft strategy and how they will work together. Neither does it set out an holistic framework for active ageing across the life course. Active ageing is a preventative concept that needs to apply before older age, in a graduated way across an individual's life. There are preventative elements in this draft strategy, but it is not comprehensively explained how they work together with the whole of the draft strategy.

48. The draft strategy is not comprehensive in illustrating what has become a larger part of active ageing frameworks, the need for measures that promote older people into positions of leadership in politics, health, education, business, or other areas that affect them. Although the draft strategy has made provision through the ASAG and through the consultation process for older people to be involved in the development and monitoring process, this is still participation at 'one step removed.'

49. The draft strategy does not lay out comprehensively how older people will be aided into moving into positions of leadership in order to have direct input into matters that affect them. The word 'active' in active ageing means as much to participate in social, economic, cultural and civic affairs as to be physically active, and the Commissioner would welcome further development of this principle within the Participation and Self Fulfilment sections.

## 1. Independence

50. This Strategic Aim promotes "*active independent living by older people giving them choice and control in their lives*" through the delivery of "*warm housing in safe neighborhoods, adequate transport and income, access to social networks and equal access to participation in the workforce.*"

51. The Commissioner welcomes the recognition that active ageing relates to a person still being able to take part in their "*social life, cultural and sporting interests, involved with their church, their hobbies and voluntary work.*" The draft strategy is correct to assert that "*some illnesses can be prevented by leading an active life in middle and later years*" and the Commissioner would encourage more thinking about a life course approach to policy about healthy and active lifestyles. The draft strategy could usefully use the term that people are involved

with their 'faith life' rather than 'church', reflecting the range of religious practice in Northern Ireland.

52. The Commissioner also agrees with the statement that the draft strategy aims to encourage *“people to continue to work as they grow older if that is the best option for them.”* The draft strategy asserts that being active can have benefits not just for those who stay in work, but *“older people who retire from work, people who are ill, and people who live with disabilities”* that can remain active in many cases. The Commissioner agrees in principle with these sentiments, but would welcome more measures to help older people participate across a range of areas, helping them gain senior positions of influence over issues that affect them.
53. Older people have a valuable contribution to make in leadership roles. As the WHO framework specifies, by doing more reaching out to older people and giving them more opportunity to be involved in political processes, planning of public services, education and research, this will naturally happen. The chances will be further improved if such a programme is allied to measures that give older people more opportunities for re training and skilling, volunteering and the choice to be involved in the labour market for longer.
54. As with other parts of the draft strategy, there are differences in language between the main part of the document and the draft Action Plan, along with a lack of clarity about available resources, which does not show how the items in the action plan will be fully implemented. The section describes the DSD's 'Maximising Incomes and Outcomes' programme which has been underway for nine years. In the main section, at paragraph 3.10, an intention to build on this programme is outlined, which states that *“we are proposing a signature programme”* to improve the situation relating to the poverty of older people, which is higher in Northern Ireland than UK averages.
55. However, later in the document at 3.27 it states that DSD *“could”* develop an *“additional approach to improving incomes for older people,”* describing some of the benefits of a *“potential programme.”* But the Action Plan states that OFMDFM proposes to work with DSD to *“consider the delivery of a Signature Project”* aimed at increasing uptake of benefits. The language is non-committal, and changes from the main part of the document to the Action Plan, in addition to which the Programme is not marked as one for which there are resources available.

56. The Commissioner welcomes the focus on extending transport to “*all who live in rural areas*” in the draft strategy, using the Rural Transport Fund and the Rural Community Transport Partnerships. This is one of the few parts of the draft strategy where rural areas are specifically mentioned. Isolation is not referenced specifically in the draft strategy. Proposals to improve displays on buses to make the experience of finding, and travelling in, public transport easier are also welcome. The Commissioner also welcomes the aims of the Accessible Transport Strategy Action Plan in reducing barriers to transport and ensuring the views of older people are taken into account when developing plans to improve accessibility. The draft strategy asserts it will enhance the ability of the Accessible Transport Strategy Action Plan, first published in 2012-2013, to deliver, but it is not fully clear how it will do this from this draft strategy.
57. It is welcome that a Fear of Crime signature programme is proposed, and that it will engage and work with older people and support local initiatives. The Commissioner is aware of £6.5 million allocated to Policing and Community Safety Partnerships for the local delivery of community safety initiatives, and understands that it is an existing Department of Justice commitment. Confirmation of whether this is new or additional money would be welcome.

## 2. Participation

58. The aim of this theme is to “*promote the active participation of older people in all aspects of life,*” socially, through being valued in society, active participation and citizenship, and the provision of services and volunteering opportunities. This is a vital part of any Active Ageing Strategy, as it gives older people the opportunity to maximise their potential and increase their quality of life, in a personal way.
59. The draft strategy expresses the wish for older people to “*become more actively engaged in the development of government policies so that we can benefit from their skills, experiences and knowledge and ensure that the services that are provided for them are the ones that best meet their needs.*” The Commissioner notes there are few recommendations that go beyond older people having an involvement in the design and implementation of the draft strategy itself.
60. In this area the draft strategy should be the means to an end, not the end itself. The proposals about digital inclusion are valuable and making sure that

information is provided in accessible formats is very important, especially as more government communications will move to digital mediums. However, overall, these participatory measures could benefit from being strengthened and widened much further so they can play a much bigger part in the draft strategy. Paper copies of all government communications and documentation should be available on request.

### 3. Care

61. The Commissioner welcomes the broad objectives of this theme, to “*promote equal access to high quality health and social care services which promote and maintain physical, mental and emotional health and well being*” and to have health and social care services which conform to best practice. High quality treatment, care and support are essential to older people. The draft strategy should directly address the importance of high quality treatment, care and support, available to all older people who need it, now and in the future.
62. Many of the measures in this section are similar to the plans outlined in *Transforming Your Care* or are re-enablement measures that appear to be taken from elsewhere. Programmes like the Dementia Strategy, My Home Life (MHL) and Healthy Homes for Older People are derived from existing programmes. For MHL the funding situation is unclear – the Action Plan states that Age NI and the Independent Health Care Providers could implement the programme subject to funding, but gives little indication of how the draft strategy will move this process forward.
63. There is a large amount of material on planning and scoping, but the phrase “*develop the resources that will help implement the vision*” does not give detailed insight into how this will happen. The Commissioner notes existing commitments to better adult safeguarding (from the Programme for Government commitment to introduce a package of measures aimed at improving safeguarding outcomes for vulnerable adults), and the existence of the dementia strategy. Progress on these is essential and should be adequately resourced.

## 4. Self-Fulfilment

64. The Commissioner supports the aim of this theme to “*support older people to develop to the fullest of their potential through promoting education, training, leisure and arts opportunities.*” Meeting this objective will give older people the chance to contribute actively, while also giving them more opportunity to interact with, and pass on their knowledge, to others. However, key parts of this theme are unclear, and for such an important positive section, it is very brief compared to other parts of the draft strategy, and to what Active Ageing Strategy frameworks recommend.
65. There is confusion about what is being targeted by the draft strategy with regard to employment. The draft strategy proposes working with DEL on a “*signature programme*” to improve the employment prospects of older people, “*specifically aimed at economically inactive older workers.*” This is reflected in the *Enabling Success* plan which is being consulted upon presently. In Phase Two of the Action Plan the document states that the programme will target “*economically inactive 50+ year olds.*”
66. A commitment to explore how DEL and OFMDFM may better promote the benefits of further education opportunities amongst older workers is very imprecise. It states that DEL will “*explore*” how to promote the benefits, and “*we would welcome your views on this.*” Clear commitments to re-skilling and new learning for older people are an essential foundation in building the economy. There are also potential personal benefits of further education for older people. The draft strategy would be strengthened by a clear commitment to increased provision of these for older people.

## 5. Promote Dignity

67. This section is outlining a series of commitments which are already in progress, including plans to introduce legislation extending age discrimination law to the provision of Goods, Facilities and Services (AGFS), and the Mental Capacity Bill. The Commissioner welcomes both of these legislative developments which should be progressed without delay.
68. The Commissioner supports the focus of the draft strategy on promoting and protecting the human rights of older people, upholding dignity and respect for older people, promoting equality, challenging ageism and recognising additional obstacles for older people with 'multiple identities'. This focus is welcome and is one that would have made the whole draft strategy more coherent if it had flowed through the whole document.
69. This section recognises the importance of legislation, and restates Programme for Government commitments, to end unfair age-related discrimination in the provision of goods, facilities and services. This proposed new AGFS legislation would help older people exercise their rights and benefit without discrimination from the wider range of consumer opportunities, and opportunities in society.
70. The Commissioner also welcomes the recognition that the "*provider of care needs to involve the older person wherever possible when decisions are being made.*"
71. The draft strategy states that the Executive is "*committed to upholding the dignity of older people in all areas of life taking full account of their human rights.*" The Commissioner welcomes this focus to include all older people.

## Conclusions

72. The Commissioner welcomes and supports the broad aims of this draft strategy. Instead of being an impetus for change and an originator and driver for new active ageing policies, based on active ageing frameworks and best practice, the draft strategy appears to be a collection of existing policies that, whilst relevant to active ageing, are reflected in current departmental plans.
73. The measurement of change should be clear. A baseline for measurement along SMART principles should be integral to a wide ranging Active Ageing Strategy. With measures spanning different departments and different timeframes there needs to be clarity around the timely monitoring and review of the objectives and measures in the draft strategy.
74. Communicating with older people about the strategy is necessary. Appropriate measures need to be taken to communicate the objectives of the plan and to engage as many older people as possible. There is a section in the draft strategy which refers to communications but this needs to be expanded into a more comprehensive plan of how the content of the draft strategy will be communicated.
75. There needs to be more clarity and detail about the funding of measures proposed in the draft strategy. The resourcing of proposed actions remains unclear. Many do not have definitive finance allocated to them, and it is unclear whether further funds will come from individual departmental budgets, or through *Delivering Social Change*. The role of *Delivering Social Change* in the draft strategy is unclear – it refers to DSC in parts as the delivery channel for the actions proposed and in other as a planning or scoping process for potential actions.
76. The issue of how measures will be implemented needs to be clear. The document uses different phrases to describe how the draft strategy will be delivered. Both DSC and Departmental budgets are referenced, but not consistently. It is unclear whether the draft strategy will be resourced in itself or whether its delivery depends on individual departments finding adequate resources. The draft strategy states that measures will be implemented through

specific departments and agencies that have the *“resources and expertise”* to deliver key programmes and services.

77. The draft strategy would benefit from additional information on the themes of self-fulfilment and participation, which need to be reinforced in order to align with the level of commitment encouraged by international active ageing frameworks. These themes are brief and offer little in the way of new commitments. The Commissioner would welcome consideration of these two areas, highlighted as fundamental in active ageing frameworks worldwide.

78. In conclusion the Commissioner welcomes the draft strategy, and believes it is a good and necessary development. While welcoming consultation on the document, the Commissioner believes that any final draft should include details on targets, additionality, new resources and clarity on the mechanisms for monitoring and review.