



Comisiynydd Pobl Hŷn Cymru
Older People's Commissioner for Wales

Strategic Equality Plan: Annual Report 2017-18

An independent voice and
champion for older people

The Older People's Commissioner for Wales

The Older People's Commissioner for Wales is an independent voice and champion for older people across Wales. The Commissioner and her team work to ensure that older people have a voice that is heard, that they have choice and control, that they don't feel isolated or discriminated against and that they receive the support and services that they need.

The Commissioner and her team work to ensure that Wales is a good place to grow older, not just for some but for everyone.

How to contact the Commissioner:

Older People's Commissioner for Wales
Cambrian Buildings
Mount Stuart Square
Cardiff
CF10 5FL

Phone: 03442 640 670

Email: ask@olderpeoplewales.com

Website: www.olderpeoplewales.com

Twitter: [@talkolderpeople](https://twitter.com/talkolderpeople)

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This document is also available in Welsh.

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1. Introduction

The Older People's Commissioner for Wales is an independent voice and champion for people aged 60 years and older, as defined in the Commissioner for Older People (Wales) Act 2006. The role is underpinned by the United Nations Principles for Older Persons and the promotion of equality and human rights is implicit to my statutory role.

This report details action taken during 2017-18 to comply with the statutory equality duties set out in the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011. It outlines how the Commissioner and her team - as we go about our business - engage with, understand and include older people in all their diversity.

Older people are not a homogenous group. They represent the full diversity of Wales - this diversity is what makes us the nation we are and it is to be celebrated. The Commissioner will continue to represent ALL older people and will continue to work to promote equality and protect older people's right to lead lives that have value, meaning and purpose.



Kelly Davies

Deputy Older People's Commissioner for Wales

2. Summary requirements and structure of the report

The Older People's Commissioner for Wales is a listed authority under the Equality Act (Statutory Duties) (Wales) Regulations 2011 and must adhere to the general duty to promote equality laid out in the Equality Act 2010.

Other reporting requirements included the publication by April 2012, of a Strategic Equality Plan incorporating specific objectives and the annual publication of a progress report. This sixth annual report must be published no later than 31 March 2019.

This report focuses on the specific Welsh duties and the Commissioner's Strategic Equality Objectives:

- Section 3 explains the Commissioner's role
- Section 4 sets out the relevance of the Public Sector General Duty to the Commissioner's core business
- Section 5 sets out the Commissioner's Equality Objectives
- Section 6 outlines progress against the Strategic Equality Objectives incorporating the general duties
- Appendix A - Workforce profiles as at 31 March 2018
- Appendix B - Strategic Equality Objectives for 2018-19
- Appendix C - UN Principles for Older Persons

Copies of the Commissioner's Strategic Equality Plan and prior year annual reports can be found on the Commissioner's [website](#).

3. Role of the Older People's Commissioner for Wales

The Commissioner is a Corporation Sole created under the Commissioner for Older People (Wales) Act 2006, an independent legal entity in her own right and a listed authority for the purpose of the Equality Act (Statutory Duties) (Wales) Regulations 2011.

The Commissioner for Older People (Wales) Act 2006 sets out a number of statutory duties for the Commissioner.

1. Promote awareness of the interests of older people in Wales and the need to safeguard those interests.

The Commissioner uses her status to help set the agenda amongst decision makers at all levels about issues affecting older people and promotes public discussion through the media.

A key role for the Commissioner is to be a powerful champion for older people leading and intervening in a wide and increasing range of debates and decision making across Wales.

2. Promote the provision of opportunities for, and the elimination of discrimination against, older people in Wales.

The Commissioner advocates changes to the law, guidance and practice in order to address inequality. She presents realistic and positive images of older people, recognising older people in all their diversity.

Older people are individuals and, whilst they might share some common concerns, their individual status remains undiminished. There should be no one view of older people and the Commissioner aims to reflect this in her work.

The Commissioner promotes understanding of the nature of discrimination against older people in its most evident and its more hidden – but equally damaging – forms and sees tackling discrimination effectively as key to making progress across all policy areas, not just health and social care.

3. Encourage best practice in the treatment of older people in Wales.

The Commissioner aims to achieve this through a variety of methods, including bringing together people and evidence and - where necessary - carrying out research, to demonstrate effective practice.

Most importantly she presses for excellent services to be made widely and consistently available for older people. She encourages change to established practices where alternatives have been shown to work better. She encourages service providers to face the challenge of change so that the needs of older people can be better met, e.g. giving older people early support in order to prevent greater dependency at a later stage.

4. Keep under review the adequacy and effectiveness of the law affecting the interests of older people in Wales.

The Commissioner builds the case for change and makes this case to the Welsh Government and the National Assembly. She establishes what the issues and opportunities are through bringing together leading legal and other expertise and the experience and views of older people.

The law is a vital part of empowering and protecting older people and providing redress, and yet it is often complex, confusing, and hard to access and in need of reform. The Commissioner has already played a strong role in recommending changes that will benefit older people and others.

Illustrations of the types of activity that have or may be undertaken by the Commissioner are set out below:

- Providing leadership on the issues that matter to older people
- Raising the profile of older people within Welsh Public Services
- Making representation to the Welsh Government
- Reviewing how devolved organisations discharge their functions
- Publishing guidance and standards
- Assisting individuals to make complaints or representations
- Commissioning research or assisting others in doing so
- Carrying out, commissioning or assisting others with educational activities
- Undertaking examinations (investigations)
- Issuing non-statutory guidance
- Advocating for changes to legislation, guidance and practice
- Speaking out publicly about service failures
- Promoting good practice

It is important to note that the Commissioner does not provide frontline services other than through direct advice and support provided to older people through our casework and the work led by the Communications and Engagement team in delivering events and producing publications. The majority of the Commissioner's business involves working with others to effect changes in policies and practices.

4. The Public Sector Equality Duty

4.1. The Public Sector Equality Duty

The three aims of the general equality duty are to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act.
- Advance equality of opportunity between people who share a relevant protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

The general duty covers the following protected characteristics:

- Age
- Sex
- Race – including ethnic or national origin, colour or nationality
- Disability
- Gender reassignment
- Pregnancy and maternity
- Sexual orientation
- Religion or belief – including lack of belief
- It applies to marriage and civil partnership, but only in respect of the requirement to have due regard to the need to eliminate discrimination.

For the purposes of the Equality Act, language (including the Welsh language) is not a protected characteristic. However, the Commissioner considers language need to be on a par with other characteristics. Since 25 January 2017, the Commissioner has committed to comply with the Welsh Language Standards, as set out by the Welsh Government under Section 44 of the [Welsh Language \(Wales\) Measure 2011](#).

The standards set out a number of ways in which the Commissioner must provide and promote services through the Welsh language and facilitate and encourage its use in the workplace. The Commissioner must report annually on how the Standards are being met. A copy of the Commissioner's report for 2017-18 can be found [here](#).

Through her work, the Commissioner also considers the impact of poverty and rurality on equal access to services.

4.2. Core Business

As a publically funded body, the Commissioner and her staff have a range of statutory functions and other administrative responsibilities, these include:

- Promoting the interests of older people, including challenging discrimination, encouraging best practice and reviewing the law.
- Making the role known to older people across Wales.
- The recruitment, engagement, training, and management of staff.
- The procurement of services including tendering for goods and services such as research.
- Reward, recognition, and payment of staff.
- Providing assistance to older people who wish to make a complaint or representation to public bodies or other service providers.

4.3. Protection and Scrutiny

4.3.1. Casework

The Commissioner's powers under the Commissioner for Older People (Wales) Act 2006 allow her to provide direct support and assistance to older people, which she delivers through her dedicated Casework Team.

Older people and their families from across Wales contact the Commissioner when they require support to challenge the decision-making and practice of public bodies, when they feel that their voices are not being heard, often in the most difficult and distressing of circumstances. The Commissioner's Casework Team offers information advice and guidance to help them to negotiate complex policies, processes and frameworks, intervening on their behalf where necessary (subject to their consent).

The Casework Team provided assistance and support to 366 older people and their families across Wales during 2017-18, many of which were protracted and complex in nature, particularly where safeguarding and protection issues were identified.

People contact the Commissioner about a very wide range of issues, including treatment and care in hospital and residential care settings; financial issues such as cross-organisational funding disputes, incorrect charging of fees, or non-payment of financial entitlements; housing issues ranging from accessing home adaptations, home safety, evictions and couples being separated; best interest decisions covering a range of matters; waiting times for services; domestic abuse and safeguarding; and failures to prosecute.

Everyone who contacts the Commissioner is unique, as are their needs and the circumstances in which they find themselves, and the approach the Commissioner takes when providing them support through the Casework Team reflects this.

4.3.2. Safeguarding and Protecting Older People

Ensuring that older people are safeguarded and protected has remained a key priority for the Commissioner and a wide range of work has continued throughout 2017-18 to raise awareness about the nature of the abuse faced by over 40,000 older people each year and the circumstances that can lead to older people becoming particularly vulnerable or at risk of harm.

Alongside this, the Commissioner has also continued to work to ensure that there is a systematic approach to identifying older people who are at risk of harm and that those who are abused are fully supported to access the help and assistance they need to regain their safety and wellbeing.

Furthermore, the Commissioner maintained White Ribbon status during 2017-18 (awarded by the White Ribbon Campaign) and the Commissioner's Safeguarding Lead was officially recognised as a White Ribbon Ambassador.

4.3.3. Safeguarding in Hospitals in Wales

Whilst there is much good safeguarding work underway in Wales, more still needs to be done across our public services to safeguard and protect older people. Much of the assistance and support the Commissioner provides to older people through the Casework Team involves issues relating to safeguarding, and many of the cases where older people and their families have raised concerns about safeguarding relate to hospital settings.

The Commissioner has welcomed the ambition of the Social Services and Well-being (Wales) Act 2014 to improve the safeguarding of adults at risk of abuse and neglect by placing this on a statutory footing and creating new duties for public bodies, and therefore wanted to review the difference the Act is making to the safeguarding work of Health Boards.

The Commissioner wrote to Health Boards in June 2017, asking them to participate in a review to determine how effectively they are responding to their new duties arising under the Act.

Using a questionnaire, as well as follow-up interviews with safeguarding staff, the Commissioner gathered a wide range of information about the safeguarding work in Health Boards, such as changes to safeguarding teams, changes to policies and procedures, staff training, the ways in which alleged victims of abuse are supported and engaged with, access to advocacy and learning from cases. Information was also gathered from stakeholders from Social Services departments and Public Health Wales who have a detailed knowledge of adult safeguarding.

The Commissioner's assessment of the responses provided by Health Boards and the Velindre NHS Trust formed the basis of a report – Safeguarding in Hospitals in Wales – which the Commissioner shared with the Welsh Government and Health Boards.

The report identified that whilst new initiatives are now underway within Health Boards to address the requirements of the Act, alongside a greater focus on adult safeguarding within core work and increased resources, a number of factors were potentially weakening the approaches being taken. These included a lack of national guidance, resulting in different approaches being taken in different parts of Wales; variations in reporting under the new Duty to Report within the Act; variations in the ways in which enquiries and investigations are undertaken; the level of training provided to hospital staff; access to advocacy; and the ways in which data is collected to measure progress.

In sharing the report with the Welsh Government, the Commissioner made clear her expectations that the issues identified would be addressed, and requested a written response from the Minister setting out what action would be taken to deal with the concerns raised.

4.3.4. Information and Guidance on Domestic Abuse: Safeguarding Older People in Wales

In June 2017, the Commissioner published new guidance, in partnership with the Welsh Government, to help front-line professionals who have contact with older people – such as social care staff, domiciliary care workers, doctors nurses, housing officers and police officers – to recognise the signs of domestic abuse and provide them with information about the help available to protect and safeguard older people.

The guidance covers a wide range of subjects, including the characteristics of the abuse faced by older people, how to recognise controlling and coercive behaviour, the impact of abuse and how to provide an effective response.

The Commissioner launched the guidance with the Cabinet Secretary for Communities and Children, who reaffirmed the Welsh Government's commitment to working closely with partners to protect the victims of domestic abuse and welcomed the guidance as a practical resource that would help professionals to work more effectively with older people who are experiencing domestic abuse.

4.3.5. Awareness Raising Seminars and Presentations

Building upon the success of similar events held during 2014-15, 2015-16 and 2016-17, the Commissioner held four safeguarding seminars to continue to raise awareness of the abuse faced by older people.

The seminars, which were held in Carmarthen, Wrexham, Bangor and Newport, covered the scale and impact of abuse, human rights, abuse within the BAME and LGBTQBT communities, the vital role of advocacy and the support available for those who have experienced abuse. One of the speakers at the event in Bangor was transgender and provided a fascinating insight into the abuse experienced by transgender people.

226 delegates attended the seminars, from a wide range of organisations working with and for older people. Feedback on the seminars was overwhelmingly positive, with praise for depth of information provided and the multi-agency perspective provided by the speakers.

4.3.6. Other Awareness Raising Presentations and Events

In addition to the seminars described above, the Commissioner also delivered a number of awareness raising presentations to stakeholders during 2017-18, setting out what needs to be implemented to improve the lives of older people whose lives have been affected by abuse:

- Hywel Dda University Health Board – 6 awareness training sessions (over 150 front-line staff; further presentations will be delivered during 2018-19)
- Dyfed Powys Police Public Protection Officers (15 officers)
- Cardiff Council – 3 awareness raising sessions (45 social workers: further presentations will be delivered during 2018-19)
- Royal College of General Practitioners (Wales) Conference (over 70 GP's in attendance)
- Action on Elder Abuse Conference – Coercive control of older people workshop presentation (70-80 attendees from various organisations)
- Probus Group Cardiff (25 attendees)
- Parish Men's Fellowship Group, Cardiff (20 attendees)
- Cardiff & Vale University Health Board (over 70 front-line staff attended, further presentations will be delivered during 2018-19)
- Anuerin Bevan Health Board (over 120 front-line staff attended; further presentations will be delivered during 2018-19)
- Vale of Glamorgan Neighbourhood Watch Association (20 attendees)
- Ministerial Advisory Forum on Ageing Group (20 attendees)
- Cardiff University – School of Social Sciences Students (110 Students)
- Vale of Glamorgan Violence Against Women & Domestic Abuse Conference (Around 120 attendees)
- Monmouthshire Ageing Well Executive Group (15 attendees)

Furthermore, the Commissioner's Safeguarding Lead also participated in the following engagement events to raise awareness about the scale and impact of the abuse faced by older people:

- Roundtable safeguarding meetings with the Public Guardian
- ABMU Ask & Act Steering Group meetings
- IPCC Stakeholder forum meetings
- Live Fear Free (Domestic Abuse Helpline) Steering Group meetings
- Welsh Government - Mental Capacity Act Deprivation of Liberty Safeguarding Group meetings

- All Wales Deprivation of Liberty Safeguarding Network meetings
- Gwent-Wide Adult Safeguarding Board meetings
- Powys Adult Safeguarding Board meetings
- Public Health Wales – NHS Wales Safeguarding Network meetings
- South Wales Police Accountability & Legitimacy Group meetings
- White Ribbon Campaign – Ambassador Stakeholder event – Cardiff
- Crown Prosecution Service – National Scrutiny Panel (Crimes against older people)
- Welsh Women's Aid 40 years celebration event
- Gwent Police Scrutiny Panel meeting to review cases relating to crimes against older people
- Dewis Choice meetings relating to Domestic Abuse of older people
- Tackling Vulnerability Together – South Wales Police event

Further work to raise awareness of the scale and impact of the abuse of older people will be undertaken during 2018-19, and training courses have been offered to Health Boards, the Velindre NHS Trust, Local Authority Social Services teams and South Wales Police.

4.3.7. Tackling the neglect of older people

An area of growing concern for the Commissioner is the increasing number of cases of neglect of older people being recorded, particularly those relating to avoidable serious pressure sores. Through the Commissioner's casework and her review of many high-profile neglect cases in Wales involving older people, the Commissioner has seen a worrying pattern emerging.

There is currently a frustrating lack of accountability for those who have a responsibility to care for our most vulnerable citizens, and the Commissioner has continued to be clear that the criminal justice system is inadequate if it fails to hold to account those who neglect to provide adequate care.

One of the criticisms of the current system, shared with the Commissioner by a number of stakeholders she has engaged with on this issue, is that the evidential bar is set very high to successfully prosecute criminal cases of neglect, even when a person has died because of failures to provide proper care. The Commissioner has therefore continued to call for legislation to be reviewed and amended to prevent this growing problem to continue going unchallenged by our legal system.

Through this work, the Commissioner has also been made aware that there have been delays in the police becoming involved in some cases of neglect involving avoidable pressure sores. This has often been due to some organisations failing to recognise potential criminality, which has resulted in opportunities to collect evidence being lost or not considered.

Similarly, the Commissioner has found that some basic lines of enquiry are not always considered by the police, as officers are not aware of their significance to a potential investigation. In a number of cases, the Commissioner's Casework Team has brought these facts to the attention of the police, but the passage of time has resulted in lost opportunities to secure potential evidence or to follow lines of enquiry. Whilst this is not a criticism of the police, it is clear that greater awareness and information is needed on this issue.

The Commissioner therefore developed an investigative guidance document (relating to avoidable pressure sores) to provide police officers with relevant information to assist them with their investigations and support them in considering relevant and potential lines of enquiry. The guidance includes information that defines the different types of avoidable pressure ulcers, making clear that they can be the result of criminal negligence, and should therefore be subject to closer scrutiny by our law enforcement agencies.

The Commissioner has shared this with the College of Policing, for their consideration in using the guidance as part of police training and the Commissioner is currently in discussions with the College about how this could be taken forward.

4.4. Wellbeing and Empowerment

4.4.1. Influencing Policy, Legislation and Practice

The Commissioner has continued to meet regularly with Welsh Government Ministers throughout 2017-18, to ensure that they are aware of and understand the issues that affect older people across Wales and, more importantly, that the voices of older people are heard.

These meetings, alongside other engagement with the Welsh Government and its officials, provided opportunities for the Commissioner to raise concerns about policy and practice that is not sufficiently focused on older people, and make clear where change and improvements are needed.

The Commissioner has also continued to work with the National Assembly for Wales, providing briefings to members ahead of debates relating to issues that affect older people. Furthermore, the Commissioner has continued to work closely with National Assembly Committees, in particular the Health, Social Care and Sport Committee, sharing information and evidence to highlight potential areas for scrutiny and investigation. During 2017-18, the Commissioner provided evidence to the following committee inquiries:

- Poverty in Wales: Communities First – Equality, Local Government and Communities Committee, May 2017
- Apprenticeships in Wales – Economy, Infrastructure and Skills Committee, June 2017

- The use of antipsychotic medication in care homes – Health, Social Care and Sport Committee, September 2017
- Local Approaches to poverty reduction: The Well-being of Future Generations Act and Public Service Boards - Equality, Local Government and Communities Committee, December 2017
- Loneliness and isolation – Health, Social Care and Sport Committee, January 2018
- The cost of caring for an ageing population – Finance Committee, March 2018

4.4.2. Consultation Responses

The Commissioner has responded to a broad range of consultations undertaken by the Welsh Government and other key bodies and stakeholders during 2017-18, using the voices of older people and the experiences they have shared with her to set out how policy and practice should be shaped to reflect older people's needs and deliver positive outcomes for them:

- Welsh Government – Draft Dementia Strategy, April 2017
- Welsh Government – Reforming Local Government: Resilient and Renewed White Paper, April 2017
- Welsh Government – Parliamentary Review of Health and Social Care, April 2017
- Welsh Government – Proposals to Improve Local Bus Services in Wales, May 2017
- Welsh Government Transport for Wales – Design of Wales and Borders Rail Service (including Metro consultation), May 2017
- Social Care Wales – Review of Health and Social Care Induction Framework, June 2017
- Welsh Government – Phase 2 implementation of the Regulation and Inspection of Social Care (Wales) Act 2016, July 2017
- Welsh Government – Phase 2 implementation of the Regulation and Inspection of Social Care (Wales) Act 2016 – Workforce Aspects, July 2017
- Welsh Government – Supporting People Programme Guidance and Outcome Framework, August 2017
- Social Care Wales – Social Care Wales Strategic Plan, 2017-2022, August 2017
- Welsh Government – Draft Budget Proposals 2018-19, September 2017
- Welsh Government – Services Fit for the Future, September 2017
- Welsh Government – Public Good and a Prosperous Wales – Building a Reformed Post Compulsory Education and Training System, October 2017
- House of Commons Transport Committee – Community Transport, November 2017

- Social Care Wales – Transforming Care in the 21st Century, October 2017
- Department of Transport – Accessibility Action Plan Consultation: A Transport System that is Open to Everyone, November 2017
- Welsh Government – Mandatory Concessionary Fares Scheme in Wales, January 2018
- Public Health Wales – A Major Trauma Network for South and West Wales and South Powys, January 2018
- House of Commons All-Party Parliamentary Group for Ageing and Older People: Human Rights and Older People Inquiry, January 2018
- Social Care Wales – Draft Practice Guidance for Domiciliary Care Workers, January 2018

4.4.3. Social Care Legislation

The Commissioner has been clear that robust and effective regulation and inspection of social care is essential, not only to keep older people using social care services safe and protected, but also to ensure that the care and support provided to them is of the highest standard.

The Commissioner therefore welcomed the introduction of the Regulation and Inspection of Social Care (Wales) Act 2016 and the new standards of care the Act aims to deliver through its regulations. The Commissioner was also clear that quality of life must sit at the heart of these new standards of care and provided detailed commentary on the Regulated Services Regulations to ensure that the recommendations made in the Commissioner's Care Home Review were appropriately translated into law.

Many of the Commissioner's calls were reflected in the Act and supporting regulations, including:

- Statutory guidance for services providers and responsible individuals on meeting service standard regulations.
- A written guide to the service for residents, including information about healthcare services.
- A duty to provide a Personal Plan for each resident, setting out how their needs will be met.
- The inclusion of 'chemical means' within the definition of restraint.
- A duty to provide older people with access to aids and adaptations to facilitate communication.
- A duty for providers to produce an annual report on their services
- A duty for Welsh Government Ministers to produce a National Market Stability Report.

In addition, Care Inspectorate Wales (formerly Care and Social Services Inspectorate Wales) is now using a new inspection regime that has a greater

focus on quality of life and older people's rights, and Social Care Wales has been established as the new social care workforce regulator, which aims to 'make sure people in Wales can call on a high quality social care workforce that provides services to fully meet their needs.

The implementation of the Social Services and Well-being (Wales) Act 2014, is also an area to which the Commissioner has paid close attention. This Act sets out a wide range of new duties for public bodies to ensure a greater focus on prevention, wellbeing and independence in public service delivery, as well as offering older people and their carers greater choice and control over the care and support they receive.

Through the Commissioner's ongoing casework and engagement with the Social Services and Well-being (Wales) Act 2014 Stakeholder Evaluation Group, the Commissioner has continued to work to ensure that older people are accessing and receiving care and support in line with the legal duties and the principles set out within the legislation.

The Commissioner will continue to work with stakeholders to set out any areas of concern she has in relation to the effectiveness of the Act's implementation, as well as scrutinising the robustness of the data available to monitor the effectiveness of the Act ahead of the Welsh Government's planned evaluation.

4.4.4. Dementia Action Plan for Wales 2018-2022

Whilst the Commissioner welcomed the publication of the Welsh Government's draft dementia strategy as a positive step forward and acknowledged the breadth and depth of the issues it would potentially cover, her response to the consultation in April 2017 made clear that there were several areas in which the strategy needed to be strengthened in order to ensure it would deliver upon its ambition to improve the lives of people living with dementia, and their carers.

Within the consultation response, the Commissioner called for the strategy to be improved in a number of ways, including a greater focus on rights, diversity and independent advocacy; greater recognition of the wellbeing and needs of carers; more ambitious training targets; improved respite services; enhancing the role of dementia support workers; and improved palliative and end of life care pathways. The Commissioner also made clear the importance of engaging in a meaningful way with people affected by dementia to inform the strategy, a glaring omission to the approach that was being taken.

The Commissioner continued her work to influence the strategy, which was renamed the Dementia Action Plan for Wales 2018-2022 during its development, as a member of the Welsh Government Dementia Strategy Task and Finish Group, working alongside other key stakeholders, including people affected by dementia, to ensure that the needs of people living with dementia and their carers would be better reflected in the final version of the plan.

Following the publication of the Action Plan in February 2018, the Commissioner wrote to the Cabinet Secretary for Health and Social Services, making clear that whilst she welcomed many parts of the plan, there are a number of areas where she still has concerns that, despite its ambition, the plan will not deliver the outcomes that people living with dementia, and their carers, want and need to see.

4.4.5. Additional Work to Influence Policy, Legislation and Practice

In order to ensure that the needs of older people are understood by key stakeholders and reflected in their work, the Commissioner has continued to influence policy and practice through being a member of, and working in partnership with, a wide range of expert groups and advisory boards / panels, including:

- Welsh Government Dementia Strategy Task and Finish Group
- Welsh Government Care Home Steering Group
- Welsh Government Digital Inclusion Programme Board
- Welsh Government Accessible Transport Panel
- Welsh Government Public Transport Users Advisory Panel
- Welsh Government Financial Inclusion Programme Board,
- Welsh Government Ministerial Advisory Forum on Ageing;
- Welsh Government Technical Group on Advocacy
- Welsh Government Stakeholder Group on Evaluation of the Social Services Act
- Welsh Government Health and Social Care Workforce Workstream Steering Group
- Welsh Government Regulation and Inspection of Social Care (Wales) Act 2016 Stakeholder Reference Group
- National Assembly for Wales cross-party group on older people and ageing
- Care Inspectorate Wales Regulation and Inspection of Social Care (Wales) Act 2016 Stakeholder Group
- Money Advice Service Wales Forum
- 'Ffrind i Mi' partnership board (Aneurin Bevan UHB)
- Department of Work and Pensions Wales Stakeholder Board & PIP Forum
- Community Transport Association Wales committee
- Wales Against Scams Partnership (WASP)

4.5. Reaching out and listening to older people across Wales

Direct engagement with older people across Wales has remained a key part of the Commissioner's work throughout 2017-18, allowing her to share important information about her role, the work the Commissioner is undertaking and the ways in which the Commissioner can provide assistance and support to older people and their families. This engagement also provides vital opportunities to hear directly from older people about what matters to them, the services they want to see and the issues that affect their lives, which helps to guide and shape the Commissioner's work and priorities.

4.5.1. Engagement Roadshow

The Commissioner and her team have met with 169 groups across Wales during 2017-18, visiting a wide range of settings, such as social clubs, day centres, support groups, care homes, forum meetings, residents' associations and conference events, engaging with over 3316 older people. The Commissioner and her team travelled over 19,000 miles to reach out and listen to older people in every Local Authority in Wales.

To ensure that the voices of older people in all of their diversity inform and are reflected throughout the Commissioner's work, the Commissioner and her team have continued to meet with individuals from a wide variety of backgrounds whose voices are seldom heard. To support this essential engagement, the Commissioner has worked with a wide range of organisations working with and for people with protected characteristics, including Cyfle i Bawb, Deafblind Cymru, the Golden Years Project (for 50+ Women from BAME communities), Men's Sheds Parkinsons UK Cymru and the Stroke Association.

The Commissioner has also arranged many joint visits with Assembly Members, MPs, Council Leaders and Councillors, to provide older people with opportunities to have their voices heard and share their views and experiences directly with those who make policy and decisions that affect their lives.

4.5.2. Wider Engagement

In addition to engaging with thousands of older people across Wales through the Engagement Roadshow, the Commissioner has also worked with formal organisations that represent older people and their interests, such as the National Pensioners' Convention, Active Wales, Cymru Older People's Alliance (COPA) and the Ministerial Advisory Forum on Ageing, as well as with older people's 50+ forums across Wales.

As part of the Commissioner's wider engagement, she has continued to work with Welsh public bodies, including Health Boards, Local Authorities, Public Services Boards, Social Care Wales, Care Inspectorate Wales and National Trading Standards, and third sector organisations such as Age Alliance Wales, Age Cymru, Age Connects, Action on Hearing Loss, Care and Repair Cymru,

the Dementia Engagement and Empowerment Project, RNIB Cymru and Shared Lives Plus, to grow knowledge and understanding of the issues and challenges faced by older people, and discuss how services could be improved, through sharing information and examples of good practice. Alongside this work, the Commissioner has also delivered keynote speeches at conferences and events across Wales, allowing her to highlight a range of issues that affect older people's lives and reach out effectively to large numbers of stakeholders.

Using both the English and Welsh language media in Wales allows the Commissioner to not only reach out to large numbers of older people so they know about the work she is undertaking on their behalf to drive change, but also to the wider public so they have an understanding of the issues and challenges that affect older people's lives and the action needed to address them. Throughout 2017-18, the Commissioner has maintained a strong presence across television and radio, appearing on BBC Wales Today, ITV Wales News, S4C's Newyddion, BBC Radio Wales and BBC Radio Cymru. The Commissioner also secured extensive coverage in daily newspapers, including the Western Mail, Daily Post, South Wales Argus, South Wales Evening Post and South Wales Echo, as well as other local newspapers published around Wales.

The Commissioner's work has also been covered by a number of more specialised publications, such as professional magazines, journals and other stakeholder publications, which helps to ensure that the Commissioner is able to reach out to as many older people and stakeholders as possible to highlight key issues and share knowledge and good practice.

4.5.4. Acknowledging Excellence

The Commissioner has always been clear that there is a huge amount of good practice being delivered in different parts of Wales and she has met many dedicated individuals working across our public services whose work is making a real difference to the lives of older people.

To ensure that this outstanding work is acknowledged, the Commissioner not only references it throughout her publications and speeches, but also formally supports the RCN Nurse of the Year Awards and the Wales Care Awards to ensure that outstanding individuals working in our health and social care services are recognised and celebrated.

5. The Commissioner's Equality Objectives

The Commissioner published a Strategic Equality Plan in March 2016 following consultation with older people and stakeholders, replacing the Strategic Equality Plan that was published in March 2012.

The Strategic Equality Plan identifies specific equality objectives and sets out the way ahead for future years. The strategy was published to ensure that equality and human rights are embedded in the thinking and working practices of the Commissioner and her staff.

The Commissioner set out the following objectives for 2016-20:

- 1. To ensure that in my employment of staff I am non-discriminatory, promote equality of opportunity for all and foster good relations between staff members.**
 - I will aim to increase the diversity of my workforce
 - All staff will have development and advancement opportunities to ensure they maximise their potential
 - I will ensure that all staff are rewarded and remunerated on an equal basis regardless of protected characteristic
 - I will ensure there is a culture within my organisation in which all staff feel comfortable to be open about their protected characteristics and feel that they are a person of value to me as an employer and across the organisation
- 2. To ensure that my procurement policies and practices and associated tender documentation take account of the need to meet legal equality requirements.**
 - I will review annually all of my procurement policies, practices and tender documentation to ensure they meet the public sector equality duty
 - I will ensure that contractors are made fully aware of my equality duties
- 3. To ensure that my work is relevant to, and is seen as being relevant to, older people in all their diversity.**
 - I will increase my engagement with older people across the breadth of protected characteristics
 - I will ensure that my work is informed by what older people across the breadth of protected characteristics tell me about what matters to them, and that my work draws specific attention to impacts for those with differing combinations of protected characteristics

- I will strengthen the impact assessment that underpin the key deliverables of my work to ensure that they take full account of the impact of protected characteristics upon the outcome sought for older people
- 4. I will ensure that my work is underpinned increasingly by a rights based approach and that across Wales a rights based agenda is developed.**
- I will ensure staff integrate a human rights based approach in their work
 - I will promote the UN principles and awareness of Ageism
 - I will work with government to promote the use of UN principles and a rights based approach in forming legislation
- 5. To empower and equip older people to challenge the discrimination they face.**
- I will equip older people with the knowledge and tools to empower them to challenge discrimination
- 6. To promote an accurate and balanced view of older people in all their diversity, grow understanding about older people and their needs and to challenge stereotypes, both within my organisation and amongst other organisations.**
- I will increase the depth of understanding amongst my staff about the diversity of older people and the extent to which protected characteristics impact upon their lived experiences and access to services
 - I will increase the depth of understanding amongst my staff about the diversity of older people and I will increase the depth of understanding amongst key public services about the diversity of older people and the extent to which protected characteristics impact upon their access to services and their wider lives
 - I will on an ongoing basis challenge stereotypes and myths about older people and lay down clear expectations for change
 - I will strengthen our partnership working with other equality and human rights based organisations to strengthen the voices of older people and increase the impact of our work
- 7. To encourage and support other public bodies to comply with their own duties under the Equality Act 2010 as they apply to older people and to challenge significant breaches of legal duties.**
- I will provide guidance to public bodies undertaking key service changes to assist them in ensuring they comply with their statutory duties in relation to engagement, impact assessment and proportionality
 - I will keep under review service delivery and changes that have the potential for significant detriment or disproportionate impact on older people

6. Progress during 2017-18

Progress against the objectives is set out below:

Objective	Lead	Timescale	Means of measurement	Activity / Actions taken
1. To ensure that in my employment of staff I am non-discriminatory, promote equality of opportunity for all and foster good relations between staff members.				
I will aim to increase the diversity of my workforce.	Director of Corporate Affairs	Annually	Review recruitment practices to understand potential barriers and ensure that when recruiting, practices are inclusive and endeavour to attract candidates with a broader spectrum of protected characteristics.	The Commissioner's recruitment practices have been reviewed and roles are advertised through a wide network.
		As above	Review contract types and working patterns to understand and deal with potential barriers with a view to attracting and retaining candidates with a broader spectrum of protected characteristics.	The Commissioner's flexible working policy has been reviewed this year and roles are advertised through a wide network.
		As above	Monitor, measure and review employment application and success at all stages with a	A review has taken place after each recruitment process.

			view to ensuring equity of opportunity for all candidates.	
	Annually		Collect, monitor and publish equality data in respect of employment.	Data is published annually as part of the Strategic Equality Plan Annual Report (See page 37)
All staff will have development and advancement opportunities to ensure they maximise their potential.	Every six months	Director of Corporate Affairs	Continued six monthly performance management reviews to identify and put in place appropriate plans to meet learning and development objectives.	All staff have had six monthly performance reviews in October and March.
I will ensure that all staff are rewarded and remunerated on an equal basis regardless of protected characteristic.	As new posts are created	Director of Corporate Affairs	Review of all posts to ensure they are objectively and fairly evaluated and remunerated regardless of the protected characteristic of any post holder.	An independent job evaluation was undertaken over summer 2017. No new posts have been created since.
I will ensure there is a culture within my organisation in which all staff feel comfortable to be open about their protected characteristics and feel that they are a person of value to me as an employer and across the organisation.	Two formal sessions per year	Director of Corporate Affairs	Continued awareness raising through informal and formal sessions and training, distribution of information and use of positive imagery to actively promote an understanding of protected characteristics.	Two team meetings have been held this year to raise awareness of protected characteristics.

		Annually and in line with each scheme	Ensure the continued review and application of good practice to promote an inclusive working environment which promotes learning, development and overall wellbeing.	Practices have been reviewed.
2. To ensure that my procurement policies and practices and associated tender documentation take account of the need to meet legal equality requirements.				
I will review annually all of my procurement policies, practices and tender documentation to ensure they meet the public sector equality duty.	Director of Corporate Affairs	As specified or annually	Ensure appropriate and periodic review of all relevant policies to reflect statutory duties, good practice and learning.	Practices have been reviewed.
		Ongoing	Ensure all tender documents include requirements which will be reviewed and as part of any tender evaluation.	All tender documents and contracts include the Commissioner’s requirements.
I will ensure that contractors are made fully aware of my equality duties.	Director of Corporate Affairs	Ongoing	Contractors for lower value contracts to be made aware of equality duties and my expectations when work is being undertaken on my behalf.	

3. To ensure that my work is relevant to, and is seen as being relevant to, older people in all their diversity.				
I will increase my engagement with older people across the breadth of protected characteristics.	Director of Corporate Affairs	Ongoing	Ensure engagement continues which seek to be representative of the wider diversity of older people and that I have sought out and visited groups that are seldom heard or less visible.	The engagement roadshow has continued to seek out older people with protected characteristics and a quarterly report is developed to show how the Commissioner’s team have engaged with different protected characteristics.
		Ongoing	Ensure the continued awareness raising of my work amongst groups with protected characteristics to encourage wider and more representative engagement.	Over 64% of the Commissioner’s engagement was with groups that had one or more diverse or protected characteristic.
Ensure that my work is informed by what older people across the breadth of protected characteristics tell me about what matters to them, and that my work draws specific attention to impacts for those with differing combinations of protected characteristics.	Director of Wellbeing & Empowerment	Ongoing	Ensure wider consultation and engagement with people across the breadth of protected characteristics to specifically consider any specific impacts for inclusion in my work.	The Commissioner has undertaken consultation to consider specific impacts for inclusion in their work programme across all workstreams. In some areas such as ongoing work to raise awareness of domestic violence and older people, it has not been possible to consult widely due to personal sensitivities. However, the Commissioner has spoken to

				<p>individuals that have made direct contact, as well as utilising learning from casework, providers of services and representative community organisations to ensure that the Commissioner’s work is relevant to older people’s experiences across all protected characteristics and any relevant learning is shared in order to change frontline practice.</p>
<p>I will strengthen the impact assessments that underpin the key deliverables of my work to ensure they take full account of the impact of protected characteristics</p>	<p>Director of Wellbeing & Empowerment</p>	<p>Ongoing</p>	<p>Ensure publications reflect and represent the issues and impacts raised by a diverse range of older people, and that they are easily accessible both electronically and in hard copy.</p> <p>Utilisation and embedding of new equality and human rights impact assessment tool by all relevant staff which will seek to improve the quality of the work I do for older people.</p>	<p>All of the Commissioner’s publications reflect the issues that older people, from a diverse range of groups, say matter to them.</p> <p>The Commissioner’s team undertake an equality and human rights assessment and approach when planning and implementing actions to take forward the annual work programme.</p>

<p>upon the outcomes sought for older people.</p>				<p>The Commissioner’s approach looks at the intersection of different characteristics and is shaped by the UN Principles for Older Persons and key legislation, such as the Human Rights Act.</p> <p>This approach is mirrored by the Commissioner’s casework team, when supporting individuals who approach the office for help and support, to ensure that any potential human rights breaches are identified.</p>
<p>4. I will ensure that my work is underpinned increasingly by a rights based approach and that across Wales a rights based agenda is developed.</p>				
<p>I will ensure staff integrate a human rights based approach in their work.</p>	<p>Both Directors</p>	<p>Ongoing</p>	<p>Ensure core training is undertaken by all staff on Ageism and the UN Principles for Older People and ensure that staff are supported to integrate these into their work.</p>	<p>Directors support staff to ensure that a human rights based approach is integral to our work.</p>
<p>I will promote the UN Principles and awareness of Ageism.</p>	<p>Director of Wellbeing & Empowerment</p>	<p>Ongoing</p>	<p>Deliver training and awareness raising across public services in Wales on Ageism and the UN Principles for Older People.</p>	<p>The key goals of Ageing Well in Wales are informed by, align with and reinforce the UN Principles for Older Persons:</p>

	<p>Facilitation of training workshops with Local Authorities on Impact Assessments and Scrutiny Guidance which will include the UN Principles for Older People.</p>	<ul style="list-style-type: none"> • To make Wales a nation of age-friendly communities (as defined by the WHO) • To make Wales a nation of dementia supportive communities • To reduce the number of falls suffered by older people • To reduce the impact of loneliness and unwanted social isolation • To improve learning and employment opportunities for older people <p>The Commissioner has led network learning events and activities around all five shared aims of this national collaborative, bringing together older people with representatives of public, private and voluntary sectors to share good practice and to encourage changes in attitude, policy and design / delivery of services.</p>

				<p>Examples of training include: workshops with RCT and Swansea councils about how we perceive older people and ensuring that the UN Principles are upheld. Workshops have also been held with Blaenau Gwent, and Merthyr Tydfil Councils on age discrimination and older people’s rights.</p>
<p>5. To empower and equip older people to challenge the discrimination they face.</p>				
<p>I will equip older people with the knowledge and tools to empower them to challenge discrimination.</p>	<p>Director of Wellbeing & Empowerment</p>	<p>Ongoing</p>	<p>Older people will be made more aware of discrimination through the delivery of training and awareness raising across Wales.</p>	<p>Ageing Well in Wales regularly runs engagement events bringing together older people and key stakeholders about the wellbeing of older people to share information and learning.</p> <p>We have developed tools and resources to support people to create positive change in their communities, as well as promote those developed by partners.</p> <p>Information and resources are shared through our network of over 1,600 people, and through partner agencies and</p>

<p>organisations to reach the widest audience of older people possible.</p> <p>The Commissioner and her team continue to meet with groups of older people across Wales raising awareness about the breadth of discrimination against older people in Wales. This includes raising awareness on crimes against older people such as scams awareness training in partnership with National Trading Standards to help older people to identify when they could be at risk of being scammed.</p> <p>Presentations have been delivered about how to uphold the rights of their loved ones should they lose capacity through explanation about the Power of Attorney role and the UN Principles for Older Persons.</p>			
			<p>The Commissioner regularly refers older people and their</p>
			<p>Ongoing</p>
			<p>My website will continue to provide templates, helpful</p>

			<p>information and toolkits that can be used by older people to challenge discrimination.</p>	<p>representatives to the range of documents that are available online to inform and support them when raising issues of concern with Public Bodies. For example, the Commissioner’s ‘Effective Engagement with Local Authorities: Older People Toolkit’ is a practical tool to help older people ensure that their voices are heard by Local Authorities and that their views are fully reflected in any changes taking place to community services across Wales.</p>
<p>6. To promote an accurate and balanced view of older people in all their diversity, grow understanding about older people and their needs and to challenge stereotypes, both within my organisation and amongst other organisations.</p>				
<p>I will increase the depth of understanding amongst my staff about the diversity of older people and the extent to which protected characteristics impact upon their lived experiences and access to services.</p>	<p>Both Directors</p>	<p>Ongoing</p>	<p>Continued delivery of suite of training and awareness raising specifically including Ageism and UN Principles for Older People which will be imbedded into my staff’s approach to work.</p>	<p>All staff are informed about the diversity of older people and their rights. This includes training on the UN Principles and how these can be applied.</p>

	Both Directors	Every six months	Ensure that six monthly performance management reviews reflect on achievement in imbedding equality issues in staff’s work and seek for continual improvement.	All staff have discussed equality issues in their six monthly performance management meetings.
I will increase the depth of understanding amongst key public services about the diversity of older people and the extent to which protected characteristics impact upon their access to services and their wider lives.	Both Directors	Ongoing	Sharing of knowledge and expectations relating to older people with public bodies and outside agencies through every day business, provision of training and awareness raising, my publications and on my website.	Ageing Well in Wales works closely with statutory and public services in Wales, increasing awareness of the needs and desires of older people, as well as influencing the adoption of policies which focus on the wellbeing of older people as individuals at a strategic level.
I will on an ongoing basis challenge stereotypes and myths about older people and lay down clear expectations for change.	Both Directors	Ongoing	Training, awareness raising and promotion of ‘Say No to Ageism’ Campaign and Everyday Heroes.	Information is available on the Commissioner’s website and Twitter pages challenging her stereotypes and promoting her Say No to Ageism campaign.
		Ongoing	Raising awareness with other public services, through day to day business, which seek to talk less about older people as a homogenous group and	The Commissioner has consistently been clear with Public Bodies that we will not be able to deliver wellbeing outcomes for everyone until we start to see the individual

			<p>more about the needs and aspirations of the diversity of older individuals and how these will be met.</p>	<p>rather than their disability, faith, ethnicity, gender identity, sexuality or age.</p> <p>For example, the Commissioner has made representations to the Welsh Government to ensure that people living with dementia and their carers were represented on the dementia strategy task and finish group, as well as actively supporting and publicising a national consultation with people living with dementia and their carers across Wales.</p>
<p>I will strengthen our partnership working with other equality and human rights based organisations to strengthen the voices of older people and increase the impact of our work.</p>	<p>Director of Wellbeing & Empowerment</p>	<p>Ongoing</p>	<p>Continued and widened engagement with other equality and human rights based organisations.</p>	<p>The Commissioner continues to engage with a wide range of equality and human rights based organisations to ensure that the issues facing older people are recognised as equality and human rights issues.</p> <p>On occasion this has meant raising challenges to ensure that older people’s issues are not solely viewed through the</p>

				<p>lens of health and social care.</p> <p>In deepening the Commissioner’s understanding about service provision for older people facing domestic abuse, she has relied on the expert advice of organisations such as BAWSO, the Henna Foundation and the Transgender Unique Network about issues relating to older people with protected characteristics.</p>
		Ongoing	<p>Ensure that responses to any relevant consultations and inquiries seek to build upon their positions.</p>	<p>The Commissioner has utilised the knowledge of organisations such as the British Institute of Human Rights to raise concerns about potential threats to the Human Rights Act as well as withdrawal from the EU Charter of Fundamental Rights.</p>
		Ongoing	<p>Major reviews of public service provision will seek to actively involve equality and human rights based organisations as advisors and expert contributors.</p>	<p>In undertaking her follow up work to the Care Home Review, the Commissioner based the framework for analysis on a series of discussions with expert contributors from across the</p>

					older people and equality sector.
7. To encourage and support other public bodies to comply with their own duties under the Equality Act 2010 as they apply to older people and to challenge significant breaches of legal duties.					
I will provide guidance to public bodies undertaking key service changes to assist them in ensuring they comply with their statutory duties in relation to engagement, impact assessment and proportionality.	Director of Wellbeing & Empowerment	Ongoing	Ensure the active review, feedback and provision of consultation responses to other public bodies.	The Commissioner has provided consultation responses to a number of Public Bodies, the Welsh and UK Government, the National Assembly for Wales and UK Parliament, raising equality and human rights issues.	
I will keep under review service delivery and changes that have the potential for significant detrimental or disproportionate impact on older people.	Director of Wellbeing & Empowerment	Ongoing	The continued review of public services and provision of robust recommendations to encourage and promote positive change.	The Commissioner has undertaken pieces of work, including the follow up to the Care Home Review, 'A Place to Call Home?', as well as supported older people in their communities to challenge the decisions made by public services. This work has been undertaken with human rights and equality at its heart to ensure that any changes to service delivery that have the potential to have a	

			<p>Ongoing</p> <p>I will hold to account, using legal powers where necessary, those public bodies that refuse, without good reason, to implement my recommendations.</p>	<p>disproportionate impact on older people are raised through human rights and equality impact assessments.</p> <p>In undertaking the follow-up work to ‘A Place to Call Home’, the Commissioner was clear to the Welsh Government, Local Authorities and Health Boards that not delivering on the recommendations for older people in care homes in Wales was unacceptable.</p> <p>The Commissioner was also clear that the recommendations must be discussed and reviewed by Chief Executives, Council leaders, Health Board Chairs and Welsh Government Ministers.</p> <p>The Commissioner’s continued focus on this, both using her statutory powers as well as through ongoing relationships with stakeholders, has led to clear changes that will improve the lives of older in care homes in Wales.</p>
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<p>For example, the Welsh Government has committed to roll out a national improvement programme for care homes. This will focus on addressing those areas that were identified as in need of improvement; such as continence care, medication management and falls prevention.</p>				
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Appendix A: Workforce profiles as at 31/03/18

Headcount Information

1. A listed body in Wales must collect and publish on an annual basis the number of people employed by the authority on 31 March each year by protected characteristic.

- Age
- Gender reassignment
- Sex
- Disability
- Pregnancy and maternity
- Sexual orientation
- Race – including ethnic or national origin, colour or nationality
- Religion or belief – including lack of belief

The Commissioner undertakes an annual staff survey to gather regular equality data. This survey is confidential and responses are anonymous. For the reporting year 2017/18, the Commissioner received 19 responses out of a possible 21. However, due to the size of the organisation, where figures account for less than 10%, details are removed to prevent individuals from being identified.

Number of people employed by Protected Characteristic:

Age	
16-24	-
25-34	5
35-44	8
45-54	3
55-64	2
65 & Over	-
Prefer Not to Say	-

Gender / Sex	
Male	7
Female	10
Prefer Not to Say	-

Is your gender identity the same as the gender you were originally assigned at birth?

Yes	18
No	-
Prefer Not to Say	-

Sexual Orientation

Bisexual	-
Gay Man	-
Gay Woman / Lesbian	-
Heterosexual / Straight	15
Other	-
Prefer Not to Say	3

Relationship Status

Married	8
Divorced	-
Civil Partnership	-
Single	4
Co-habiting	3
Separated	-
Widowed	-
Prefer not to say	3

Religion or Belief

No religion or belief	11
Christian (all denominations)	6
Buddhist	-
Hindu	-
Jewish	-
Muslim	-
Sikh	-
Any other religion or belief	-
Prefer not to say	-

National Identity	
Welsh	15
Scottish	-
English	-
Northern Irish	-
Irish	-
British	2
Gypsy or Irish Traveller	-
Prefer Not to Say	-

Ethnic Origin	
White	18
Mixed/Multiple ethnic groups	-
Asian	-
Black/African/Caribbean	-
Prefer Not to Say	-

Dependents	
None	12
Children under 18	6
Children under 25 and in full time education	-
Person aged 60+	-
Prefer Not to Say	-

Disability	Yes	No / n.a	Prefer not to say
Do you consider yourself to have a disability?	-	17	2
Do you have a disability as defined by the Equality Act?	-	16	3
At least one of my dependents has a disability.	-	16	-

The below data is drawn from HR records rather than via the annual staff survey.

Pregnancy & Maternity	
Number of pregnant employees during 2017-18	3
Number of employees taking Maternity Leave during 2017-18	4

2. A listed body in Wales must collect and publish on an annual basis the number of men and women employed, broken down by the following categories:

Job	Men	Women	Total
Administrator	-	-	-
Support Officer/Assistant	2	3	5
Officer	1	5	6
Lead	4	4	8
Director	-	2	2
Commissioner	-	1	1

Pay & Grade	Men	Women	Total
18,350 – 20,450 / A	-	-	-
21,300 – 25,850 / B	2	3	5
27,100 – 32,900 / C	1	5	6
34,500 – 41,950 / D	4	4	8
42,850 – 49,900 / E	-	-	-
52,950 – 63,000 / F	-	2	-
60,000 – 117,800* / Commissioner	-	1	1

*Pay Level set by Senior Salaries Review Body

Contract Type	Men	Women	Total
Permanent	6	12	18
Fixed Term	1	3	4
Temporary	-	-	-

Working Pattern	Men	Women	Total
Full Time	7	12	19
Part Time	-	3	3
Compressed Hours	-	-	-

Recruitment

1. A listed body in Wales must collect and publish on an annual basis the number of people who have applied for jobs with the organisation over the last year.

The Commissioner monitors her recruitment process on an on-going basis to ensure that all measures are undertaken to try and increase the diversity of her staff.

Application forms are already available in alternative formats and recruitment adverts are placed widely using a variety of media. The Commissioner has a formal Dignity at Work Policy and adopts good practice regarding its recruitment process; all information containing protected characteristics within application forms is seen by HR only and is not shared with the selection panel. In addition, reasonable adjustments are available to all candidates requesting them.

During 2017/18, the Commissioner recruited for 2 posts via external recruitment.

The below table details the number of candidates who applied for each role:

Role	Number of candidates
Policy Officer	24
Senior Caseworker	11

All candidates are provided with the opportunity to complete a Diversity Monitoring form at point of application, however not all candidates choose to complete and submit a form. The Commissioner received 26 completed Diversity Monitoring Forms associated with external recruitment conducted during 2017/18.

Number of applications for jobs within 2017-18 received from the following protected groups:

Age	
16-24	3
25-34	12
35-44	3
45-54	5
55-64	2
65 & Over	0
Prefer Not to Say	1

Gender	
Male	7
Female	19
MTF Transgender	-
FTM Transgender	-
Prefer Not to Say	-

Sexual Orientation	
Bisexual	1
Gay / Lesbian	-

Heterosexual	23
Other	-
Prefer Not to Say	2

Religion of Belief	
No religion or belief	9
Christian (all denominations)	11
Buddhist	-
Hindu	-
Jewish	-
Muslim	1
Sikh	-
Any other religion or belief	3
Prefer not to say	2

National Identity	
Welsh	14
Scottish	-
English	1
Northern Irish	-
Irish	-
British	9
Gypsy or Irish Traveller	-
Prefer Not to Say	2

Ethnic Origin	
White	22
Mixed/Multiple ethnic groups	1
Asian	-
Black/African/Caribbean	2
Prefer Not to Say	1

Disability	Yes	No / N/A	Prefer Not to Say
Do you consider yourself to have a disability?	3	21	2

No data relating to pregnancy and maternity was collected in relation to recruitment activity for 2017-18.

2. A listed body in Wales must collect and publish on an annual basis the number of employees who have applied to change position within the authority, identifying how many were successful in their application and how many were not.

No employees applied to change position.

Learning & Development

1. A listed body in Wales must collect and publish on an annual basis the number of employees who have applied for training and how many succeeded in their application.

As stated in the Commissioner's Learning and Development Policy, the Commissioner aspires to be a learning organisation and will nurture the skills and knowledge that staff will need to succeed in their roles. This policy therefore supports a culture of learning and developing excellent staff at all levels. Employees are encouraged to take advantage of learning and development opportunities which are relevant to their jobs and personal development.

The Commissioner will:

- provide a challenging work environment, where staff are encouraged to develop and acquire new skills and experience.
- provide a range of development opportunities for staff consistent with the strategic and operational needs of the Commissioner.
- deliver to all new staff a basic understanding of the role, function, policies and procedures of the Commissioner at induction.
- assess Commissioner and individual learning and development needs and draw up a Commissioner training and learning needs analysis.
- undertake and agree with all staff individual training and development plans as part of the performance appraisal process.
- review individual and Commissioner plans at least annually; assess effectiveness of training interventions and feed this back into subsequent planning.

All employees have equality of opportunity regarding training and all employees requested training. The Commissioner approved all employee applications for Learning and Development (training) activity during 2017-18. This was either undertaken as individual training or as corporate training where all employees attended.

2. A listed body in Wales must collect and publish on an annual basis the number of employees who completed the training.

All employees receive training regarding equality and protected characteristics during their first year of employment as part of their induction programme. This is naturally biased to age due to the nature of the organisation.

All employees were able to attend a team meeting training session about the following topics:

- Welsh Language Awareness
- Effectively Safeguarding Adults
- Mindfulness
- Workplace wellbeing
- The benefits of cycling and walking
- Mental Health
- Effective Communication
- Substance Misuse Awareness
- Data Protection legislation

Employees attended a broad range of training, such as 'Applied Positive Psychology', 'Decision Making in Wales', 'Managing Difficult Behaviour' and 'Appraisal and Performance Management'.

All employees are able to attend Welsh language lessons during work time at either beginner, intermediate or advanced level.

All training undertaken during 2017/18 by the Commissioner's employees was completed.

Grievance Procedures

1. A listed body in Wales must collect and publish on an annual basis the number of employees involved in grievance procedures either as complainant or as a person against whom a complaint was made.

The Commissioner had no employees involved in grievance procedures either as complainant or as a person against whom a complaint was made during 2017-18.

Disciplinary Procedures

1. A listed body in Wales must collect and publish on an annual basis the number of employees subject to disciplinary procedures.

The Commissioner had no employees subject to disciplinary procedures during 2017-18.

Leavers

1. A listed body in Wales must collect and publish on an annual basis the number of employees who have left an authority's employment.

During 2017-18, one employee left the Commissioner's employment.

As all employee equality data is anonymised, no specific data relating to the protected characteristics of these employees is available. However,

the Commissioner does hold information relating to age and gender for HR purposes relating to these specific employees; this information is provided below.

Age	
16-24	-
25-34	-
35-44	-
45-54	-
55-64	1
65 & Over	-
Prefer Not to Say	-

Gender	
Male	-
Female	1
Prefer Not to Say	-

Appendix B: Strategic Equality Objectives for 2018-19

Objective	Lead	Timescale	Actions / Means of Measurement
1. To ensure that in my employment of staff I am non-discriminatory, promote equality of opportunity for all and foster good relations between staff members.			
I will aim to increase the diversity of my workforce.	Director of Corporate Affairs	Annually	Review recruitment practices to understand potential barriers and ensure that when recruiting, practices are inclusive and endeavour to attract candidates with a broader spectrum of protected characteristics.
		Annually	Review contract types and working patterns to understand and deal with potential barriers with a view to attracting and retaining candidates with a broader spectrum of protected characteristics.
		Annually	Monitor, measure and review employment application and success at all stages with a view to ensuring equity of opportunity for all candidates.
		Annually	Collect, monitor and publish equality data in respect of employment.
All staff will have development and advancement opportunities to ensure they maximise their potential.	Director of Corporate Affairs	Every six months	Continued six monthly performance management reviews to identify and put in place appropriate plans to meet learning and development objectives.
I will ensure that all staff are rewarded and remunerated on an equal basis regardless of protected characteristic.	Director of Corporate Affairs	As new posts are created	Review of all posts to ensure they are objectively and fairly evaluated and remunerated regardless of the protected characteristic of any post holder.

<p>I will ensure there is a culture within my organisation in which all staff feel comfortable to be open about their protected characteristics and feel that they are a person of value to me as an employer and across the organisation.</p>	<p>Director of Corporate Affairs</p>	<p>Two formal session per year Annually and in line with each scheme</p>	<p>Continued awareness raising through informal and formal sessions and training, distribution of information and use of positive imagery to actively promote an understanding of protected characteristics. Ensure the continued review and application of good practice to promote an inclusive working environment which promotes learning, development and overall wellbeing.</p>
<p>2. To ensure that my procurement policies and practices and associated tender documentation take account of the need to meet legal equality requirements.</p>			
<p>I will review annually all of my procurement policies, practices and tender documentation to ensure they meet the public sector equality duty.</p>	<p>Director of Corporate Affairs</p>	<p>As specified or annually</p>	<p>Ensure appropriate and periodic review of all relevant policies to reflect statutory duties, good practice and learning.</p>
<p>I will ensure that contractors are made fully aware of my equality duties.</p>	<p>Director of Corporate Affairs</p>	<p>Ongoing Ongoing</p>	<p>Ensure all tender documents include requirements which will be reviewed and as part of any tender evaluation. Contractors for lower value contracts to be made aware of equality duties and my expectations when work is being undertaken on my behalf.</p>
<p>3. To ensure that my work is relevant to, and is seen as being relevant to, older people in all their diversity.</p>			
<p>I will increase my engagement with older people across the breadth of protected characteristics.</p>	<p>Director of Corporate Affairs</p>	<p>Ongoing</p>	<p>Ensure engagement continues which seek to be representative of the wider diversity of older people and that I have sought out and visited groups that are seldom heard or less visible.</p>

		Ongoing	Ensure the continued awareness raising of my work amongst groups with protected characteristics to encourage wider and more representative engagement.
Ensure that my work is informed by what older people across the breadth of protected characteristics tell me about what matters to them, and that my work draws specific attention to impacts for those with differing combinations of protected characteristics.	Director of Wellbeing & Empowerment	Ongoing	Ensure wider consultation and engagement with people across the breadth of protected characteristics to specifically consider any specific impacts for inclusion in my work. Ensure publications reflect and represent the issues and impacts raised by a diverse range of older people, and that they are easily accessible both electronically and in hard copy.
I will strengthen the impact assessments that underpin the key deliverables of my work to ensure they take full account of the impact of protected characteristics upon the outcomes sought for older people.	Director of Wellbeing & Empowerment	Ongoing	Utilisation and embedding of new equality and human rights impact assessment tool by all relevant staff which will seek to improve the quality of the work I do for older people.
4. I will ensure that my work is underpinned increasingly by a rights based approach and that across Wales a rights based agenda is developed.			
I will ensure staff integrate a human rights based approach in their work.	Both Directors	Ongoing	Ensure core training is undertaken by all staff on Ageism and the UN Principles for Older Persons and ensure that staff are supported to integrate these into their work.

<p>I will promote the UN Principles and awareness of Ageism.</p>	<p>Director of Wellbeing & Empowerment</p>	<p>Ongoing</p>	<p>Deliver training and awareness raising across public services in Wales on Ageism and the UN Principles for Older Persons. Facilitation of training workshops with Local Authorities on Impact Assessments and Scrutiny Guidance which will include the UN Principles for Older Persons.</p>
<p>5. To empower and equip older people to challenge the discrimination they face.</p>			
<p>I will equip older people with the knowledge and tools to empower them to challenge discrimination.</p>	<p>Director of Wellbeing & Empowerment</p>	<p>Ongoing</p>	<p>Older people will be made more aware of discrimination through the delivery of training and awareness raising across Wales. My website will continue to provide templates, helpful information and toolkits that can be used by older people to challenge discrimination.</p>
<p>6. To promote an accurate and balanced view of older people in all their diversity, grow understanding about older people and their needs and to challenge stereotypes, both within my organisation and amongst other organisations.</p>			
<p>I will increase the depth of understanding amongst my staff about the diversity of older people and the extent to which protected characteristics impact upon their lived experiences and access to services.</p>	<p>Both Directors</p>	<p>Ongoing</p>	<p>Continued delivery of suite of training and awareness raising specifically including Ageism and UN Principles for Older Persons which will be imbedded into my staff’s approach to work. Ensure that six monthly performance management reviews reflect on achievement in imbedding equality issues in staff’s work and seek for continual improvement.</p>

<p>I will increase the depth of understanding amongst key public services about the diversity of older people and the extent to which protected characteristics impact upon their access to services and their wider lives.</p>	<p>Both Directors</p>	<p>Ongoing</p>	<p>Sharing of knowledge and expectations relating to older people with public bodies and outside agencies through every day business, provision of training and awareness raising, my publications and on my website.</p>
<p>I will on an ongoing basis challenge stereotypes and myths about older people and lay down clear expectations for change.</p>	<p>Both Directors</p>	<p>Ongoing</p>	<p>Training, awareness raising and promotion of ‘Say No to Ageism’ Campaign and Everyday Heroes.</p>
<p>I will strengthen our partnership working with other equality and human rights based organisations to strengthen the voices of older people and increase the impact of our work.</p>	<p>Director of Wellbeing & Empowerment</p>	<p>Ongoing</p>	<p>Raising awareness with other public services, through day to day business, which seek to talk less about older people as a homogenous group and more about the needs and aspirations of the diversity of older individuals and how these will be met.</p>
<p>Continued and widened engagement with other equality and human rights based organisations.</p>	<p>Ongoing</p>	<p>Ensure that responses to any relevant consultations and inquiries seek to build upon their positions.</p>	<p>Major reviews of public service provision will seek to actively involve equality and human rights based organisations as advisors and expert contributors.</p>

7. To encourage and support other public bodies to comply with their own duties under the Equality Act 2010 as they apply to older people and to challenge significant breaches of legal duties.			
<p>I will provide guidance to public bodies undertaking key service changes to assist them in ensuring they comply with their statutory duties in relation to engagement, impact assessment and proportionality.</p>	<p>Director of Wellbeing & Empowerment</p>	<p>Ongoing</p> <p>Ensure the active review, feedback and provision of consultation responses to other public bodies.</p>	
<p>I will keep under review service delivery and changes that have the potential for significant detriment or disproportionate impact on older people.</p>	<p>Director of Wellbeing & Empowerment</p>	<p>Ongoing</p> <p>The continued review of public services and provision of robust recommendations to encourage and promote positive change.</p>	
		<p>Ongoing</p> <p>I will hold to account, using legal powers where necessary, those public bodies that refuse, without good reason, to implement my recommendations.</p>	

Appendix C: UN Principles for Older Persons

The United Nations Principles for Older Persons were adopted by the UN General Assembly (Resolution 46/91) on 16 December 1991. Governments were encouraged to incorporate them into their national programmes whenever possible. There are 18 principles, which can be grouped under five themes: independence, participation, care, self-fulfilment and dignity.

Independence

1. Older persons should have access to adequate food, water, shelter, clothing and health care through the provision of income, family and community support and self-help.
2. Older persons should have the opportunity to work or to have access to other income-generating opportunities.
3. Older persons should be able to participate in determining when and at what pace withdrawal from the labour force takes place.
4. Older persons should have access to appropriate educational and training programmes.
5. Older persons should be able to live in environments that are safe and adaptable to personal preferences and changing capacities.
6. Older persons should be able to reside at home for as long as possible.

Participation

7. Older persons should remain integrated in society, participate actively in the formulation and implementation of policies that directly affect their well-being and share their knowledge and skills with younger generations.
8. Older persons should be able to seek and develop opportunities for service to the community and to serve as volunteers in positions appropriate to their interests and capabilities.
9. Older persons should be able to form movements or associations of older persons.

Care

10. Older persons should benefit from family and community care and protection in accordance with each society's system of cultural values.
11. Older persons should have access to health care to help them to maintain or regain the optimum level of physical, mental and emotional wellbeing and to prevent or delay the onset of illness.

12. Older persons should have access to social and legal services to enhance their autonomy, protection and care.
13. Older persons should be able to utilize appropriate levels of institutional care providing protection, rehabilitation and social and mental stimulation in a humane and secure environment.
14. Older persons should be able to enjoy human rights and fundamental freedoms when residing in any shelter, care or treatment facility, including full respect for their dignity, beliefs, needs and privacy and for the right to make decisions about their care and the quality of their lives.

Self-Fulfilment

15. Older persons should be able to pursue opportunities for the full development of their potential.
16. Older persons should have access to the educational, cultural, spiritual and recreational resources of society.

Dignity

17. Older persons should be able to live in dignity and security and be free of exploitation and physical or mental abuse.
18. Older persons should be treated fairly regardless of age, gender, racial or ethnic background, disability or other status, and be valued independently of their economic contribution.

Further information on United Nations Principles for Older Persons can be found here: <http://www.un.org/documents/ga/res/46/a46r091.htm>

