



## **Consultation: A Commissioner for Older People in Northern Ireland**

### **BACKGROUND TO ADVICE NI**

Advice NI is a membership organisation that exists to provide leadership, representation and support for independent advice organisations to facilitate the delivery of high quality, sustainable advice services. Advice NI exists to provide its members with the capacity and tools to ensure effective advice services delivery. This includes: advice and information management systems, funding and planning, quality assurance support, NVQs in advice and guidance, social policy co-ordination and ICT development.

Membership of Advice NI is normally for organisations that provide significant advice and information services to the public. Advice NI has over 70 member organisations operating throughout Northern Ireland and providing information and advocacy services to over 100,000 people each year dealing with over 225,000 enquiries the majority being social security related. Other issues covered include: housing, debt, consumer and employment issues. For further information, please visit [www.adviceni.net](http://www.adviceni.net).

### **GENERAL COMMENTS**

Advice NI welcomes the opportunity to respond to this consultation, given the fact that more and more older people are facing challenges in terms of health and social care issues; poverty (including fuel poverty); isolation abuse etc.

Advice NI supports the view of Age Concern Help the Aged NI and the Age Sector Platform that the Commissioner needs to have the maximum powers available, in particular to challenge and overthrow statutory provisions that are not in the best interests of older people. Advice NI supports the Commissioner having powers of information, research and publication; and to offer advice and guidance; as well as representation and recommendation. We do however have concerns about the strength of the Commissioner's authority and consequently the status of her/his recommendations. Persuasion is an important tool, but the Commissioner needs to be able to issue guidance that must be adhered to.

In terms of the additional powers of review and investigation – we would question what the Commissioner will be able to achieve as a result of conducting any review or investigation. In order to be effective and to be seen to be effective the Commissioner must have 'clout'.

We believe that the allocation of resources will in many ways reflect the position of the Commissioner and the relevance the Commissioner will have in terms of effectively representing older people in Northern Ireland; we are concerned that there is little detail in terms of resources. This would particularly be relevant in terms of the Commissioner's ability to bring court cases on particular questions of principle; and progress individual cases. We would therefore wish to understand the rationale behind any allocation of resources.

Advice NI would wish to understand more fully how the success of any Commissioner and his / her office is to be measured. This directly links back to the powers and resources issues as success will undoubtedly be intrinsically linked to these two issues.

Advice NI would wish to understand more fully how the Commissioner will be held accountable – we do not believe that the production of an Annual Report is sufficient and

would advocate that an 'oversight committee' be put in place. We would also support the Age Concern Help the Aged NI and the Age Sector Platform view that giving audience to older people should be a central focus for the Commissioner. The Commissioner should facilitate regular consultation between the Commissioner and older people [and their representatives] on her/his priorities and feedback on progress and results. The Commissioner should adopt a pro-active approach to developing engagement and participation practice in relation to informing and consulting older people. Particular consideration needs to be given to developing methods to involve those considered to be hard to reach. Again, fulfilling these accountability and engagement responsibilities will require adequate resources.

To take an individual issue, from the point of view of Advice NI and our advisers, income adequacy of older people is a problem that is brought to advice centres by older people on a daily basis. We would be keen to understand how this issue might be progressed under the proposals contained within the consultation document. We understand the parity issues at stake but we firmly believe that the Commissioner must set engagement with the Department for Social Development and the Social Security Agency as a key priority in terms of moving the income adequacy issue forward. Areas of work including the SSA's method of addressing benefit uptake should clearly fall within the remit of the Commissioner and we would wish to see this particular aspect of the work of the Social Security Agency critically examined. Advice NI would be keen to help and support the Commissioner in this regard.

Advice NI looks forward to seeing the subsequent developments on this consultation.

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