

Consultation Response

A Commissioner for Older People in Northern Ireland
Office of the First Minister and Deputy First Minister (OFMDFM)
January 2010

About us

We're RNID, the charity working to create a world where deafness or hearing loss do not limit or determine opportunity and where people value their hearing. We work to ensure that people who are deaf or hard of hearing have the same rights and opportunities to lead a full and enriching life. We strive to break down stigma and create acceptance of deafness and hearing loss. We aim to promote hearing health, prevent hearing loss and cure deafness.

Our response to this consultation will focus on key issues that relate to people who are deaf, deafened and hard of hearing.

RNID estimates that in Northern Ireland there are 202,000 individuals with mild to moderate hearing loss; 140,000 of these are over the age of 60. 17,000 individuals in Northern Ireland are severely or profoundly deaf; 14,000 of these are over the age of 60. Most deaf and hard of hearing people in the UK develop a hearing loss as they get older. Around the age of 50, the proportion of people with a hearing loss increases sharply. Approximately 55% of people over 60 in the UK are deaf or hard of hearing

(www.rnid.org.uk/information_resources/factsheets/deaf_awareness/factsheets_leaflets/facts_and_figures_on_deafness_and_tinnitus)

RNID NI is happy for the details of this response to be made public.

The Need for a Commissioner for Older People

RNID NI agrees with the need for a Commissioner for Older People in Northern Ireland and agrees that the Commissioner should take account of the UN Principles for Older Persons whenever he/she is deciding how to act and whenever he/she is deciding what constitutes the interests of older people.

RNID NI recommends that the Commissioner for Older People should also take account of The United Nations Convention on the Rights of Persons with Disabilities when making decisions.

A Principal Aim and the Interests of Older People

RNID NI agrees with the Principal Aim to safeguard and promote the interests of older people and agrees that the Commissioner's role and functions should be based on the interests of older people.

Proposed Duties of the Commissioner

RNID NI agrees that the duties proposed are suitable for a Commissioner for Older People. Below, we have commented on the proposed duties that we believe are particularly relevant to people who are deaf, deafened and hard of hearing.

- RNID NI welcomes the proposed duty that the Commissioner must promote an awareness of matters relating to the interests of older people and of the need to safeguard those interests

RNID NI would welcome the opportunity to meet with the Commissioner and his/her staff, once appointed, to raise awareness of matters relating to the interests of older people who are deaf, deafened and hard of hearing.

- RNID NI welcomes the proposed duty to keep under review the adequacy and effectiveness of services provided for older people by relevant authorities

RNID NI recommends that the Commissioner keeps under review the adequacy and effectiveness of services for people who are deaf, deafened and hard of hearing.

In October, 2009, RNID NI and BDA (British Deaf Association) launched a report 'Access to Public Services for Deaf Sign Language Users'. The report identifies areas where access to public services could be improved for deaf sign language users. RNID NI would welcome the opportunity to meet with the Commissioner and his/her staff to discuss the implementation of the report's recommendations.

- RNID NI welcomes the proposed duty to promote positive attitudes towards older people and encourage their participation in public life

RNID NI provides 'Deaf Awareness' training and recommends that it be delivered to the Commissioner and his/her staff. RNID NI believes that 'Deaf Awareness' training should be delivered by people who are deaf.

RNID NI also recommends that staff at the Commissioner's office complete the level one Certificate in British Sign Language (BSL) or Irish Sign Language (ISL).

Within RNID's Multimedia Library, there are a range of positive images of people who are deaf, deafened and hard of hearing. Many of these images may be suitable for the Commissioner's publicity materials.

RNID NI can support the Commissioner and his/her staff to identify barriers faced by people who are deaf, deafened and hard of hearing in participating in public life.

RNID NI would welcome the opportunity to meet with the Commissioner and his/her staff to discuss opportunities for RNID NI staff and volunteers to participate in committees associated with the Commissioner's office.

- RNID NI welcomes the proposed duty that the Commissioner must take reasonable steps to make older people aware of the existence and functions of his/her office and the location of the Commissioner's office

RNID NI would welcome the opportunity to work with the Commissioner and his/her staff to make older people who are deaf, deafened and hard of hearing aware of the existence, location and functions of the Older People's office.

- RNID NI welcomes the proposed duty that the Commissioner must take reasonable steps to encourage older people to communicate with the Commissioner and his/her staff and to seek the views of older people

Under the Disability Discrimination Act 1995, people who are deaf, deafened and hard of hearing are entitled to access communication support when using public services.

RNID NI recommends that the Commissioner and his/her staff consider the use of our 'Communication Service' which matches requests for communication support to qualified professionals who are trained 'Language Service Professionals' i.e. sign language interpreters, deaf-blind interpreters, electronic and manual note-takers, lip speakers and speech to text reporters. RNID NI would welcome the opportunity to discuss our 'Communication Service' with the Commissioner and his/her

staff and to explain to them how Language Service professionals can be booked.

In order to improve accessibility for people who are deaf, deafened and hard of hearing, RNID NI recommends that the Commissioner's office consider the use of

- 1) Text-messaging, E-mail and Fax
- 2) Textphones
- 3) Typetalk; a text relay service operated by BT (www.textrelay.org)
- 4) TalkByText for Windows, a business software programme that provides staff with real-time text on their computers and allows them to hold conversations with landline and mobile textphones (www.ict.rnid.org.uk)
- 5) TalkByText Web Edition, a business software programme that provides staff with real-time text calls over the Internet at or away from their computers (www.ict.rnid.org.uk)

Whatever methods of communication are chosen, RNID NI recommends that they are widely advertised and promoted to people who are deaf, deafened and hard of hearing.

RNID NI recommends that the Commissioner's office provides a range of auxiliary aids to support communication for people who are deaf, deafened and hard of hearing e.g. information displayed on computer screens etc. RNID NI provides a range of listening products (personal listeners, room loops, headphones, neck loops, elite listeners etc) which can help people who are hard of hearing to hear more effectively.

RNID NI also recommends that the Commissioner's office considers environmental factors e.g. good lighting, good acoustics etc when communicating with people who are deaf, deafened and hard of hearing.

RNID NI recommends that Induction Loop systems are installed in the Commissioner's office and staff trained in their use. Induction Loop systems should also be considered when planning internal or external events.

RNID's Employment, Training and Skills Service (ETSS) have developed a 'Louder than Words' charter mark. This charter mark ensures that all premises and services offered by organisations are accessible for people who are deaf, deafened and hard of hearing. RNID NI

recommends that the Commissioner's office considers working towards this charter mark.

RNID NI recommends that advice and information from the Commissioner's office is accessible to people who are deaf, deafened and hard of hearing. Staff from RNID NI's Information and Outreach service would welcome the opportunity to work with the Commissioner's office to ensure that advice and information is accessible. Staff at RNID NI would also welcome the opportunity to work in partnership with the Commissioner's Office to distribute information to people who are deaf, deafened and hard of hearing.

Advice and information from the Commissioner's office could be placed on RNID NI's website.

RNID NI would welcome the opportunity to discuss with the Commissioner and his/her staff, the above steps which, could be taken to encourage older deaf, deafened and hard of hearing people to communicate with the Commissioner.

RNID NI would welcome the opportunity to work in partnership with the Commissioner's office to organise consultation events with people who are deaf, deafened and hard of hearing. RNID NI believes it imperative that the Commissioner's office consider the views of people who are deaf, deafened and hard of hearing.

- RNID NI welcomes the proposed duty that the Commissioner and his/her staff must make themselves available to older people at a place convenient for older people, including their own local area

RNID NI would welcome the opportunity to host events organised by the Commissioner's office at our offices in Belfast, London/Derry and Enniskillen.

Working with Other Organisations

RNID NI agrees with the proposed general powers of the Commissioner.

Specific and Formal Powers and Relevant Authorities

RNID NI agrees with the proposed powers of review, complaint and formal investigation, which should, we believe, also include case work powers, in relation to organisations known as relevant authorities. RNID NI also agrees with the proposal that the list of relevant authorities can be changed by legislation.

RNID NI agrees that the Commissioner should be able to provide assistance, including financial assistance, to an older person making a complaint to a relevant authority. RNID NI believes it is essential that the Commissioner's office has enforcement powers.

Legal Proceedings

RNID NI agrees that the Commissioner should be able to take or support legal cases which involve the interests of older people, including people who are deaf, deafened and hard of hearing. RNID NI would like to see financial resources being made available to do this.

Corporate Governance, Appointment and Accountability

- RNID NI agrees that older people should have a role in the process of appointing an Older People's Commissioner

RNID NI believes it important that an older person who is deaf, deafened or hard of hearing is involved in the recruitment/selection process. RNID NI would welcome the opportunity to work with staff at OFMDFM to discuss how best deaf, deafened and hard of hearing people could be involved in interview panel/s.

- RNID NI agrees that older people should be able to participate with the work of the Commissioner and to engage with the Commissioner's office
- RNID NI agrees that the Commissioner should consult regularly with older people and seek feedback from them

RNID NI would welcome the opportunity to work in partnership with the Commissioner and his/her staff to organise consultation events, which would facilitate people who are deaf, deafened and hard of hearing to have their voice heard e.g. in relation to the priorities of the Commissioner and what he/she does.

RNID NI would also welcome the opportunity to work with staff at OFMDFM to ensure the involvement of deaf, deafened and hard of hearing people on e.g. an Older People's Stakeholder Panel.

In order to ensure effective engagement and inclusion of older people who are deaf, deafened and hard of hearing, RNID NI would welcome the opportunity to be represented on e.g. a formal regional network supporting the Commissioner and his/her staff. RNID NI agrees that the 'Commissioner should have an active relationship with, but be demonstrably independent from, stakeholder organisations'.

RNID NI agrees that to ensure effective engagement and inclusion of older people, there should be an infrastructure of Older People's Champions in Government and across the public sector.

RNID NI agrees that a complaints procedure should be put in place for the Commissioner and the Commissioner's office.

Financial and Audit Arrangements

RNID NI agrees that the Commissioner and his/her staff should endeavour to ensure the proper, economic, effective and efficient use of the resources available when carrying out its functions. RNID NI agrees that, where possible, the Commissioner should share back office services with other Commissioners to help save public money.

Conclusion

RNID NI would welcome the opportunity to meet with representatives from OFMDFM to discuss this consultation response.

Once appointed, staff at RNID NI would welcome the opportunity to meet with the Commissioner and his/her staff to discuss how we could best support the Commissioner's work e.g. the issuing of guidance on best practice, the production of research/educational activities, the compilation and publication of information etc especially as they relate to the interests of older people who are deaf, deafened and hard of hearing.

[Redacted signature block]

Belfast

[Redacted]

Telephone: [Redacted]

Textphone: [Redacted]

Text Answerphone: [Redacted]

TalkByText: [Redacted]

Fax: [Redacted]

Email: [Redacted]

Website: [Redacted]