



SUMMARY

Age Equality

Policy Priorities and Recommendations

Executive Summary

To advance age equality, we recommend that the Executive, Departments and other key stakeholders act to address the following policy priorities, including via the Programme for Government and Budget: the Active Ageing Strategy; the Children and Young People's Strategy; and the wider policies and programmes of government.

- **Law Reform:** Introduce comprehensive age equality legislation to make unlawful any unjustified age discrimination in the provision of goods, facilities and services.
- **Health, social care and wellbeing:** Provide adequate services to meet the specific needs of older and younger people across a range of equality groups, including with regards to mental health; the transition from youth to adult health services; the provision of domiciliary, residential or nursing care.
- **Employment:** Ensure planned actions are effective in addressing the proportion of young people Not in Education, Employment or Training (NEET). Action to reduce the proportion of older people who are long-term unemployed.
- **Education:** Facilitate the effective participation in education of older people; young carers; looked after children; and children and young people in the Juvenile Justice Centre.
- **Housing and accommodation:** Ensure access to and availability of appropriate accessible accommodation for older people across all tenures. Consideration should also be given to providing a fuel brokering scheme to secure competitive rates across all tenures
- **Participation in public life:** Ensure effective measures are in place to secure the active participation of younger and older people in all areas of public life (including the policy development process), and to address identified barriers.
- **Prejudice and social attitudes:** Ensure action is taken to understand and challenge age-based negative and prejudicial attitudes; ensure balanced media reporting; and address the fear of crime among older people.
- **Welfare and social protection:** Further assess the impact of the Welfare Reform programme on particular age groups. For younger people action is needed to reduce the number of looked after children within the criminal justice system.

LAW REFORM: Introduce comprehensive age equality legislation to make unlawful any unjustified age discrimination in the provision of goods, facilities and services.

We recommend that the Programme for Government (PfG) contains a clear timetabled commitment to strengthen existing legislation in age discrimination legislation (in the provision of goods, facilities and services, relating to all ages).

1. Reforming, strengthening and updating Northern Ireland equality law will help tackle inequalities, ensure greater harmonisation and consistency across the equality legislation, and address the significant gaps in protection between equality law in Great Britain and Northern Ireland.

HEALTH, SOCIAL CARE AND WELL-BEING: Provide adequate services to meet the specific needs of older and younger people across a range of equality groups.

Action to meet the specific needs for younger people should include the provision of adequate mental health support services; transition services from child to adult services; and support for young trans people.

- i. We recommend that the Department of Health (DoH) ensures that provisions for Child and Adolescent Mental Health Services (CAMHS) are adequate to ensure services support the mental health needs of all children and young people.
2. Children and young people in Northern Ireland face particular barriers in relation to mental health treatment. Specific issues relate to the provision of funding to ensure services are age appropriate and provide adequate services to support children and young people with mental health needs.
- ii. We recommend that the Department of Health (DoH) implements a service framework to support the needs of young trans people.
3. Currently few trans people¹ aged under 18 have access to hormone suppressants² creating an inequality in service provision between Northern Ireland and Great Britain.
4. Early intervention through hormone suppressants has the potential to prevent costly interventions, including prolonged mental health support, inpatient psychiatric admissions and complex surgical interventions³.

¹ Young trans people (gender variant children) have a self awareness that their gender identity does not correspond to cultural expectations with their assigned birth sex.

² Also referred to as hormone blockers

³ The International Planned Parenthood Federation (IPPF) (Mar 2014) [Over-protected and Under-served: A multi-country study on legal barriers to young people's access to sexual and reproductive health services](#)

- iii. Effective processes should be put in place to ensure the successful transition from youth to adult health services.
- 5. During the transition from child to adult care, adolescents can be left with no service at all until responsibilities are established⁴. This can result in a child having services withdrawn, with no adult alternative available. In addition, young people with specific care needs can experience a lack of support when making the transition from one service to another.

Action to meet the specific needs for older people should include the provision of effective care in the community; and in domiciliary, residential or nursing care, encouragement on the use of assistive technologies and meet the specific needs of older LGB and trans people.

- iv. Action is needed to ensure effective care in the community.
- 6. To be 'effective', care should support people to live at home, where it is their wish and it is appropriate for them to do so. We welcomed⁵ the intended outcome of the new model 'Transforming Your Care'⁶ which seeks to move the provision of healthcare from hospitalisation or institutional care to community based health service provision⁷.
- 7. We reiterate our call that Government must ensure that care in the community arrangements guarantee the quality of care within the home. Whilst the time allocated for visits is an important consideration the overall quality of the care package is key to the effectiveness of community care.
- v. Action should be taken to raise awareness and uptake amongst older people of the use of assistive technologies to access health, social care and well-being services.
- 8. The development of the Health and Social Care Board's eHealth and Care Strategy for Northern Ireland's⁸ ⁹ framework sets out a range of measures to increase the use of innovative technologies in the delivery of health and social care over a five year period from 2016 to 2020.
- 9. Any radical shift in the provision of health, social care and well-being will require support to develop understanding of the new technologies. In addition, safeguards should be put in place to ensure that the use of these technologies does not lead to social isolation.

⁴ Care Quality Commission (2014) [From the pond to the sea: Children's transition to adult health services](#)

⁵ ECNI consultation response to [Transforming your care – From vision to action](#)

⁶ Department of Health (Dec 2011) [Transforming Your Care: A Review of Health and Social Care in Northern Ireland](#)

⁷ Health and Social Care Board (October 2012): ["Transforming Your Care" Draft Strategic Implementation Plan, Executive Summary](#), paragraph 1, page 3: 'Home as the hub for care for older people, with more services provided at home and in the community.'

⁸ Health and Social Care Board (Mar 2016) [eHealth and Care Strategy for Northern Ireland](#)

⁹ Role of lead department moved from the Health and Social Care Board to Department of Health in May 2016

- vi. There is a need to ensure that older people of differing sexual orientations and transgender people have their domiciliary, residential or nursing care needs fully met.
- 10. On average, older LGB and trans people have different family support networks and thus potentially differing needs for domiciliary, residential or nursing care support when compared to heterosexuals.
- 11. The care needs and sensitivities of LGB and trans people may not be taken into account by service providers, therefore it is important that health care workers providing care in residential or nursing care support, receive training in the provision of intimate care and the sensitivities that arise.

EMPLOYMENT: Ensure planned actions are effective in addressing the proportion of young people Not in Education, Employment or Training (NEET); and take action to reduce the proportion of older people who are long-term unemployed.

Targeted careers advice and support for those at, or approaching, school leaving age could help young people to match their aspirations to realistic job prospects, by providing a focus on job opportunities available in addition to educational achievement.

- i. Government must ensure that planned actions are effective in addressing the proportion of young people Not in Education, Employment or Training (NEET)
- 12. Spending time NEET is linked to lifelong problems associated with worklessness, poverty, limited employment opportunities, poor pay and ill-health. For young people who are already disengaged with conventional education early intervention and a pro-active approach is needed.
- 13. Targeted action is required for those with multiple identities who may face additional barriers to training and the labour market. For example, lone parents who are predominately women¹⁰, may require assistance with childcare, while disabled people may require support in relation to transport, additional costs and/or securing reasonable adjustments.

Devolved Northern Ireland strategies such as ‘Pathways to Success, should target actions to reduce the proportion of older people who are long term unemployed.

- ii. The Department for the Economy and the Department of Education should work in partnership to reduce the proportion of older people who are long-term unemployed
- 14. The share of people in Northern Ireland classed as long-term unemployed is higher for the over 50s age group¹¹. Despite the fall in unemployment figures people aged 50 years and over claiming long-term unemployment benefits has increased by 2

¹⁰ Dr Russell, R. (Jun 2014) [Census 2011: Key Statistics at Northern Ireland and LGD level](#)

¹¹ Long-term unemployed is a percentage of unemployed who have been unemployed for 12 months or more – sourced from the Labour Force Survey

percentage points over a three year period¹². This age group appear to find it harder to get back into employment compared with the rest of the working population.

EDUCATION: Facilitate the effective participation in education of older people; young carers; looked after children and children and young people in the Juvenile Justice Centre

This includes targeted action to remove perceived barriers to the participation in education of older people; collaboration between Departments to identify young carers and provide services to support their educational outcomes; action to ensure the effective participation in education of every looked after child; and access to appropriate education curriculum for children in the juvenile justice centre.

- i. The Department for the Economy (DfE) should target action to remove the barriers perceived by older people to their participation in education
15. We welcome the aims of the Northern Ireland Strategy for Further Education¹³ to tackle the barriers perceived and/or faced by older people through, for example: the provision of on-going support; consideration of their views in determining training methods; the use of technology to provide flexibility for caring responsibilities. We call for the development of policy proposals which will seek to remove the barriers.
16. Northern Ireland has the highest proportion of adults in the United Kingdom with no educational qualifications.¹⁴ Data indicates that the proportion of people who lack basic or have no qualifications, whilst decreasing for all age groups over time, still remains highest amongst older age groups.¹⁵
- ii. We recommend the Department of Health (DoH) and the Department of Education (DE) work in collaboration to identify young carers and provide the services needed to support their improved educational outcomes.
17. By working in collaboration, Education and Health Departments could better identify carers; raise awareness among young carers of supports potentially available; provide signposting to relevant DE and DoH services; and improve monitoring and data collection.
18. Providing care can result in low educational attainment and make the transition into adulthood more difficult, with regard to going into further education or securing employment.

¹² NISRA long-term claimants over 50 (January 2014 to March 2017) – [comparison of figures between March 2014 to March 2017]

¹³ DEL, 2016, [Skills to succeed Further Education Means Success](#)

¹⁴Office of the First Minister and Deputy First Minister [Active Ageing Strategy 2014 -2010 consultation](#),

¹⁵ ECNI, Key Inequalities in Education (final report) (2014) pending Table 4.3 Highest qualification proportions by age in the NI population

- iii. The Department of Education and the Department of Health should provide tailored support and assistance to ensure the effective participation in education of every looked after child.
 - 19. It is important that the Department of Education and the Department of Health work together to provide a co-ordinated and consistent approach, including via their duty within the Children's Services Co-operation Act (Northern Ireland) 2015¹⁶, to ensure the effective participation in education of every looked after child.
 - 20. Evidence shows that looked after children have poorer educational achievements when compared to their peers. To provide support and assistance teaching staff and carers should have an awareness and understanding of the issues and barriers that looked after children face in an educational setting.
- iv. Action is needed to ensure children in the juvenile justice centre have access to an appropriate education curriculum.
 - 21. Children and young people in the Juvenile Justice Centre (JJC) in Northern Ireland do not have the same access to the full education curriculum as their peers. A review of the core curriculum against the requirements of Education Other Than At School (EOTAS) provision has been carried out¹⁷. The Commission welcomes this and awaits a report on progress, particularly in light of staffing levels.
 - 22. Education is crucial to providing young offenders with the skills and training they need to improve their life chances and assist in reducing reoffending.

HOUSING AND ACCOMMODATION: Ensure access to, and availability of, appropriate accessible accommodation for older people across all tenures.

This includes the application of the Lifetime Homes Standard and wheelchair housing design standard, to all new builds across all tenures; provision of easy to access adaptation services; and sufficient capacity to provide care and support for care home residents. Consideration should also be given to providing a fuel brokering scheme.

- v. We recommend the application of accessible housing standards to all new builds, including, as a minimum, the extension of the Lifetime Homes Standard to all new builds across all tenures.
- 23. More needs to be done to ensure that all new builds in private tenures comply with accessible standards, so as to better facilitate individuals to remain in their homes as they age or as their needs change. We note recognition within the draft Programme for Government delivery plans of the need to increase the provision of accessible homes.¹⁸
- 24. While Part R of the Building Regulations - 'Access and Facilities for Disabled People'¹⁹ has applied to all new private sector builds since 2001, providing basic

¹⁶ [Children's Services Co-operation Act \(Northern Ireland\) 2015](#)

¹⁷ Youth Justice Agency (Jul 2016) [YJA Annual Report & Accounts 2015-16](#)

¹⁸ NI Executive (2017) [PfG Delivery Plan indicators 8 and 48](#)

¹⁹ [The Building Regulations \(Northern Ireland\) 2000, Part R](#)

access standards in dwellings, the Building Regulations do not include the Lifetime Homes Standard that were adopted for all social housing in 1998.

- ii. We recommend the provision of easy to access adaptation services in order to secure older people's independence in their home.
- 25. We recommend²⁰ that the Northern Ireland Housing Executive (NIHE) (or others as appropriate) ensure there are sufficiently resourced adaptation services across all tenures; setting out key targets and associated performance indicators via an outcome focused action plan.
- 26. Maintaining older residents in their own homes (as long as it is viable and they wish it) is a core element to securing and maintaining personal independence. To allow this, housing adaptations may be required – driven by changing needs with age, or following any discharge from hospital.
- iii. Trusts should ensure there is sufficient capacity to care for permanent care home residents (where they wish it), and provide for all older residents requiring care and support.
- 27. Should the Department of Health's plans proceed to reduce residential accommodation for older people²¹ it will be vital that older residents are assured that they will receive the same level of care and support in alternative accommodation.
- 28. We recommend the mandatory inclusion of an assessment of the quality and services available in alternative care options. Compliance with the best practice guide –The Reconfiguration of Statutory Residential Homes (Nov 2013)²² on the role of advocacy and the importance of infrastructure is needed.
- iv. We call for further research to understand the housing expectations and requirements of accommodation for older people.
- 29. Research into housing needs and preferences, and geographical patterns of need, may help contribute to a balance in provision. Research would likely assist the Northern Ireland Housing Executive; Housing Associations; and the nine councils in assessing the need for demand and supply of future social housing.
- v. Consideration should also be given to providing a fuel brokering scheme to reduce the impact of fuel poverty on older people.
- 30. An energy brokerage scheme would allow the group purchase of fuel at more competitive rates than by individual households.
- 31. While we recognise that progress has been made to the benefit of older people and we welcome the improvements in energy efficiency through the Affordable Warmth

²⁰ ECNI (May 2013), [Response to the Northern Ireland Housing Executive's consultation on the Inter-Departmental Review of Housing Adaptations Services](#)

²¹ DHSSPS [Transforming Your Care: A review of health and social care in Northern Ireland](#)

²² Health and Social Care Board (Nov 2013) [Making Choices: Meeting the current and future accommodation needs of older people – Good Practice Guide – Reconfiguration of Statutory Homes, November 2013](#)

Scheme, we reiterate that, as recognised in the Active Ageing Strategy 2016 – 2021, addressing fuel poverty should remain a priority.

PARTICIPATION IN PUBLIC LIFE: Ensure effective measures are in place to secure the active participation of younger and older people in all areas of public life and to address identified barriers

This includes public authorities taking steps during policy development to effectively and meaningfully engage people of all ages; and to encourage younger people to apply for public appointments.

- i. We recommend that steps are taken to encourage younger people to apply for public appointments; and to explore and address any institutional barriers to their appointment
 32. Greater participation by younger people in public appointments would help to ensure a more informed policy decision making process. We support initiatives which create opportunities to gain apprentice style experience of board membership through training, experience and support.
 33. As part of a range of actions to encourage applications from younger people, new avenues of promotion could be explored and implemented to raise awareness of opportunities and their relevance among younger age groups. Consideration could also be given to the production of more online guides and competency based interviewing.
- ii. Public authorities should take steps to more effectively and meaningfully consult with, engage and foster the active participation of people of all ages during the policy development process.²³
 34. We recommend that Departments ensure that this aim is fulfilled, not only in the delivery of actions associated with the Strategy; but across the development, delivery and review of all Government policies and services more generally.
 35. Research on engagement with young people has noted inconsistencies on levels of engagement; of children not being consulted at the same time as adults; and has raised questions about the meaningfulness of engagement.
 36. Older people, although well represented in public appointments, report more generally that they feel they are not fully involved in policy making.

PREJUDICE AND SOCIAL ATTITUDES: We advocate action to understand and challenge age-based negative and prejudicial attitudes.

This includes further exploration of how prejudicial attitudes impact on older people's health and lifestyle choices; training for police incorporating challenging negative and prejudicial attitudes towards children and young people; and promoting children and young people's positive contribution to society. Address the fear of crime among older people.

²³ ECNI, 2015, consultation response to OFMDFM [Children's Services Co-operation Bill](#)

- i. We call for action to further explore how prejudicial attitudes impact on older people's health and lifestyle choices; and the key actions that will overcome any identified issues²⁴.
 - 37. Targeted research to examine any prejudicial attitudes amongst staff in the health and social care, and their impact on older people's health could highlight specific measures that would assist in the development of policies and procedures to address key issues.
 - 38. Studies and attitudinal surveys suggest that prejudicial attitudes may be an issue in the provision of health and social care generally for older people, but a more detailed exploration of the specific situation in Northern Ireland is currently lacking.
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- ii. We recommend that training for police should incorporate challenging negative and prejudicial attitudes towards children and young people.
 - 39. The Review of the Youth Justice System²⁵ in 2011 highlighted a need to challenge, within the police service, negative and prejudicial attitudes towards children and young people.
 - 40. We welcome the then Justice Minister's 2015 announcement²⁶ of a comprehensive scoping study into how children who may be impacted by the justice system are dealt with and await evidence of improvements in outcomes. .
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- iii. We recommend that the forthcoming Children and Young People's Strategy and its action plans should include balanced media reporting measures to promote children and young peoples' positive contribution to society.
 - 41. We welcome the proposed indicator in the Children and Young People's Strategy's consultation document²⁷ to measure the 'percentage of young people who feel the media represents young people fairly'. To assist with positive messages there is therefore a need for balanced reporting with media stories covering children and young people's achievements and their positive contributions to society.
 - 42. Society's perception of children and young people is reinforced by negative media stories. However, actual police crime figures do not support this negative media image of children and young people, who are more likely to be victims of crime rather than perpetrators.
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- iv. We call on government to address the fear of crime among older people.
 - 43. We have recommended that the Programme for Government²⁸ includes a commitment to take actions to tackle prejudicial attitudes and behaviour experienced by particular groups /individuals within the Section 75 categories. We further

²⁴ Life style choices is about enabling older people to make independent choices about how they live, taking part in activities, interests and having their opinions valued

²⁵ Department of Justice (2011) [A review of the Youth Justice System in Northern Ireland](#)

²⁶ Justice Minister Ford announcement in May 2015 on [scoping study into how children who may be impacted by the justice system are dealt with](#)

²⁷ Department for Education (Dec 2016) [Children and Young People's Strategy 2017-2027 Consultation Document](#)

²⁸ ECNI (Jan 2017) response to draft Delivery Plan for Indicator 1: [Prevalence rate \(% of the population who were victims of any NI Crime Survey crime\)](#) (Para 1.14)

recommend the adoption of specific outcomes and associated measures towards tackling the fear of crime and the perception of the prevalence of crime amongst older people.

44. The likelihood of an older person being a victim of crime is low.²⁹ However in 2016 Age Sector Platform's survey of older people reported that almost half (48%) identified fear of crime as a major concern.³⁰

WELFARE AND SOCIAL PROTECTION: Further assess the impact of the Welfare Reform programme on particular age groups. Action is required to address the number of looked after children within the criminal justice system.

In particular, of Universal Credit on low income mixed aged couples; unemployed 18-21 year olds; and single tenants aged 35 years and under when renting in the private rented sector.

- i. An assessment of the impact of Universal Credit on low income mixed age couples is warranted.

45. The introduction of Universal Credit provisions relating to Pension Credit³¹ will have an adverse financial impact on low income couples where one partner is aged below the State Pension Age.³²

46. Under the new provisions couples on low income will not be able to claim Pension Credit until both parties reach the State Pension Age.

- ii. We recommend that an assessment is undertaken to ascertain the effect on unemployed 18-21 year olds when access to housing benefit is withdrawn, and that steps are taken to ensure changes do not result in a rise in youth homelessness.

47. The summer budget 2015 announced the removal of the housing benefit element of Universal Credit for out-of-work young people aged 18-21 from April 2017.^{33 34}

48. In June 2015, 3,800 claimants in Northern Ireland under the age of 22 claimed housing benefit, receiving an average of £54 per week.³⁵ Of these claimants, it has been indicated that 800 would be directly affected by the removal of housing benefit by the introduction of Universal Credit.³⁶

²⁹ PSNI (2015) [Trends in Police Recorded Crime in Northern Ireland 1998/99 to 2014/15](#)

³⁰ Age Sector Platform (2016) [Pensioners' Parliament Report](#)

³¹ Pension Credit is income-related and provides a 'top-up' on weekly income if below the 'Guarantee Credit' income. At December 2015 – Pension credit will top up your weekly income to: £151.20 if single and £230.85 if a couple.

³² As at December 2015 – qualifying age is 65

³³ Parliament UK (Aug 2015) [Research Briefings: Housing Benefit: withdrawing entitlement from 18-21 year olds](#)

³⁴ This will take effect from April 2017

³⁵ Housing benefit is currently available to people if they pay rent, rates, have a low income, savings or if not in work.

³⁶ Department for Social Development (Sept 2015) [The Impact of the Summer Budget 2015](#)

- iii. We recommend that the Department for Communities, in its review of the role and regulation of the private rented sector, includes targeted action to address the needs of single tenants aged 35 years and under when renting in the private rented sector.
- 49. Changes to Housing Benefit³⁷ have resulted in single people aged 35 years old and under only entitled to a shared accommodation rate. Young people aged under 35 have been negatively affected by Welfare Reform measures, as regards their ability to secure and sustain private rented sector accommodation, in the absence of available social housing.
- 50. We welcome the commitment within the draft Programme for Government delivery plan³⁸ to develop affordable housing solutions to meet the needs of single people aged under 35 on benefits.

For younger people, action is needed to reduce the number of looked after children subject to Police and Criminal Evidence Order (PACE) detentions in the Juvenile Justice Centre.

- iv. The Commission recommends action to reduce the number of looked after children subject to PACE detentions within the Juvenile Justice Centre (JJC), and to address the overrepresentation of looked after children within the criminal justice system.
- 51. The Review of the Youth Justice System in Northern Ireland³⁹ recommended development of an appropriate range of supported accommodation to reduce the use of the JJC as a place of safety under PACE⁴⁰. It recommended that looked after children should not be placed in custody where this would not have been an outcome for children in the general population⁴¹.
- 52. In 2015/16 36% of all transactions⁴² within the JJC were with looked after children, a similar rate to previous years⁴³. We would recommend action is taken to reduce the overrepresentation of looked after children within the criminal justice system and reduce the number subject to PACE detentions.

**For further information visit:
www.equalityni.org/age**

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³⁷ Northern Ireland Housing Executive's website: [Benefits and Grants/Local Housing Allowance](#)

³⁸ NI Executive (2016) [Delivery plan: Number of households in housing stress](#)

³⁹ Department of Justice (2011) [A review of the Youth Justice System in Northern Ireland](#)

⁴⁰ Department of Justice (2011) [A review of the Youth Justice System in Northern Ireland](#) recommendation 8

⁴¹ Department of Justice (2011) [A review of the Youth Justice System in Northern Ireland](#) recommendation 19

⁴² Transactions are new admissions and internal changes of status from PACE to remand

⁴³ Youth Justice Agency (2016) [Annual Workload Statistics 2015/16](#) reported: 2014/15 - 39%; 2013/14 - 42%; 2012/13 38%; 2011/12 - 32%