

Number: WG47762

Welsh Government Consultation (WG47762) – summary of responses

Older People's Commissioner for Wales term of office

A proposal to amend the Commissioner for Older People in Wales (Appointment) Regulations 2007 (as amended) so that the Older People's Commissioner for Wales is appointed by the First Minister for a 7-year term of office rather than a 4-year term of office.

September 2023

Overview

This report provides a summary of responses from a consultation on a proposal to change the terms of appointment for the Older People's Commissioner for Wales so that the term of office becomes 7 years rather than the current term of 4 years.

Action Required

This document is for information only.

Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

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Additional copies

This summary of response and copies of all the consultation documentation are published in electronic form only and can be accessed on the Welsh Government's website.

Link to the consultation documentation: hyperlink

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1. Background

Wales has four Commissioners who are appointed by the First Minister for Wales. The Welsh Language Commissioner, the Children's Commissioner for Wales, the Future Generations Commissioner for Wales, and the Older People's Commissioner for Wales. All have different statutory powers but are supported by Welsh Government officials through similar funding and governance arrangements. The Welsh Language Commissioner, the Children's Commissioner for Wales and the Future Generations Commissioner for Wales are all appointed on a fixed, non-extendable 7-year term of office.

However, the Older People's Commissioner for Wales ("OPCW") is appointed for a 4-year term of office. There is the possibility of a 2-year extension added to the 4-year term of office which needs to be agreed by the First Minister after taking account of those that represent the views of older people in Wales. Alternatively, the Commissioner may reapply for a second 4-year term of office under a competitive process.

The Older People's Commissioner for Wales's primary functions are to:

- promote awareness of the interests of older people in Wales and of the need to safeguard those interests.
- promote the provision of opportunities for, and the elimination of discrimination against older people in Wales.
- encourage best practice in the treatment of older people in Wales.
- keep under review the adequacy and effectiveness of law affecting the interests of older people in Wales.

For more information on the role of the Commissioner, please visit the website: Home - Older People's Commissioner for Wales

The OPCW is appointed in accordance with the following regulations:

- <u>The Commissioner for Older People in Wales (Appointment) Regulations 2007</u> as amended by:
- The Commissioner for Older People in Wales (Appointment) (Amendment)
 Regulations 2016

We propose that the term of office that applies to all Welsh Commissioners should be consistent at a fixed, non-extendable 7 years. This would ensure that all four Commissioners have the same term of office and therefore the same opportunity to work with the groups of people that they represent and to champion change on their behalf.

To do this, we propose to amend the 'Commissioner for Older People in Wales (Appointment) Regulations 2007 (as amended) ("the Regulations")'. This amendment will allow the First Minister to appoint the OPCW for a term of office of 7 years rather than the current term of 4 years. The opportunity to ask the First

Minister for an extension of 2 years, or to reapply for a second 4-year term of office through a competitive process will be withdrawn from these Regulations.

The next OPCW is due to be appointed by August 2024. We would like to make the proposed changes to the Regulations so that the next OPCW can be appointed for a fixed, non-extendable 7-year term of office.

2. Consultation questions

The consultation on this proposal was conducted between 19 June and 12 September 2023. We asked five questions:

Question 1

Are you completing the survey as a member of the public or on behalf of an organisation?

Member of the public

On behalf of an organisation

Question 2

We would like your views on whether we should make these proposed changes.

Do you agree that we should change the Regulations for the appointment of an Older People's Commissioner for Wales from a 4-year term of office to a 7-year term of office in line with the other Welsh Commissioners? In doing so, we will remove the existing option to request a 2-year extension or to apply for a second 4-year term of office.

Yes
No
Don't know

Question 3

Do you have any additional comments to support your response?

Question 4

We would like to know your views on the effects that these changes would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Question 5

Please also explain how you believe the proposed changes could be formulated or changed to have a positive effect or increased positive effects on opportunities for

people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language, and on treating the Welsh language no less favourably than the English language.

Question 6

What do you think would be the likely effects on individuals and groups with protected characteristics from these changes? Your views on how positive effects could be increased, or negative effects mitigated, would also be welcome.

3. How the consultation was held

The 12-week consultation was held via the Welsh Government website between 19 June and 12 September. The consultation document provided an overview of the reasons behind the consultation and details on how to respond. This is a hyperlink to the consultation. In June, we wrote by e-mail to our stakeholders inviting them to respond and to share the invite within their communities and networks across Wales.

Organisations invited to respond who represent the views of older people included:

- Members of the Ministerial Advice Forum on Ageing
- Age Cymru
- National Pensioners Convention (NPC) Wales
- Active Wales
- Cymru Older People's Alliance Wales Seniors Forum
- Age Friendly Wales Officers located in each local authority in Wales
- Elected Councillor Age Friendly Wales Champions at each local authority
- The Older People's Commissioner for Wales
- Other partner organisations in the private, public and third sector

The consultation was also publicised via the Welsh Government channels on social media and discussed at relevant meetings and events.

There were several ways to respond:

- completing our **online form**
- download and complete our response form and e-mail us at: olderpeopleandcarers@gov.wales
- download and complete our response form and post to:

Older People and Carers Team Welsh Government Cathays Park Cardiff CF10 3NQ

4. Consultation response summary

In total, 71 respondents engaged with the consultation. 23 provided 'partial' responses and 48 provided 'completed' responses.

Of the 48 'completed' responses, 46 were completed online, 2 were received via e-mail. The list of the respondents can be found in Appendix 1. Those who have asked to remain anonymous are not included.

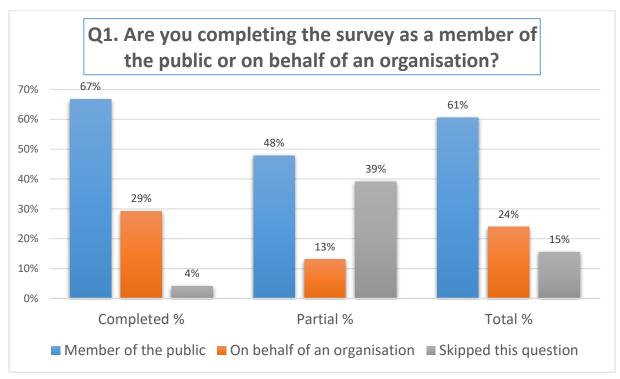
Of the 'partial' and 'completed' responses received, 61 answered 'YES' or 'NO' to the primary question asking if they agree that the regulations around appointing the OPCW should be changed from 4 to 7 years. This group will be the primary focus of this report.

Of the 61 'YES' or 'NO' respondents, 41 submitted further comments, 8 were submitted in Welsh and 33 were submitted in English.

Question 1

Are you completing the survey as a member of the public or on behalf of an organisation?

Of the 48 'completed' responses, 32 were members of the public and 14 responded on behalf of an organisation. Of the 23 'partial' responses 11 were members of the public and 3 responded on behalf of an organisation. Graph 1 shows a breakdown by percentage.



Graph 1.

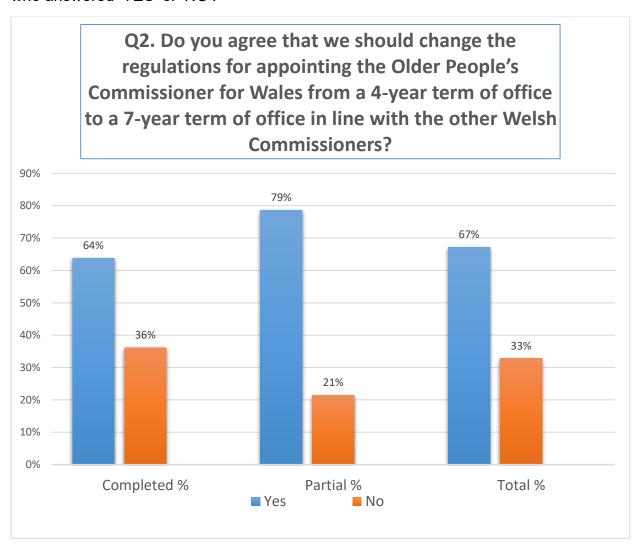
Question 2

We want your views on whether we should make these changes. Do you agree that we should change the regulations for appointing the Older People's Commissioner for Wales from a 4-year term of office to a 7-year term of office in line with the other Welsh Commissioners? In doing so we will remove the opportunity to ask for a 2-year extension or to reapply.

Of the 48 'completed' responses, 30 answered 'YES' that they agreed with the proposed change, 17 answered 'NO' that they did not agree with the proposed change and 1 respondent was 'NOT SURE'.

Of the 23 'partial' responses, 11 said 'YES' and 3 said 'NO'. 9 did not submit a response to this question.

Graph 2 shows a breakdown by percentage of all completed and partial responses who answered 'YES' or 'NO'.



Graph 2.

Question 3

Do you have any additional comments to support your answer?

41 of the respondents gave additional comments. The most significant comments are listed in Appendix 2.

Of those that provided additional comments, 18 were in favour of the change. Their comments mainly focused on the need for alignment with the other Commissioners and that 7 years would provide the opportunity to develop a longer-term approach towards working with older people. Some made comments around the importance of having a Welsh speaker in post.

17 respondents added additional comments to support why they had said 'NO' to the proposed change. These comments mainly focused on the risk that the OPCW may become complacent over a longer period. Some felt that the opportunity to apply for an extension was important so that it might be awarded based on merit and effectiveness.

Some expressed strong feelings of dissatisfaction with the OPCW and felt that the role should be reviewed in its entirety.

Conclusions from Questions 2 and 3

Whilst a notable number (33%) of the respondents were against the idea of changing the regulations for appointing the OPCW from 4 to a 7-year term of office, most respondents (67%) expressed their support for this change.

Next steps for Welsh Government

As the majority are in favour of this change, Welsh Government officials will proceed with preparations for amending 'The Commissioner for Older People in Wales (Appointment) Regulations 2007' by bringing forward a set of amending regulations.

The amending regulations will be made under the negative procedure. This means that the regulations will be made by the relevant Minister and then laid before the Senedd. The regulations will come into force by the date stated in the regulations unless they are called in for debate by the Senedd Members, and that the members vote against them. If the amended regulations come into force, the First Minister will proceed to appoint the next OPCW on a fixed, non-extendable 7-year term of office.

Question 4

We would like to know your views on the effects that changing these regulations will have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

There were 33 responses to Question 4. The most significant comments are listed in Appendix 3:

Question 5

Please also explain how you believe the proposed changes could be formulated or changed to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

There were 26 responses to Question 5 that were additional to Question 4. The most significant responses are listed in Appendix 4.

Conclusions from Questions 4 and 5

Eight of the 33 respondents who added comments in answer to Question 4 felt that the Commissioner should be able to speak Welsh or should be a committed Welsh learner. They felt that a longer term of office would support this approach.

A significant number of the respondents did not know or did not think that the changes to the regulations would have an effect on the Welsh language, although one did emphasise the importance of engaging effectively with Welsh speakers across Wales.

There were 26 comments in response to Question 5. Some focussed on the importance of the Commissioner having Welsh language skills, and that a longer term could support the development of these skills. Others expressed caution that making the role Welsh essential might risk limiting the field of suitable candidates, noting that a balance needs to be found.

One noted that they would welcome further use of the Welsh language by future Commissioners including at public appearances and on social media. Some reemphasised their sentiment that 4 years was appropriate or expressed that they were not satisfied with the Commissioner's role in general.

Next steps for the Welsh Government

The current Commissioner's term of office will end in August 2024. The recruitment process for the next Older People's Commissioner for Wales will begin during the January of 2023. Careful consideration will be given to ensuring that the Welsh language requirements for the post of the OPCW are appropriate so that the role can be delivered effectively.

Question 6

What in your view would be the likely impacts upon individuals and groups with protected characteristics from these changes? Your views on how positive effects could be increased, or negative effects could be mitigated, would also be welcome.

There were 26 responses to Question 6. The most significant responses are listed in Appendix 5.

Conclusions from Question 6

Question 6 received a mixture of comments. Some felt that a longer term of office would ensure greater continuity in the relationship with individuals and groups with protected characteristics. Some would welcome efforts to attract a wider diversity of candidates. Some respondents were concerned that a longer term of office could lead to complacency whilst others noted a shorter term would bring a fresh approach to working with individuals and groups with protected characteristics.

Next steps for Welsh Government

Efforts need to be made to attract a wide diversity of candidates as part of the recruitment process for the next Commissioner. Due consideration needs to be given to addressing the concerns held by some respondents around complacency in supporting individuals and groups with protected characteristics. Applicants for the role of Older People's Commissioner for Wales will be encouraged to consider their approach to tackling these issues.

List of respondents who 'completed' the form and were happy to share their details.

- 1. Christopher Thomas, member of the public
- 2. Malcolm Worth, Colwyn Bay Men's Shed
- 3. Alan Curtis, member of the public, Older Persons Forum,
- 4. John Evans Jones, member of the public, Councillor,
- 5. Dr Sandip Raha, member of the public,
- 6. Gareth Parry, member of the public
- 7. Martyn Glen Hughes Jones, member of the public,
- 8. Ceri Davies, member of the public,
- 9. Sue Jordan, member of the public,
- 10. Vale of Glamorgan Council
- 11. Martyn Glen Hughes Jones, member of the public, Care and Repair in Powys
- 12. National Pensioners Convention Wales
- 13. Adult Social Care & Homelessness Service, Denbighshire County Council
- 14. Care and Repair Cymru
- 15. R.H. Wyn Williams, member of the public
- 16. Wales safer Communities Network
- 17. Gabriela Todd, member of the public
- 18. Welsh Seniors Forum
- 19. Age Cymru
- 20. Audit Wales

Comments marked with * were originally submitted in Welsh.

Appendix 2

Question 3 asked for additional comments to the response given in Question 2 which asked if they agree that the term of office should be extended to 7 years and in doing so, remove the opportunity to ask for a 2-year extension or to reapply.

- 1. This post should be the same as other commissioners.
- 2. The various Commissioners have proved their worth over the extended period of time in office. It therefore makes sense that all Commissioners serve for same period.
- 3. I think it would provide consistency with the other Commissioners, but also encourage long-term planning and implementation. *
- 4. The same conditions should apply to all commissioners. Why isn't this the answer? If the term of the other three commissioners is seven years, then this is certainly the case to be for the Older People's Commissioner for Wales. *
- 5. It seems only fair as the other Commissioners appointments are for 7 years. A new Commissioner needs longer than 4 years to bed into the post and it seems petty to have to go cap in hand to the WG to have a further 2 years afterwards.
- 6. Parity seems a good idea.
- 7. Seven years is too long. They can sit there and enjoy as they know that they are safe for seven years.
- 8. The Commissioner should be ensured to be fluent in Welsh/Welsh. It is not acceptable to appoint an English-only Commissioner. The current Commissioner and her officers attended an elderly conference in Gwynedd and gave an English-only (PowerPoint and verbal) presentation to a roommate (around 80 people) with the vast majority being Welsh. There was considerable discontent, and the lack of understanding of the Commissioner and her officer of the linguistic situation was incredible. *
- 9. 4 years is not long enough to implement and see results of any recommendations. This role is vital and should have enough time to see the results of actions.
- 10. Too long, need new thoughts.
- 11. Self-serving politicians deserve no consideration. Terms should be short and decided by effectiveness. What have you achieved, what have you improved? How has the current head improved things for the elderly? Not by much. Still, I am sure that they have pocketed a large salary and pension benefits. Far more than the people they are supposed to protect and represent.

- 12. I don't think it should be extended. If a commissioner does a good job in four years, then they can ask for a two-year extension. But what if they have done a poor job? Or have done nothing why be stuck with that situation and person for 7 years.
- 13. There is no case made as to why 7 is appropriate compared to other elected public offices such as councillors or the Senedd which are 4 or 5 years. I would far prefer a 4-year term that can be extended if desired by both sides for a further term.
- 14. The present commissioner has made no progress on medicines management for older people. The use of antipsychotics in car homes has increased, not decreased. We need a new commissioner to engage with the avoidable harms to older people caused by prescribed medicines.
- 15. Four years is long enough to see whether they have made a positive difference if so, their term can be extended, or they can reapply. If not, it's time to get somebody else.
- 16. Seven years is too long to have the same person in this position. There often needs a new person with new ideas and new approach to such an appointment.
- 17. Our view is that the arrangements for all commissioners should be the same.
- 18. The field of Older People is an area that currently faces tremendous challenges, especially considering that our society is becoming more elderly every year, which is significantly increasing demand on resources such as care and health. To that end, there is probably no quick fix for these issues and that it will be an extended process to promote the significant changes needed nationally and I therefore think that a 7-year post is certainly more suitable. *
- 19. I think there should be more public input into all appointments of this sort, the scope should be wider and have more teeth.
- 20. There appears to be no relevant reason as to why the term is different to the other commissioners, so it should be brought into alignment.
- 21. NPC Wales resolved to support the proposal at the meeting of their Executive Committee on 20th July 2022. The support is based on our experience with the current commissioner whose office was extended by 2 years and the understanding that the role did need continuity beyond the 5-year cycle of Senedd Elections.
- 22. This change is very much needed to regularise the appointment regime and avoid the need for ad-hoc extensions. It will bring parity with the other Commissioners, increase stability and continuity of the role, and ensure older people can sustain a longer-term relationship with the Commissioner. The

proposals would provide more time and opportunity to develop and bring about changes that will be beneficial to older people – with a more realistic period to influence change in society that are often complex and require expert and high-level influencing and action over time.

- 23. Overall, Care & Repair are comfortable with the intention to extend the length of office of the Older People's Commissioner (OPC). With the other three roles appointed by the First Minister (Welsh Language Commissioner, Future Generations Commissioner and Children's Commissioner) being a seven-year term, it would allow the Commissioner to be brought in line with the similar existing roles.
- 24. The extension of the term of office from a four-year term to a seven-year term would ensure parity with other Commissioners as terms of office would then be in line. As well as parity, a seven-year term would enable the Commissioner to plan on a longer term setting a Strategic Plan and deliverables in a more realistic time frame, which would have a positive impact for delivering change for older people. A seven-year term would also provide more stability to the organisation. Financial pressures would be able to be managed over a longer time and staff would specifically have more stability with a longer term.
- 25. Opportunity to provide longer periods of stability, useful to support mid to longer term plans and strategies.
- 26. A much needed, very important position.
- 27. Our management team have no issue with this as it brings the position in line with other commissioners and gives a level of stability in the role.
- 28. Please disband the Older Peoples' Commissioner for Wales role and office immediately. It serves no meaningful purpose or has any meaningful effect on the lives of older people in Wales or those who deliver services or support to them.
- 29. This brings the term into line and ensures consistency when Government's change over.
- 30. 4 years with a two-year extension should be the ideal appointment time for this post. Energy and initiative is at its highest in first two years of an appointment- 7 years could lead to a stale comfortable job where its effectiveness wains. You could have it so after 4 years it goes back to market and incumbents could reapply. This would be easier than trying to manage out a poor performing incumbent.
- 31. 7 years would make them too complacent and lose the impetus to care about people.
- 32. There should be a formal appraisal of the effectiveness of the commissioner, it is unclear what any of the postholders have achieved. That is not to slight

- commissioners individually or collectively but recognises that much policy surrounding ageing is not Senedd business. The question should be asked whether this role actually improves the voice for older people or not.
- 33. We agree with the principle of having consistency between the four Welsh Commissioners which has the potential to enable an increased in partnership working and collaboration.
- 34. It is important to make long-lasting changes and not just look at this term of political office. 7 years is a time in which change can happen, be monitored, evaluated, reviewed, and renewed. The responsibility for achieving set aims and goals at the beginning of the period can be expected to be reported towards the hand over period at the end.
- 35. As a member of Wales Seniors' Forum and Newport 50 Plus Forum I have watched the operations of the commission's office over a number of years. I have come to the conclusion the post, not the individual, has very little impact on the lives of the poorest senior citizens living in Wales. That said it is difficult to judge the efficiency or otherwise of the post because no minutes, attendance lists or agenda are made public. Transparency is a necessity if people are to know they are being represented. I see no reason extend the duration of post that does so little for the poorest senior citizens of Wales.
- 36. Abolish the post, it is not needed or even wanted by the older people I speak to. Nobody knows what the older Peoples' Commissioner for Wales does.
- 37. If the appointed commissioner turns out to be unsatisfactory (perhaps for health, family, or personal reasons) 7 years is too long for them to remain in post. 4 years plus the possibility of reappointment for another 4 years would be safer and therefore preferable. This observation applies to all commissioners.
- 38. We believe that the Older People's Commissioner for Wales is a vital role to champion the rights of older people and ensure that their voices are heard at the heart of decision making in Wales. To have the maximum amount of time to deliver their workplan the term of office should be in line with the other three Commissioners.
- 39. We think there is likely benefit to applying consistency amongst the terms of commissioners in Wales. We understand that the current Older People's Commissioner was granted an extension. Extending the length of the term will avoid the necessity for the next Commissioner to seek an extension or reapply through a competitive process. This will reduce public resources needed to consider a request or new recruitment process. It seems appropriate to offer the role as a longer term from the outset, to better align the position with comparable senior positions.
- 40. A 4-year term is too short for the OPC to complete her tasks.

Question 4 asked the respondents to comment on the effects that changing these regulations will have on the Welsh language specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. Comments marked with * were originally submitted in Welsh.

- 1. It can only be positive.
- 2. I don't think there would be any change.*
- 3. This job and all of these posts should be ones where someone is either a Welsh speaker or a learner and commits to continuing to learn. The posts are currently filled by individuals who barely speak Welsh. Although a commitment to learning has been given this is not policed and so once someone has got the job the commitment means nothing. This isn't good enough. A Commissioner of any kind is one who supports the public across Wales and the Welsh language should be essential for communicating effectively with the individuals they represent.*
- 4. Why not make the jobs 7 years on a condition of continuous development to learn Welsh and that this is measured in detail through exams such as the Language Certificate? It's one thing to commit to learning LEARNING the language is something completely different.*
- 5. I don't see how these changes can affect the Welsh language. The Commissioner for Older People's office already send out bilingual information and have some Welsh speakers in post.
- 6. It is vital that the Commissioner can speak Welsh fluently.*
- 7. Small steps are already in place to try to encourage staffing levels within the Older Care Sector and I believe there would be an additional resource here to assist with recruitment efforts locally as in Welsh. There is a need to ensure that the Commissioner has the ability to speak Welsh. A More than Words strategy and the Proactive Offer is vital for older people, and it is therefore vital that the Commissioner is able to engage with people in their chosen language. *
 - The appointment of an English-only Commissioner would have a negative impact on the population.*
- 8. This would allow for continuation of the current arrangements on Welsh Language introduced and improved by successive Commissioners.

- 9. Care & Repair do not believe that extending the term of office for the Older People's Commissioner will have a direct impact on the Welsh language, either positively or negatively. However, from data collected by the Census in 2021, 1 in 5 people aged 65+ speak Welsh, equating to nearly 117,000 people. There could be a perception by some Welsh-speaking older people that their language and identity is not accurately reflected in the Commissioner appointment. However, this is unavoidable in some cases as we feel it would be unethical to only consider bilingual applicants for a post such as this.
- 10. By being fluent in both languages it will show more respect for older people in Wales.*

Question 5 asked how the respondents believed the proposed changes could be formulated or changed to have a positive effect or increased positive effects on opportunities for people to use the Welsh language. Comments marked with * were originally submitted in Welsh.

- Suggest that all public speeches by the Commissioner starts and ends in Welsh.
- 2. It is important to ensure that the Welsh language is treated absolutely equally.
- 3. The rules aren't strict enough at the moment. Not only for the post of Older People's Commissioner but for the other two which are Children's Commissioner and Future Generations Commissioner. This needs to be changed and things firmly put in place. Attitude towards the Welsh language is appalling and not good enough. In local authorities like Gwynedd it's hard to justify visits from someone who knows nothing more than "good morning" and this isn't good enough.*

Either the jobs need to change to be essential Welsh (there are plenty of Welsh speakers who are suitable for the job) or that measures are in place to be able to see if there is development in the learning of the language and if they do not reach a certain 'level' within two years then another commissioner will need to be nominated.*

- 4. It might be useful to advertise for a new post as preferably Welsh speaking, but I expect this is already happening.
- 5. The post of Commissioner is currently failing due to the lack of Welsh available.*
- 6. A Commissioner who is bilingual would be desirable but not essential.

- 7. As above, we do not believe that the extension of the term will have an effect on the Welsh language, as this will be more heavily influenced by the person appointed into the role as opposed to the length of the role. We would welcome any future candidates committing to utilising the Welsh language wherever possible and to the best o their ability in speeches, social media, public appearances and other. This would be a positive way of showing leadership, but this is not a requirement of the role and so is not necessarily in the scope of this consultation.
- 8. I feel it would be a pity if the best candidate were to be ruled out because of their Welsh fluency.

Question 6 asked the respondents what they think would be the likely effects on individuals and groups with protected characteristics from these changes? Comments marked with * were originally submitted in Welsh.

- Consistency and opportunities to build long-term relationships would be beneficial to all.*
- 2. A lot of Older People's organisations appreciate the help and support from the Commissioner and her office at present. Continuity of the service given is essential to an older person.
- 3. Continuity of groups should lead to smoother communications.
- 4. If you change it to 7 years and the commissioner is useless, or lazy or both. Then those affected will be stuck with a useless commissioner.
- 5. NPC Wales view is that we support and understand that the role did need continuity beyond the 5-year cycle of Senedd Elections, and this would be of benefit to groups with protected characteristics.
- 6. Improved consistency and opportunities for partnership working and collaboration should improve the engagement and voice of older people and potentially have the opportunity to respond and make improvements where issues and concerns are raised. Which should have a positive impact on older people. Community safety is frequently a concern for older people and therefore the longer term could enable more joined up working between devolved and reserved agencies.
- 7. Similarly, to our response regarding the Welsh language, we do not anticipate that altering the term of office for the Older People's Commissioner will have any adverse effect on individuals or groups with protected characteristics.

There must be assurances from all future appointed Commissioners that they will work equitably for all older people, irrespective of identity or protected characteristics to ensure parity of representation and opportunity to be heard.

It would be positive to see a move to interview and seek to appoint more diverse candidates into this role, as currently there has been a strong pattern in the postholder of Older People's Commissioner. This would reflect our changing demographics in Wales and allow older people from other ethnic minority communities to see a commissioner role as something that reflects and represents them.