

Implementation of '*Improving the Life Chances of Disabled People*' – Age Concern's response

1. Introduction

- 1.1 Age Concern England (the National Council on Ageing) brings together Age Concern organisations working at a local level and 100 national bodies, including charities, professional bodies and representational groups with an interest in older people and ageing issues. Through our national information line, which receives 225,000 telephone and postal enquiries a year, and the information services offered by local Age Concern organisations, we are in day to day contact with older people and their concerns.
- 1.2 The Prime Minister's Strategy Unit *Improving Life Chances of Disabled People* report contains a number of proposals that will have a considerable impact on older disabled people. The report itself notes that over 40% of people aged 65 to 74 and over 50% of people aged 75+ have a longstanding illness or disability. It is noted on page 3 of the Executive summary that 'many of the proposals in the report will help to improve the life chances of disabled people across the entire life-course'. Many of the proposals are also included in the DWP '*Opportunity Age*' strategy and in the '*Independence, Well-being and Choice*' Green Paper, to which we will be responding in due course. However *Improving the Life Chances of Disabled People* is still described as being primarily about the needs of disabled people below pension age.

The *Life Chances* report contains a number of specific proposals for early implementation in advance of any measures that may arise from the Green Paper. We regard it is vital that older people are involved in the implementation of these proposals for the following reasons:

- The proposals include recommendations (in recommendation 8.3) for reform of regulations, standards and legislation affecting social care. These proposals will affect all adult users of social care services.
- The proposals include recommendations for the development of services to support users of direct payments. It is important that older people are included in these plans, particularly given the Government's aim of expanding the use of direct payments by older people. This does not seem to have happened so far as part of the consultation process leading to the proposals.

- Implementation of the *Life Chances* proposals must be undertaken in a way that does not discriminate against different groups, including older disabled people.
- It is crucial that measures to improve the recruitment and retention of disabled people take into account the needs of the over 50's and address the barriers to accumulating an adequate pension that disabled people face. The report notes that 25% of disabled people of working age are over 50. In our view the use of the concept of working age is outdated and represents a failure of 'joined up thinking' on the part of the Government since in other contexts such as the *Opportunity Age* strategy the Government is encouraging the extension of working lives. In the future many people will wish to, or need to work, beyond the age of 65, so the concept of 'working age' makes little sense. This means that the figure of 25% underestimates the number of disabled people aged over 50 who will be affected by the proposals.
- We have raised concerns about the extent to which Government childcare policy is based on the assumed norm of the two generation nuclear family. However changing family structures mean that childcare responsibilities often fall on more than one generation, including grandparents. Support for families that include disabled children or parents need to take account of these changing structures.

Many of the measures needed to make society more accessible for younger disabled adults are also important for older people. It therefore makes little sense to separate measures that will benefit older people and younger disabled adults. The Green Paper, with its proposal for a new 'Director of Adult Services' to co-ordinate a strategic approach to social care, housing, transport and making community facilities accessible, recognises this. However, at a national level Government strategies need to take a joined up approach.

2. Recommendations in the Report

- 2.1 We recommend that the claim that the strategy refers primarily to the needs of disabled people of below state pension age should be dropped as it is not sustainable, given the wide ranging scope of the recommendations. This should be accompanied by further steps to ensure that the views of disabled people who are over state pension age are incorporated into proposals.
- 2.2 The summary of recommendations at the end of the report shows that many of the proposals in the report are far from being, as the strategy claims, 'primarily about the needs of disabled people below state pension age'. This description might legitimately be applied to recommendations in Chapter 5, referring to early years and family support (although note the above comments on grandparents), and Chapter 6, transition to adulthood. It could be applied to Chapter 7 on employment, although there is a need to make sure that these recommendations take account of the needs of the over 50's, and the fact that some people will want to work beyond state pension age. However, it is not clear why recommendations in Chapter 4 referring to independent living, Chapter 8 on improved delivery or Chapter 9 on implementation are more applicable to younger disabled people than to those over state pension age.

3. Centres of Independent Living

- 3.1 In our view, it is vital that local arrangements to support disabled people in arranging and managing care services build on existing community networks. Different groups in the community may access services in different ways. This is most apparent with groups who have traditionally been reluctant to access mainstream services, such as people who are HIV+ or who have AIDS, or young carers. However, it may also be the case that, in a particular locality, older disabled people will be more likely to be in contact with services that are specifically aimed at older people, especially if they do not view themselves as disabled. Specialised services for older people may also be particularly successful in mobilising volunteering or other community activity (this may also be true of other specialist services such as those operating within minority ethnic communities or faith based organisations). The best solution will depend on local circumstances, though we accept that there might be a need for national standards for support services which could cover involvement of and control by actual and potential service users.
- 3.2 It is not clear whether this is recognised in the *Life Chances* proposals, or whether the proposals view Centres of Independent Living (CILs) as a 'one size fits all' solution. Whether a CIL is the appropriate approach to meet local needs may depend on what is meant by a CIL. A CIL might be alternatively viewed as a building based service, an organisation operating from a number of premises, a federation, a network or an umbrella group. In our view it is vital that older disabled people and indeed all users of existing community networks and support activities have an input into this debate. It is not apparent that this has happened so far.
- 3.3 It is noted in Chapter 4 that CIL's currently provide the same services to older disabled people as they do to those who are below retirement age, and that 'it would be expected that' following the projected expansion of CILs they would provide a service to disabled people of all ages. This commitment is welcome, but CILs do not only provide services. They can also build community capacity, mobilising resources amongst disabled people, and act as a means through which disabled people influence policies that will affect them. The *Life Chances* proposals make specific recommendations that give priority to CILs as the representative agency for all adult social care users.
- 3.4 The development of such activities is a long term, organic process which will work differently depending on local circumstances. An 'expectation' that CIL's will represent the entire community of disabled people regardless of age (and presumably of other components of individual identity such as ethnicity) does not of itself give much guarantee that this will happen, or that local community resources and networks will develop in a uniform manner. Even if these resources and networks could be made to conform to a standard pattern, it is not clear why there would be any advantage to requiring them to do so.
- 3.5 We therefore recommend that implementation of this proposal should be subject to local consultation by local authorities, who should be required to demonstrate that they have

taken steps to ensure that consultation includes the views of older disabled people and of other groups who might have distinctive needs or ways of accessing services.

4. The Office of Disability Issues

- 4.1 The proposed Office of Disability Issues has a key role to play in ensuring that policy is co-ordinated across government. This co-ordinating role means that it is vital that the office represents all disabled people and that the scope of its activities are not restricted by arbitrary administrative divisions that force people into a single category – e.g. either old or disabled.
- 4.2 Paragraph 8.4 of the proposals state that the Office of Disability Issues will cover people of all ages. This is welcome, and given the wide ranging scope of the proposed activities of the Office, essential. However it is not apparent from the implementation strategy what measures are proposed to ensure that the office is able to do this.

5. Economic Benefits

- 5.1 We fully support the argument that investing resources in greater economic participation by disabled people could deliver a net economic benefit in the medium to long term. However in our view that benefit is most clearly apparent when the entire life course is taken into account and we therefore recommend that this approach is adopted.
- 6.2 For example measures that result in greater economic participation by disabled people will support the aim of the DWP strategy of increasing economic participation by the over 50's. The DWP strategy notes that, due to rising numbers of older people, increased economic participation by over 50's is vital in order to maintain the current ratio of economically active to inactive people. Greater economic participation by disabled people will also increase the number of people who are able to accumulate some form of pension provision.
- 6.3 Age Concern has already carried out considerable work on the economic contribution of older people which notes that this contribution goes well beyond paid employment. Older people may play a multiplicity of roles, for example volunteering or caring for older or disabled relatives or grandchildren. We therefore recommend that the Life Chances Strategy should not adopt a view of economic contribution that is restricted to paid work.

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