

Sight Scotland   
Call for views: Consultation on the proposal for a Commissioner for Older People  
October 2023

About Sight Scotland

At Sight Scotland we’re tackling vision loss together. Our mission is to reach everyone in Scotland with sight loss – where and when they need us. We are here for everyone affected by vision loss in Scotland. We offer support and advice, campaign for equal rights and fund medical research. We provide learning, care, accessible formats and support blind and partially sighted people in their communities.

Our services include The Royal Blind School and education outreach services in mainstream schools, residential care for children and adults, the provision of formats which enable equal access to the written word for people with sight loss, emotional support and information to anyone living with or impacted by sight loss through our support line and community service, and expert rehabilitation and mobility training to enable people to regain independence after sight loss.

To get free support you can call Sight Scotland on 0800 024 8973. You can also get in touch by emailing us at [help@sightscotland.org.uk](mailto:help@sightscotland.org.uk), or by visiting our website Sightscotland.org.uk.

**Sight Scotland and Sight Scotland Veterans response to Pavement Parking consultation** 

1. **Which of the following best expresses your view of the proposed Bill?**

**Please note that this question is compulsory.**

**c Fully supportive**

**c Partially supportive**

**c Neutral (neither support nor oppose)**

**c Partially opposed**

**c Fully opposed**

**Please explain the reasons for your response.**

At Sight Scotland and Sight Scotland Veterans, we support people of all ages with visual impairment; many of our service users are over 60 – particularly the veterans that our sister charity, In the next decade, the number of people who are blind or partially sighted in Scotland is set to increase by 30,000 to over 200,000 people. RNIB’s sight loss data tool estimates that, in 2022, there were 37,700 older people aged 65-74 living with sight loss in Scotland. This number increases with age: 52,500 people aged 75-84 and 54,600 people aged 85 and over are living with sight loss across Scotland. Such statistics, combined with the knowledge that Scotland’s population is rapidly ageing, demonstrates to us that there is no better time to introduce a Commissioner for Older People who will champion the issues that are faced by people of an older age living in Scotland. An issue that we recognise to disproportionately affect older people in Scotland with visual impairment, is the feelings of loneliness and isolation that many experience. This is something we find concerning and which became even more pertinent during the Covid-19 pandemic. As we now work to reduce these feelings and support older people with visual impairment as much as possible, we fully support the proposal for a Commissioner for Older People.

1. **Do you think legislation is required, or are there are other ways in which the proposed Bill’s aims could be achieved more effectively?**

**Please explain the reasons for your response.**

We support the proposal for the Bill, as we believe that this will demonstrate the Scottish government’s commitment to uphold the right’s of older people.  Any further legislation created must be accompanied by raising awareness of current obligations, identifying gaps and needs not being met, as well as highlighting good practice and positive examples. The role of the Commissioner is suited to these functions and would help to achieve the aims of the Bill effectively. In addition, the role of the third sector in service provision is often undervalued; having a Commissioner would allow direct dialogue and improved collaboration and coordination with providers.  

1. **Which of the following best expresses your view on whether there is a need for a specific, dedicated Commissioner focusing solely on older people’s rights and interests?**

**c Fully supportive**

**c Partially supportive**

**c Neutral (neither support nor oppose)**

**c Partially opposed**

**c Fully opposed**

**c Do not wish to express a view**

**Please explain the reasons for your response, including your views on the list of proposed functions set out between pages 29 and 32 of the consultation document, and any additional functions you think the commissioner should have.**

We believe that having a commissioner dedicated to championing the interests and rights of older people is really important. Introducing a Commissioner allows the voices of a group of people who are more likely to be vulnerable to be shared. This is even more integral for people with visual impairment, as living with sight loss adds yet another barrier to the process of defending one’s own rights. Many older people live with visual impairment amongst other impairments, such as dementia. Such an introduction would make sense with the existing Commissioner who is dedicated to championing the rights and interests of Children and Young People. We understand that Wales and Northern Ireland have already dedicated Commissioners for Older People and believe it is important for Scotland to follow this path.

The proposed functions of the commissioner are representative of what we believe a Commissioner for Older People needs to do. It is important to us that the commissioner works to eliminate discrimination against older people in Scotland, and that the commissioner is committed to championing and campaigning for the rights of older people.

We would suggest that the functions could involve, when stating “Promote awareness of the rights and interests of older people in Scotland and of the need to safeguard those interests.”, that the commissioner will voice the concerns of people who are vulnerable or who have disabilities that result in additional challenges doing this for themselves. A key function of the Commissioner should be to act as a collective voice for older people with disabilities to ensure their experiences and views are heard.

1. **Which of the following best expresses your view on the age range of the proposed Commissioner’s remit covering all those in Scotland aged 60 and over?**

**c Fully supportive**

**c Partially supportive**

**c Neutral (neither support nor oppose)**

**c Partially opposed**

**c Fully opposed**

**c Do not wish to express a view**

**Please explain the reasons for your response.**

We support the suggestion for the age range of the proposed Commissioner’s remit to cover those in Scotland aged 60 and over. We feel this is appropriate as at age 60, some individuals may experience age-related health issues, changes to their employment, lifestyle and caring responsibilities – significant areas of life in which a person might experience discrimination. The Commissioner is therefore best placed to protect the rights of older people at this age point.

1. **Which of the following best expresses your view on whether the proposed Commissioner should hold powers of investigation?**

**c Fully supportive**

**c Partially supportive**

**c Neutral (neither support nor oppose)**

**c Partially opposed**

**c Fully opposed**

**c Do not wish to express a view**

**Please explain the reasons for your response including how the powers of investigation would work in practice.**

We think that it’s really important that the Commissioner for Older People to hold powers of investigation. By supporting the proposal for the introduction of such a commissioner, we are supporting this individual championing the interests and rights of older people living in Scotland. To carry out their duties properly, and to meet the functions which we have addressed above, the commissioner would need to have authority to instigate investigations where possible. We want the commissioner to be someone who supports and champions people who are older and who are vulnerable, including those with disabilities. From a visual impairment perspective, it is integral that older people with sight loss have their rights and interests championed and campaigned for. In cases where the rights of such individuals are not being met, it would seem necessary that a Commissioner for Older people could investigate and ensure the situation is rectified. We would welcome the opportunity to work with a Commissioner for Older People as part of our campaigning and think that having the powers of investigation would be an important part of their work.

1. **Given a number of other bodies have similar functions to some of those proposed for the Commissioner, which of the following best expresses your view on whether the proposed Commissioner’s work can avoid duplication with existing officeholders?**

**c Strongly agree**

**c Tend to agree**

**c Neutral (neither agree nor disagree)**

**c Tend to disagree**

**c Strongly disagree**

**c Do not wish to express a view**

**Please explain the reasons for your response, including any views on how the Commissioner and existing officeholders can operate to ensure they do not replicate each other’s work.**

We believe that introducing a Commissioner for Older People will avoid duplication with existing officeholders. In the same manner as there is a Commissioner for Children and Young People whose work does not overlap with other officeholders, we believe a proposed Commissioner for Older People wouldn’t be any different.

If we look at the current officeholders, the Scottish Human Rights Commission stands out as being similar to the role of the Commissioner for Older People. However, the important aspect is that this Commissioner would focus solely on the rights and interests of older people, whilst the SHRC looks at issues that affect everyone’s human rights in Scotland. We believe that a Commissioner for Older People would complement the work that the Scottish Human Rights Commission does, not detract from, or replicate it. With a rapidly aging population in Scotland, having an individual to represent the rights and interests of this group is essential. This becomes even more pertinent when viewed in the joint context of the large number of older people who live with disabilities, and the 30,000 more people who are expected to develop sight loss within the next decade – many of these will be older.

1. **Which of the following best expresses your view on whether the proposed Commissioner should be independent of Government?**

**c Fully supportive**

**c Partially supportive**

**c Neutral (neither support nor oppose)**

**c Partially opposed**

**c Fully opposed**

**c Do not wish to express a view**

**Please explain the reasons for your response, including any views on what the accountability and governance arrangements should be for the Commissioner.**

We support the proposal that the Commissioner will be independent of Government, held accountable by the Scottish Parliamentary Corporate Boday (SPCB), and require approval of the Parliament before appointment. We also support the suggestion that an annual report would need to be produced. We think that it is important for members of the community of older people in Scotland, particularly people with visual impairment, are able to be kept up to date with the work and priorities of the Commissioner for Older People. When creating the annual report, we would advise that it is produced and published in accessible formats – for example, in both large print and audio versions. Braille is also a format that we champion, and which should be explored.

1. **Any new law can have a financial impact which would affect individuals, businesses, the public sector, or others. What financial impact do you think this proposal could have if it became law?**

**c a significant increase in costs**

**c some increase in costs**

**c no overall change in costs**

**c some reduction in costs**

**c a significant reduction in costs**

**c skip to next question**

**Please explain the reasons for your answer, including who you would expect to feel the financial impact of the proposal, and if there are any ways you think the proposal could be delivered more cost-effectively.**

We recognise that the introduction of this proposal as law would have cost implications. As we have already mentioned, the Commissioner for Children and Young People is already in post, and so has certain financial implications that wouldn’t be any different for a Commissioner for Older People. Due to the similarities in their respective work, we welcome the suggestion that the proposed Commissioner could ‘co-locate with an existing body’ and believe that combining office spaces with the Commissioner for Children and Young People would help reduce some costs.

**Equalities**

1. **Any new law can have an impact on different individuals in society, for example as a result of their age, disability, gender re-assignment, marriage and civil partnership status, pregnancy and maternity, race, religion or belief, sex or sexual orientation. What impact could this proposal have on particular people if it became law?**

**If you do not have a view skip to next question.**

**Please explain the reasons for your answer and if there are any ways you think the proposal could avoid negative impacts on particular people.**

We see there to only be positive impacts of the introduction of a Commissioner for Older People. From a visual impairment perspective, we believe that the introduction of a Commissioner for Older People would allow for greater space for the interests and rights of a group of people who are often more vulnerable, and who are increasingly likely to live with impairments like sight loss, to be championed. The proposal would hopefully lead to greater accessibility for older people living with visual impairment and other disabilities, but also greater happiness and quality of life for older people whose interests and rights would be at the forefront of the Commissioner’s work.

1. **Any new law can impact on work to protect and enhance the environment, achieve a sustainable economy, and create a strong, healthy, and just society for future generations. Do you think the proposal could impact in any of these areas?**

**If you do not have a view then skip to next question.**

**Please explain the reasons for your answer, including what you think the impact of the proposal could be, and if there are any ways you think the proposal could avoid negative impacts?**

We believe that this proposal for a Commissioner for Older People would help create a stronger, healthier, and more just society for older people living in Scotland. This proposal seeks to introduce a role that is working to uphold and champion the rights and interests of older people in Scotland – such a role and the functions that are involved would enhance the lives of older people in Scotland. The Commissioner, by getting to know what the main issues are experienced by older people in Scotland, and by dealing with individual cases, will be creating a society that is increasingly welcoming, healthy, and just for future generations of older people. Whether this is to do with healthcare, access and equality issues, or quality of life – to name a few aspects of work that such a Commissioner may encounter – we believe bringing this proposal into law would have a significant positive impact.

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