

Business Plan 2024-25

Background

The Office of the Commissioner for Older People for Northern Ireland (COPNI) was established by the Commissioner for Older People Act (Northern Ireland) 2011, which took effect from January 2011. COPNI is an Executive Non-Departmental Public Body (NDPB) sponsored by the Department for Communities (DfC). The principal aim of the Commissioner for Older People for Northern Ireland (COPNI) is to safeguard and promote the interests of older people.

The role of the Commissioner is unique in providing a strategic vision and focus on the rights and interests of older people in Northern Ireland. The Commissioner's powers to influence policymaking and service delivery and provide advice to government relating to older people adds significant value to the public discourse. The scrutiny powers of the COPNI Act on legislation, policy, and practice of public authorities, holds the government to account on providing adequate protections and services to older people. The Commissioner's remit to address the wider impact on older people, to inform systematic improvements and influence the wider social policy agenda, strengthens the rights and interests of older people, and enables their voice to be heard in public and political debate and discourse.

COPNI actively engages with older people across NI and communicates proactively with older people, defined as everyone over the age of 60. COPNI is also an influential opinion maker on older peoples' issues. demands and expectations from stakeholders are high. These stakeholders include older people in all their diversity of chronological age, community identity, sex and gender, sexual orientation, ethnicity and lifestyles, the media, officials of central and local government, the criminal justice system, and the legislature.

In the 2021, Stratagem MLA Survey, COPNI was perceived as the most effective of six bodies with scrutiny/representative powers. MLAs were asked for a view on each bodies' effectiveness in carrying out its statutory duties. The Commissioner for Older People topped the poll with a very high perception of effectiveness in its use of statutory powers, demonstrating the value for money delivered by the Commissioner and his office.

The Commissioner

The First Minister and deputy First Minister appoint the Commissioner for Older People for Northern Ireland. The term of office is four years. A Commissioner can serve for two terms by mutual agreement. Mr. Eddie Lynch, who was reappointed to a second term of office in June 2020, currently holds the post of Commissioner. This term is due to come to an end in June 2024, with a new appointment anticipated to be made in the summer of 2024.

Vision

COPNI's vision is that:

"Northern Ireland is a great place to age."

Purpose

COPNI's purpose is:

"To be an authoritative and independent champion that safeguards and promotes the interests of older people."

Focus

COPNI's focus for the Commissioner's term of office will be focus on a number of key themes that will be determined in line with the Commissioner's Corporate Plan.

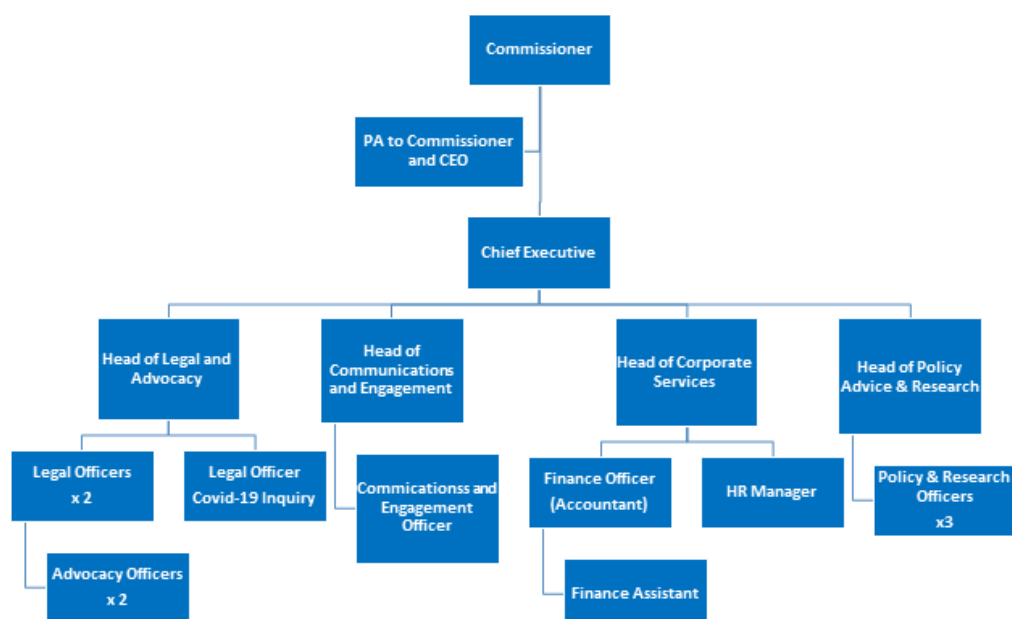
International Framework

COPNI's work is underpinned by the UN Principles for Older Persons (1991), which are.

- Independence
- Care
- Participation
- Self fulfilment, and
- Dignity

Staff of the Commissioner for Older People

Organisational Chart



Review of activity in 2023/24

Globally, we are still coming to terms with COVID-19, and both the short and long-term effect that this will have on our society. Compounded by global supply-chain disruption, and the, until recent, absence of Northern Ireland's Assembly, COPNI has continued to offer much needed legal support and guidance to older people and their families across a variety of urgent issues in 2023/24.

Enquiries to the Commissioner have been consistent throughout this period and relate to a diverse range of issues, such as the provision of goods and services to older people, access to core healthcare services, dementia care, the availability of rural transport routes, and the impact of increasingly digitised services on older people who chose not to be online.

Alongside enquires, the Commissioner has undertaken extensive in-person engagement with the public in his current term. This has included a series of roundtable events in each of Northern Ireland's six counties as part of the "Tackling Ageism" agenda. At these events, the Commissioner heard first-hand the issues most relevant to the day-to-day lives of older people. This culminated in the publication of the "Are You Ageist? (2024) report, which was launched in March 2024.

The Commissioner continued to listen to the concerns of older people and their families, offering advocacy and legal assistance as required. A key success in the current term includes the high-profile case in which the Commissioner successfully raised a legal challenge through Judicial Review on behalf of a client with regards to the Department of Health's Continuing Healthcare policy. This judgement has been

appealed by the Department of Health and the defence of this appeal, due to be heard in September 2024, will represent a key priority for COPNI in the 2024/25 business plan.

The Commissioner's role as advocate for older people has also meant that there has been significant ongoing involvement in the work of the COVID-19 Inquiry. COVID-19 exposed weaknesses in the systems of health and social care; it also demonstrated multiple examples of age-based discrimination in Northern Ireland.

The pandemic had devastating impacts on the older people in our society. The majority of those in Northern Ireland who got profoundly ill, and who died, were in the older age category. Those that were living with vulnerability from existing conditions, endured long periods of shielding and self-isolation which resulted in increased incidences of loneliness and isolation. How older people were presented throughout the pandemic, and the approach adopted by the government are a significant concern of the Commissioner as they reflect long-standing and damaging attitudes that are held against older people. As such, the Commissioner offers continued support to the COVID-19 inquiry as both a Core Participant in Module 2C, and through mandatory Rule 9 requests from the Inquiry, providing evidence on behalf of older people. With the hearing of Module 2c commencing in April 2024, preparation of the Commissioner to provide oral evidence has been a key focus in 2023/24, and this will continue to be a key focus in the early part of the 2024/25 year.

Outside of the Inquiry, the Commissioner has also offered a response to a diverse range of consultations from NI public bodies throughout the current term. This has included responses submitted to, amongst others, the Executive Office, the Department of Health, the Department for Infrastructure, and the Department for Communities. In line with Corporate Plan themes, the Commissioner also continues to produce comprehensive reports to inform future departmental planning. In the most recent term this has included the published *A Different Crime: Offending Against Older People* report, and a report that examines ageism, *Are you ageist? Older People's Perceptions of Ageism in Northern Ireland*.

In March 2024, the Commissioner published *Respecting Residents' Rights in Care Homes: A Review of the Regional Care Home Contract*. This advice to government on the commissioning of residential care highlighted the need for increased rights protections for residents of care homes, in particular in terms of security of tenure and complaints pathways. The advice was provided to the Minister of Health and key department officials. Following its dissemination, the Department of Health's Strategic Planning and Performance Group responsible for reforming the Regional Care Home Contract invited COPNI to present its research and recommendations. The advice was widely covered by the media and was welcomed in communications directly with COPNI and through various platforms by members of the public with experience of the issues addressed in the report. The work to highlight the need for reform of the Regional Care Home Contract through engagement with the Department of Health and public awareness of the issues continues.

Planning is also underway to determine how best the Commissioner can support a returned Executive. Currently, scoped projects in draft include a report that assesses

government's planning and decision making in key policy areas relevant to older people, and another that will assess the implications of domestic abuse for older people.

Corporate Plan 2022-24 and beyond

The Corporate plan 2022-24 was approved by the Department for Communities (DFC), in the Autumn of 2022. This business plan is based on the priorities identified in that Corporate Plan. COPNI is currently in the process of drafting a new outline Corporate Plan ahead of a new Commissioner coming into post in summer 2024. This will be submitted to the Department when the new Commissioner has reviewed and agreed the priorities for their term and has consulted widely with older people.

The Commissioner's Priorities

The current Commissioner's priorities are centred around the overarching theme of Tackling Ageism, focusing on the six issues, as illustrated below. These priorities derived from engagement with older people and key organisations via a survey. The key priorities have also been informed from policy and research and key policy developments across government as well as the nature and theme of the issues that the organisation deals with throughout the year.

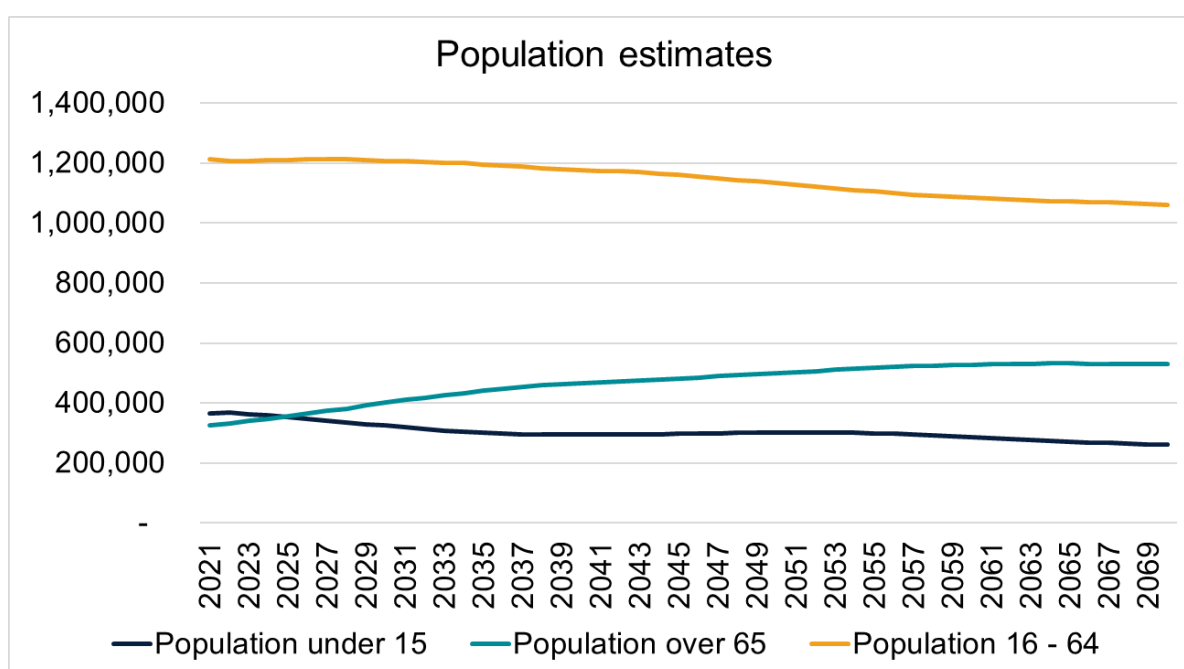


An Ageing Society

There are more people today in Northern Ireland than at any other stage of its history. In 2001 Northern Ireland had a population of just under 1.7 million people. In 2021,

the population was just over 1.9 million people. This suggests that in the last 20 years the population has increased by 13%.

While Northern Ireland's population grows, it is also getting older. The figure below compares Northern Ireland's population over time using census data and Office for National Statistics (ONS) 2020-based interim population projecting. This analysis suggests that for the first time in Northern Ireland's history, the population will begin to decrease by the mid-2040s, peaking at c.1.94m people. In the years leading up to 2040, and in subsequent years the number of people aged over 65 will increase, whereas the number of people aged under 65 will decrease. It is estimated that by as early as 2025, there will be more people over the age of 65 than there are under the age of 15.



Source: Census 2021, ONS 2020-based interim population projections for Northern Ireland

An ageing population will have significant implications on all aspects of our society. It will impact how we interact with one another, how our communities are connected, and how our public services are designed. To best meet the needs of our future society, there must be consistent engagement with older people to understand their needs, as well as an assessment of the evidence and evidence gaps that exist in Northern Ireland that should be addressed to promote effective decision-making and policy design.

The Challenge for an Ageing Society

While increased life expectancy is a great achievement of public health, and one which we should celebrate, the key challenge for Government, is not only the extension of life expectancy but to ensure those extra years are healthy and disability free for as long as possible. All countries, including Northern Ireland, face major challenges to ensure that their public services, including health and social systems, are ready to make the most of this demographic shift and meet the needs of the population.

Ageing is a life-long process and ensuring people can age healthily and maintain independence in old age requires a life-course approach. Public health interventions can have a significant impact on the quality of ageing in terms of health outcomes, disability, and quality of life.

As a result, the Commissioner's work will continue to be important and he will continue to work closely with Government, within the context of 2011 Act to ensure that public services are fit for purpose, adequate and effective in meeting the needs of the ageing population in NI.

Programme for Government

With an Executive now in place, the focus of the Commissioner is to secure the inclusion of high-level outcomes within the new Programme for Government (PfG) and working with government to understand the potential for this within the PfG and in collaboration within other plans. The Commissioner will continue to advise politicians on the need to prioritise the needs of older people in the context of an ageing society, including specific measures and outcomes. The Commissioner will also continue to seek progress on the introduction of legislation to protect older people from discrimination in the provision of facilities, goods, and services.

Business Plan 2024-25

This year's business plan sets out the key priorities and the areas of continuing focus to be taken forward in 2024-25. The plan identifies the key pieces of work to be undertaken and the minimum targets to be met during the year. The delivery of the plan is subject to obtaining a full budget allocation from DfC and progress will be reviewed on a quarterly basis throughout the year.

The purpose of the business plan is to implement the priority objectives set out in the Commissioner's Corporate Plan 2022-24, establish the key performance indicators by which progress will be measured and demonstrate the level of progress required in year towards the delivery or achievement of them. It should be noted that as 2024-25 represents a transition year from one Commissioner to another, there may be a need for an adjustment to priorities based on the focus of the incoming Commissioner.

This plan is high level and is not intended to capture all the operational activities and day-to-day tasks of all staff. COPNI will continue to exercise flexibility around the movement of budget and human resources across the work programme as required.

All work will be taken forward with a proportionate project management approach. All expenditure will be made in accordance with internal controls and compliance with the requirements of Managing Public Money NI.

The information which follows in the action plan summarises the work planned under the Commissioner's priorities and provide details of the activities planned for this year.

The plan outlines the following.

- High Level outcomes

- Goals
- Key objectives
- A description of actions to be undertaken
- Responsible Officer for each objective
- Key Performance Indicators
- An overall programme budget

Financial resource pressures

Uncertainty of budget – Like much of the public sector, COPNI faces uncertainty over its budget allocation for 2024-25, with a number of inescapable pressures arising from involvement in the UK COVID-19 Public Inquiry and the appeal hearing for the Judicial Review into Continuing Healthcare. These pressures have been compounded by the requirement to absorb staff pay increases arising from the annual Pay Remit, as well as an agreed increase in employers pension contribution for all staff, commencing 1st April 2024, following publication of the 2020 pension scheme publication. COPNI has taken a zero-based budget approach, based on establishing a budget built on essential expenditure needed to achieve its business objectives in the business year. A core element of this approach has been to review the costs associated with recruiting and retaining a staff complement that can ensure COPNI is fit for purpose, and able to deliver the mandate of the outgoing Commissioner as set out in the Corporate Plan 2022-24, and the mandate of the new Commissioner when they come into post. COPNI is funded by DfC and will work closely with the Department to ensure that the budget is fully spent but not exceeded.

Monitoring

Progress against each KPI is monitored and reported to the Senior Management Team and the Commissioner using a RAG status. The definition for each RAG status is detailed below. Periodically such details will be reported to the Audit and Risk Committee for their information, and as always, the Commissioner will compile and provide quarterly performance reports to the Department for Communities (DfC).

- **Red** – Significant slippages, lack of funding or not to be completed within target.
- **Amber** – Delayed but is expected to meet objectives.
- **Green** - Progressing as planned or already delivered.

Human Resources

The need to finalise the organisational re-structure and staffing is of paramount importance for the smooth and consistent management of COPNI as an organisation and is especially relevant in 2024-25 as this represents a transition year between Commissioners. It is anticipated that in 2024-25, COPNI will fill vacant posts that were approved in the Strategic Review of Future Needs business case. The Commissioner

will also co-operate on any required improvements identified through internal and external audits and put in place improvement plans to ensure robust procedures are in place for the effective operation of COPNI.

In common with all other government bodies, COPNI has introduced a hybrid working policy. A rolling programme of annual review is in place to ensure the policy remains flexible and responsive to business need. Staff are fully equipped to undertake their normal duties through this hybrid approach.

COPNI's High Level outcomes

COPNI's Corporate Plan suggests that there are three distinct ways in which COPNI safeguards and protects the interests of older people:

- **Advice and Support** - Through provision of advice and support to older people
- **Investigation and Challenge** - Through investigation of service failures and challenge to government and its agencies.
- **Advocating and Representing** - Through advocating for, and representing, the interests of older people.

Operationally, COPNI also has in places processes and controls and that ensure **Good Governance** underpins every area of our work.

COPNI has developed this business plan to align to several high-level outcomes that fall under the distinct areas set out above, with specific operational objectives for 2024/25 developed for each outcome.

The high levels outcomes are as follows:

Advice and Support

- 1) Older people are better informed of their rights.
- 2) Older people are better able engage in civic society to their full potential.

Investigation and Challenge

- 3) The performance of government with respect to provision of services for older people is investigated and changes recommended.
- 4) Shortfalls in service provision for older people are identified and changes recommended.

Advocating and Representing

- 5) Older people are legally represented and protected.
- 6) The design of Policy, legislation, and services for older people are better informed.

Good Governance

- 7) COPNI is an efficient and effective organisation.

As 2024-25 represents a transition year between Commissioner's, a separate outcome has been created to encompass the planning and scoping work involved in preparing for the arrival of a new Commissioner.

Advice and Support

High Level Outcome 1: Older people are better informed of their Rights				
<p>Goal: To ensure older people in Northern Ireland have access to resources to understand and assert their legal rights.</p> <p>Commissioner Duty: The Commissioner must promote an awareness of matters relating to the interests of older persons and of the need to safeguard those interests & the Commissioner must promote positive attitudes towards older persons and encourage participation by older persons in public life.</p>				
Reference no.	Objective	Actions	Key Performance Indicators	Responsible Owner
1.1	Direct engagement with older people through in-person meetings.	<p>Engagement Events</p> <p>Attendance at events across Northern Ireland.</p> <p>Meetings with key stakeholders on priority issues as identified in the Corporate Plan.</p>	<p>Develop a stakeholder engagement strategy for new Commissioner. - target of 20 meetings with partners/stakeholders on priority issues</p> <p>Attend 20 engagement events throughout the year, ensuring equal geographical spread, equal gender representation and inclusion of ethnic minority and LGBTQ+ groups.</p> <p>Organise two 'clinics' per year, where legal and advocacy team alongside Commissioner host an event in a central location and invite older people in that locality along to speak to a member of the team and get advice and assistance in person.</p>	Head of Communications and Engagement
1.2	Indirect engagement with older people through the	<p>Media Engagement</p> <p>Engagement with Media, social media,</p>	Devise a new Communications and Engagement plan for the new Commissioner once the Corporate Plan priorities have been agreed.	Head of Communications and Engagement

	media and other outlets.	Radio, television, and website. Publications – newsletter information leaflets and resources.	Accept 60% of media bids received. See a steady increase in engagement on Facebook and increase our audience on Facebook by 200. Media engagement also decided per each project/PR campaign. Dissemination of leaflets to a variety of older people's groups Quarterly newsletter issued, with increase in newsletter subscribers of 100.	
1.3	COPNI will ensure the website is updated as and when required and fully accessible to all, enabling older people to avail of current information. Website should also be promoted at every opportunity.	Website engagement Content reviewed and updated regularly. Utilisation of Accessibility features kept under review, annually. Increased monitoring of website traffic and usage.	Setting of baseline usage figures for 2024/25 of new website in first year of new website. Develop a suite of management information reports analysing effective engagement through the website.	Head of Communications and Engagement

1.4	Signposting to other service providers and statutory bodies, where applicable	<p>Advocacy support</p> <p>Training of Advocacy Officers to ensure knowledge of remit of other government bodies.</p> <p>Clear process for signposting clients to appropriate services where required.</p>	<p>Record of number of clients signposted to other organisations and noted on ALB Management system.</p> <p>Engagement with other bodies that COPNI are signposting to, to increase awareness of services provided.</p> <p>Report annually on which alternative bodies have been signposted to.</p>	Head of Legal and Advocacy Services
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High Level Outcome 2: Older people are better able to engage in civic society to their full potential

Goal: To ensure older people in Northern Ireland can engage in society through full participation and contribution to community activities, leading to increased well-being and a reduction in social isolation and loneliness.

Commissioner Duty: The Commissioner must promote the provision of opportunities for, and the elimination of discrimination against, older persons & the Commissioner must promote positive attitudes towards older persons and encourage participation by older persons in public life.

Reference no.	Objective	Actions	Key Performance Indicators	Responsible Owner
2.1	Work with partners in the criminal justice system, and offenders to increase awareness and understanding of the deliberate targeting of older people by offenders due to their age and/or vulnerability.	<p>Provide advice to Government and relevant agencies on COPNI's criminal justice research (A Different Crime, 2023) and seek appropriate actions/improvements.</p> <p>Publish an extended briefing building on the 2023 COPNI Crime Report, highlighting the statistical and policy context of older victims of domestic abuse.</p>	<p>Hold a minimum of 3 meetings with justice agencies (e.g. PBNi/PSNI/PPS/CJI/CVC) on COPNI's work on issues facing older victims of crime.</p> <p>Meet with Minister for Justice to discuss the removal of older people from future hate crime legislation proposals, as recommended in the Marrinan report.</p> <p>Hold a minimum of 3 meetings with justice agencies and stakeholder organisations on the issue of older victims of domestic abuse during and subsequent to the report drafting.</p>	Head of Research and Policy Advice

2.2	Communicate effectively around the issue of deliberate targeting of older people due to their age and/or vulnerability.	To respond to/ contribute to any public discussion (in the media) in relation to crime and older people.	Monitor articles daily in the media on the topic of crime and older people. Log media bids in relation to this issue, with appropriate response advised upon by Head of Communications and Engagement.	Head of Communications and Engagement
2.3	Provide advice to relevant agencies on the recommendations of COPNI's research (A Different Crime, 2023) and consider appropriate actions/improvements.	Work with the relevant voluntary and community sector to better support older people who have been victims of crime.	Hold a minimum of 3 meetings with voluntary and community sector organisations focused on supporting older victims of crime.	Head of Research and Policy Advice
2.4	Fully participate in the Scamwise partnership.	Engage in the sharing of information through social media and through the organisation's website to raise awareness amongst older people of how to identify and protect themselves from scams.	Continue to manage the Scamwise Facebook page, co ordinating content from the partnership and providing monthly reports on engagement and reach. Attend and participate fully in all Scamwise Partnership meetings as arranged by PSNI.	Head of Communications and Engagement
2.5	Tackling Ageism - follow up to the "Are You Ageist?" (2024) report.	Engage with government departments, and the voluntary and	Meet with at least 3 government departments, as well as voluntary and community bodies to discuss COPNI's recommendations on tackling ageism.	Head of Research and Policy Advice

		community sector to promote the messages and recommendations contained in the 'Are You Ageist?' report (2024).	<p>Include challenges to institutional ageism in all publications published in 2024/25.</p> <p>Reiterate recommendations of Ageism report in future engagement with all stakeholders.</p>	
2.6	Tackling Ageism – Promotion of positive attitudes towards older people through internal media resources.	<p>To promote positive attitudes towards older people proactively tackling media narrative of ageism, where it occurs.</p> <p>To proactively and reactively welcome opportunity to collaborate with other organisations where the message of anti-ageism can be amplified.</p>	<p>To publish 'Words of Wisdom' interviews (4 per year minimum) which promote a positive attitude to ageing.</p> <p>Monitoring of media daily, advising of opportunities to react or call out ageism via social media, newsletter, or a statement.</p> <p>Target organisations to be included as part of engagement plan.</p> <p>To develop and deliver an awareness campaign on the impact of Ageism on NI society on International Day of Older People.</p>	Head of Communications and Engagement

Investigation and Challenge

High Level Outcome 3: The performance of government with respect to provision of services for older people is investigated and changes recommended

Goal: To ensure that older people's interests are fully accounted for in respect of the statutory provision of services, and investigated where there is a failure in this provision.

Commissioner Duty: To keep under review the adequacy and effectiveness of services provided for older persons by relevant authorities & the Commissioner must encourage best practice in the treatment of older persons.

Reference no.	Objective	Actions	Key Performance Indicators	Responsible Owner
3.1	Active Ageing Strategy The Commissioner will work with DfC to ensure the timely development of a new and meaningful Active / Healthy Ageing Strategy for NI.	Engage with DfC on a regular basis to assess progress on the new Active / Healthy Ageing Strategy for NI. Produce a briefing that outlines a best practice Active Ageing Strategy and meet with DfC to discuss findings and the development of future strategy.	Active ageing best practice evidence to be published. Meet with the Minister and lead official in DfC to consult on the need for a separate Active Ageing Strategy, or alternative mechanism to address needs of an Ageing society.	Head of Research and Policy Advice
3.2	Advise Government to bring forward the relevant legislation required to end the discrimination for	Require Government action on addressing key issues and implementing the relevant Age GFS	Participate in a minimum of 3 meetings with stakeholders on GFS legislation (e.g. the Equality Commission and The Executive Office).	Head of Research and Policy Advice

	Older People in relation to accessing goods, facilities and services and push for the development and introduction of legislation in Northern Ireland in the next mandate.	<p>legislation in Northern Ireland.</p> <p>Publish advice on Goods, Facilities and Services legislation (in relevant consultation responses and within our advice on the new Programme for Government).</p>	Publish advice on legislation to ensure equal access to Goods, Facilities and Services.	
3.3	Promote awareness of age discrimination and its effects.	Speak publicly about the need for AGFS legislation to protect older people.	<p>Run an awareness campaign/video on social media with older people talking about the impact of no GFS.</p> <p>Target a media outlet for an exclusive interview with the Commissioner on this topic.</p>	Head of Communications

High Level Outcome 4: Shortfalls in service provision for older people are identified and changes recommended

Goal: To ensure that gaps in service provision, or issues raised through trends in legal casework, are identified and appropriate action taken to improve the provision of these services.

Commissioner Duty: To keep under review the adequacy and effectiveness of services provided for older persons by relevant authorities & the Commissioner must encourage best practice in the treatment of older persons.

Reference no.	Objective	Actions	Key Performance Indicators	Responsible Owner
4.1	Adult Protection Bill Provide advice to Government on the introduction of the Adult Protection Bill.	Meet with Department of Health officials on a quarterly basis to consider progress and ensure the contents of the Adult Protection bill are adequate.	Provide written briefings for members and Committees of the Assembly debating the Bill.	Head of Research and Policy Advice
4.2	Reform of Adult Social Care	Hold quarterly meetings with the Department of Health officials which will include discussion on the progress of the Reform of Adult Social Care. Follow-up on research on Regional Care Home Contract by liaison with officials.	Provide guidance on aspects of the reform of adult social care through participation in meetings and consultations. Where needed, provide formal advice to the Minister of Health on aspects of the reform programme. New Commissioner to meet the Minister in 2024/25 to discuss progress on ASC reform. Monitor and report on the implementation of recommendations by end of 2024/25.	Head of Research and Policy Advice

Advocate and Represent

High Level Outcome 5: Older people are legally represented and protected				
<p>Goal: To ensure that older people have access to appropriate advocacy and legal representation, and to safeguard their interests through available legal frameworks.</p> <p>Commissioner Duty: Keep under review the adequacy and effectiveness of the law as it affects older people, and the effectiveness of services provided to older people.</p>				
Reference no.	Objective	Actions	Key Performance Indicators	Responsible Owner
5.1	Respond to Older People who contact the Commissioner for assistance.	Provide advocacy support, informal mediation and conciliation, provision of financial support in the preparation and litigation of cases where resolution has not been successful.	<p>Manage over 250 new and ongoing cases from older people requiring legal or advocacy support.</p> <p>Monthly reporting of analysis of enquiries and caseload management information to minuted SMT meeting.</p> <p>Preparation of briefing papers to SMT on receipt of 3 or more cases of a similar nature within a 3-month period.</p>	Head of Legal and Advocacy Services
5.2	Defend the Judicial Review appeal into Continuing Healthcare	<p>Instruct Counsel to defend the appeal by the Department of Health in the court in May 2024.</p> <p>Provide necessary Legal support to the counsel to enable work</p>	<p>Robust defence of the appeal of initial Judicial Review judgement to achieve clarity on policy.</p> <p>Liaise with the Department of Health on changes to be made to policy moving forward to ensure older people are appropriately assessed.</p>	Head of Legal and Advocacy Services

		to be carried out promptly and efficiently.	Keep clients involved in the issue regularly appraised of outcome and further engagement.	
5.3	Process requests for legal funding, where applicable	<p>Assess requests for legal funding support through the acceptance criteria.</p> <p>Bid for required funding through Monitoring Rounds and bids to the Department if required.</p> <p>Where approved, engage with legal counsel to proceed with legal action.</p>	<p>Management of internal allocation of budget for this work.</p> <p>Successful bid for additional legal funding from DfC (as required)</p> <p>Legal proceedings progressed in line with counsel advice.</p>	Head of Legal and Advocacy Services
5.4	COVID-19 Inquiry Core Participant status	<p>Participate in the hearing for Module 2c of the Inquiry.</p> <p>Review and consider evidence provided through Relativity Portal, as and when it is received.</p> <p>Meet with the Legal representatives when required, to discuss</p>	<p>Counsel and in-house solicitor to have undertaken full review of all relevant documentation made accessible to COPNI.</p> <p>Counsel to have prepared the Commissioner with most relevant evidence ahead of the oral hearing in May 2024.</p> <p>Commissioner to provide oral evidence to the Inquiry in May 2024.</p>	Head of Legal and Advocacy Services

		progress and next steps.		
5.5	COVID-19 Inquiry Rule 9 requests	Respond to all requests for information and all Rule 9 requests for evidence	<p>A response to all Rule 9 requests from the Inquiry to be submitted to the Inquiry by the deadline, after final drafting by Counsel.</p> <p>Any follow-up queries from the Inquiry to be responded to within timeline set out by the Inquiry.</p>	Head of Legal and Advocacy Services
5.6	COVID-19 Inquiry applications for relevant modules	Apply for the relevant modules in the UK Public Inquiry where it deemed the Commissioner holds important evidence.	<p>Application to be forwarded to legal counsel for review in line with Inquiry rules, after final drafting by Counsel.</p> <p>Application to be submitted to the Inquiry by the deadline.</p>	Head of Legal and Advocacy Services
5.7	COVID-19 Inquiry – Effective communications strategy	<p>Deal with all media bids arising from the Commissioner's engagement with the COVID-19 enquiry.</p> <p>Report through the Ezine to older people about the Commissioner's involvement with the COVID-19 Inquiry.</p>	<p>Assess 100% of media bids and accept/decline as appropriate.</p> <p>Issue public statements as required.</p> <p>Website updated to include separate section for the COVID-19 Public Inquiry.</p> <p>Report quarterly on progress in Ezine.</p>	Head of Communications

5.8	Review of Section 21 of legislation presented to the Sponsor Branch	COPNI instructed to assess potential changes to the legislation in 2023/24 and subsequent recommendations will be forwarded to DfC for assessment.	<p>Recommendations for changes to the legislation forwarded to DfC Minister</p> <p>Monitor proposed actions by DFC to change COPNI legislation in line with recommendations.</p> <p>Advise MLAs and respond to committee and MLA questions about proposed legislative changes as they are being made (debated).</p>	<p>Head of Legal and Advocacy Services</p> <p>Head of Corporate Services</p>
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High Level Outcome 6: The design of Policy, legislation, and services for older people are better informed

Goal: To ensure that the interests of older people are promoted and safeguarded when policy or legislative changes are being considered. Continued development of a body of knowledge/expertise at COPNI that assists the Commissioner to promote awareness of the issues and rights of older people.

Commissioner Duty: To keep under review the adequacy and effectiveness of services provided for older persons by relevant authorities & the Commissioner must promote positive attitudes towards older persons and encourage participation by older persons in public life.

Reference no.	Objective	Actions	Key Performance Indicators	Responsible Owner
6.1	The Commissioner will call on Government and seek high level commitments to older people in a new Programme for Government (PfG).	<p>The Commissioner will meet the First and Deputy First Ministers, departmental officials, party leaders and MLAs to promote inclusion of a specific older people's outcome in the PfG and seek commitment the addition of specific objectives targeted at improving the lives of older people.</p> <p>COPNI to prepare detailed report setting out the necessity for older people to be at the heart of decision making in the PfG.</p>	<p>Publication of a report offering advice to government on the forthcoming Programme for Government to include a developed high-level outcome for older people.</p> <p>A minimum of two meetings with department officials to discuss the next PfG and COPNI's report/recommendations.</p> <p>Commissioner to promote the inclusion of the HLO for older people in the media, at Committee, Party, and individual MLA level.</p>	Head of Research and Policy Advice

6.2	<p>Respond to public consultations from relevant authorities regarding matters that may impact older people and those who care for them.</p>	<p>Ensure that COPNI is a key consultee with all relevant public bodies.</p> <p>Ensure officer resources are allocated to adequately respond to consultations that are most impactful on older people.</p> <p>If the consultation topic is of serious or significant nature, the Commissioner may engage directly with older people on the specific issue, and/or issue a media release drawing attention to the Commissioner's/older peoples' views.</p>	<p>Respond to all consultation requests that are relevant to older people within the published deadline.</p> <p>Respond to a minimum of 10 consultation responses from 1st April 2024 – 31st March 2025.</p> <p>.</p>	Head of Research and Policy Advice
6.3	<p>Ensure that stakeholders and older people are aware of the Commissioner's views on consultations by government.</p>	<p>Publish all relevant consultations on the COPNI website, and other relevant publications.</p>	<p>Publish relevant consultation responses on the website within 2 days of submission to the consulting body.</p> <p>Include a list of consultations responses in the quarterly ezine to older people.</p> <p>To respond to media bids and coverage of issues under consultation.</p>	Head of Communications and Engagement

Governance Framework

High Level Outcome 7: COPNI is an efficient and effective organisation				
<p>Goal: Maintain an efficient and effective governance framework and support and develop our people to enable delivery of high-quality public services.</p> <p>Commissioner Duty: As the designated Accounting Officer, the Commissioner is responsible for implementing a robust governance framework within COPNI.</p>				
Reference no.	Objective	Actions	Key Performance Indicators	Responsible Owner
7.1	Delivery of 2024-25 Business Plan	<p>Allocation of organisational resources (financial, human and physical) to align with business objectives.</p> <p>Development of work plans across COPNI departments to align with objectives.</p> <p>Stakeholder engagement as necessary in achievement of Business Plan aims and objectives;</p>	<p>Monthly review by SMT of progress against targets ahead of minuted Senior Management meeting.</p> <p>Quarterly reporting on achievement of set targets against business objectives to ARAC and DfC Sponsor Branch.</p>	Senior Management Team

7.2	Governance arrangements to ensure scrutiny of performance	<p>Pursue agreement of new Partnership Agreement with DfC.</p> <p>Quarterly Reports to DfC Sponsor Branch and ARAC.</p> <p>Monthly internal reporting to COPNI Senior Management Team.</p>	<p>Quarterly Performance Reports, including ALB Assurance Statement, ALB Corporate Performance Report, Reporting Checklist and Risk Register forwarded to DfC within 10 working days from the end of the quarter.</p> <p>ARAC papers issued to attendees no later than 1 week before the meeting.</p> <p>Papers prepared for Senior Management meetings no later than 3 days before the meeting.</p> <p>Updated Governance Statement in Annual Report and Accounts.</p>	Head of Corporate Services
7.3	Engagement with internal and external audit	<p>Annual Internal Audit Plan 2024/25 is in place, with planning meetings held to agree Terms of Reference for assignments.</p> <p>Management responses to audit reports are provided on a timely basis.</p> <p>Reporting of audit outcomes, recommendations, and management responses</p>	<p>Reporting of audit outcomes, recommendations, and management responses to ARAC and Sponsor Branch in DfC at the next quarterly meeting.</p> <p>Action all recommendations included in NIAO's Report (RTTCWG) within the next financial year.</p> <p>Satisfactory assurance ratings for individual Internal Audit assignments, and overall Satisfactory annual assessment.</p> <p>Internal Audit report outcomes reflected in Annual Report and Accounts.</p>	Head of Corporate Services

			Recommendations in follow-up audit confirmed as being completed by Internal Audit.	
7.4	Continue to develop an effective workforce.	<p>Development of staff development plan resulting from effective Personal Performance Agreement/Personal Development Plan process.</p> <p>Development of an organisational Training Plan to ensure staff avail of role-appropriate training.</p> <p>Provision of mandatory sectoral training.</p>	<p>100% of Personal Performance Agreement to be completed with line managers by no later than May 2024, to set individual objectives for performance for 2024-25.</p> <p>Organisational Training Plan developed and signed off by Chief Executive by June 2025.</p> <p>100% of staff to maintain mandatory training on LinkS training portal.</p>	<p>Head of Corporate Services</p> <p>(Input from SMT)</p>
7.5	Transparency of expenditure and budget projections, including pressures.	<p>Monthly submission of Consumption Report to Sponsor Branch in DfC.</p> <p>Monthly submission of cash drawdown requests to Sponsor Branch in DfC.</p> <p>Quarterly budget updates.</p>	<p>Commissioner review and approval of Consumption Report within 5 working days of the end of the month.</p> <p>Commissioner review and approval of cash drawdown submission within 5 working days of the end of the month.</p> <p>Communication of financial position to Audit and Risk Assurance Committee on a quarterly basis.</p>	Head of Corporate Services

		Submission of Monitoring Round returns and bids to DfC.	Submission of Monitoring Round bids by deadline set by Sponsor Branch in DfC.	
7.6	By year end operate within allocated Budget, avoiding overspend.	<p>Completion of monthly Management Accounts to assess adequacy of budget.</p> <p>Pressures identified in Management Accounts communicated to Sponsor Branch in DfC through Consumption Report.</p> <p>Bids for additional funding through Monitoring Rounds/bids.</p>	<p>Management Accounts to be completed for review by Commissioner within 2 working days after month end.</p> <p>Draft Financial Statements by April 2024, and final Financial Statements by August 2024.</p> <p>Obtain an unqualified audit opinion from NIAO.</p>	Head of Corporate Services
7.7	Ensure a robust risk management process is in place and followed.	<p>Corporate Risk Strategy and Risk Register in place.</p> <p>Quarterly meetings with SMT to update the Risk Register, including any new and emerging risks.</p> <p>Risk Register included in papers to both ARAC and Sponsor Branch in</p>	<p>Quarterly meetings with SMT to discuss existing and emerging risks, within 1 week from the end of the quarter.</p> <p>Risk Register shared with DfC in Quarterly Assurance Report within 10 working days from the end of the quarter.</p> <p>Committee papers to be sent to all ARAC attendees no later than 1 week in advance of the meeting.</p>	<p>Head of Corporate Services</p> <p>(Input from SMT)</p>

		<p>DfC, ahead of quarterly meetings, and represents a standing item on meeting agendas.</p> <p>Any significant risks identified between reporting cycles are communicated to the ARAC and Sponsor Branch in DfC at the earliest opportunity.</p>	Training of ARAC and key staff.	
7.8	Prompt Implementation and / or updating of relevant policies, procedures and practice as required.	<p>Policy and Procedures register is maintained.</p> <p>Monitoring of relevant information sources i.e. DoF, DfC, legislative requirements.</p> <p>Policies and Procedures shared with COPNI staff for consultation at drafting stage and relevant Human Resources policies forwarded to NIPSA to ensure input from Trade Union side.</p>	<p>Monthly review of the Policies and Procedures register.</p> <p>Responsible owners informed no later than 3 months ahead of revision date of policy of the requirement to review the relevant policy.</p> <p>All policies are shared for consultation with staff and all relevant Human Resources Policies are shared with NIPSA.</p> <p>A S75 Equality Screening completed for all policies.</p>	Head of Corporate Services

		S75 Equality Screening completed alongside policies to assess any adverse impact on S75 groups.		
7.9	Review Annual Business Plan 2024-25 following finalisation of new Corporate Plan 2024-2028	<p>COPNI to assess the Business Plan in context of new Commissioner's Corporate Plan to ensure alignment.</p> <p>Submit to Sponsor Branch in DfC if any amendments are required.</p> <p>Approved Business Plan to be published on COPNI's website.</p>	<p>Business Plan redrafted where necessary including any change to annual Budget requirements.</p> <p>Business Plan submission to DfC within one month of submission of New Commissioner's Corporate Plan.</p> <p>Business plan published on COPNI's website, once approved by the Minister.</p>	<p>Head of Corporate Service</p> <p>(Input from SMT)</p>
7.10	Drafting of Annual Business Plan for 2025-26	<p>Schedule of development of Business Plan 2025-26.</p> <p>Submit to Sponsor DfC Branch in DfC.</p>	<p>Business Plan drafted including annual Budget requirements, to align with new high-level outcomes from the new Corporate Plan 2024-28.</p> <p>Business Plan submission to DfC by 31 January 2025.</p>	<p>Head of Corporate Service</p> <p>(Input from SMT)</p>
7.11	Develop solution to IT provision post March 2025	COPNI to assess through an economic appraisal of options the	Business case to be submitted to Sponsor Branch in DfC before September 2025 to assess options for future provision of IT services.	Head of Corporate Services

		<p>most efficient and effective options for IT provision from 2025-26 onwards.</p> <p>All COPNI information to be moved to the cloud to enlarge availability of options for provision.</p>	<p>Procurement exercise completed and new solution in place by 31 March 2025.</p> <p>All remaining COPNI legacy systems to be moved to the cloud to enable smooth transition to new service provider.</p>	
7.12	Agree and implement recommendations of the New Decade New Approach (NDNA) review	COPNI will discuss with the Minister the recommendations from the NDNA report, and work with the Department to implement where directed.	<p>Meet with the Minister and Officials from DfC during the 2024-25 year to discuss recommendations from the report.</p> <p>Implement any agreed recommendations within deadlines set by the Minister.</p>	Commissioner and Chief Executive.

Preparing for a new Commissioner

High Level Outcome 8: Preparation for the appointment of a new Commissioner				
Goal: To ensure that COPNI is prepared for the appointment of a new Commissioner in 2024-25, including a well-advanced draft of the Corporate Plan, and scoping of projects for inclusion.				
Reference no.	Objective	Actions	Key Performance Indicators	Responsible Owner
8.1	New Corporate Plan 2024-28 developed following appointment of the next Commissioner.	<p>COPNI to develop an advanced draft of a new Corporate Plan 2024-28.</p> <p>New Commissioner to make amendments where appropriate to the plan, in line with their own priorities.</p> <p>Consult widely with older people across NI on the Corporate Plan priorities and make any changes to the draft plan as required.</p> <p>Submit to Minister DFC</p> <p>Approved Corporate Plan to be published on COPNI's website.</p>	<p>Advanced draft (90% completed) of Corporate Plan presented to the new Commissioner, for review and amendments, on day one of their term.</p> <p>Corporate Plan submission to DfC within one month of the Commissioner commencing their role.</p> <p>Approved Corporate Plan published on COPNI's website.</p>	Senior Management Team.

8.2	Scoping of projects for new Corporate Plan	<p>Policy and research unit to longlist research projects relevant to the needs of NI's older population.</p> <p>Research projects to be shortlisted and aligned to Corporate Plan 2024 – 2028 priority areas with feedback from SMT and the new Commissioner.</p>	<p>Development of at least 15 project plans for internal review. These scoping documents will outline the project and the rationale for the proposal, enabling the new Commissioner to choose their priorities.</p> <p>Assess value of ad hoc toolkit briefings which include COPNI's position on topical issues relevant to older people.</p>	Head of Research and Policy Advice
8.3	Preparation for new Commissioner	<p>COPNI to prepare the Commissioner for Accounting Officer responsibilities.</p> <p>COPNI to ensure new Commissioner is aware of the work undertaken by COPNI in the last two terms of the previous Commissioner, to ensure no duplication of work.</p>	<p>Develop 90% of new Corporate Plan in advance of new Commissioner's appointment for their edit and approval. (See also 8.1)</p> <p>Corporate Governance and Accounting Officer training arranged for new Commissioner.</p> <p>Press release to announce commencement of term of a new Commissioner, and website updated to reflect new personnel.</p> <p>COPNI's SMT to discuss with the new Commissioner the context and content of previous research projects undertaken, to ensure future priorities are not duplicating work already completed.</p>	Senior Management Team

			COPNI website updated to reflect appointment of new Commissioner.	
8.4	Programme of meetings and engagement with older people and key stakeholders for the first 3 months of new term of Commissioner.	<p>COPNI to prepare meetings with key stakeholders within the Department and across the sector.</p> <p>Series of events and meetings with groups of older people.</p> <p>Accept incoming invitations to ensure equal geographical spread, equal gender representation and inclusion of ethnic minority and LGBTQ+ groups.</p>	<p>Commissioner to meet the Minister for Communities within 1 month of commencement of their term.</p> <p>Commissioner to meet with key stakeholders within the Health and Social care sector, within two months of taking up post.</p>	<p>Head of Research and Policy Advice</p> <p>Head of Communications and Engagement</p>

Proposed Budget 2024/25

Budget Category	Allocation
	Total £
Salaries*	1,089,000
Current approved staffing	1,089,000
Overheads**	217,000
IFRS 16 depreciation (Leases)	39,000
Total Projected Expenditure (exc. depreciation and capital)	1,345,000
Depreciation	35,000
Total Expenditure	1,380,000

*COPNI has been required to absorb significant anticipated increases arising from the 2023 and 2024 Pay Remit, as well as the increase in Employer's pension contribution for 2024/25.

**COPNI has been required to absorb significant increase in IT costs in 2024/25 arising from very short notice of termination of existing arrangements with ECNI.

Pressures identified for 2024/25

COPNI's projections for the 2024/25 year are based on maintaining vacancies within the newly approved staffing structure, as implementation in full of the new structure is not affordable within the opening allocation. COPNI has though identified the following inescapable pressures that are due to arise during the year and for which additional budget cover will be required:

Staffing (£54k - Inescapable)

The work of the COVID-19 Inquiry has had a significant impact on the capacity of COPNI's legal team, and the case for an additional fixed-term Legal Officer was accepted in the final approval of the COVID-19 business case in February 2024. This work has been undertaken previously by a small team comprising of a full-time Legal Officer, the Head of Legal Services, the Chief Executive and the Commissioner, plus in-house admin support, but this arrangement was not sustainable given the workload pressures across teams. This additional post has been recruited on a 12-month fixed term basis, with an option to extend at the end of this period.

UK COVID-19 Inquiry (£53k - Inescapable)

COPNI has been awarded Core Participant status in Module 2c of the UK COVID-19 Public Inquiry and the Commissioner is to be prepared by legal counsel to provide oral evidence to the Inquiry in May 2024. A business case approving these costs was approved by the Department for Communities in February 2024 and without the subsequent provision of funding in 2024/25 COPNI will be unable to participate to the extent required, with the reputational damage expected to be significant amongst COPNI's client base, who were most adversely impacted by the pandemic and who expect their experiences to be shared to ensure the recommendations include future provisions to protect older people.

Judicial Review (£41k - Inescapable)

COPNI successfully brought a Judicial Review against the Department of Health in 2022 in respect of Continuing Healthcare and the initial judgement confirmed COPNI had won the case on both counts in June 2023, providing much needed clarity for older people on the issue. The Department of Health has appealed the ruling and COPNI has prepared a defence of the appeal, which was initially due to be heard in February 2024, but this has been delayed until Q2 in 2024/25. COPNI cannot be in a position where it is unable to defend a judgment that ruled in its favour, due to a lack of budgetary support. Such a position would render the initial judgement, and the work undertaken to date, meaningless if COPNI is unable to instruct legal counsel to provide a robust defence.