

Consumer Council for Northern Ireland
Draft 2024–2025 Forward Work Programme
Via email to: FWP@consumercouncil.org.uk

13 March 2024

Re: Draft 2024-2025 Forward Work Programme Consultation

Dear Sir/Madam,

I am writing on behalf of the Commissioner for Older People for Northern Ireland (COPNI) regarding the proposed Draft Forward Work Programme (FWP) for the period 2024-2025 and its impact on older people. The Commissioner recognises the Consumer Council as a pivotal body in safeguarding the rights and interests of older people, and welcomes its focus on vulnerable consumers, which includes those ‘who are disabled or chronically sick; who are of pensionable age; who are on low incomes; and who live in rural areas’.¹

The vulnerability of older people in our society is often caused by overlapping factors, which includes those identified by the Consumer Council as priorities. Older people in Northern Ireland are more likely to have a disability² and to have a lower income³. Furthermore, the income of older people is not rising in line with the cost of living. Pensioners’ gross income in Northern Ireland has only increased by 1.9% between 2017 and 2022⁴ in the context of the highest inflation rates in three decades.⁵ All these risks linked to lower income and higher

¹ Consumer Council for Northern Ireland (2024) [Draft 2024-2025 Forward Work Programme Consultation](#), p.6.

² In Northern Ireland, 56% of people older than 65 have a long-term condition that limits their day-to-day activities, as compared to 13% of those aged 16-39 and 28% of those aged 40-64 (see Census 2021, [Custom table, Health Problem or Disability \(Long-term\) - 2 Categories by Age - 4 Categories](#)).

³ In Northern Ireland, the income of a household of a couple without children is 57% higher than the income of a pensioner couple [calculation based on [Households Below Average Income \(HBAI\) Supporting Data Tables](#); “Table 3.1 (After Housing Costs): Quintile distribution of income for individuals by various family and household characteristics”], and the income of households in which the main earner is older than 65 is on average 22% lower than households where the main earner is aged 25-64 in the UK (calculation based on the Office for National Statistics dataset [Timeseries of equivalised household disposable income by age group of the chief economic supporter, 2021/22](#)).

⁴ Calculation based on data from [The Family Resources Survey \(FRS\) for Northern Ireland 2021-2022 – supporting data tables](#); “Table 7.3: Real income of pensioners, 2011/12 - 2021/22”.

⁵ Worlddata (n.d) [Inflation rates in the United Kingdom](#) [Retrieved 1st March, 2024].

prevalence of long-term conditions are aggravated in rural areas. For these reasons, the Consumer Council's action plan is of great interest to the Commissioner.

Overall, the Commissioner welcomes the Consumer Council's analysis of the needs and issues faced by the most vulnerable consumers in our society, which of course includes older people. This response aims to emphasize the importance of certain aspects that COPNI considers vital for the rights and wellbeing of older people.

Consumer Priorities

Among the four consumer priorities described in the FWP, two are salient for the Commissioner (Digital Inclusion and Cost of Living). The shift in focus from digitalisation to digital inclusion seems appropriate. Unquestionably, the increasing digitalisation of services carries the risk of social exclusion for vulnerable groups. Digital exclusion is undeniably one of the most significant issues facing older people today.

There has been a recent exponential increase in the number of queries received by the Commissioner's office from members of the public that feel excluded from all types of services due to their lack of IT literacy.^{6 7} These individuals feel they are being left behind due to services or appointments being moved to online only, and to discounts in services being only available for those who are IT literate. COPNI believes that the role of the Consumer Council as a mediator between vulnerable consumers and private providers is essential, in order to offer alternatives to digital only services.

Unfortunately, older consumers are legally unprotected (and consequently have no grounds to challenge) in cases of discriminatory behaviour based on age by service providers, due to a lack of age discrimination legislation in the provision of goods, facilities, and services in Northern Ireland (as opposed to the rest of UK jurisdictions). For this reason, COPNI believes that the focus of the strategic objective "protecting consumers" should include working towards enshrining such protection in legislation, in order to be truly effective and to offer tangible protections to vulnerable consumers. In this respect, the recommendation to the

⁶ 40% of people older than 70 do not use the internet in the UK. This percentage is even higher for those older than 70 who live alone and have a limiting condition (60% of them do not use the internet or do not have access to it) (see Ofcom (2022) [Digital exclusion. A review of Ofcom's research on digital exclusion among adults in the UK](#)).

⁷ In addition, Northern Ireland has been consistently the UK jurisdiction with the lowest number of internet users over the past decade (88% in 2020) (see ONS (2021) [Internet users, UK: 2020](#) and ONS (2019) [Exploring the UK's digital divide](#)).

Assembly to fulfil the commitment of the *New Decade, New Approach*⁸ deal to bring forward age discrimination legislation could be included among the goals of the strategic objective of “influencing policy”.

Strategic Objectives

The Commissioner is pleased with the strategic objectives described in the FWP but maintains that vulnerable consumers must be specially protected against the threat of rising costs in public services, as well as against the reduction in the range of essential services available for them. As previously mentioned, older people earn less, and their income does not keep up with the cost of living. Any increase in costs derived from the implementation of new charges in public services will impact those already living on a tight budget.⁹

In the past nine months, our office has responded to several consultations to different departments and public bodies on consumer issues that affect older people. Unfortunately, within this short timeframe, COPNI has witnessed a trend in proposals from statutory bodies that could potentially increase costs and risks for older people, such as the modification of the Concessionary Fares Scheme,¹⁰ the implementation of water charges,¹¹ and the modification of the Universal Service Obligation (USO) of Royal Mail.¹²

It seems that older people might be facing a turning point, as they progressively find themselves in an increasingly vulnerable position. It is worrying that the absolute and relative poverty rates of pensioners in Northern Ireland are currently at the highest level in almost a decade.¹³ Regrettably, we are witnessing a surge of policy reform proposals that aim to reduce, rather than to expand, the protections offered to older citizens. For this reason, the Commissioner commends the Consumer Council’s commitments on “influencing policy” and on “understanding consumers”.

⁸ [New Decade, New Approach](#) (2020).

⁹ Worlddata (n.d) [Inflation rates in the United Kingdom](#) [Retrieved 1st March, 2024].

¹⁰ Department for Infrastructure (2023) [Consultation on Northern Ireland Concessionary Fares Scheme launched](#) [Retrieved 1st March 2024].

¹¹ Department for Infrastructure (2023) [Water and sewerage charges – options for revenue raising](#) [Retrieved 1st March 2024].

¹² Ofcom (2024) [Call for input: The future of the universal postal service](#) [Retrieved 1st March 2024].

¹³ Department for Communities (2023) [Northern Ireland Poverty and Income Inequality Report, 2021/22](#).



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Conclusion

The Commissioner for Older People for Northern Ireland agrees with the areas of focus identified by the Consumer Council as being essential for vulnerable consumers in its 2024-2025 plan. COPNI commends the Consumer Council's stated commitment to representing consumers in the range of issues highlighted in the plan and encourages a strong focus around the areas of public service provision (transport, water, postal services, etc.) and age discrimination legislation in the provision of goods, facilities, and services. The Commissioner would welcome further discussion and collaboration on areas of policy that are of common interest for our organisations.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Ángel Leira Pernas', written over a horizontal line.

Ángel Leira Pernas
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Commissioner for Older People for Northern Ireland

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