



Commissioner for Older People
for Northern Ireland

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By email: equality@ppsni.gov.uk

10.08.26

Re: Consultation on the PPS Equality and Disability Action Plans 2026-2029

Dear Tara

I am writing to you on behalf of the Commissioner for Older People for Northern Ireland (COPNI) in relation to the Public Prosecution Service's (PPS) Equality and Disability Action Plans. The role of the Commissioner is to safeguard and promote the rights and interests of older people across Northern Ireland.¹ Thus, both Action Plans are of interest and importance to COPNI's office. There are several measures in the draft Plans that align with COPNI's priorities.² In that context, COPNI welcomes the opportunity to engage with and respond to this consultation.

As you may be aware, Northern Ireland's population is ageing, characterised by an increase in the number of older people here. As an example, between 2025 and 2050, the number of people aged 60 plus in Northern Ireland is projected to rise by over 32%.³ As the population continues to age, the number of people with long-term health conditions or disabilities is also expected to increase.⁴ COPNI's office has consistently warned that, without adequate planning, the consequences of an ageing population will be considerable, particularly for older people.⁵

In this context, the risk of inequality among older people is increasing. The PPS' Equality and Disability Action Plans reflect a commitment to reduce inequalities for older people engaging in the criminal justice system. The Plans propose several positive measures that, if implemented and resourced properly, would address challenges and barriers faced by older

¹ [Commissioner for Older People Act \(Northern Ireland\) 2011](#).

² COPNI (2026) '[Corporate Plan 2025-2029](#)'.

³ NISRA (2026) '[National population projections: 2024-based](#)'.

⁴ NISRA (2022) '[Census 2021 main statistics health, disability and unpaid care tables](#)'.

⁵ See, for example, COPNI (2024) '[At the centre of government planning: The Programme for Government and preparing for an ageing population](#)'.

victims and witnesses. COPNI has identified several themes (highlighted below) across both Plans and offers the following commentary.

Distinct needs of older people

Older people are not a homogenous group in that they embody multiple identities relating to characteristics such as age, gender, race, ethnicity and sexuality. Older people also have differing backgrounds, experiences, health needs and living situations. This diversity among older people is not always recognised by criminal justice agencies in the design or delivery of their services. As a result, older people often do not see themselves or their needs reflected in the services on offer, which can deter many from engaging with criminal justice processes.

Considering this, COPNI welcomes the PPS commitment in the Action Plans that “each victim and witness will have a needs assessment undertaken by their Victim and Witness Care Unit Case Officer and will have an opportunity to identify any difficulties they are experiencing or support they may require”.⁶ This is crucial for older people. Many older people live with a long-term health condition or disability that may affect their ability to participate in proceedings.⁷ Physical disabilities may make it difficult to attend court or other in-person appointments. Cognitive conditions such as dementia can impact an older person’s memory and understanding of the crime.⁸ Hearing or speech impairments may make communicating experiences of crime difficult.⁹ Likewise, many older people who are lonely or socially isolated may have reduced confidence in engaging with justice processes.¹⁰ In instances where the perpetrator is known to the older victim, many can experience fear of the consequences of reporting and seeking help. If the older victim is dependent on the perpetrator for care or financial reasons, for example, they may be reluctant to pursue criminal proceedings.¹¹ Thus, COPNI trusts that the distinct needs of older people will be considered in the needs

⁶ PPS (2026) ‘[2026-2029 Equality Action Plan](#)’ and ‘[2026-2029 Disability Action Plan](#)’.

⁷ 185,282 older people in Northern Ireland live with a long-term health problem or disability that limits their day-to-day activities. NISRA (2022) ‘[Census 2021 main statistics health, disability and unpaid care tables](#)’.

⁸ There was projected to be over 27,000 older people in Northern Ireland living with dementia in 2025. By 2040, this figure is projected to increase to 42,800. Wittenberg et al (2019) ‘[Projections of older people with dementia and costs of dementia care in the United Kingdom, 2019-2040](#)’.

⁹ Over 70,000 people aged 65 plus in Northern Ireland live with deafness or partial hearing loss. NISRA (2022) ‘[Census 2021 main statistics health, disability and unpaid care tables](#)’.

¹⁰ 16.7% of people aged between 65 and 74, as well as 22.7% of people aged 75 plus in Northern Ireland report feeling lonely at least some of the time. A further 5% of those aged between 65 and 74 report feeling lonely often/always, as well as 7.5% of those aged 75 plus. NISRA (2026) ‘[Individual Wellbeing in Northern Ireland Report 2024/25](#)’.

¹¹ COPNI (2024) ‘[Growing Concern: Older Victims of Domestic Abuse in Northern Ireland](#)’.

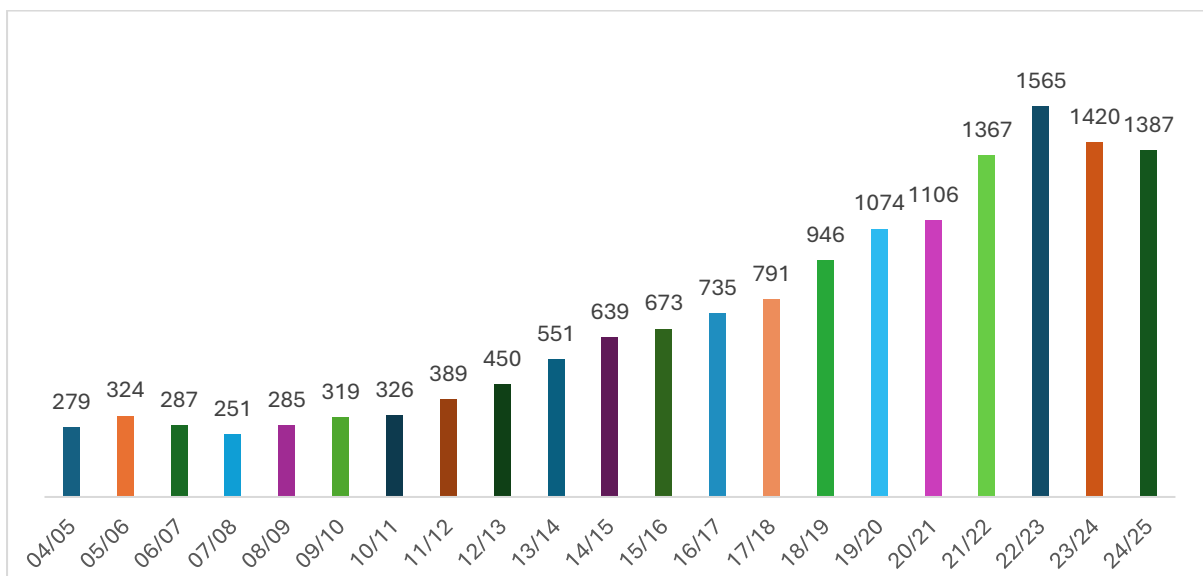
assessments and measures put in place to effectively support older victims and witnesses to engage with criminal justice processes.

Sexual and Domestic Abuse

Domestic Abuse

In 2024, COPNI published *Growing Concern*, a report on older victims of domestic abuse in Northern Ireland.¹² The recorded number of older domestic abuse victims in Northern Ireland has increased over the past two decades from 279 victims in 2004/05 to 1,387 in 2024/25.¹³

FIGURE 1. *Number of domestic abuse victims aged 60 plus in Northern Ireland 2004/05 – 2024/25 recorded by the PSNI.*¹⁴



COPNI's report further explores the distinctive experiences of older people subjected to domestic abuse in Northern Ireland. Our review found that older victims of domestic abuse can experience a number of factors that make them less likely to report and reach out for support. These included reduced mental capacity, the overlap between elder abuse and domestic abuse, complex relationships between older victims and their abusers and the

¹² COPNI (2024) '[Growing Concern: Older Victims of Domestic Abuse in Northern Ireland](#)'.

¹³ PSNI (2025) '[Domestic Abuse Annual Trends 2004/05 to 2024/25](#)'.

¹⁴ PSNI (2025) '[Domestic Abuse Annual Trends 2004/05 to 2024/25](#)'.

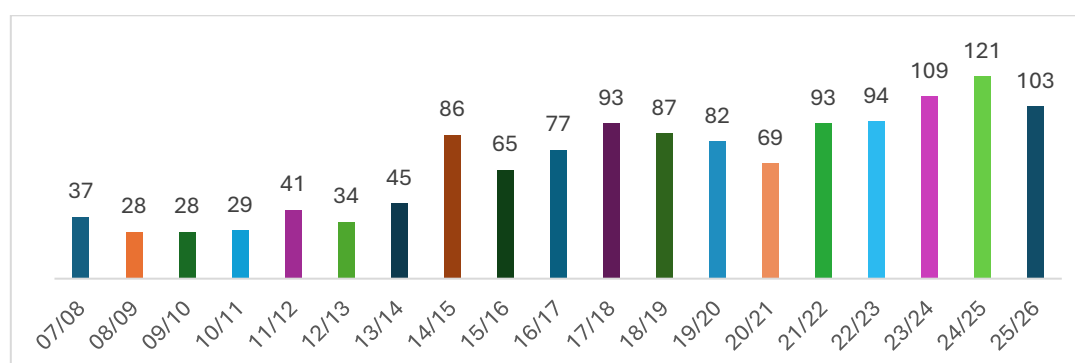
prevalence of ageism in Northern Ireland. This led the Commissioner to recommend the implementation of “long-term, collaborative and resourced specialist domestic abuse services that are responsive to the distinct needs of older victims”.¹⁵

In this context, COPNI welcomes and supports the PPS’ commitment to “establish a new Sexual and Domestic Violence and Abuse Strategic Oversight Board to provide a governance and oversight framework for our work in tackling sexual and domestic abuse”, as well establish an “Independent Consultation Group...to ensure that victims receive the best possible support and encouragement to stay engaged in the criminal justice process”.¹⁶ COPNI hopes that older people and their needs will be represented on both the Board and the Group, perhaps by the inclusion of members that advocate on behalf of older people. Older victims’ lived experience will bring a vital perspective to discussions, ensuring the PPS can make informed and effective decisions that lead to better services for older victims. A Board that lacks such insight could become disconnected from the realities and barriers older victims of domestic abuse face.

Sexual Offences

The prevalence of sexual offences among older people has increased dramatically over the last few decades. For instance, in 2007/08, there were 37 recorded victims of sexual offences in Northern Ireland aged 60 plus. By comparison, in 2025/26, there were 103, an increase of over 178%.¹⁷

FIGURE 2. *Number of sexual offence victims aged 60 plus in Northern Ireland 2007/08 – 2025/26 recorded by the Police Service of Northern Ireland (PSNI).*¹⁸



¹⁵ COPNI (2024) ‘[Growing Concern: Older Victims of Domestic Abuse in Northern Ireland](#)’.

¹⁶ PPS (2026) ‘[2026-2029 Equality Action Plan](#)’.

¹⁷ PSNI (2026) ‘[Financial year update, period ending 31 March 2026, providing figures for 2025/26](#)’.

¹⁸ PSNI (2026) ‘[Financial year update, period ending 31 March 2026, providing figures for 2025/26](#)’.

COPNI therefore welcomes and supports the commitment in the PPS' Equality Action Plan to "publish a new Sexual Offences Strategy (jointly with PSNI)".¹⁹ We hope it will give consideration to the experiences and needs of older victims and ensure they are appropriately reflected throughout its implementation. COPNI would welcome the opportunity to engage with the PPS and the PSNI as the Strategy is developed.

Legislative Changes

The Equality Action Plan states that the PPS will "implement all legislative changes relating to victims and witnesses introduced by Parliament at Westminster and the NI Assembly, including any new provisions set out in the Sentencing Bill, Victims and Witnesses of Crime Bill and the Crime and Policing Bill".²⁰ COPNI is encouraged by this commitment. In May this year, COPNI provided evidence to the Assembly's Justice Committee on the hate crime provisions of the Criminal Justice (Sentencing etc) Bill.²¹ ²² Despite a recommendation from an independent review commissioned by the Department of Justice (DoJ),²³ age is excluded from the list of protected characteristics at Clause 33 of the Bill. This means that older people are essentially excluded from the principal hate crime aggravator, as it currently stands. In COPNI's view, the Criminal Justice (Sentencing etc) Bill should be amended to include age in the list of protected characteristics. Its inclusion, alongside the vulnerability aggravator at Clause 36, "would provide a more complete and effective framework for recognising and addressing harm experienced by older people".²⁴ COPNI would welcome engagement with the PPS on this issue, especially if the amendment is adopted.

Special Measures

Special Measures provisions were established under The Criminal Evidence (Northern Ireland) Order 1999.²⁵ Special Measures can "substantially improve victim participation in the justice system and increase the number of cases that achieve a successful outcome".²⁶ Such

¹⁹ PPS (2026) '[2026-2029 Equality Action Plan](#)'.

²⁰ PPS (2026) '[2026-2029 Equality Action Plan](#)'.

²¹ [Criminal Justice \(Sentencing etc\) Bill](#).

²² COPNI (2026) '[Written Evidence to the Northern Ireland Committee for Justice on the Criminal Justice \(Sentencing etc\) Bill from the Commissioner for Older People for Northern Ireland \(COPNI\)](#)'.

²³ D. Marrinan (2020) '[Hate crime legislation in Northern Ireland, Independent Review](#)'.

²⁴ COPNI (2026) '[Written Evidence to the Northern Ireland Committee for Justice on the Criminal Justice \(Sentencing etc\) Bill from the Commissioner for Older People for Northern Ireland \(COPNI\)](#)'.

²⁵ [The Criminal Evidence \(Northern Ireland\) Order 1999](#).

²⁶ Brown and Gordon (2024) '[Constructions of vulnerability in relation to older victims of crime](#)'.

is particularly important in the context of older victims. In 2025/26, the PSNI's recorded sanction outcomes rate for the 65 plus age group was 17.3%, the lowest of all adult age groups.²⁷ However, special measures are not automatically offered to all victims or witnesses. Instead, "legislation defines the circumstances in which they can be made available".²⁸

The Northern Ireland Assembly's Justice Committee is currently considering a new Victims and Witnesses of Crime Bill which proposes to amend The Criminal Evidence (Northern Ireland) Order 1999.²⁹ Clauses 24 and 25 of the Bill extends eligibility for Special Measures in cases involving hostility aggravation under the Criminal Justice (Sentencing etc) Bill.³⁰ As discussed above, the Criminal Justice (Sentencing etc) Bill currently does not include age as a protected characteristic in its hate crime provisions. Thus, older people will not receive the protections offered by the hostility aggravation model. This, in turn, means that, under the new Victims and Witnesses of Crime Bill, older people will also not receive automatic consideration for Special Measures.

As well as this, the Victims and Witnesses of Crime Bill does not extend eligibility for Special Measures to the vulnerability aggravator of the Criminal Justice (Sentencing etc) Bill. Some older people are expressly included in the vulnerability aggravator model and, thus, COPNI is of the view that, where vulnerability is already central to the case, there should be automatic consideration of Special Measures. In sum, as it currently stands, older people are effectively excluded from the protections of the Victims and Witnesses of Crime Bill due to the exclusion of the vulnerability aggravator, as well as the exclusion of age from the Criminal Justice (Sentencing etc) Bill. COPNI is currently preparing a written evidence submission to the Justice Committee on the Victims and Witnesses of Crime Bill.

Considering this, COPNI welcomes the PPS commitment to consider and apply Special Measures in cases where it is deemed appropriate.³¹ In making these decisions, COPNI hopes older people and their distinct needs will be given due consideration.

²⁷ PSNI state that "sanction outcomes include charge/summons, cautions (adult and juvenile), community resolutions (formerly known as discretionary disposals), penalty notices for disorder and offences taken into consideration". See PSNI (2026) '[Financial year update, period ending 31 March 2026, providing figures for 2025/26](#)'.

²⁸ Brown and Gordon (2024) '[Constructions of vulnerability in relation to older victims of crime](#)'.

²⁹ [Victims and Witnesses of Crime Bill](#).

³⁰ [Criminal Justice \(Sentencing etc\) Bill](#).

³¹ PPS (2026) '[2026-2029 Equality Action Plan](#)'.

Communication

Both Action Plans note the PPS' commitment to ensuring "appropriate access to information".³² This is particularly important for older people. Digital exclusion is a common concern for many and one that they often bring to the attention of the Commissioner. Older people's experiences of digital exclusion place them at risk of missing out on crucial information and services. While we strive to limit the digital divide and lessen its impact on older people, there are factors such as disability that mean some older people are unable to access the internet. A major concern for this cohort is the move of information and services to online-only, with limited or no offline alternative. As an example in a justice context, the closure of local police stations may have impacted older victims' ability to report crime and receive support. Thus, COPNI welcomes the PPS' commitment to "attend outreach events and meetings to address the perceptions of people in affected S75 groups".³³ Such opportunities for in-person engagement will go some way in supporting older people to understand, participate and navigate criminal justice processes.

As well as this, COPNI notes that the Equality Action Plan commits to "publish regular Statistical Bulletins covering: (a) PPS casework; (b) Sexual offences; and (c) Hate crime".³⁴ COPNI has consistently called for improved statistical information in respect of crime among older people. For instance, in our *Growing Concern* report, COPNI recommended that "criminal justice organisations should improve the consistency of their data collection and analytics".³⁵ Similarly, in our evidence to the Justice Committee on the Criminal Justice (Sentencing etc) Bill, COPNI highlighted that "the absence of official statistical evidence in Northern Ireland of hate crimes based on hostility towards someone's age does not mean that such crimes do not exist. Rather, it reflects limitations in data collection".³⁶ COPNI, therefore, suggests that PPS consider collating and publishing data on older victims and witnesses that engage with their services in each of the proposed Statistical Bulletins. Such would provide a more comprehensive picture of crime against older people in Northern Ireland.

³² PPS (2026) '[2026-2029 Equality Action Plan](#)' and '[2026-2029 Disability Action Plan](#)'.

³³ PPS (2026) '[2026-2029 Equality Action Plan](#)'.

³⁴ PPS (2026) '[2026-2029 Equality Action Plan](#)'.

³⁵ COPNI (2024) '[Growing Concern: Older Victims of Domestic Abuse in Northern Ireland](#)'.

³⁶ COPNI (2026) '[Written Evidence to the Northern Ireland Committee for Justice on the Criminal Justice \(Sentencing etc\) Bill from the Commissioner for Older People for Northern Ireland \(COPNI\)](#)'.

Older Workers

The Disability Action Plan includes a measure to ensure “an inclusive workplace for all”.³⁷ Similarly, both Plans commit to providing training and learning opportunities on disability and diversity-related issues.³⁸ COPNI welcomes all such measures. As Northern Ireland’s population continues to age, a growing proportion of people will reach State Pension Age (SPA) while fewer will reach working age.³⁹ In other words, there will be more people leaving the labour market than entering it, creating a diminishing workforce. One possible way to ameliorate the impact of labour shortages is to support older workers to voluntarily extend their working lives.⁴⁰ Doing so will not only benefit older people themselves, but also their employers and wider society. An ageing population means enabling people to extend their working lives is not just desirable but increasingly necessary.

That said, older people can experience a number of barriers to continuing employment, one being living with a disability. As the number of older people is projected to increase, so too is the number of people living with disabilities. As such, it is key that measures to support older people to remain in work or return to the workforce are responsive to the diversity of older people. In this context, COPNI supports the PPS’ commitments to “ensure implementation of Reasonable Adjustments...complete risk assessments to ensure PPS buildings are accessible...have a Well Champion who assists the NICS WELL Team in the delivery of services, activities and provides information to staff on a range of health and wellbeing issues within the NICS...continue to implement the NICS policy of Guaranteed Interview Scheme for those with a Disability”.⁴¹

Conclusion

In sum, both the Equality and Disability Action Plans propose steps that would address the inequalities, barriers and challenges older people face in engaging with the criminal justice system, which the Commissioner welcomes. A consistent message from this response is that older people and their distinct needs must be considered and included. Only by doing so will the proposed measures be effective and successful in limiting the challenges faced by older victims and witnesses.

³⁷ PPS (2026) ‘[2026-2029 Disability Action Plan](#)’.

³⁸ PPS (2026) ‘[2026-2029 Equality Action Plan](#)’ and ‘[2026-2029 Disability Action Plan](#)’.

³⁹ NISRA (2026) ‘[National population projections: 2024-based](#)’.

⁴⁰ COPNI (2024) ‘[At the centre of government planning: The Programme for Government and preparing for an ageing population](#)’.

⁴¹ PPS (2026) ‘[2026-2029 Disability Action Plan](#)’.



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COPNI would welcome the opportunity to discuss the Plans, this response or any issue mentioned herein should it be necessary or helpful.

Yours faithfully

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