



Commissioner for Older People
for Northern Ireland

**Victims and Witnesses Branch
Access to Justice Directorate
Department of Justice
Massey House
Stormont Estate
Belfast
BT4 3SX**

By email: DOJVictimsWitnesses@justice-ni.gov.uk

17/01/25

Re: Consultation on Proposals for Inclusion in a Victims and Witnesses of Crime Bill

Dear Sir/Madam

Thank you for the opportunity to engage with you on the development of a new Victims and Witnesses of Crime Bill. I offer a response to this consultation on behalf of the Commissioner for Older People for Northern Ireland (COPNI). The principle aim of COPNI, as set out in Section 2 of the Commissioner for Older People Act (Northern Ireland) 2011, is to “safeguard and promote the interests of older people”.¹

COPNI is supportive of measures that seek to protect all victims and witnesses of crime but has a particular focus on the protection of older victims and witnesses. Whilst statistics show that older people are less likely to be victims of crime in Northern Ireland,² they can often experience crime more acutely than other age groups due to distinct factors.³ In his eight-year term, which came to an end in December 2024, Commissioner Eddie Lynch published four reports exploring the impact of crime on older people.^{4 5 6 7} Each report discusses the barriers faced by older people and provides recommendations for improving the experiences of older victims navigating the criminal justice system. This consultation is an opportune time to set out some of the issues and challenges faced by older people, as they relate to your Proposals.

¹ [Commissioner for Older People Act \(Northern Ireland\) 2011, Section 2.](#)

² For instance, in 2023/24, there were 4,193 recorded victims of crime aged 65+ in Northern Ireland, compared to 8,205 recorded victims aged 30 to 24. Police Service of Northern Ireland (2024) [‘Annual Trends in Police Recorded Crime 1998/1999 to 2023/2024, Pivot Table 4 Police Recorded Crime by victim gender, victim age and policing district.’](#)

³ Social, health and institutional factors include living with a disability, experiencing of loneliness and social isolation, living alone, being widowed, the prevalence of ageism in Northern Ireland, lack of appropriate housing.

⁴ Brown and Gordon (2019) [‘Improving Access to Justice for Older Victims of Crime: Older People as Victims of Crime and the Response of the Criminal Justice System in Northern Ireland’.](#)

⁵ Commissioner for Older People for Northern Ireland (2019) [‘Crime and Justice: The Experience of Older People in Northern Ireland’.](#)

⁶ Commissioner for Older People for Northern Ireland (2023) [‘A Different Crime’.](#)

⁷ Commissioner for Older People for Northern Ireland (2024) [‘Growing Concern: Older Victims of Domestic Abuse in Northern Ireland’.](#)

Older People and Experiences of Crime

In Northern Ireland, older people are relatively safe from crime in that they are less likely to be victims. However, when crimes are committed against older people, COPNI's report *A Different Crime*, highlighted that different age groups experience varying frequency of different types of crime. Older people, for instance, are often more vulnerable to experiencing crimes such as theft, burglary and criminal damage. Older victims also experience poorer outcomes in the criminal justice system, perhaps due to barriers to reporting and receiving support.⁸ Despite being less likely to be victims of crime, studies have suggested that older people in Northern Ireland have much higher levels of fear of crime.⁹

Older people are a diverse group with multiple aspects of identity such as age, gender, race, ethnicity and sexuality. Often, such characteristics can intersect to exacerbate older people's vulnerabilities to experiencing crime and affect their ability to report and receive support. An older victim's "pre-offence status" can also determine the extent to which a crime can impact them.¹⁰ COPNI's report *A Different Crime*, found that "an older victim of crime may be subject to the same crime as a younger victim, but frequently, she or he, experiences a greater impact from that crime due to pre-existing issues".¹¹ Older people in Northern Ireland are more likely to live alone,¹² live with a disability,¹³ experience health issues,¹⁴ be widowed,¹⁵ and experience loneliness and social isolation.¹⁶ Such factors can encourage many older victims to feel hesitant about reporting a crime, reaching out for support and engaging with the criminal justice system.¹⁷ For example, COPNI's most recent crime report¹⁸ highlighted that older

⁸ Commissioner for Older People for Northern Ireland (2023) '[A Different Crime](#)'.

⁹ The 2020/21 Northern Ireland Safe Community Telephone Survey found that 11% of respondents aged 75 plus had high levels of worry about crime. Similarly, respondents aged 65 plus were more likely to describe the effect of fear of crime on their quality of life as 'moderate' or 'great'. NISRA (2022) '[Findings from the 2020/21 Northern Ireland Safe Community Telephone Survey](#)'.

¹⁰ Commissioner for Older People for Northern Ireland (2023) '[A Different Crime](#)', page 9.

¹¹ Commissioner for Older People for Northern Ireland (2023) '[A Different Crime](#)', page 13.

¹² In 2025, the number of people aged 75+ living alone is projected to be 57,560. By 2040, this figure is projected to increase to 77,924. NISRA (2018) '[Northern Ireland Household Projections \(2016 based\)](#)'.

¹³ Census 2021 results showed that 56.8% of people aged 65+ live with a limiting long-term health problem or disability. Census 2021 (2022) Main statistics for Northern Ireland, Statistical bulletin, Health, disability and unpaid care, p 18. Available at: <https://www.nisra.gov.uk/system/files/statistics/census-2021-main-statistics-for-northern-ireland-phase-2-statistical-bulletin-health-disability-and-unpaid-care.pdf>

¹⁴ Census 2021 results showed that 17.4% of people aged 65+ have 'bad or very bad general health' compared to 11% of 40 to 64 year olds, 3.1% of 15 to 39 year olds. Census 2021 (2022) '[Main statistics for Northern Ireland, Statistical bulletin, Health, disability and unpaid care](#)', page 10.

¹⁵ Census 2021 results showed there were 80,802 people aged 65+ who were widowed or a surviving partner from a civil partnership, equating to 24.7% of all those aged 65+. Census 2021 (2023) '[Marital and civil partnership status by broad age bands](#)'.

¹⁶ 18.7% of those aged 65 to 74 and a further 22.6% of those aged 75+ report high levels of loneliness. NISRA (2023) '[Wellbeing in Northern Ireland, 2022/23](#)', page 5.

¹⁷ Commissioner for Older People for Northern Ireland (2023) '[A Different Crime](#)', page 9.

¹⁸ Commissioner for Older People for Northern Ireland (2024) '[Growing Concern: Older Victims of Domestic Abuse in Northern Ireland](#)'.

victims of domestic abuse can often have complex relationships with their abusers.¹⁹ An older victim living with a disability may depend on their abuser for care and hesitate to report their experience in fear that they will not have anyone to provide care.

A Statutory Commissioner for Victims and Witnesses of Crime

COPNI welcomes the Proposal to establish a statutory Commissioner for Victims and Witnesses of Crime. Laws, policies and support services should be inclusive and consider the experiences of older victims and witnesses by being responsive to their distinct needs. The Commissioner should ensure such mechanisms are developed, implemented and effective in practice. COPNI believes the overarching aim to promote the interests of “all victims and witnesses in the justice system”²⁰, as well as the proposed powers and duties, could serve to support older people in navigating the criminal justice system. COPNI is pleased that the remit of the Commissioner addresses both victims and witnesses since older people are affected as victims of crime but also, often as vulnerable witnesses of crime. Support should be available to all citizens affected by crime.

Statistical Victim Information from Criminal Justice Organisations

Many older people who experience crime have limited awareness of the support available to them. A statutory Commissioner for Victims and Witnesses of Crime has the potential to raise awareness of support and services available for victims and witnesses, while encouraging increased collaboration between criminal justice agencies. The Proposal that criminal justice organisations “provide or publish statistical victim information” is echoed in COPNI’s *Growing Concern*. The report recommends criminal justice organisations improve the consistency of their data collection and analysis so stakeholders can understand the scale and nature of domestic abuse against older people. COPNI is hopeful the department’s Proposal would include collecting data on the age of the victim, among other demographic characteristics. In doing so, we can obtain a clearer picture of offending against older people in Northern Ireland, while also ensuring agencies are compliant with their Victim Charter responsibilities. Such statistical information will provide the basis for informed service provision and evidence-based policies that effectively meet the diverse needs of older victims.

¹⁹ Commissioner for Older People for Northern Ireland (2024) [‘Growing Concern: Older Victims of Domestic Abuse in Northern Ireland’](#), page 15 - 22.

²⁰ Department of Justice (2024) [‘Consultation on Proposals for Inclusion in a Victims and Witnesses of Crime Bill’](#), page 16.



Older People as a Priority Group for the new Commissioner

COPNI suggests consideration be given by the department to the inclusion of older people as a “vulnerable group of victims” and hence as an area of focus for the new Commissioner.²¹ Northern Ireland’s population is an ageing one. By 2040, there is projected to be 465,905 people in Northern Ireland aged 65 and over²², compared to 326,500 in 2021.²³ COPNI’s *At the Centre of Government Planning* report called for “a coordinated response by the Executive and departments ... to address the challenges of an ageing population”.²⁴ With older people making up a growing proportion of Northern Ireland’s society, the Commissioner for Victims and Witnesses of Crime should ensure criminal justice policies and support systems are designed to address the challenges of the ageing population. COPNI maintains that consideration of older victims and witnesses of crime is essential to achieving the Minister’s vision of ensuring a “fairer and better justice system for everyone”.²⁵

Finally, COPNI is supportive of the development of a Victims and Witnesses of Crime Bill, as well as the Proposals outlined in the consultation document. We hope it will serve to support older victims and witnesses of crime in Northern Ireland as they navigate the criminal justice system. We look forward to engaging with you further during the development and implementation of the Bill. I would welcome the opportunity to discuss this response, or the new Bill, further should it be necessary or helpful.

Best wishes

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²¹ Department of Justice (2024) ‘[Consultation on Proposals for Inclusion in a Victims and Witnesses of Crime Bill](#)’, page 17.

²² NISRA (2022) ‘[2020-Based Population Projections: Principal Projection](#)’.

²³ NISRA (2022) ‘[Census 2021 Population and Household Estimates for Northern Ireland, Statistical Bulletin](#)’.

²⁴ Commissioner for Older People for Northern Ireland (2024) ‘[At the Centre of Government Planning: The Programme for Government and Preparing for an Ageing Population](#)’, page 11.

²⁵ Naomi Long MLA Minister of Justice (2024) ‘[Consultation on Proposals for Inclusion in a Victims and Witnesses of Crime Bill, Ministerial Foreword](#)’.