



Commissioner for Older People
for Northern Ireland

2025-2026 Forward Work Programme
The Consumer Council
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By email: FWP@consumercouncil.org.uk

24/03/25

Re: Draft 2025-2026 Forward Work Programme consultation

Dear Sir / Madam

The Commissioner for Older People for Northern Ireland (COPNI) welcomes the opportunity to engage with you on the development of your 2025-2026 Forward Work Programme. COPNI is supportive of the Consumer Council's vision "to protect and empower consumers in Northern Ireland", as well as your four consumer priorities and five strategic objectives.¹ We particularly welcome your prioritisation of older consumers.²

Northern Ireland's population is an ageing one. Soon, there will be more older people here than children.³ Older people will therefore represent a significant and growing portion of consumers across Northern Ireland. Older people are as diverse as any other age group and thus their consumer affairs span a wide range of needs and interests. However, older consumers face unique challenges including limited access to digital tools, restricted financial flexibility and vulnerability to experiencing financial abuse. To support older consumers, products, services and policies need to effectively address their specific needs and preferences. This consultation is an opportune time to set out some of the key issues for older consumers in Northern Ireland as they relate to your four consumer priorities.

Cost of Living Crisis

Older people are among the hardest hit by the cost of living crisis. In 2022/23, 12% of pensioners in Northern Ireland were living in relative poverty, with a further 7% living in absolute poverty.⁴ Similarly, 36% of households aged 60 plus in Northern Ireland are in fuel

¹ Consumer Council for Northern Ireland (2025) '[Draft 2025-2026 Forward Work Programme consultation](#)', page 5.

² Consumer Council for Northern Ireland (2025) '[Draft 2025-2026 Forward Work Programme consultation](#)', page 6.

³ For example, in 2030 there is projected to be 323,299 children aged under 15, compared to 406,627 older people aged 65 plus. NISRA (2025) '[2022-based Population Projections for Northern Ireland, Tabular 5 Year Age Bands](#)'.

⁴ Department for Communities (2024) '[The Northern Ireland Poverty and Income Inequality Report, 2022/23](#)'.

poverty.⁵ The increasing costs of essentials has put significant financial strain on older people. A key issue for many is living on a fixed income, with little to no scope to source additional or new income.⁶ This limited financial flexibility often means older people have less capacity to adapt to price increases. Especially given the recent cut to the Winter Fuel Payment,⁷ COPNI is in no doubt that many older people across Northern Ireland have made and continue to make difficult decisions between choosing to heat their homes or cutting back on healthcare, medication and food expenses. We know such decisions will disproportionately impact older people. Cold homes can lead to poor housing conditions such as damp and mould. Because older people are more likely to live with a disability or long-term health problem,⁸ such living conditions can work to exacerbate existing health issues. Cutting back on food expenses can lead to a poor diet, malnutrition, weight loss, muscle weakness, fatigue and overall worsened health outcomes. Medical conditions may go untreated if older people delay or skip appointments and necessary treatment due to financial constraints.

In this context, COPNI was encouraged that the Consumer Council has identified the cost of living crisis as one of four consumer priorities. Older people need immediate as well as long-term measures to mitigate the impacts of poverty, fuel poverty and the cost of living crisis on their consumer affairs. We were reassured by your commitment to “protect those most exposed to the crisis”⁹, as well as several of your proposed work areas which we are hopeful will go some way in supporting older consumers through the cost of living crisis:

Establish annual fuel poverty and energy affordability levels...Produce a range of accessible resources and guides on consumer rights and consumer issues for our annual outreach programme and partner organisations...Annual consumer outreach programme to support hard-to-reach, priority consumer groups and communities across Northern Ireland on a range of consumer rights and protection issues...Deliver Omnibus surveys to measure how consumers are coping with cost of living impacts, financial resilience,

⁵ Consumer Council for Northern Ireland (2022) '[A Review of Fuel Poverty Levels in Northern Ireland](#)', page 21.

⁶ Age NI (2022) '[All Party Group on Ageing and Older People, 7th September 2022 Briefing](#)'.

⁷ Department for Communities (2024) '[Written Ministerial Statement, Proposed Policy Changes to the Winter Fuel Payment Scheme in Northern Ireland](#)'.

⁸ Census 2021 results found that 56.8% of those aged 65 plus in Northern Ireland live with a long-term health problem or disability. NISRA (2022) '[Census 2021, Main Statistics for Northern Ireland, Statistical Bulletin, Health, Disability and Unpaid Care](#)', page 18.

⁹ Consumer Council for Northern Ireland (2025) '[Draft 2025-2026 Forward Work Programme consultation](#)', page 10.

*consumer confidence, and awareness and accessing advice and support from the Consumer Council.*¹⁰

Digital Inclusion

Digital exclusion is a common concern for many older people across Northern Ireland and is one often brought to COPNI's attention. Research by Age UK found that 29% of older people aged 75 plus across the UK do not use the internet.¹¹ Experiences of digital exclusion place older people at risk of missing out on crucial information and services, as well as limiting their access to online activities and resources – all of which can support them to age well.

With this in mind, COPNI is pleased that the Consumer Council is prioritising “positive and equal opportunity, access and outcomes when interacting with digital markets”, particularly for vulnerable consumers such as older people.¹² Many of your proposed work areas will increase levels of digital inclusion among older people, including:

*Grow consumer access of digital platforms, social networks and content partnerships including online guides, advice hubs, price comparison tools, and educational videos...Outreach partnership with Libraries NI to improve confidence and choice by helping consumers to safely access and navigate digital markets...Improve digital practices through engagement with Ofcom, Office for Product Safety and Standards Consumer Reference Panel and Competition and Markets Authority...Carry out a feasibility exercise of a digital inclusion pilot project to better understand digital and financial inequalities at a local council level in Northern Ireland.*¹³

However, whilst we strive to close the digital divide and lessen its impact on older people, many factors, such as disability, impairment or finances, can mean some older people are unable to access the internet. As such, a major concern for this cohort is the move of information and services to online-only, with limited or no offline alternative. COPNI welcomes your proposed work area to “support consumers through our Consumer Helpline”.¹⁴ This gives older people the opportunity to access information from the Consumer Council through offline means, ensuring they are aware of the services available to them. By doing so, your services

¹⁰ Consumer Council (2025) [‘Draft 2025-2026 Forward Work Programme consultation’](#), pages 15 – 27.

¹¹ Age UK (2024) [‘Facts and Figures about Digital Inclusion and Older People’](#), page 5.

¹² Consumer Council (2025) [‘Draft 2025-2026 Forward Work Programme consultation’](#), page 10.

¹³ Consumer Council (2025) [‘Draft 2025-2026 Forward Work Programme consultation’](#), pages 15 – 27.

¹⁴ Consumer Council (2025) [‘Draft 2025-2026 Forward Work Programme consultation’](#), page 21.

are maximally accessible to older people across Northern Ireland and will support them to age well.

Research by COPNI found that 21% of people aged 60 and over are affected by financial abuse in Northern Ireland.¹⁵ Older people may be more vulnerable to experiencing financial abuse through digital channels, especially if they have limited experience with technology and the internet. Age UK reported that almost half of older people aged 75 plus in the UK are unable to complete eight of the tasks required to set someone up for success online. Similarly, 33% do not have the skills required to thrive in our increasingly digital society.¹⁶ Abusers may take advantage of some older people's limited understanding of digital security practices, scams or fraudulent online schemes. Considering this, COPNI welcomes several of your proposed work areas. We are hopeful that it will encourage greater awareness of financial abuse, particularly among older people, ensuring they are informed and educated about online safety as well as reduce their risk of experiencing financial abuse:

Deliver a programme of outreach events across Northern Ireland to promote awareness of scams and online harms and their impact and build consumer confidence, prioritising groups in vulnerable circumstances... Advance consumer protection in Northern Ireland through engagement with industry, government and advice sector partners, and participation on relevant All-Party Groups. This will also include...Scamwise Partnership.¹⁷

Net Zero

The Climate Change Act (Northern Ireland) 2022 sets a reduction target of, at least, 100% lower than the baseline greenhouse gas emissions by 2050.¹⁸ At the same time, Northern Ireland's population is ageing. In Northern Ireland, in 2022, there were 335,449 older people aged 65 and above. By 2050, this figure is projected to rise to 514,748, over a 53% increase.¹⁹ In January 2025, COPNI responded to the Department of Agriculture, Environment and Rural Affairs' (DAERA) consultation on the establishment of a Just Transition Commission under the Act. The role of the Commission will be to "oversee the implementation of the just transition

¹⁵ Commissioner for Older People for Northern Ireland (2016) '[Financial Abuse of Older People in Northern Ireland: The Unsettling Truth](#)', page 7.

¹⁶ Age UK (2024) '[Facts and Figures about Digital Inclusion and Older People](#)', page 5.

¹⁷ Consumer Council (2025) '[Draft 2025-2026 Forward Work Programme consultation](#)', pages 17 and 24.

¹⁸ [Climate Change Act \(Northern Ireland\) 2022](#), Section 1.1.

¹⁹ NISRA (2025) '[2022-based Population Projections for Northern Ireland, Tabular 5 Year Age Bands](#)'.

elements of the Act, and to provide advice to Northern Ireland departments on how to ensure all proposals, policies, strategies and plans required under the Act comply with the just transition principle”.²⁰ In our response to the consultation, COPNI highlighted that “rapid societal change due to population ageing will coincide with that of significant disruptive climate change”.²¹ Older people are at greatest risk of climate change impacts. Many may experience vulnerability to climate-related natural disasters, sensitivity to extreme hot and cold temperatures, as well as prolonged exposure to pollution.²² COPNI therefore recommends that consideration of an ageing population be incorporated into the Consumer Council’s plans around net zero, just transition and climate change:

*Examine the limitations for rural consumers without a car in adopting a more sustainable pathway to net zero and identify possible solutions... Annual campaign to support Northern Ireland's Energy Strategy... We will also develop consumer and community engagement pathways with partners in government and industry, safeguarding and representing their interests as we prepare for net zero, for example supporting consumers to develop their understanding of and to ‘buy into’ the use of smart meters... Establish baselines for consumer understanding, barriers, expectations and engagement frameworks to drive behavioural change for a sustainable and circular society, building on our annual attitudinal survey on the energy transition.*²³

EU Exit

The EU exit has significant implications for older people across Northern Ireland, with increased uncertainty relating to healthcare arrangements, rising living costs, pensions and social security, as well as equality and human rights. Given that older people are a growing section of Northern Ireland’s population, their interests and concerns need to be taken into account when considering post-EU outcomes. COPNI welcomes the following proposed work areas, ensuring older people are kept informed of matters relating to the EU exit and their views reflected in the Consumer Council’s engagements and research:

²⁰ Department of Agriculture, Environment and Rural Affairs (2022) [‘The Climate Change Act \(Northern Ireland\) 2022 – Key Elements’](#).

²¹ Commissioner for Older People for Northern Ireland (2025) [‘Consultation Response on the Establishment of a Just Transition Commission’](#), page 2.

²² Help Age International (2023) [‘Climate Justice in an Ageing World’](#), pages 4 and 7.

²³ Consumer Council (2025) [‘Draft 2025-2026 Forward Work Programme consultation’](#), pages 15 – 27.



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Develop, maintain and expand (as appropriate) online information and educational resources for consumers on EU Exit, mobile roaming and travel...Respond to consultations and calls for evidence, and safeguard consumer interests on EU Exit matters...Conduct annual research into real and perceived impacts of EU Exit on Northern Ireland consumers five years after the end of the transition period, with a focus on statutory areas.²⁴

Thank you for the opportunity to engage with you on the development of your 2025-2026 Forward Work Programme. COPNI is hopeful the Programme and its proposed work areas will be resourced properly and implemented fully to meet the consumer-related needs of older people across Northern Ireland. We trust this response will be considered in your planning to support, protect and empower older consumers as our population ages. I would welcome the opportunity to discuss this response, or your Forward Work Programme further should it be necessary or helpful.

Best wishes

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²⁴ Consumer Council (2025) '[Draft 2025-2026 Forward Work Programme consultation](#)', pages 15 – 27.