



Commissioner for Older People
for Northern Ireland

08 October 2024

PfG and NICS of the Future Division,
Room E4.15,
Castle Buildings,
Stormont Estate,
Belfast,
BT4 3SL.

By email: PfGconsultation@executiveoffice-ni.gov.uk

Dear Sir/Madam,

Re: Draft Programme for Government 2024-2027 'Our Plan: Doing What Matters Most'

In June 2024, the Commissioner for Older People for Northern Ireland (COPNI) published the report 'At the Centre of Government Planning. The Programme for Government and Preparing for an Ageing Population'.¹ In this report, COPNI drew attention to the challenges posed by demographic ageing to the economy and public services of Northern Ireland, and the need for coordinated action from government to effectively respond to them.

Evidence shows that demographic ageing is among the most powerful factors in the rising costs of public services and is exacerbating the skilled worker shortage in our labour market. Demographic ageing is possibly the greatest structural challenge to our economic and welfare model. For this reason, the main recommendation of COPNI's report refers to the need, first and foremost, to acknowledge demographic ageing as a central concern of government planning in the Programme for Government.²

In common with other developed nations, we are living through a dramatic and unprecedented increase in the ageing population. This is not a "sectorial" issue or a problem that only affects older people as a "sector", but a phenomenon that will have direct impacts for everyone in society. Unless we take action and plan adequately for this increasingly present challenge, we will fail to harness the benefits of an older population, and will instead realise the burden of it, which is still avoidable.

There are 460,000 people over the age of 60 in Northern Ireland,³ and they are as diverse in characteristics as any other section of the population, but they also face common challenges such as ageism, fuel poverty or legal age discrimination. For this draft Programme for Government to fail so comprehensively to address their needs is an indictment of our society's approach to older people. It is baffling that the needs and

¹ Commissioner for Older People for Northern Ireland (2024) [At the Centre of Government Planning. The Programme for Government and preparing for an ageing population](#).

² For a detailed analysis of the effects of demographic ageing on Northern Ireland's welfare state, see COPNI's report on demographic ageing, which includes recommendations for the Programme for Government ([At the Centre of Government Planning. The Programme for Government and preparing for an ageing population](#)).

³ See [NISRA. 2023 Mid-Year Population Estimates for Northern Ireland. All areas - Population by sex and age bands](#).

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concerns of so many of our citizens are ignored by the government's most significant planning document.

This response aims to highlight shortfalls in the draft Programme, often drawing on the report that COPNI published in June 2024. Specifically, this response will point out issues of misjudgement and misdiagnosis in the Programme when addressing the challenges that our economy and public services face.

"Cut Health Waiting Times"

One of the main focuses of the Executive for the period 2024-27 will be to address the problems of the health system and, specifically, to reduce health waiting times. This issue has been listed as one of the nine priorities in the draft Programme during the forthcoming period of government, and therefore, it will be a key area of activity for the Executive. However, by not acknowledging demographic ageing as the most relevant driving factor in terms of our strained healthcare provision, the Executive has failed to accurately diagnose the situation, and consequently, the proposed plan of action is likely to be ineffective.

In last year's Budget EQIA by the Department of Health, the department discusses reasons for the increase in service demand, stating that

"Older people tend to have the highest and most complex needs ... This demographic shift is likely to put additional pressure on health service in future ... As older people tend to have more frequent, and more complex needs than the general population, any reduction in the provision of health services will affect them disproportionately".⁴

In Northern Ireland, demand for health services is largely outpacing supply. The number of patients waiting for a first consultant-led outpatient appointment between 2009 and 2023 has increased by 453%.⁵ In the period between 2009 and 2023, the population older than 65 increased by 35.2%.⁶ As a result of this ageing, more of the population experience higher morbidity rates and are more likely to have a disability or a limiting long term condition.⁷ Thus, the reform of the health and social care sector and specifically, solutions to the long waiting lists that citizens of all ages experience cannot be achieved without factoring in the impact of demographic ageing.

The destructive impact of not planning for an ageing population is evident in inconsistent government action. For example, despite waiting times being one of the

⁴ See Department of Health (2023) [Budget 2023-24 Equality Impact Assessment](#), page 24.

⁵ See Northern Ireland Executive (2024) [Draft Programme for Government 2024-2027 'Our Plan: Doing What Matters Most'](#), page 27, 'The number of patients waiting for a first consultant-led outpatient appointment has increased from 77,091 in Q1 2008/09 to 428,858 in Q2 2023/24'.

⁶ The total number of people older than 65 in Northern Ireland grew from 253,367 in 2009 to 342,482 in 2023. See [NISRA. 2023 Mid-Year Population Estimates for Northern Ireland. All areas - Population by sex and age bands](#).

⁷ The percentage of population that experience a limiting long-term condition in Northern Ireland increases with age. While only 12.8% of people aged 16-39 and 28% of those aged 40-64 experience a limiting long-term condition, up to 56.7% of people of 65 and older do. See Census 2021, [Custom table, Health Problem or Disability \(Long-term\) - 2 Categories by Age - 4 Categories](#).

nine priorities outlined in the draft Programme⁸, the Department of Health is simultaneously proposing 10 health service cuts in its latest Budget,⁹ all of which would disproportionately affect older people. These cuts, which will extend waiting times for all citizens, include the reduction of core preventive services for older people.¹⁰

Therefore, while the government aims to reduce waiting times, by not recognising that the ageing population is at the root of the problem, the steps taken may, in fact, worsen the problem. An inaccurate diagnosis often leads to ineffective treatment. If older people are not prioritised within the health system, waiting lists will continue to grow continuously as population ageing increases.

“Grow a Globally Competitive and Sustainable Economy”

Another priority of government that should have given due consideration to demographic ageing is the economy. In this priority, the draft Programme again fails to offer an adequate diagnosis. The lack of awareness in the Programme of the impact of demographic ageing on economic inactivity and labour shortages in Northern Ireland is concerning and again, is reflected in the Executive’s plan of action.

The greatest challenge within the labour market of Northern Ireland is not unemployment but economic inactivity. Currently, the unemployment rate stands at 2% in Northern Ireland,¹¹ while inactivity levels are high, especially among older workers.¹² As shown in COPNI’s report, there is a general consensus among independent and statutory bodies that advise government, both in the UK and in Northern Ireland, that demographic ageing is among the main causes of the high levels of economic inactivity¹³ and of the labour shortages in our labour market.¹⁴ Northern Ireland has, in fact, the highest rate of economic inactivity of older workers in the whole UK.¹⁵ For this

⁸ See Department of Health (2024) [Budget 2024-25 - Equality Impact Assessment](#), page 12.

⁹ The only savings measure that did not affect older people disproportionately was not related to service cuts (“No budgetary provision for 2024/25 pay settlements). See Department of Health (2024) [Budget 2024-25 - Equality Impact Assessment](#), page 12.

¹⁰ For instance, the “reduction in payments for support services provided by the Community and Voluntary Sector”, “suspending some vaccination programmes”, “a reduction of circa 400 acute hospital beds across NI”, “a reduction of in the region of 1,100,000 hours of homecare/domiciliary care type support provincewide over the year”, and “an estimated reduction of care home beds of circa 500”. See Department of Health (2024) [Budget 2024-25 - Equality Impact Assessment](#), page 12.

¹¹ See NISRA [Labour Market Report – Headline Tables – September 2024](#).

¹² See [Annual population survey - regional - labour market status by age](#). Queried data: geography (Northern Ireland, England, Scotland, Wales), date (12 months to March 2024), age (16-64, 50 to 64), labour market status (economically inactive).

¹³ A report published in 2017 by the Government Office for Science (see [Longer working lives bring significant benefits to individuals, employers and wider society](#), page 4) warned that with the exit rate of older workers from the labour market, the UK will face a labour shortage. Similarly, the Finance and Economics Team, Research and Information Service of the Northern Ireland Assembly reported in 2024 that Northern Ireland’s economy is facing the challenge of weak labour supply due to ‘low growth in working age population’ (see [Northern Ireland economic overview Briefing Paper](#), page 3).

¹⁴ The Northern Ireland Chamber of Commerce and Industry showed in its latest quarterly report that 66% of businesses in the service sector and 77% of businesses in the manufacturing sector face difficulties recruiting. See Northern Ireland Chamber of Commerce and Industry (2024) [Quarterly Economic Survey Summary, Q1 2024](#).

¹⁵ Half of the older workers that are economically inactive in Northern Ireland report to be inactive due to health reasons. See [Annual population survey - regional - labour market status by age](#). Queried data: geography (Northern Ireland, England, Scotland, Wales), date (12 months to March 2024), age (16-64, 50 to 64), labour market status (economically inactive). See [Annual population survey - regional - economic inactivity by reasons](#). Queried data:

reason, it hard to understand why the Programme does not mention older workers in its diagnosis of the faults in our labour market, and why it does not consider older workers as part of the solution.

Older workers are a realistic and easily accessible supply of skilled workers in Northern Ireland. Under the current circumstances, the most credible solution to improve activity levels in Northern Ireland is to offer support to older workers who want to remain active but face barriers to do so.¹⁶ Many sectors of the economy of Northern Ireland survive today supported by the invaluable contribution of individuals of pension age. For instance, COPNI has learned through its engagement with different Trusts that some statutory obligations of our health sector are currently being carried out mainly by bank staff, most of whom are retired health professionals and social workers. This serves as an example of how older people can make contributions to the economy in sectors that desperately need skilled workers.

A credible economic and skills strategy should put older workers at the forefront (or at least take them into consideration) when planning effective interventions. Instead, the draft Programme for Government simply ignores them, again raising concerns about the government's awareness of the real challenges we as a society face.

“Provide More Social, Affordable and Sustainable Housing”

In this section, the draft Programme acknowledges an issue of lack of supply of social housing. However, it is disappointing that the Executive does not commit to any practical action aimed at resolving (or at least improving) the situation. The proposals that are listed in this priority are already existing initiatives. If these approaches have not addressed the longest social housing waiting list (and the lowest level of supply) since records began,¹⁷ it remains to be seen how and why they will now prove effective. Regarding the proposal for a new Fuel Poverty Strategy, based on COPNI's engagement with the Fuel Poverty Team, it seems that the new Fuel Poverty Strategy will not have a budget. Such unfunded commitments seem utterly insufficient in context of the gravity of housing issues in Northern Ireland.

In this section, the draft Programme for Government leaves unaddressed the ageing of the population, which is a key factor in the housing crisis of Northern Ireland. The number of households has grown in Northern Ireland faster than the increase in the total population due to demographic ageing.¹⁸ An ageing population means smaller households.¹⁹ An ageing population would also change the main reason to move into

geography (Northern Ireland, England, Scotland, Wales), date (12 months to March 2024, 2019, 2014, 2009), age (aged 16-64, 16-24, 25-49, 50-64), reasons for economic inactivity (student, looking after family/home, temporary sick, long-term sick, discouraged, retired, other), wants a job (does not want a job, wants a job).

¹⁶ 12% of older workers that are economically inactive report that they want a job. See [Annual population survey - regional - labour market status by age](#). Queried data: geography (Northern Ireland, England, Scotland, Wales), date (12 months to March 2024), age (16-64, 50 to 64), labour market status (economically inactive).

¹⁷ See [Department for Communities, Northern Ireland Housing Statistics 2022-23. Section 3 Tables - Social Renting Sector](#).

¹⁸ Since 2011, the population has increased by 92,200 or 5%, while the number of households has increased by 65,600 or 9%. See [Census 2021 Population and household estimates for Northern Ireland Statistical bulletin](#).

¹⁹ 'In line with the ageing population, the average household size across Northern Ireland decreased from 2.54 usual residents per household in 2011 to 2.44 usual residents per household in 2021. The average household size decreased across all 11 local councils.' See [NISRA. 2021 Census Statistics press notice. Main Statistics](#), page 2.

a social housing home (while younger tend to move into a social housing home for financial reasons, older people are more likely to move due to the unfitness of their home). The relevance of the demographic shift in social housing is reflected and acknowledged by the Northern Ireland Housing Executive, which clearly state that social housing must respond to our ageing population. The NIHE has stated that if the social housing sector wants to address the ageing population, it should cater for single, small family and older person households. This would include, for instance, adapting new builds to an aged population by building category 1 (older person's accommodation).²⁰

Once more, in this section of the Programme, the absence of a diagnosis and the lack of appropriate commitments to improve the situation are concerning. The draft disregards the pertinence of an ageing population to an effective housing policy.

Absence of a commitment to end legal discrimination against older people

The word "discrimination" is never used in the draft Programme for Government. However, discrimination has not been eradicated in Northern Ireland. For instance, as COPNI showed in its June 2024 report, older people still face legal discrimination due to age in Northern Ireland (unlike in the rest of the UK).

In 2015, the Executive recognised the need for protecting people against discrimination due to age, launching a consultation on Age Discrimination Legislation (Age Goods, Facilities and Services).²¹ Similarly, a commitment to enact such legislation was made in the "New Decade, New Approach" deal. Yet despite these promises no such anti-age discrimination legislation exists in Northern Ireland.

Older people in Northern Ireland can be legally refused services, be treated unfairly in the provision of a service, and be refused access to public spaces simply because of their age. COPNI regularly receives communication from members of the public who have experiences of this type, only for these inquirers to learn that such treatment is perfectly legal.

As age discrimination often reaches into the daily lives of many older people going about their routine activities, the choice to leave such prejudicial attitudes and conduct unchallenged in the draft Programme is saddening.

A cultural shift is needed

From May 2024 until the publication of the draft Programme for Government, COPNI met with officials at the Executive Office, and the Commissioner and Chief Executive met with the First Minister and Deputy First Minister, to discuss the findings of our own report. In these conversations, officials agreed with COPNI's analysis that demographic ageing presents enormous structural challenges to our economy, public services and social life, and that such challenges require decisive action.

However, to our disappointment, the draft Programme for Government did not include provision and planning for an ageing population among its high-level priorities for the

²⁰ See Northern Ireland Housing Executive (2023) [Commissioning Prospectus 2024-25 to 2026-27](#).

²¹ See [Age Discrimination Legislation \(Age Goods, Facilities and Services\)](#).

period 2024-27.²² Nevertheless, the exclusion of “providing for an ageing population” as a high-level priority in the Programme (as COPNI recommended) would not be so concerning if the government had shown awareness of the significance of demographic ageing within and across all the priorities listed in the current draft Programme. Worryingly, this is not the case. Instead, the draft Programme reflects an outright inattention to the impacts of demographic ageing on the whole society. More broadly, it is deeply concerning that the Programme does not reflect the concerns pertaining to population change raised by departments, expert advisors to government and other statutory bodies leading on housing, health, the labour market, and public services.

Not only are older people not a high-level priority for the government, but they have been excluded from the draft Programme for Government altogether. If older people are excluded from the Programme so completely, it is no surprise that they are then first in line when service and benefit cuts (such as the Winter Fuel Payment) are implemented.

Demographic ageing will only accelerate in the next 15 years, and the government is quickly running out of time for effective planning. Regrettably, if the government keeps turning a blind eye to the reality of population ageing, the situation can only worsen, affecting public service provision for all citizens. For this reason, COPNI urges the Executive to reconsider its priorities and to adopt demographic ageing as a first level priority in the Programme for Government.

Conclusion

Comprehensive, evidence-based planning for the challenges of an increasingly ageing population is possible and will affect all of society. By keeping older people in economic activity, by harnessing their skills, by preventing illness and frailty and by caring compassionately for them when they need it, we will be building a better society for everyone. My firm advice is that, by ignoring the challenges of an ageing society you will continue to create the divisive narrative of burden and discrimination for older people and that will have a very detrimental impact on everyone in our society.

I have provided government with evidence on the need to plan for an ageing population in the Programme for Government, and with statutory advice on a sensible and logical course of action. I have done so through a comprehensive and thorough report and through a series of meetings with officials at The Executive Office, a meeting with the First and deputy First Minister, and communications with ministers sharing the content of the report.

²² Indeed, the Programme limited its consideration of demographic ageing to a paragraph in the “Reform and Transformation of Public Services” priority. In this section, demographic ageing is listed among six other causes for the current strain on public services. However, the influence of population ageing in the rising costs of public services is undeniable, and hardly comparable to any other cause. For instance, most of the government revenue comes from work-related taxes, while a big proportion of government expenditure is used to fund public pensions (13% of the Budget, see [2024-25 Budget Resource for Current Purposes](#)). Demographic ageing will negatively affect government revenue (because less people will work) and will increase the cost of pensions (because more people will be of pension age). In this regard, the cost of retirement pensions has grown from £1.1 billion in 2004 to £2.7 billion in 2023, and the Department for Communities estimates that the total cost of retirement pensions will rise sharply to £4.2 billion by 2029 (this information was submitted to COPNI by the Department for Communities after an FOI request).

The evidence base for demographic change is powerful and compelling and action in relation to public legislation, policy and practice is vital to avoid the consequential challenges. I would be grateful for a formal response to my statutory advice on this matter and an explanation for it being ignored in the draft PFG.

I am publishing this response on my website and will be sharing it with all members of the legislative committee for TEO. I also enclose the report of June 2024 for further detailed information.

I will be seeking further meetings with Ministers and with Assembly Committees to discuss the inclusion of the issues of an ageing society within the final Programme for Government.

Yours sincerely



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within the office of Commissioner for Older People for Northern Ireland

CC First Minister, Michelle O'Neill, MLA
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