



Commissioner for Older People
for Northern Ireland

Department for Communities
Causeway Exchange
1-7 Bedford Street
Belfast
County Antrim
BT2 7EG

By email: AdviceandDebtConsultation@communities-ni.gov.uk

06/10/2025

RE: Consultation on Support Framework for Independent Advice and Debt Services

Dear Sir/Madam

I am writing on behalf of the Commissioner for Older People for Northern Ireland (COPNI) regarding the consultation on the proposed Support Framework for Independent Advice and Debt Services.

Advice services are often the first point of contact for older individuals that are experiencing financial difficulties. For this reason, the Commissioner welcomes enthusiastically the Department's initiative to improve the effectiveness of advice services, reducing duplications, providing more value for money, increasing regional cohesion and advancing long-term budgeting and planning.

The Commissioner also commends the Department's efforts to strengthen services through direct engagement with providers and advisers, and the Department's frank assessment of the situation amid the ongoing financial constraints.

However, despite these efforts, the Commissioner is concerned that the Department's framework overlooks older people's issues and needs. ~~In particular, the present consultation document stresses the growing needs of the working age population and the necessity to increase remote access to services, while failing to address specifically the needs of which could potentially exclude older people.~~

The Department's view that advice services should be more focused on a younger working age population is—in the Commissioner's opinion—inconsistent with the growing number of older people in need of support. While ~~this does not mean that COPNI does not deny~~ diminishes the importance of advice services for a working age population, the reality of a growing proportion share of older people carries with it the need to address the increasing demand ~~for of~~ services by this age group.

Anti-Poverty and older people's services

The present framework ties in directly with the Executive's Anti-Poverty strategy,¹ which stated that assisting vulnerable people to receive the help and support they need was among its principal aims. The Anti-Poverty Strategy did not by itself provide a roadmap for achieving its stated goal of "eradicating poverty." The strategy's objectives were intended to be implemented through future workstreams, strategies and frameworks, such as the one here discussed. The strategy's success was directly dependent on these additional documents. Consequently, the present framework represents a cornerstone of the Executive's plan to "eradicate poverty" and, as such, demands close attention.

COPNI is concerned that despite its many positive aspects, the framework overlooks older people's needs. The consultation document argues that advice services need to address the changing needs of the population, with higher numbers of "working people being impacted by hardship", "higher numbers of immigrants and refugees requiring access to advice services" and the growing need for "services to be accessible remotely."²

The suggestion that services must be modelled to cater for people in younger age groups could be detrimental to older people, since a higher focus on remote services will disadvantage those who are more likely to require face to face services and are less likely to use digital services or self-refer.

The analysis made by the Department indicates that older people's issues may require a lower level of attention in the design of advice services as evidenced by the "changing" profile of those that seek help, a view which something does not seem to be supported by the available evidence. No indications in the Pre-Consultation Engagement and Evidence Gathering³ lead to this conclusion, and no other form of evidence has been provided to demonstrate that the advice and support needs of the working age population are growing faster than older people's needs.

In fact, contrary to that conclusion, this office believes there are multiple reasons to expect that the number of older individuals requiring advice and support is increasing more rapidly than in any other age group.

First, the Department has recently experienced a sharp growth in the number of people applying for Pension Credit. During the winter 2024-25, Communities Minister Gordon Lyons stated admitted that new claimants of Pension Credit increased by 56% in the period from August to October of 2024 in comparison relation to the same period of

¹ Department for Communities (2025) [Consultation on NI Executive Anti-Poverty Strategy](#); page 23.

² Department for Communities (2025) [Support Framework for Independent Advice and Debt Services – Proposals for consultation](#), page 9.

³ Department for Communities (2025) [Support Framework for Independent Advice and Debt Services – Pre-consultation engagement and evidence gathering](#).

2023. Other data available from the Department reinforces this claim, as the number of Pension Credit applicants grew by almost 1,800 individuals from the first to the second half of 2024 (a 43% increase).⁴

While this increase in applicants has been partially fuelled by the withdrawal of Winter Fuel Payment during the winter 2024-25 and the engagement exercise by the Department to increase Pension Credit uptake, it is inseparable from the fact that the number of older people grew by almost 7,000 individuals in 2024, and has grown by an average 6,000 individuals since 2021—much faster than any other age group. Therefore, the growing number of applicants is not only a result of the Department's work, but of the changing demographics and needs of the population.

An ageing population is likely to increase demand for older people's services and benefits, something that the Department has surely experienced, and the number of applicants for Pension Credit and other benefits—such as Attendance Allowance or Lone Pensioner Allowance—is likely to continue to grow annually in the next two decades. Furthermore, if older people—whose numbers continue to grow each year—were engaging less with advice services, this is more likely to reflect shortcomings in the capacity of those services to reach older people, rather than a reduced level of need.

In addition, the Pension Credit uptake statistics published by the Department show that 28% of people estimated to be entitled to Pension Credit—more than one in four—did not claim it. This amounts to around £1.1 million in unclaimed benefits across Northern Ireland.⁵ These figures highlight gaps in the ability to reach those most in need.

There are other pieces of evidence suggesting that the needs for advice and support of older people are growing. The Report and Financial Statement of Age NI for 2023-24 shows an increase in their number of engagements by 60%, including more than 10,000 calls to the Advice Line with £1m in unclaimed benefits for older people.⁶

Similarly, a recent report on food bank assistance by the Trussell community in Northern Ireland shows that people older than 65 have “by far the highest growth rate for any age group” in need for food assistance.⁷ The report states that

Our wider administrative data shows a concerning rise in the use of food banks in the Trussell community in Northern

⁴ Department for Communities (2024) [Freedom of Information Request DFC/2024-0282 about Pension Credit Applications](#).

⁵ NISRA, [2024 Mid-Year Population Estimates](#).

⁶ Age NI, [Report and Financial Statements, 31 March 2024](#).

⁷ Trussell (2025) [Hunger in Northern Ireland, September 2025](#); page 51.

Ireland by pensioners over the last five years. In 2024/25, close to 1,900 emergency food parcels were distributed for someone aged 65 and over. This is nearly double the number provided in 2019/20, when 983 parcels were distributed.⁸

TABLE 1. PERCENTAGE INCREASE IN THE NUMBER OF PARCELS PROVIDED BY FOOD BANKS IN THE TRUSSELL COMMUNITY BY AGE GROUP (NI)⁹

Age	Percentage increase (2019/20-2024/25)
0-4	47%
5-11	53%
11-16	84%
17-24	63%
25-64	63%
65+	91%

In essence, while it is important that actions are taken to guarantee sustainability, best practice and efficiency of debt and advice services, it is crucial that none of these actions hinder the capacity of older people to access these services at a time of growing need. Older people, as the fastest growing group of people in Northern Ireland, should be at the centre of any design of service delivery.

Vulnerable older adults often experience issues that are different to people in other age groups, such as loneliness, social disengagement, and digital illiteracy. Protecting older people requires targeted support, often through accessible, non-digital and face-to-face options. However, there is no provision in this framework specifically designed to support older people. In fact, the framework highlights a move ~~the need to push~~ towards greater remote, digital and self-referral of services, without giving due consideration to how this could affect older adults.

Conclusion

COPNI commends the Department and independent advisers for their efforts to improve the delivery of such crucial services. This framework, although designed in a negative financial landscape, is likely to have a positive impact on overall service provision in many areas. Reorganisation of services, speaking with one voice, long-term planning and long-term budgets are all positive improvements, which seem to reflect

⁸ Trussell (2025) [Hunger in Northern Ireland, September 2025](#); pages 50-51.

⁹ Trussell (2025) [Hunger in Northern Ireland, September 2025](#); page 51.

the recommendations of experts on the ground. Despite all these positive elements, COPNI believes that the Department has not paid enough attention to older people in the design of future advice services.

Older people's need for support services is increasing as they make up a growing proportion of the total population, and are increasing ~~rising~~ in number more rapidly than other age group. COPNI is concerned by the lack of attention given to older people in strategies and frameworks designed to address poverty—such as the current framework and the Anti-Poverty Strategy. At a time when demographic change is so significant, it is vital that services adapt to meet the needs of older people more specifically.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Ángel Leira Pernas', with a stylized, cursive script.

Ángel Leira Pernas

Policy Advice and Research Unit

Commissioner for Older People for Northern Ireland