COPNI Commissioner for Older People for Northern Ireland

The Executive Office

SD03 Stormont Castle

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

28/10/26

Re: Northern Ireland's Draft Artificial Intelligence Strategy

Dear Sir / Madam

The Commissioner for Older People for Northern Ireland (COPNI) welcomes the opportunity to respond to the draft Artificial Intelligence Strategy. Its emphasis on human oversight, accountability, fairness and inclusion provides a welcome foundation. However, these principles must become enforceable commitments that protect older people's rights, promote independence and prepare public services for an ageing population. Success should mean better lives, not simply faster processes or reduced expenditure.

Planning for an Ageing Population

NISRA's projections indicate that, between 2024 and 2049, Northern Ireland's population aged 65 and over will increase by 45%, while the population aged 85 and over will increase by 126%. The strategy must explicitly address this transformation. AI offers opportunities to support independent living, accessible transport and service planning. Investment should prioritise demonstrable public benefit, crucially, with older people involved in identifying problems and evaluating solutions.

Digital Inclusion

The draft Strategy notes that people in the '65+ age group are four times as likely to report that they have no digital skills (41%) than those aged 16-49 (10%)'. Digital inclusion must not become compulsory digital participation. Older people have diverse capabilities, preferences and circumstances. Inaccessible design, connectivity, affordability and lack of confidence can create barriers to services. Public services should guarantee adequately resourced telephone, paper and face-to-face routes, without additional charges or disadvantage. No citizen should be compelled to own a smartphone, use a chatbot or rely on relatives to access essential support.

The training and literacy principle should mean the provision of funded, accessible learning throughout later life, delivered through trusted community organisations and libraries. Provision must include practical assistance, scam awareness and understanding AI's limitations, alongside support for older workers. Accessibility testing should involve people with sensory, physical and cognitive impairments and take account of the needs of a large rural population. Participation should build confidence and agency, rather than transfer responsibility for inaccessible services onto individuals.

Rights and Oversight

AI can reproduce ageist assumptions where training data underrepresents older people or retains historical decisions that continue unequal treatment. Before introducing new AI systems, public bodies should publish equality and human rights assessments, including on age specific testing. Particular scrutiny is needed where systems influence healthcare, social care, housing, benefits or recruitment. Testing should examine differences within the older population, rather than relying on a single broad category.

Human oversight of AI processes must be meaningful in all situations. A named, accountable professional must have the authority and time to question or override AI recommendations. People should be informed when AI is involved in a decision,

receive an understandable explanation and have accessible pathways to human review and redress. Commercial confidentiality should not prevent appropriate scrutiny of systems affecting people's rights.

Health and Social Care

In health and social care contexts, AI should complement professional judgement and relationships, not represent an excuse for an absence of human contact. Monitoring technologies must respect dignity, privacy, and informed choice, with appropriate human support for decision-making. Sensitive information requires clear safeguards, secure handling and limits on secondary use.

Citizens' Panel

The proposed Citizens' Panel should include meaningful representation of older people, including those who are not online, alongside sustained engagement with older people's organisations. Participation must, in fact, influence decisions, not merely endorse existing proposals. A published delivery plan should identify departmental leads, frame rights assessments and establish processes for independent scrutiny. Annual reporting should measure accessibility, errors, complaints, review outcomes and benefits across age groups. Clear arrangements should be established to pause or halt systems where unacceptable harms emerge.

Conclusion

The Commissioner recommends that the strategy and linked documents make an explicit commitment to consider the impact that AI systems will have on older citizens. Innovation must strengthen older people's independence, participation and access to services, while preserving genuine choice. A strategy designed with an ageing population, rather than simply applied to it, can ensure technological progress delivers fair and lasting benefits for everyone throughout later life.

COPNI Commissioner for **Older People** for Northern Ireland

Best wishes

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