

THIRD STATE PENSION AGE REVIEW: INDEPENDENT REPORT CALL FOR EVIDENCE. RESPONSE FROM THE COMMISSIONER FOR OLDER PEOPLE FOR NORTHERN IRELAND.

The Commissioner for Older People for Northern Ireland (COPNI) is a statutory body responsible for protecting the interests of older people in Northern Ireland and providing advice to government on matters affecting older people.

In some respects, the circumstances of pensioners in Northern Ireland vary significantly in comparison with pensioners in Great Britain. With this response, COPNI aims to provide the panel conducting the review on State Pension Age with relevant information regarding the specific circumstances of pensioners in Northern Ireland.

The Commissioner primarily wants to address four of the questions posed in the consultation. However, most of the evidence will focus on “question j” (*How might changes to State Pension age impact people differently? Which groups of people, regions or nations may be most impacted by changes to the State Pension age, and why?*). The main purpose of this response is to provide evidence regarding the specific living standards of pensioners in Northern Ireland.

Question a. *What are the advantages and disadvantages of linking State Pension age to life expectancy?*

Reviews of State Pension Age are never immediately implemented. As such, any review of State Pension Age requires long-term planning, which can result in serious anomalies. For instance, when State Pension Age was reviewed in 2007 and accelerated in 2011, it was planned that increases would take place by 2020, 2026 and 2046. These plans were based on the evolution of life expectancy prior to 2010,¹ and expectations that this evolution will continue. In 2011, it was expected that the increase in life expectancy and disability free life expectancy would justify the increase in State Pension Age. However, this expectation has not been realised, and it is unclear whether it will be realised in the future.² Consequently, an older worker in Northern Ireland must work today a year longer than in 2019 to reach pension age, despite a drop in life expectancy during this period.³ In 2026, a pensioner will be required to work two years longer than in 2019, yet it is unlikely that any increase in life expectancy will occur between 2019 and 2026 to justify it. In 2046, it will be three years longer. Today’s expectations (and optimism) about the evolution of life expectancy will not necessarily be realised in the future. On the contrary, the reality seems to point to a stagnation of life

¹ ONS (2025) [National life tables: Northern Ireland](#). Between 2000 and 2010, life expectancy at birth grew by 2.5 years for men and 1.9 for women.

² Ibid.

³ Ibid.

expectancy in the UK and Northern Ireland over the past decade, while State Pension Age is being increased.

Question c. *What role, if any, should State Pension age have for managing the cost of the State Pension in the longer term?*

In comparative terms, the UK State Pension is among the least generous across the Organisation for Economic Co-operation and Development (OECD). The UK public pensions' system offers a replacement rate of about 21.7% of pre-retirement earnings. This contrasts with countries like Spain (80.4%), Italy (76.1%), France (57.6%), Sweden (49%), Germany (43.9%), or even the United States (39.1%).⁴ Continues in "question d".

Question d. *What are the advantages and disadvantages of using State Pension age to manage the cost of the State Pension in the longer term?*

The definition of "sustainability" is always subject to interpretation and definition. The cost of UK pensions as share of GDP would be deemed to be "sustainable" under the standards of many of the countries above, which spend a bigger share of GDP on pensions and have younger populations.⁵ In 2020, UK pension spending as a share of GDP was below the OECD average, with 18 OECD countries spending more on pensions than the UK.⁶ By contrast, a deliberately restrictive definition of "sustainability" could cause punishing increases in State Pension age.

Question j. *How might changes to State Pension age impact people differently? Which groups of people, regions or nations may be most impacted by changes to the State Pension age, and why?*

The Commissioner wants to respond to this question thoroughly in this response to provide evidence on the specific circumstances of older people in Northern Ireland. Comparisons will be made, if possible, with other jurisdictions. Evidence is provided in the following pages.

Summary of evidence:

- The income of pensioners in Northern Ireland is the lowest in the UK.
- Pensioners in Northern Ireland receive lower State Pensions and lower Occupational Pensions.
- There is a sharp divide in pensioners' income in Northern Ireland. Poorer pensioners only have access to state pension, while richer pensioners receive significant income from other sources.

⁴ Source: OECD (2023) [Pensions at a Glance 2023: OECD and G20 Indicators](#), OECD Publishing, Paris; Table 4.2.

⁵ A comparison of pension spending as a percentage of GDP can be found at OECD, [Pension spending](#). From this source, public pension expenditure in the UK was in 2020 8.3% of GDP. The Office for Budget Responsibility estimates a lower proportion (5.1% in 2023-24). Source: Office for Budget Responsibility, [Welfare spending: pensioner benefits](#).

⁶ Source: OECD, [Pension spending](#).

- Women and older pensioners are much more likely to live in poverty than men and younger pensioners.
- Pensioners in Northern Ireland work for longer and earn more through employment than pensioners in Great Britain.
- A progressive reduction in public services is impacting older people's income and well-being, including:
 - A reduction of health and social care services.
 - A reduction in the protection afforded by social housing, and a growing share of pensioners living as private renters (this will increase in the future).
 - Increased transport issues and mobility costs in rural areas (40% of the older population of Northern Ireland live in rural areas).
- Northern Ireland pensioners seem to be protected from poverty by two factors: lower costs and higher employment rates and earnings.
- Costs are rapidly increasing. Housing costs are spiralling up, and more older people will require accommodation in the private rented sector. Health and social care services are being reduced, forcing older people to look for alternatives.
- People older than 65 in Northern Ireland are significantly more likely to be in paid employment than those in Great Britain. This may be caused by lower pensions (State and Occupational). An increase in State Pension age may force pensioners in Northern Ireland to work for even longer to fund retirement.
- Pensioners are facing increasing costs due to lower access to health and social care, lower access to social housing, and increased cost of living arising from a greater dependence on the private rental sector.

Issue 1. Pensioner poverty

1. In 2023-24, 12% of NI pensioners were in relative poverty, and over the past 10 years (since 2013-14), NI pensioner poverty has averaged 13%.⁷
2. The level of absolute poverty of Northern Ireland pensioners stands at 9%, having averaged 10% in the past decade (since 2013-14)⁸
3. Pensioner poverty levels increase by age: 75 to 79 (16%), 80 to 84 (17%), 85 or over (18%).⁹
4. Female pensioners in Northern Ireland are significantly more likely to experience relative poverty (13%) compared to male pensioners (10%).¹⁰
5. Age and gender intersect and increase risk of poverty. For instance, poverty levels of female pensioners aged 80 to 84 is as high as 22%.¹¹
6. 8.3% of pensioners in Northern Ireland experience deprivation. This is the highest recorded level of pensioner material deprivation in the past decade (since 2013-14).¹²

Issue 2. Pensioners' Income

7. Pensioners' income (from all sources) is generally lower in Northern Ireland as compared with GB countries.¹³ This is partly due to State Pension household income being lower in NI than in all GB countries (see table below).^{14 15}

	Northern Ireland	Scotland	Wales	England
Weighted mean of State Pension income	£237	£248	£244	£242

8. Northern Ireland pensioner's Occupational Pensions household income is also significantly lower than in any GB country (see table below).¹⁶

⁷ Source: Households Below Average Income stats, DWP.

⁸ Ibid.

⁹ Ibid.

¹⁰ Ibid.

¹¹ Ibid.

¹² Ibid.

¹³ Source: Pensioners' Incomes statistics, DWP. NI pensioners receive £617 per week, as compared with Scotland (£654), Wales (£626) and England (£697).

¹⁴ Ibid.

¹⁵ Ibid. This also occurs when other supports available for pensioners—as Pension Credit and Income support—are included in the calculation. Weighted mean of State Pension, Pension Credit and Income Support: NI (£245), Scotland (£255), Wales (£251), England (£252).

¹⁶ Ibid.

	Northern Ireland	Scotland	Wales	England
Weighted mean of Occupational pension income	£176	£212	£207	£203

9. Gaps in Occupational Pensions create additional gaps in pensioners' earnings across different income quintiles.
10. Public benefits make up 95% of the total income for individual pensioners in the bottom quintile, and 93% for those in the second quintile.¹⁷
11. This contrasts with the highest pensioners' income quintile. For these individuals, State Pension represent only 35% of their total income. Therefore, the 40% of richer pensioners earn three times more than the 40% poorest.¹⁸
12. This means that the four out of every ten pensioners—the poorest in Northern Ireland—do not benefit from the mixed pension system, receiving their full income almost exclusively from the State Pension and other related public benefits. These individuals will be severely impacted by any changes in State Pension.
13. People older than 65 in Northern Ireland are more likely to remain in paid employment. The employment rate of those aged 65 or more in Northern Ireland is 14.2%, significantly higher than in England (12.1%), Wales (9.5%) or Scotland (9.5%).¹⁹
14. Older people in Northern Ireland may have to stay in paid employment to compensate for their lower income levels. Northern Ireland pensioners earn on average through paid employment £87.7/week, which is a significantly higher amount than the UK average (£72.2).²⁰
15. If pensioners in Northern Ireland remain in paid employment due to the need for additional income, pushing back retirement age will force them to work even longer years if their pension income is insufficient.

Issue 3. Health and social care services

16. The disposable income of pensioners is affected by any reduction of public health and social care services. If pensioners must pay for services that used to be universal, their disposable income will be affected by it.

¹⁷ Ibid.

¹⁸ Ibid.

¹⁹ Source: Annual Population Survey – regional – labour market status by age.

²⁰ Source: Pensioner's Income statistics of the DWP.

17. The Department of Health (DoH) in Northern Ireland is experiencing enormous financial pressures due to increasing demand and has implemented service cuts in Health and Social Care (HSC) over recent years.²¹
18. These service cuts affect primarily older people as high service users of HSC services. For instance, the number of care packages in the past ten years has decreased in Northern Ireland as a result of these pressures. This has occurred despite the increasing number of older people, indicating that public services are less capable of meeting the needs of our older population.²²
19. The number of care home beds in proportion to the older population of Northern Ireland is reducing rapidly. The proportion of residential and nursing beds per person aged 65+ has reduced by 23% in the past 15 years.²³
20. The DoH's budgets over the years underscores these pressures and service cuts. Due to higher demand, 10 service cuts were proposed by the DoH in the Budget 24/25²⁴ and 6 service cuts were proposed in the 25/26 one.²⁵ These include reductions in the Waiting List Initiative, domiciliary care packages, provision of independent sector care home beds, and a reduction in funding for Enhanced GP Services. In the department's Equality Impact Assessment (EQIA), it is acknowledged that the impact of all these service cuts disproportionately affects older people.
21. Therefore, public services that used to be universal and available to older people are rapidly becoming restricted in Northern Ireland. This is likely to impact on older people's disposable income, as on many occasions they will be required to fund these services by themselves.

Issue 4. Housing

22. Older people in Northern Ireland experience high levels of Fuel Poverty as compared to people in other age groups. Fuel poverty of older households (34%) in Northern Ireland is twice as high as adult households (17%) and households with children (15%).²⁶ This is not an issue that has been statistically significant

²¹ Department's budgets for [24/25](#), [23/24](#), [22/23](#), [21/22](#), [20/21](#).

²² Department of Health (2025) [Statistics on community care for adults in Northern Ireland 2023/24](#) and [Statistics on community care for adults in Northern Ireland 1998/99 to 2022/23](#).

²³ The ratio of residential and nursing beds per older person was 6.2 beds per 1000 persons in 2008, and has been reduced to 4.7 in 2023. The population older than 65 was sourced from [NISRA 2023 Mid-Year Population Estimates](#). The number of registered beds in Care Homes in Northern Ireland is sourced from RQIA (2019) [Registered Nursing and Residential Homes and Beds Trend Report 2008- 2018](#) RQIA (2023) [Census of Bed Availability in Registered Care Homes in Northern Ireland on 27 September 2023](#). The number of registered beds in the YEAR 2019 is missing from these reports

²⁴ Department of Health (2024) [Budget 2024-25 - Equality Impact Assessment](#).

²⁵ Department of Health (2025) [Draft Budget 2025-26 - Equality Impact Assessment](#).

²⁶ Source: Source: Northern Ireland Housing Executive, Northern Ireland House Condition Survey 2016; [Table 6.6: Household Characteristics – Fuel Poverty \(10% definition\)](#);

in other jurisdictions, where older people are generally less likely to be in fuel poverty.²⁷

23. The average weekly cost of housing payments (repayment mortgage payment or rent) is lower for pensioners in Northern Ireland as compared with other jurisdictions (£92/week).²⁸ However, housing payments and general housing costs in Northern Ireland are likely to increase in coming years if the share of private renters keeps growing.
24. The proportion of older people living in the private rented sector has increased in the decade 2011-2021 (from 4.9% to 5.6%), while the proportion living in social housing has decreased (from 11.9% to 13.9%).²⁹
25. The share of people living in the private sector will treble or even quadruple in GB in the next two decades.³⁰ This is also likely to occur in Northern Ireland, with the current proportion of private renters higher in Northern Ireland than in GB (5.6% in NI vs 4% in GB).³¹
26. Housing costs are rising sharply in Northern Ireland. Average rents and housing prices are spiralling up (since 2019, average private rents grew by 33%,³² and Social Housing rents grew by 11%³³).
27. The cost of private rents has increased massively in the past decade, way over the CPI and pensioners' income. Between 2015 and 2024, the average monthly rent of Northern Ireland has increased by 60%, from £560 to £896 per month.³⁴
28. The Price Index of Private Rents (PIPR) statistics recorded monthly by the ONS show that rent inflation has been approximately 4.8% annually between January 2016 and April 2025, peaking at 10.4% annually between February 2023 and 2024.³⁵
29. The proportion of pensioners' income that goes into private rent has increased from 51% to 56%.³⁶

²⁷ Department for Energy Security and Net Zero (2025) [2024 fuel poverty detailed tables under the Low Income Low Energy Efficiency \(LILEE\) indicator \(Excel\), Table 22](#). Definitions of fuel poverty vary across jurisdictions. The definition of Northern Ireland uses the "10% definition" (a household is in fuel poverty if it needs to spend more than 10% of its income to maintain a satisfactory level of heating). In England, fuel poverty is measured by the Low Income Low Energy Efficiency (LILEE) indicator.

²⁸ This information was obtained from the Family Resources Survey statistics.

²⁹ NISRA Census 2021 [tenure \(5 Categories\) by age \(4 Categories\)](#) and Census 2011 [tenure by general health by long-term health problem or disability by age](#).

³⁰ Williams, R, and Robinson, D. (2024) [Projections of housing tenure and poverty in older age in Great Britain, 2022-2040](#), University of Sheffield for UK Collaborative Centre of Housing Evidence.

³¹ NISRA Census 2021 [tenure \(5 Categories\) by age \(4 Categories\)](#). The numbers have been calculated excluding the category "no code required"; Williams, R, and Robinson, D. (2024) [Projections of housing tenure and poverty in older age in Great Britain, 2022-2040](#), University of Sheffield for UK Collaborative Centre of Housing Evidence.

³² This information was obtained from Ulster University private rent reports.

³³ This information was obtained from DfC social housing statistics.

³⁴ Ulster University (2024) [At a Glance. Private rental market performance 2024](#)

³⁵ ONS Price Index of Private Rents (2025) [Figure 4, Private rents annual inflation, UK countries, January 2016 to December 2024](#).

³⁶ These percentages have been calculated using the average monthly rent prices in Northern Ireland over the period 2015-2024, and the average monthly income for private renters over the same period. The average

30. Social housing is a key protection for older people against the future challenges of housing, especially as an increasing share of older people live in the private sector. However, social housing is becoming restricted, with higher competition, longer waiting lists and lower availability.
31. The competition for a social home for people in housing stress has grown by 400% in Northern Ireland over the past two decades.³⁷ Average waiting times for a social home were 34.8 months in 2024-25, an increase of 10 months since 2020-21 (25.1). For older people, the average waiting time is 27.8 months.³⁸
32. This is a key concern for the future of older people: with lower availability of social housing, more older people are likely to live in the private rented sector, with spiralling rents, lack of rent stability and insecurity of tenure.

Issue 5. Transport

33. Rural communities tend to face more limited and irregular transport services, making trip planning difficult and often unpredictable.^{39 40} This affects older people, as 39.6% of all older adults in Northern Ireland live in rural areas.⁴¹ The implications of poor transport infrastructure in these settings are enormous for them.⁴²
34. In Northern Ireland, 19% of residents live more than a 14-minute walk from their nearest bus stop; in rural areas, this rises to 39%.⁴³
35. While 66% of urban residents have access to bus services running at least once per hour, this frequency level is only enjoyed by 18% of rural residents.⁴⁴
36. The most recent transport strategy of the DfI in Northern Ireland states that 'In many rural locations it can be challenging to provide the same frequency of services along direct routes to make public transport a realistic alternative to

monthly income was estimated by converting weekly income figures (weekly income \times 52 \div 12). Sources: Ulster University (2024) [At a Glance. Private rental market performance 2024](#); Ulster University (2024) [Performance of the private rental market in Northern Ireland](#); Family Resources Survey (Individual Dataset, Department for Work and Pensions). Retrieved through Stat-Xplore. Weighted mean net income by individual and in Northern Ireland and weighted mean gross income by household, in year prices (weekly, in nominal terms) by type of adult (pensioner) and financial year.

³⁷ In 2002-03, there were 1.49 applicants in Housing Stress in the Social Housing Waiting List for each allocation. By 2024-25, this figure had risen to 6.22, which means that, on average, only one social home is allocated annually for every six applicants experiencing housing stress. This ratio has been calculated by dividing the total number of people in Housing Stress by the number of allocations to applicants in the waiting list. Sources: Department for Communities (2024) [Northern Ireland Housing Statistics 2023-24 Section 3 Tables – Social Renting Sector](#); table 3.5; and NISRA (2025) [Northern Ireland Housing Bulletin](#); Section Two: Social Renting Demand.

³⁸ This information was obtained through a Freedom of Information request submitted to the Department for Communities.

³⁹ Age NI (2024) [Healthy Ageing in Rural and Coastal Areas of Northern Ireland: Challenges and Solutions](#).

⁴⁰ Belfast Healthy Cities (2025) [Transport Poverty in NI: A Health Equity Perspective](#).

⁴¹ NISRA 2021 Census, [Population aged 65+ by Urban/Non-Urban status](#).

⁴² Rural areas are defined by NISRA as settlements of more than 5000 people (see [Rural statistics | Department of Agriculture, Environment and Rural Affairs](#)).

⁴³ Department for Infrastructure (2021) [Travel Survey for Northern Ireland In-depth Report](#).

⁴⁴ Department for Infrastructure (2021) [Travel Survey for Northern Ireland In-depth Report](#).



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private vehicles', therefore providing no specific plan to increase services in rural areas.