

CONSULTATION RESPONSE



Comisiynydd
Pobl Hŷn
Cymru
Older People's
Commissioner
for Wales

DIGITAL INCLUSION ACTION PLAN

The Older People's Commissioner for Wales

Established by the Commissioner for Older People (Wales) Act 2006 which sets out details of the Commissioner's role and statutory powers, the Older People's Commissioner for Wales is an independent voice and champion for older people throughout Wales. The role of the Commissioner is to promote awareness of the rights and interests of older people in Wales, challenge discrimination, encourage best practice and review the law affecting the interests of older people in Wales.

Introduction

The Commissioner welcomes the UK Government's emphasis on tackling digital inclusion and recognition of the impact this has on people, including older people.

While many older people in Wales are confident users of the internet, the Commissioner is frequently contacted by those who are not and who experience problems as a result. In Wales, 31% of over 75s (95,069 people) do not have access to the internet at home and 33% of over 75s do not use the internet (including Smart TV and handheld devices), compared to 13% of 65-74s and 0% of 25-44s. This means around 101,200 people over 75 do not use the internet.ⁱ

Likewise, in Wales 8% of people are offline, compared to UK's 4%. In terms of skills, 28% of people in Wales have the lowest digital capability, compared to UK's 25%.ⁱⁱ

Older people continue to raise issues of digital exclusion and the impact this has on everyday life. In January 2024, the Older People's Commissioner for Wales published a report – Access Denied: Older people's experiences of digital exclusion in Wales – [Access Denied: Older people's experiences of digital exclusion in Wales - Older People's Commissioner for Wales](#) .

The report highlighted how digital exclusion is a complex issue where older people can be comfortable using the internet for some activities, such as keeping in touch with friends and family, but not for activities such as banking or managing utilities. Many older people are not wholly online or offline and people can be partially digitally excluded.

The report also contained recommendations for a range of organisations and bodies. These included the need for the UK Government to publish an updated digital inclusion strategy and provide funding to ensure that this can be properly implemented. The UK Parliament's Women and Equalities Committee also recommended a refreshed Digital Inclusion Strategy, and that this

should have a detailed focus on the needs of digitally excluded older people, including a plan for funding locally delivered digital skills provision and promoting best practice in the public and private sectors in maintaining offline alternatives to digital for as long as needs remain, as well as a focus on broadband connectivity in rural and coastal areas.ⁱⁱⁱ

The UK Government's consultation is an important step in addressing that recommendation.

The vision of the future "where everyone can continue to access offline support if they need it" contained within 'Digital Inclusion Action Plan: First Steps' is vital for ensuring that all older people can continue to take part in everyday activities as well as being able to use public services. That this consultation enables responses via post, as well as online and via email, is a positive step in ensuring that people are able to have their say, irrespective of their existing level of digital skills.

Digital exclusion is an issue that affects older people across the UK. The levers to tackle it effectively lie with both the Welsh Government and the UK Government and so the new interministerial group on digital inclusion referenced in the consultation represents an opportunity to ensure initiatives are joined up where appropriate. It also supports sharing of best practice and lessons of what does or does not work. The new interministerial group needs representatives from all devolved administrations at an appropriate level to ensure that it works effectively across the UK.

Similarly, the Digital Inclusion Action Committee will need representatives from all four UK countries to provide insight in order to work most effectively.

Future work on this topic needs to ensure the benefits of economic development and social inclusion are both reflected in the approach to improving digital inclusion.

At the same time, it is essential that offline routes to accessing services and activities remain in place and that these options are not poorer quality alternatives.

The consultation recognises that "most studies do not provide long-term analysis on digital inclusion, and many studies do not provide demographic breakdowns. This means that most of the current evidence is provided at a single point in time without accounting for a rapidly changing digital landscape". It would be helpful to improve data and tracking in order to be able to properly understand trends and differences over time. A longitudinal focus across the UK could be helpful here.

The importance of the Welsh language in supporting digital inclusion should not be underestimated. Support and information to build digital confidence needs to be available in Welsh and the importance of working in a bilingual environment should be taken into account at all stages from design to delivery. Older people may wish to access the internet and a number of websites, including those offering public services, through Welsh and this should be enabled. Terminology should be tested with older people to ensure that translations of unfamiliar terms into Welsh are understood by those who may be expected to work with them.

Government has identified five population groups that would likely benefit greatly from digital inclusion initiatives, these are:

Low-income households

Older people

Disabled people

Unemployed and those seeking work

Young people

The Commissioner agrees with these population groups, noting that they are not homogenous and that there will be important differences between them. For example, Black, Asian and Minority Ethnic older people may benefit from tailored support. Many people will fall into more than one category, and this will also present specific challenges to address.

Are there examples of digital inclusion initiatives that could be scaled-up or replicated in other local communities? If known, please provide the name of the initiative, the organisation, a summary of what they do and contact details (if relevant).

Digital Communities Wales is offering 'Tea and Technology' training in an informal setting. These events offer a supportive atmosphere to explore and develop digital skills, while enjoying a hot drink and some cake. These sessions have resonated well with older people.

At Digital Confidence Denbighshire, attendees have the opportunity to try out a variety of digital activities, such as using Google Maps to virtually explore different places around the world, learning how to view and buy train tickets, and how to scan QR codes. The blend of learning and socialising creates an open and friendly environment, where people feel comfortable. The interactive format allows attendees to see how digital skills could enhance their daily lives in practical ways.

It is vital that support for older people to develop digital skills and confidence builds on people's own interests and hobbies rather than being the forced result of essential services moving online.

Another example of good practice is that Age Cymru Dyfed offers a digital project to support people aged 50+ who want to learn how to navigate the Internet. Through this project, older people can gain access to a loaned device, gain an Internet connection with free data SIMs and receive dedicated skills support that focus on learning goals. Support sessions are run by volunteer 'Digital Champions', who offer support in person and remotely.

The Centre for Digital Public Services (CDPS) Digital Service Standard for Wales^{iv} shows what good public services look like in Wales, and how to achieve them. However, good practice should also include awareness of the need to ensure people who cannot or choose not to use the internet can still access information and services. The Welsh Government's 'Digital Strategy for Wales'^v makes clear alternative ways to access public services in Wales must be provided and designed to be as good as those offered online. This was emphasised more recently via the Welsh Government's 'How to make a service inclusive: Guidance to help the public sector design inclusive services by avoiding a digital only approach'^{vi}. Produced with support from the CDPS and the Welsh Local Government Association (WLGA), the Guidance is designed to raise awareness of the need to include people who do not use the internet in the design and delivery of services.

In what ways could the government partner with industry, charities and community organisations to promote digital inclusion?

Reducing levels of digital exclusion is a long-term project requiring a sustained focus. Government partnerships therefore need to be based on building long-term relationships, developing sustainable initiatives and providing reliable funding.

How can the government ensure the Digital Inclusion Innovation Fund best supports local communities across the UK?

Clarification is needed as to whether the Digital Inclusion Innovation Fund is available in Wales and if so, the level of funding available, timescales and duration, and the process for accessing it.

The Fund should be simple to access and administer, allowing room for innovation and trying new approaches. It should not, however, be restricted to solely supporting 'new' projects or approaches at the risk of defunding existing effective initiatives that are working well. There is a risk that digital inclusion initiatives that are having a positive impact come to an end as a result of a difficult financial climate and the UK and Welsh Governments should think about how to sustain these.

The government has identified four focus areas for how it will drive up digital inclusion, these are:

Opening up opportunities through skills

Tackling data and device poverty

Breaking down barriers to digital services

Building confidence

The areas identified are all important but an additional or specific focus on the area of maintaining digital skills is required, concentrating on older people who are leaving the workplace. The issue is not just about developing skills, but also of keeping up with developments, especially where people have retired or left the workplace and opportunities for training, or informal learning, become more limited.

Ensuring that older people continue to be confident and active users of the internet is vital to ensure that the number of lapsed users is reduced as far as possible. According to research by Lloyds Bank's published in 2023, overall internet usage reduced from 98% to 84% since 2022. The findings showed this is being driven by reduced usage in individuals over the age of 60.^{vii} This highlights to need to ensure that older people are encouraged and supported to maintain digital skills so that people who were not previously digitally excluded do not join this category.

Opening up opportunities through skills

Planned action in this section needs to take greater account of older people: "developing the necessary digital skills and having access to the right training and support to meet people's changing needs" should also take into consideration when people are leaving the workplace.

There is a need to be more explicit that this area means maintaining skills as well as developing skills. The reference to changing needs is helpful as what people need changes over time, but it is important to remember that technology also changes and people need current and up to date skills. There should be specific actions to support older people, including those who have or are about to retire, taking into consideration people who may retire earlier due to poor health.

Reference is made more than once to Skills England: as the objectives are UK-wide, it would be helpful to consider what action devolved governments are taking and how this aligns.

The focus on harder to reach groups via points of interaction with public services could be effective if public sector workers have both the skills and capacity to undertake support. However, care must be taken not to assume such workers will automatically be able to take on additional roles.

In terms of next steps, the UK and Welsh Governments might also want to consider if there are ways that employers can support retired staff to maintain skills, for instance via formal or informal networks. A specific work stream on digital skills maintenance and making it easy to maintain skills once older people have left work would help address this UK-wide issue.

Tackling data and device poverty

The objectives here are sensible and helpful. The accompanying steps are positive but it will be important to ensure that older people, including those living in care homes, are taken into consideration as part of this work from the outset. The definition of 'households' should explicitly include care homes and other places where older people live which might fall outside traditional understandings of households.

Breaking down barriers to digital services

The objectives here are positive and the focus on alternative pathways to digital services are very welcome. However, more detail is needed on the "well supported alternative pathways for those that need them" referred to in this section to ensure that this aspect of inclusion is not marginalised in favour of simply focusing on encouraging people to learn to use digital services.

Making digital public services better and easier to use is important as this should increase the range of people, including older people, who may choose to use them. However, ensuring over the phone or in-person support is essential for those people who cannot or do not use online services.

Improving standards and regulations to make digital services more inclusive will be helpful but sufficient monitoring and enforcement is crucial. The UK Government should take action to address the issue of UK websites, requiring a focus on inclusivity, not just accessibility, developing appropriate standards and monitoring. The current situation is recognised as problematic in the consultation and the Government should set out its intentions in this area.

The focus on working with the private sector and key private sector services is welcome. However, the UK Government should identify what action might be needed to ensure that key services offered by the private sector remain accessible to older people and others who do not use the internet. This might require legislation if voluntary action is insufficient. Access to banking and managing utilities, for example, should not be dependent on being able to use the internet.

Libraries are referenced throughout the consultation as important and there are some excellent examples of good practice being delivered through libraries. However, the reality is that library opening hours, branches and services are continually being reduced or cut due to the financial climate. This makes it more difficult for libraries to provide local support. Consideration should be given as to whether the proposed funding stream – the Digital Inclusion Innovation Fund – can provide support to activities in libraries.

Building confidence

Priorities in this area are helpful with the emphasis on encouraging people to understand the benefits of being online and encouraging understanding of online safety. Building confidence is an essential part of supporting older people to get and stay online.

It is welcome that consideration is given to exploring how best to raise awareness of the rights and protections people have to keep them safe and secure online. It is also welcome that the Government will work with researchers and survey owners to shape existing research on confidence and motivational barriers as well as explore commissioning new research to understand confidence and motivational barriers. This work should incorporate providing more information on scams and increase understanding on how concerns about scams, privacy and security are barriers to being online, in particular to certain sections of society, such as older people. The Commissioner's office has produced a series of principles that can help support the development of effective work to [combat scams](#).

Growing the evidence base on digitally excluded people's lack of interest in and need for being online is welcome – understanding more about this should provide opportunities for better designed interventions. The UK Government should commit to commissioning this research and doing so quickly rather than simply explore commissioning such work.

Likewise, research and greater understanding of the issue of lapsed users, as well as the complexity of digital exclusion (where people are confident doing certain activities but not others) would benefit from a fresh look.

Local opportunities for skills development, trouble-shooting, and asking questions in an informal face to face environment are vital to enabling older people to develop and maintain confidence. Older people in Wales have told the Commissioner about not knowing what to do when devices or kit they usually use break down or have problems. Practical, local support is valued but this must be available on a long-term basis, rather than short-term projects and initiatives which come to an end.

If you have any additional ideas on what government should be doing, please tell us more.

- **Regulators and Industry**

The previous Commissioner's research – Access Denied – contained a series of recommendations. One of these was for the UK Government to work with regulators and provide strategic input to help ensure that services are accessible to customers who are not online, ensuring that the issue of digital exclusion is taken into account consistently in regulatory guidance on dealing with vulnerable customers.

The UK Government should ask regulators what action they are taking to ensure digital inclusion but particularly how they are monitoring the experiences of vulnerable customers who cannot or do not use the internet. The results of an information gathering exercise should be used to decide whether further action, changes to guidance or practices are necessary.

Collaboration with industry, as set out in the consultation, is welcome but again, more specific action may be needed to ensure services are available to people who cannot or do not use the internet. It is also essential that the benefits of industry initiatives, whether skills provision or device donation, are spread throughout the UK. A commitment to working with groups most in need, rather than what is easiest for partners to deliver, should be at the heart of these initiatives.

- **Technology, AI and Digital Ageism**

The Commissioner also notes the UK Government's emphasis on the growing importance of technology and especially Artificial Intelligence (AI). While AI has huge potential to provide benefits across society, the risks of AI bias on the basis of race and gender have already been identified.

There is a further risk of AI bias in relation to age – the phenomenon of 'digital ageism'. This has a variety of forms and impacts. For example, who is involved in the design of technologies and the assumptions made about end-users risks reinforcing stereotypes, exclusion and marginalisation. The lack of involvement of older adults can see technology predominantly focused on health, care and disease management rather than for leisure or enjoyment.

Chu, Nyrup et al identify how ageism fits into a broader cycle of injustice: "Existing stereotypes of older adults as unhealthy and/or technologically incompetent (Representation) affect the assumptions made about older adults, which can lead to the exclusion of older adults from research and design processes (Design). Ageist stereotypes are further reinforced by the fact that new information technologies for older adults mostly focus on health and health care management (Design/Technology). The digital divide (Allocation), together with patterns in existing applications, results in data sets that inaccurately represent healthy older adults (Technology). These biased data sets incentivize further technology development that primarily focuses on health care needs (Design). The limited availability of digital technologies serving other needs, interests, and aspirations of older adults can further entrench the digital divide (Allocation)."^{viii}

The UK Government and Welsh Government should consider how digital ageism might be affecting efforts to improve digital inclusion and develop appropriate strategies to tackle this.

ⁱ See [Understanding-Wales-ageing-population-September-24.pdf](#)

ⁱⁱ See [Understanding-Wales-ageing-population-September-24.pdf](#)

ⁱⁱⁱ [The rights of older people](#)

^{iv} [Digital Service Standard for Wales | Centre for Digital Public Services](#)

^v [Digital strategy for Wales | GOV.WALES](#)

^{vi} [How to make a service inclusive \[HTML\] | GOV.WALES](#)

^{vii} See [Understanding-Wales-ageing-population-September-24.pdf](#)

^{viii} Charlene H. Chu, Rune Nyrup et al., *The Gerontologist*, Volume 62, Issue 7, September 2022, Pages 947–955, <https://doi.org/10.1093/geront/gnab167>

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