



Comisiynydd Pobl Hŷn Cymru

Older People's Commissioner for Wales

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Rydym yn croesawu
galwadau yn Gymraeg

Adeiladau Cambrian
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Dear Sir/Madam

Thank you for the opportunity to respond to the consultation on your proposed Plan of Work 2020/21 – Making communications work for everyone.

My role as Older People's Commissioner for Wales - an independent, statutory role established in law - is to protect and promote older people's rights and to stand up and speak out on their behalf so they can access the services and support they need, and ensure that those who may be vulnerable or at risk of harm are kept safe and protected.

I recently met with Eleanor Marks, Ofcom's Director in Wales and we were able to discuss areas where we both shared concerns and discussed areas where we might align our work in the future. I look forward to continuing that conversation at our next meeting.

I welcome the attention you give in the plan to ensuring that everyone can access a fast and reliable broadband service and the commitment to continue to work on improving mobile coverage, which, as I'm sure you are aware, is a cause for concern in many parts of Wales, particularly in rural areas.

This is complemented by the work being done by the Welsh Government under its digital inclusion programme Digital Communities Wales and the success of both the Digital Heroes and the Digital Companions initiatives is welcomed. However, I do have some concern for the vulnerability of some of the older people taking on digital connectivity as beginners with basic skills and understandably limited confidence.

I am pleased therefore to see that your work plan identifies a continuation of the work to tackle nuisance calls and scams, although I do have concerns about using the term 'scams'. I would suggest that 'Scams' suggests a lightness of approach that

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

does not help to convey the seriousness of the crimes being committed or the full devastating impact that these acts have on those who have been targeted. I welcome the ongoing work with the FCA and other partners and look forward to receiving more information about the “Stop Scams UK2 initiative” in order to gauge whether my office can assist in some way, perhaps through my membership of the Wales Against Scams Partnership¹

Whilst it is important to improve availability and access to the internet, I am concerned about the real danger that a significant cohort of older people could be left isolated and disenfranchised as services and the public sector increasingly move services exclusively online. Over a third of older people in Wales (37%) do not make personal use of the internet daily whilst for older people aged over 75, this figure increases to 51%.²

This digital exclusion is particularly felt in single pensioner households where only 55% have access to the internet.³ This group is also most likely to be living in relative income poverty and their situation is often made worse by being digitally excluded or lacking confidence and skills to shop online for goods and services, which often leads to discounted costs. Research suggests that offline households miss out on savings of up to £560 a year from shopping and paying bills online.⁴ I welcome the proposed work you have identified around the possible introduction of social tariffs, as well as the proposals to provide guidance on the support needs and protections required for older people on low incomes.

With regards to accessibility, I was particularly concerned recently about the BBC’s announcement that it intended to stop the Teletext ‘red button’ service. I wrote to the BBC asking them to rethink their decision reminding them that the loss of the service was likely to have a disproportionate impact on older people. I welcome the fact that they have now decided to pause and review their decision.

Finally, I welcome that Ofcom is committed to delivering a Diversity and Inclusion Programme to build a diverse workforce to better reflect the UK population. As part of my 2019 – 2022 work strategy, one of my strategic objectives is to ‘End ageism and age discrimination’. Two of the actions I have identified that will help

¹ <https://www.ageuk.org.uk/cymru/our-impact/policy/wales-against-scams-partnership/>

² Gov.wales. (2019). *National Survey for Wales, 2018-19 Internet use and digital skills*. [online] Available at: <https://gov.wales/sites/default/files/statistics-and-research-april-2018-march-2019-207.pdf> [Accessed 17 Feb. 2020].

³ *ibid*

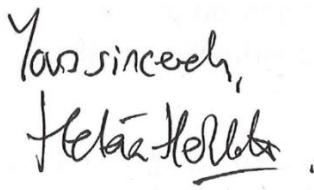
⁴ Digital Leaders. (2019). *The digital revolution: older people online and on-board?*. [online] Available at: <https://digileaders.com/digital-revolution-wales-older-people-online-board/> [Accessed 17 Feb. 2020].

to achieve this is by both improving older people's access to training and employment and by tackling discrimination against older people in the workplace.

I would therefore expect that under your priority, you will be including commitments to retain and recruit older workers alongside an undertaking the adoption of flexible working policies, in order to build an inclusive culture within the workplace.

I hope that these comments are helpful. If I can be of any further assistance, please don't hesitate to contact George Jones, my Community Services and Inclusion Lead, on 03442 640 670 or by emailing george.jones@olderpeoplewales.com

Yours Sincerely

A handwritten signature in black ink that reads "Yours sincerely, Heléna Herklots". The signature is written in a cursive style.

Heléna Herklots CBE

Older People's Commissioner for Wales