




**Comisiynydd Pobl Hŷn Cymru**  
**Older People's Commissioner for Wales**



# **Access Denied:**

## **Older people's experiences of digital exclusion in Wales**

**An independent voice and champion  
for older people**

# The Older People's Commissioner for Wales

The Older People's Commissioner for Wales is an independent voice and champion for older people throughout Wales.

The Commissioner is taking action to protect older people's rights, end ageism and age discrimination, stop the abuse of older people and enable everyone to age well.

**The Commissioner is working for a Wales where older people are valued, rights are upheld and no-one is left behind.**

## How to contact the Commissioner:

The Older People's Commissioner for Wales  
Cambrian Buildings  
Mount Stuart Square  
Cardiff  
CF10 5FL

Phone: 03442 640 670  
Email: [ask@olderpeople.wales](mailto:ask@olderpeople.wales)  
Twitter: [@talkolderpeople](https://twitter.com/talkolderpeople)

Website: [www.olderpeople.wales](http://www.olderpeople.wales)

## Accessible formats

If you would like this publication in an alternative format and/or language, please contact us.

**Mae'r ddogfen hon ar gael yn Gymraeg // This document is available in Welsh**

# Contents

<b>Foreword</b>	<b>04</b>
<b>Executive Summary</b>	<b>06</b>
<b>Introduction</b>	<b>10</b>
<b>Legislation, Policy and Practice</b>	<b>12</b>
<b>Methodology</b>	<b>14</b>
<b>Older people's views and experiences: Access to information and services</b>	<b>16</b>
Financial services	17
Health services	19
Access to online support and entitlements	20
Parking	21
<b>Barriers that lead to and reinforce digital exclusion</b>	<b>22</b>
Digital Skills	23
Cost	24
Choosing not to be online	25
Concerns about security	25
Poor design and accessibility	26
Language	27
<b>Impact on older people's day-to-day lives</b>	<b>28</b>
<b>Improvements suggested by older people</b>	<b>29</b>
<b>Summary of responses from local authorities and health boards</b>	<b>30</b>
<b>Other issues and future challenges</b>	<b>32</b>
<b>Conclusions</b>	<b>33</b>
<b>Recommendations</b>	<b>35</b>
<b>Action from the Commissioner</b>	<b>39</b>
<b>Appendix A: Local authorities and health boards who contributed to this report</b>	<b>40</b>
<b>References</b>	<b>41</b>

# Foreword

Until relatively recently, it would have been hard to imagine just how far the digital world would extend into almost all aspects of our lives, now covering everything from making appointments, to finding information, to parking the car.

For people with digital skills this can bring a range of personal benefits, as well as wider benefits such as cost savings that can support the delivery of services. This applies to many older people, and stereotypes that older people are not interested in or are not capable of using technology are simply not true.

However, a significant number of older people in Wales – including a third of people aged 75+ – find themselves digitally excluded and increasingly face barriers when trying to access the information and services they need, something that exacerbates inequalities, including health inequalities, and puts people's health and well-being at risk.

Older people are by no means the only group affected by digital exclusion – for example, people living with disabilities, people on low incomes, and people with long-term health also find themselves at particular risk – but given that age remains the biggest risk factor, it is crucial that older people's voices and experiences are used to understand the issues people are facing and, more importantly, the action needed to ensure people who are digitally excluded are not left behind.

That's why I invited older people throughout Wales to contact me and my team to share examples of the ways that the shift towards digital services is affecting people's lives, and the impact this is having.

Over 150 older people responded to share their experiences, and I would like to say a big thank you to everyone who got in touch for being so open and for providing such a powerful snapshot of what day-to-day life can be like for older people who are digitally excluded. A big thank you, too, to the older people who shared their experiences of digital exclusion with me and my team at engagement visits and events or contacted my Advice and Assistance Service to share information and highlight issues.

My findings highlight a stark digital divide that is not only exclusionary, but also often leaves older people feeling worthless, inadequate and that they are not valued by society. In addition, older people often struggle to find the right kinds of support to enable them to get and stay online through learning and maintaining digital skills.

Concerningly, this seems to have resulted in some older people accepting that digital exclusion is simply a part of growing older, resigned to having to live with the consequences of this due to the seemingly insurmountable barriers to getting and staying online.



This has to change, and while the work being delivered by local authorities and health boards in response to the formal Guidance I issued in 2021 is welcome, it is clear that far more needs to be done to tackle the issues and barriers shared by older people.

Without the action I am calling for, more older people will become excluded, not only unable to access the information and services they need, but also, more concerningly, finding themselves without a voice, without an opportunity to have a say on the future.

But by working together to deliver the right action and support, we can break down the barriers that lead to and reinforce digital exclusion, and help to create a healthy and inclusive Wales that enables us to age well.

A handwritten signature in black ink, reading 'Heléna Herklots', with a horizontal line underneath the name.

**Heléna Herklots CBE**

**Older People's Commissioner for Wales**

# Executive Summary

## Background

The increasing use of digital technology, and the pace of change we have seen in recent years means that the ways in which we access services and information, and the ways we communicate, have changed significantly. This brings with it the potential for positive improvements and efficiencies across a range of services as technology continues to develop.

However, the changes we are seeing, which accelerated a great deal as a result of the pandemic, has left many older people who are not online struggling to access the information and services they may need.

Recognising a stark digital divide that undermines people's rights and will potentially grow wider as the shift towards digital continues, having an even greater impact on many older people's health, well-being and day-to-day lives, the Commissioner issued formal Guidance to local authorities and health boards.

Published in November 2021, the Guidance sets out the kinds of action needed to ensure that older people who are not online can access the information and services they need via non-digital means, and that older people who wish to get online are encouraged and supported to do so.

The Guidance was strongly welcomed by many older people and older people's groups, and responses from local authorities and health boards highlighted a variety of work and initiatives underway or planned to support older people.

However, engagement with older people throughout Wales and via the Commissioner's Advice and Assistance Service suggested that many individuals still find themselves facing significant issues when trying to access digital services or non-digital alternatives, something the Commissioner wanted to explore further given the potential impact of this on people's lives.

The Commissioner therefore invited older people to get in touch to share their experiences of digital exclusion and the impact this has on their day-to-day lives, as well as any examples of good practice making a positive difference.

From July to November 2023, a total of 159 responses were received, highlighting the experiences of older people throughout Wales. Information was also captured through engagement sessions with older people and via the Commissioner's Advice and Assistance Service.

The Commissioner also requested further information from local authorities and health boards about any further actions or measures they have put in place since 2021, as well as inviting them to share examples of good practice or highlight gaps or barriers to inclusion they have encountered.

## Findings and Conclusions

The experiences shared indicate that older people who are not online or have limited digital skills often find it difficult, or in some cases impossible, to access crucial services – including healthcare services and financial services – and often find non-digital alternatives to be of poor quality and offer an inferior service.

This risks undermining people's rights and exacerbating existing inequalities, as those who are likely to need services the most, who are also more likely to be digitally excluded, may find themselves essentially prevented from accessing them.

Older people's responses highlighted that the 'digital world' often creates stress and anxiety when undertaking everyday tasks they previously found straightforward, and said it can be difficult to access the right kinds of support to overcome the barriers that lead to and reinforce digital exclusion. Older people with other protected characteristics – such as Black, Asian and Minority Ethnic older people or older people with disabilities – often also face additional barriers in terms of language and accessibility.

Concerns were also shared by older people about the difficulties they have in maintaining digital skills due to the speed at which technology changes, something that often leaves people feeling reliant on others and undermines their independence.

The rapid shift towards digital and the digital divide this has created has left many older people in Wales feeling inadequate, that they are not valued by society and that they are being left behind, affecting the ways people feel about themselves and about growing older. Many older people appeared to have 'given up' in terms of getting online or doing certain things, and had resigned themselves to facing growing exclusion as they got older.

Updates provided by local authorities and health boards indicate that a range of work is ongoing to provide non-digital services and support older people to get online, but it is clear from the experiences shared by older people that much more needs to be done to ensure that those who are not online or those with limited digital skills are not excluded and that their rights are upheld.

This must include practical action – such as promoting telephone services or making websites more accessible – as well as action at a strategic level to ensure a consistent approach to tackling digital exclusion throughout Wales.

The Welsh Government and other public bodies have a crucial role to play in delivering this, both through meeting their duties under legislation and ensuring the issue of digital exclusion is central to decision-making and service design. The private sector also has a role to play through meeting duties under the Equality Act 2010.

A failure to act will not only lead to more older people being further marginalised as more areas of life 'go online', but will also make it much harder, or even impossible, for citizens who do not use the internet to participate, have a voice and have a say on the future.

# Recommendations

The Commissioner's findings, based on the experiences shared by older people living throughout Wales, have been used to develop a series of recommendations for the Welsh Government, UK Government and public bodies focused on ensuring that:

- Public bodies are meeting their duties under the Equality Act 2010 and other relevant legislation.
- Policies and strategies are delivering the action promised and that this is reflected in older people's experiences.
- Digital exclusion is central to discussions relating to the design and delivery of services.
- The voices of older people who are not online or who have limited digital skills are heard and responded to.
- Further practical action is taken to ensure the availability of non-digital information and services in community spaces, and to support older people to get and stay online if they wish to and use the internet securely and confidently.

The Commissioner is also calling for action within the private sector focused on ensuring that:

- Customers who are not online receive equivalent levels of service to those who are.
- Approaches to digitalisation fully meet regulatory guidance on protecting vulnerable customers.
- Additional support is provided to customers who are digitally excluded, or find themselves in vulnerable situations, including support with costs.

Playing her part, the Commissioner will also take a range of action to influence public bodies and support older people:

- Using the evidence within this report to make the case for change and secure commitments to take forward the action required.
- Scrutinising policy and strategy developments to ensure older people who are not online do not find themselves excluded.
- Promoting older people's rights in relation to accessing information and services under the Human Rights Act and Equality Act.
- Continuing to raise awareness of digital exclusion and its impact on people's day-to-day lives across the Welsh Government, public bodies and wider society.
- Providing support to older people experiencing digital exclusion to challenge poor practice, including via the Advice and Assistance Service.

The Commissioner will also publish an update six months after the publication of this report, which will consider progress against her recommendations and highlight the action she has delivered.





# Introduction

The increasing use of digital technology means that the ways in which we access services and information, and the ways we communicate, have changed significantly in recent years. The pace of this change accelerated significantly due to the impact of the pandemic, and issues relating to digital exclusion are frequently raised with the Commissioner by older people.

Digitalisation has created barriers for older people and other groups who are not online when trying to access services and information, as well as other kinds of amenities. Being online no longer just makes life easier, it is now often essential for everyday activities. This makes the issue of digital exclusion even more serious, particularly as the right to access information is a key element of freedom of expression and is protected across several human rights instruments.

While there is no ‘universally accepted definition of digital exclusion’, it broadly refers to members of the population who are unable to use the internet in ways that are needed to participate fully in modern society.<sup>1</sup> This is reflected in the definition used by the Welsh Government in its Digital Strategy for Wales, which also considers the reasons why people may find themselves digitally excluded:

**“There are some people, however, who do not, or cannot, use digital tools or online services. This can be for a number of reasons - they might have made a choice not to, they may lack motivation and / or confidence, they might not have the recognised basic digital skills, or they might not have access to (or be able to afford) devices or connectivity. This means that they are digitally excluded.”**

These kinds of definitions may limit the understanding of digital exclusion, however, as they can make this seem like a binary issue – i.e. that someone is either online or not online – rather than reflecting the fact that there are different levels of digital exclusion.

For example, people may choose to use the internet for certain activities, such as keeping in touch with friends or family via social media, but not others, such as banking or shopping. Similarly, it is important to remember that access is not the same as inclusion: people may be online but may still find themselves digitally excluded in some way, as highlighted by many of the quotes from older people below.

Research shows that older people are most at risk of digital exclusion, while other factors – such as not working, being amongst the most financially vulnerable and living with a condition that limits or impairs the use of communications – also make it more likely an individual will be digitally excluded.<sup>2</sup>

This is reflected in the latest available data for Wales, which show that:

- 31% of over 75s (95,069 people) do not have access to the internet at home
- 33% of over 75s (101,200) do not use the internet (including Smart TV and handheld devices), compared to 13% of 65-74s and 0% of 25-44s.<sup>3</sup>

Similarly, data shows that older people are far less likely to have accomplished the 5 Basic Digital Skills (handling information and content, communicating, transacting, problem solving and being safe and legal online) in the past three months compared to other age groups, 41% of over 75s and 61% of 65-74 year olds had these skills, compared to 80% of 45-64 year olds, 88% of 25-44 year olds and 91% of 16-24 year olds.<sup>4</sup>

While older people who have digital skills are using the internet more than ever<sup>5</sup>, the figures above demonstrate a stark digital divide that will potentially grow wider and have an even greater impact on many older people's health, well-being and day-to-day lives as the shift away from non-digital information and services continues.

Recognising this, the Commissioner used her legal powers to issue formal guidance to local authorities and health boards in Wales in November 2021, setting out the kinds of action they should be taking to ensure that people who can't (or don't wish to) get online have ways to access the information and services they need via non-digital means.<sup>6</sup> The guidance also set out the ways that support could be delivered to help older people to get online and use the internet safely and with confidence.

All local authorities and health boards responded to the guidance, highlighting the measures they currently had in place or planned to provide access to information by non-digital means, and to support older people to get online.<sup>7</sup>

Alongside publishing her guidance, the Commissioner also produced and distributed an information booklet for older people, to help people to better understand their rights to access information and services via non-digital means and provide contact details for organisations that can offer help and support if people feel their rights are not being upheld. To date, over 10,000 paper copies have been distributed via partners, older people's groups, and organisations throughout Wales.

Building on this work, this report examines the ways in which older people's day-to-day lives and experiences are being affected by digital exclusion and emerging digital barriers, to identify where further action may be needed to ensure that older people's rights to access information and services are upheld.

The report is based on responses shared by over 150 older people (in some cases with support from family or friends) to a call for evidence and examples of good practice from the Commissioner, as well as conversations during engagement sessions with older people's groups and information captured via the Commissioner's Advice and Assistance Service.

The powerful evidence they provided not only highlights the many, and rapidly changing, ways that digital exclusion impacts upon their lives, but also shows that people often find themselves feeling powerless, worthless and left behind.

The report also includes a summary of updates provided by local authorities and health boards requested about action and progress since 2021, which the Commissioner has also used to form her conclusions and determine her calls for action.

# Legislation, Policy and Practice

As highlighted in the introduction, the right to access information is a key element of the broader right to freedom of expression and is protected across several human rights instruments, including the UN International Covenant on Civil and Political Rights, the European Convention on Human Rights, and the Human Rights Act 1998.<sup>8</sup>

Alongside this, the Equality Act 2010 states that providers of goods and services (e.g. shops, GPs, social services, transport services), as well as employers, must not discriminate – or offer inferior services or treatment – on the basis of a protected characteristic, such as age.<sup>9</sup>

The Act also includes a duty to consider the needs of people with protected characteristics, as part of wider general duties to ‘advance equality of opportunity between people who share a protected characteristic and those who do not’ and also to ‘remove or minimise disadvantages suffered by people due to their protected characteristics’.

This means that the Act should offer protection to individuals both proactively, as public bodies and businesses fulfil their legal duties, and ‘reactively’ as a means to challenge instances of age discrimination. However, as case law relating to the Equality Act is still relatively limited, there are difficulties in determining the extent to which this is reflected in the reality of people’s lived experiences.

Other legislation, such as the Public Sector Bodies Accessibility Regulations 2018, creates duties at a more operational level with the aim of ensuring consistent standards across digital public services in terms of accessibility, content and design.

In Wales, further responsibilities are created under the Socio-Economic Duty within the Equality Act, which was enacted by the Welsh Government in March 2021.

Furthermore, Wales also has its own specific Digital Strategy, which was published in March 2021.<sup>10</sup> The Strategy sets out ‘a vision and ambition for a coordinated digital approach in Wales’ and states a commitment to continuing to deliver alternative ways to access public services, which will be ‘as good as those offered online’, something restated in the Welsh Government’s Strategy for an Ageing Society.<sup>11</sup>

However, there is still little detail on the timescales for delivering upon this commitment: within the delivery plan that accompanies the Welsh Government’s Digital Strategy, this action is listed under ‘later’, with no indication of timescales.

If this kind of action is delayed, there is a risk that online-only options, many of which were introduced during pandemic (such as the removal of paper copies of information leaflets from community spaces) will become normalised and that even more non-digital options could be lost.

The Equality and Human Rights Commission in Wales has recognised the potential risks presented by this kind of shift towards digital services, calling on the Welsh Government to ‘increase digital inclusion for those aged over 65 and ensure that services such as health and social care are accessible for those without access to the internet or digital literacy skills’.<sup>12</sup>

Some action has taken place, however, which aims to deliver improvements. For example, Digital Communities Wales: Digital Confidence, Health and Well-being exists to reduce digital exclusion in Wales, aiming to build a Wales where everyone has the skills, access and motivation to be a confident user of digital technology. Similarly, local authorities report a range of activity in relation to supporting older people to be online.<sup>13</sup>

The Centre for Digital Public Services has also developed the Digital Service Standards for Wales, which set out what's expected from new or redesigned digital services funded by Welsh public sector organisations. The Standards emphasise the importance of understanding users and their needs (Standard 3 in particular) as public services are for everyone. Likewise, there is a focus on examining the 'user journey' from start to finish, understanding the different ways people use services, whether online, over the phone or in person, based on first-hand research with users to understand their experiences.

In addition, the Welsh Government has commissioned the University of Liverpool to undertake research on developing a Minimum Digital Living Standard (MDLS), a citizen-centred definition of what counts as digital inclusion or exclusion and can be used to assess (with input from members of the public) the minimum that certain types of households need in order to take part in everyday activities, covering factors including access to devices and internet connections, as well as people's skills.

This initially focused on the needs of households with children through a series of focus groups, but expanding this to include other groups – such as older people and people living in care homes – could provide important insights into the diversity of people's needs and where particular challenges may exist, (e.g. the difficulties older people often face in developing and/or maintaining digital skills).

Developing an MDLS is also part of the Welsh Government's efforts to measure digital inclusion, as the status of this is listed as one of the Welsh Government's 50 current National Indicators as part of the Well-being of Future Generations Act. According to the 'National Indicator technical descriptions and data links', a technical measurement for this indicator is still under development, alongside the development of the MDLS.<sup>14</sup>

While this kind of work is to be welcomed, it is important that policy- and decision-makers also fully understand the needs of people, including older people, who are not online and who will not be online in the future, so that services and information remain accessible. Digital exclusion is not an issue that can be resolved by simply trying to get everyone to use the internet and solely concentrating efforts on activities around this.

# Methodology

The formal Guidance the Commissioner issued in November 2021 was strongly welcomed by many older people and older people's groups, and the responses from local authorities and health boards highlighted a variety of work and initiatives underway or planned to ensure people could access information and services via non-digital means.

However, engagement with older people throughout Wales and via the Commissioner's Advice and Assistance Service suggested that many older people still found themselves facing significant issues when trying to access digital services or non-digital alternatives, something the Commissioner wanted to explore further given the potential impact of this on people's lives.

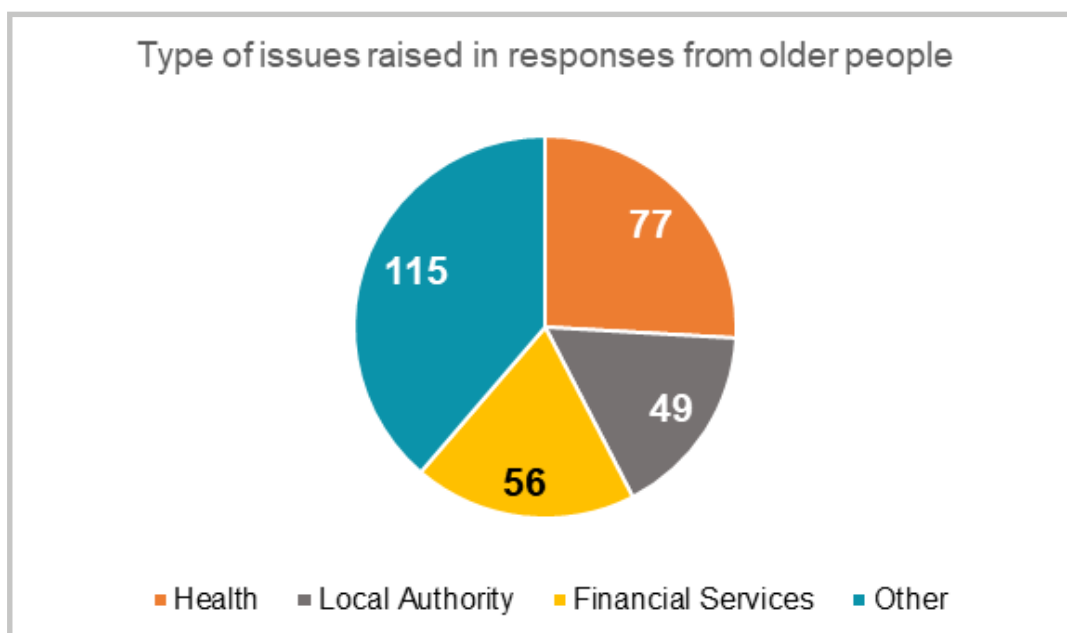
The Commissioner therefore invited older people to get in touch to share their experiences of digital exclusion and the impact this has on their day-to-day lives, as well as any examples of good practice making a positive difference.

Older people could share their experiences by telephoning the Commissioner's office, or by completing a paper or online form, and adverts were placed in newspapers throughout Wales to encourage people to respond. The Commissioner also worked with national and local partners and organisations to reach out to older people throughout Wales, as well as using social media channels to target family and friends.

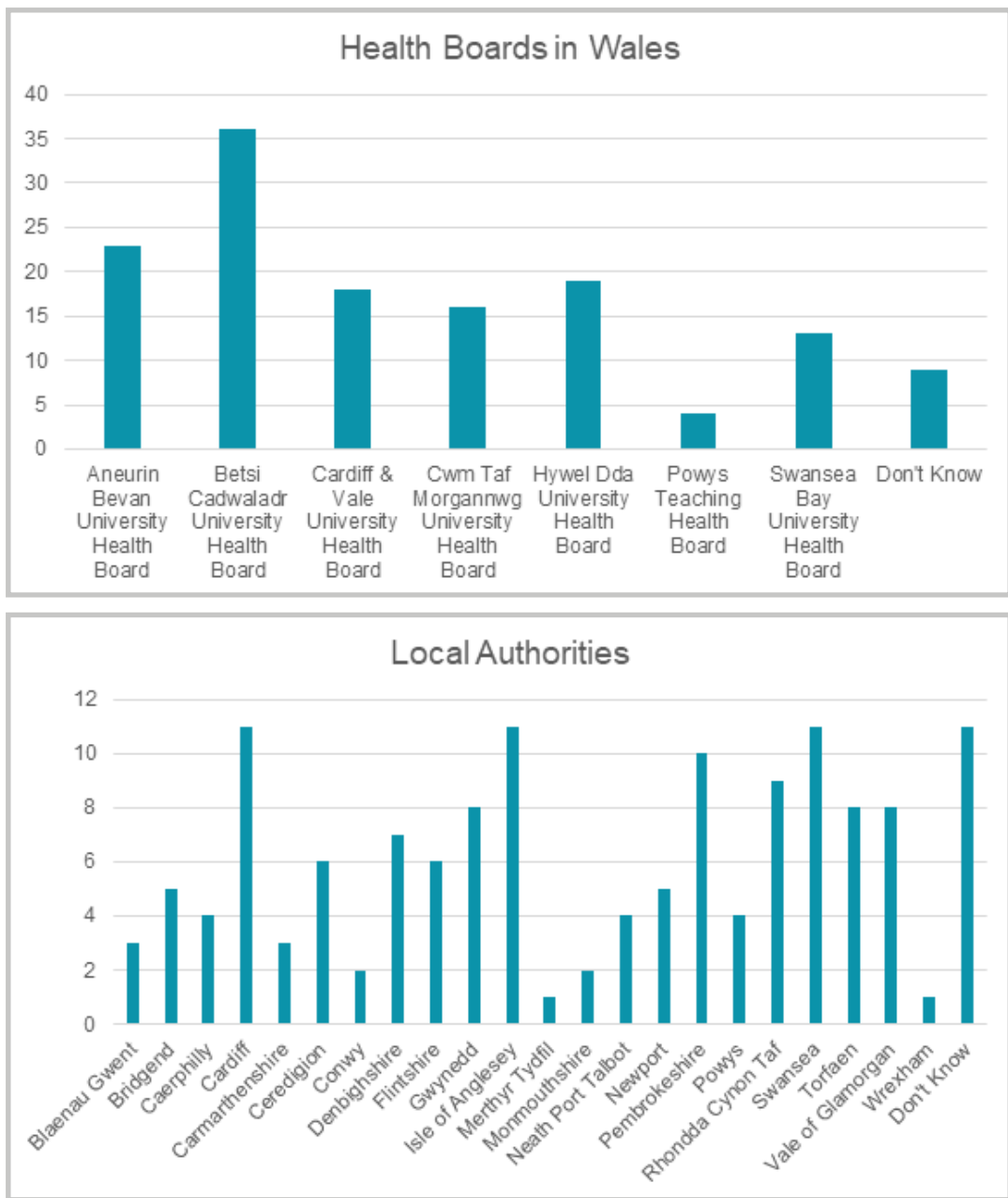
A simple framework was used to capture people's voices experiences, based around three questions:

- What were your experiences?
- What impact did this have and how did this make you feel?
- What needs to happen to prevent others experiencing this kind of thing in the future?

A wide range of examples of digital exclusion and related barriers were shared, most commonly relating to health and local authority services, but also covering other issues, such as access to financial services, as highlighted in the figure below.



From July to November 2023, a total of 159 responses were received, highlighting the experiences of older people living throughout Wales. The vast majority of responses were written / sent by older people themselves, although in a small number of cases someone else provided a response on behalf of an older person.



Alongside encouraging older people to share their experiences, the Commissioner also requested further information from local authorities and health boards about any further actions or measures they have put in place since 2021, as well as inviting them to share examples of good practice or highlight gaps or barriers to inclusion they have encountered. A summary of these updates is included below.

# Older people's views and experiences:

## Access to information and services

This section is based on quotes from older people who responded to the Commissioner's invitation to share their experiences of digital exclusion and the impact this has on their lives.

The responses received covered a wide variety of topics, including access to services (such as financial services, health services and services provided by local authorities), cost barriers, digital skills, assumptions that everyone is online and difficulties in terms of the design and accessibility of websites and user interfaces.

The breadth of experiences shared demonstrates that digital exclusion affects older people's lives in many different ways, creating barriers – or in some cases making it impossible – for people to access the information and services they need and do the things that matter to them. This often leads to disengagement and withdrawal and puts people's health and well-being at risk.



# Financial services

The shift to online banking, which has resulted in the closure of bank branches in communities throughout Wales, was a significant issue for many of the older people who responded, reflecting the wider trend of other local services closing, being amalgamated or moving further away, which makes it much harder to undertake routine activities.

Many older people told us they do not feel comfortable banking online, or do not have the devices required to do so, and rely instead on telephone banking to avoid having to make long, difficult journeys – often more than 10 miles – to visit their nearest branch, something that is often mentally and physically draining.

**‘I am terrified of doing online banking.’**

**‘Dyslexic, and terrified of doing online banking. Lloyds Bank has closed in Pwllheli, and everything has to be done over the phone.’**

Despite the importance of these services for many customers, the experiences shared were often negative, with older people reporting issues that often make it time-consuming and more difficult to carry out the transactions they need to.

**‘We resort to phoning and waiting and listening through the ‘go on-line’ messages. When a human being answers we run the gauntlet of security questions in order to verify my identity. They ask her for her card number, she gets flustered and upset because she cannot read the numbers - and so on. It takes forever, she feels exhausted and humiliated. She still gets asked for an email address - despite the fact that they are supposed to know of her circumstances.’**

Some older people shared that they were unable to hear the messages over the phone, and needed the help of family and friends in order to bank successfully, while others highlighted long delays when using offline services, including one individual who had to wait three weeks to set up a bank card.

Another older person said they were unable to bank online, but also felt nervous using an ATM, yet had been told by bank staff that they were unable to withdraw cash from the branch itself.

These kinds of issues – where being offline meant people were simply unable to do the things they needed to – also affected people more widely.

**‘I have found out that \*large retail store\* refuse your application for a credit card, even if you have held one without issue for decades. When challenged that they were severing links with good customers, they agreed and said they would live with it! No alternative method of ID verification was offered, despite the fact that companies like PayPal can provide the same service via a landline. Some banks do provide an alternative – a card reader – but this involves having an online Bank Account, something which many, especially of the older generation, prefer not to have.’**

**‘Pension company was only dealing with people online. This lady had to wait a year for a lump sum from her pension and she had to pay a financial advisor to get this money for her.’**

**‘\*Utility company\* insists on sending our bill by email. We are not on the internet and we keep telling them. We did have a computer but it broke and we never replaced.’**

The older person who shared this example said that having their request for an alternative bill format repeatedly ignored created stress and anxiety, and it is difficult to see why such a request could not be accommodated.

Issues and challenges accessing financial and similar services were not confined to people who were not online: even those with digital skills faced difficulties due to changes in technology or poor design.

**‘Recently my bank has introduced facial recognition as an extra layer of security, in addition to fingerprint security. Try as I might, and I have tried countless times I cannot get the facial recognition to acknowledge that it is me. As a result I am excluded from making payments via bank transfer, often necessitating a trip to a an ATM to withdraw cash to pay the bill. This is very inconvenient and involves a special trip of six miles or so. I acknowledge the bank’s concern for security, but I believe that I am especially conscious of security without this inconvenience.’**

**‘I am 76 years of age and I am happy with the use of my iPad for many uses like banking etc, and find it useful, but the increasing necessity for smart phones does create a barrier for some which can be stressful.’**

# Health services

Access to health services, particularly GP services, plays an important role in supporting many older people to remain healthy and independent. Yet many older people told us that the use of digital services had created significant barriers for those who are digitally excluded, often leaving people feeling angry, frustrated and that they were receiving an inferior, potentially discriminatory service.

**‘No appointments - when told to phone at 8.45 all appointments gone. Have to phone GP - they phone back. Can’t walk into the Surgery. Not able to use the computer.’**

**‘Need to phone asap after 8am you find you are approx. 30 in queue, this is because people can book online on the previous evening, also all appointments are filled by 9.15am.’**

Concerningly, responses from some older people suggested that some surgeries are offering no alternative but to use an online system.

**‘Called at my doctor’s surgery to make an appointment and was informed appointments could not be made except “online”. I explained I didn’t and could not use a computer and asked what to do, and the receptionist repeated appointment to be done ONLINE. I asked her what could I do and was told again ONLINE ONLY. I left very upset.’**

**‘It is impossible to get a GP appointment as they have all gone first thing in the morning, and as it has to be done online. If you are ill the last thing you want to do is get up at 7.30am to log on to a computer to book an appointment, however if you do not then you do not get an appointment. I have witnessed MANY older people asking the receptionist at [the surgery] how to get an appointment and they are very sternly and rudely told to go online or get someone to help them go online, as there is no other way! This is causing a great deal of anger towards the practice.’**

Some older people also shared that they felt that not being online was resulting in them having to wait longer for treatment, either due to difficulties booking appointments, as highlighted above, or because appointments being offered were not suitable.

**‘Hospital appointment wants me to fill in a questionnaire online but because I didn’t have a computer I’ve gone lower down on their list.’**

It should be noted that there is no NHS policy to deprioritise people who are not online or who are not digitally confident. However, older people’s experiences and the concerns they shared suggest that there may be a perception that this is the case.

In some cases, older people were offered virtual appointments in order to be seen more quickly, which left them feeling upset as they felt this type of appointment was not felt to be appropriate, or impossible to attend for someone without access to a computer. This had led some individuals to arrange private appointments at their own (often significant) expense, an option that is simply not feasible for most people.

# Access to online support and entitlements

Access to financial entitlements and other forms of support, such as Blue Badges, can be important as we get older to enable us to remain independent and do the things that matter to us, crucial to support us to age well.

However, the shift to digital within our public services appears to have not sufficiently accounted for the fact that the individuals most likely to need to access support or financial entitlements, in many cases older people, are also more likely to be digitally excluded, making it difficult, if not impossible, for them to find the information they need or make applications online.

One response, sent by a library worker on behalf of older people, said that they and their colleagues had dealt with hundreds of cases of older people needing assistance with digital services such as applying for a Blue Badge, Concessionary Bus Pass and financial entitlements. They said that people are often 'desperate' and come to them feeling angry and frustrated due to failed attempts to speak to someone on the phone. They shared a recent example of an older man who was trying to renew his Blue Badge.

**'He'd tried ringing our local council (Bridgend) and after numerous attempts to get through, someone eventually answered the phone. They told him to take a photo and one form of ID to a library. This he did. However, we needed much more information than this to proceed with his application. I tried to ring the council and waited 30 mins on the line for someone to answer. Nobody did. This was 2.30 on a Friday afternoon. We had to send the man away with a list of all the information he'd need to give us to enable us to apply on his behalf. Suffice to say, he was understandably disappointed. I could give so many more examples of this type of treatment.'**

This kind of experience was reflected in other responses, which suggested that the realities of providing information or making applications via non-digital means had not been considered by those designing systems, and that it often felt impossible to find help over the phone.

**'M is registered disabled. She has a blue badge which has now expired. I rang the council to sort out a renewal, listened to the 'go on-line' messages, spoke to a human being who asked me to upload the entire set of documents we sent out when she originally applied for the badge. There was an option to post copies (presumably we all have photocopiers?) or physically take them to the office - 5 miles away.'**

**'Wouldn't know who to talk to get information nowadays. Can't find telephone numbers, excluded. Feels stuck because getting information on transport is harder, and access to councillors is more difficult. Feels she cannot get help anymore, and incredibly expensive to get accessible aid.'**

**'My wife and I are both 85. We have no extended family. The use of computers has made us feel illiterate. What annoys me is a lot of companies no longer put a phone number down. This should be mandatory and the Commissioner should fight for this. We are anxious of becoming ill.'**

# Parking

One area that illustrates the increasing role digital technology plays in every aspect of our lives is car parking, where digital payments and the use of parking apps are becoming increasingly common.

Many older people who got in touch with the Commissioner highlighted barriers created by issues relating to parking and the fact that a growing number of car parks / spaces no longer accept cash payments. This meant people often found it more difficult to do the things they needed to, or were put off getting out and about altogether.

**‘It makes life much more complicated than it needs to be... we have to use car parks further away than we would like, which don’t use smartphone apps only.’**

**‘We don’t go anywhere in the car where we can’t pay for parking by cash.’**

**‘Where I have failed to obtain a parking ticket to place on the car windscreen, I have to abandon my day out.’**

Examples of older people with digital skills experiencing similar difficulties were also shared, often relating to problems accessing or using parking apps themselves, or concerns about security or making online payments.

**‘[I was] unable to download an “app” required to pay for parking at Holyhead.’**

**‘Parking is a nightmare where I live, the online payment system is terrible on many days it takes 5/6 attempts to make the programme work and pay for parking.’**

**Trying to pay for parking in Haverfordwest, card declined because of \*Parking Company\*, they are known to Barclays as a bad company and used by the council, it was the only way to pay.’**

Concerns about how the continuing shift towards digital payments for parking could affect people and make their lives more difficult in the future were also shared by a small number of older people.

**‘Parking in King St Car Park noticed drivers using smart phones and apps, which I don’t have. Luckily it still took coins. If that facility is taken away, many like us will stop going to Mold with bad consequences for local businesses.’**

Similarly, another older person we spoke to had been told that a mobile app was needed to pay for parking in Ceredigion and was particularly worried about what this would mean for her as she is visually impaired and has no smartphone.

# Barriers that lead to and reinforce digital exclusion

Older people shared a range of reasons why they were not online. In some cases, this was a choice, but, more commonly, people found themselves digitally excluded due to limited digital skills, cost barriers, concerns about security and the changing nature of technology.

The responses below also reveal that these barriers often leave older people feeling left behind or as though they have failed in some way, that they have little control over their lives, and that their needs and rights do not matter.

# Digital skills

As highlighted above, older people are far less likely to have accomplished the 5 Basic Digital Skills (handling information and content, communicating, transacting, problem solving and being safe and legal online) in the past three months compared with other age groups and may also find it difficult to maintain these skills, particularly after leaving the workplace. This can make it difficult to keep up to date with new technological developments or get help with common problems.

A significant number of older people (around 7% of people aged 75+) are also 'lapsed users', individuals who have not used the internet during the past three months, despite having done so previously. Given the pace of change within the digital world, these individuals may find their digital skills quickly becoming out of date.

These kinds of issues and barriers were highlighted by several older people, who said they felt as though they were increasingly excluded from a range of services and activities due to the rapidly changing nature of technology, and that they often found it difficult to adapt to new technology.

**'Systems are progressively changing adapting to technology to benefit their organisation. This transference is not to the advantage of the older generation some of whom are not tech savvy and find it difficult to navigate their day with these systems in place. Especially difficult for me is the use of smart phones which I choose not to own and which are necessary for many functions.'**

**'I am in my 70's and do feel I am increasingly excluded from things because I do not have a Smartphone. How does one choose what type of Smartphone? Understanding the memory capacity of the phone in relation to Apps. Security matters when using it. Where to get training in using it. We don't all have knowledgeable younger family members/friends.'**

Several older people shared this view, saying that more opportunities to learn digital skills, with the right types of support, would be very beneficial.

**'I have a mobile and internet but don't know how the internet works. There should be someone available to teach us.'**

**'I am confused with information given - need face to face.'**

The way we access services and activities has changed so quickly and significantly that it can be hard for some older people to adapt to new ways of doing things and keeping track of new forms of information, such as remembering several online passwords. This can create stress and anxiety, which can act as a further barrier to people getting or staying online, and created other difficulties.

**'Just remember the password. Needing a mobile phone that is tricky to get things right.'**

**'This lady wanted us to know that because she had forgotten her PIN she was unable to get her money out of [high street building society]. Neither her or her husband are using the internet.'**

# Cost

Around 1 in 5 older people in Wales lives in poverty, and many more have been particularly badly affected by the cost-of-living crisis. This has forced many older people to look at their spending habits and consider ways in which they could save money.

It is perhaps unsurprising, then, that cost was one of the most common reasons given as to why people are not online, both in terms of the cost of purchasing technology itself, and ongoing costs such as broadband or mobile data. This was a particular issue for people with limited pension income, who were often unable afford these kinds of contracts.

**‘May not be able to afford the required, and mostly expensive digital equipment.’**

**‘Told to ‘go online’ and ‘get the app’. BUT I did not have a smartphone. Now I have, I put £10 on it but data in background took ALL the money. I would also add that the tech is expensive and on a pension I simply find ‘contracts’ beyond my means.’**

**‘In this day and age where people are trying to cut costs, why should it be a necessity to pay for mobile data, in case you need to pay for parking. Linking a payment card to a phone horrified many old and young. People are frightened of being scammed and losing all their money.’**

Older people’s responses also highlighted that cost barriers could also actually result in higher costs, whether due to more expensive pay-as-you-go mobile costs, or due to having no option but to use large amounts of credit waiting on the phone for help and support if they are unable to access online services.

**‘Pay-as-you-go is also expensive if the credit is being used up in the background before I have even connected to Wi-Fi or used the phone or texts. Furthermore, I don’t actually have any family or friends to contact so what is point of bundles of so many texts/calls?’**

**‘I’m on pay as you go, so my credit does not last long and I have to ring (the GP) before 8.00 a.m. I am 81 years old. When I am in a queue my credit is used up.’**

**‘Since not online: Spending hours getting through to Utility Companies - sometimes being cut-off. Being passed from pillar to post.’**

Research also shows that alongside these kinds of costs, older people who are digitally excluded are missing out on significant savings by being unable to purchase products and services online. It was reported that home insurance could cost up to 46% more when purchased offline, while a ‘SIM only’ phone contract could cost £192 more.<sup>15</sup>



# Choosing not to be online

For some older people, not being online is a choice – which was reflected in some of the responses shared with the Commissioner.

People told us they were happy using a landline or receiving bills via the post, for example, and simply had no desire to be online, with the costs and complications they felt this could bring. This often led to people feeling like they were being treated unfairly, and that their lives were being made more difficult.

**‘I refuse to have a smartphone. I get my son to sort out the gas and electricity bills. Everything is online and this is restrictive.’**

**‘At last, someone is recognizing the discrimination against older people without smart ‘phones. I am 87 and I don’t want one. There are so many things now that cannot be accessed without one.’**

**‘Don’t use the computer. OK with medical appointments, but his hobby is football and he can’t go on-line to see the fixtures.’**

**‘No computer or smart phone. Banks wants me to go paperless. Hospital appointment wants me to fill in a questionnaire online... No longer have yellow pages to find numbers - you must get online for finding a chiropodist etc.’**

These examples illustrate the extensive reach the digital world now has throughout many aspects of our lives – from health appointments to paying bills to engaging in our hobbies – and how the choice to not be online, or use certain technology, can create significant barriers and make what were once ‘simple’ things much harder.

# Concerns about security

Online security is an issue that affects the whole of society, and media stories about the potential risks of using the internet are common. It is perhaps unsurprising, then, that concerns about online security are common amongst older people, and often act as a barrier to accessing digital information and services.

Some older people shared that online security is causing them a great deal of anxiety, who spoke about mistrusting the internet and the ‘virtual world’. Older people said they had concerns that scams and phishing had increased, and that they felt safer not using the internet.

**‘It is safer and less worrying not to use virtual at all and many have no idea of how internet security is applied or how you confirm that a website is to be trusted and that is something that is often missing in the training and design of services.’**

**‘I always want to avoid the internet. If around, have to ask family members to do things for me. Feel useless I can’t always remember all the instructions. Scams - scared of the knowledge available to anyone.’**

Alongside these kinds of concerns, which often deter people from being online, other aspects of online security, such as managing passwords or remembering pin codes, can also act as a barrier, preventing some older people, particularly individuals living with cognitive impairments, from successfully using the internet even if they want to.

## Poor design and accessibility

The design and accessibility of websites, apps and other digital services plays a crucial role in defining our experiences online and enabling us to easily access what we need, when we need it. However, poorly designed, inaccessible content often acts as a barrier, particularly for people living with sensory loss or other conditions who may rely on assistive technologies.

Older people shared that while they wanted to be online, they often found websites inaccessible and difficult to use.

**‘Lots of websites not accessible without screen readers so have to get daughter to help or call but when I call nobody is there is to answer lots of the time.’**

**‘Website design and functionality is poor, not intuitive and the typeface and use of images, tick boxes is poorly designed and user testing seems to have been ignored; Size of devices being used and too much included on screens.’**

**‘In my experience there needs to be different platform options for online forms, e.g. phone or laptop / iPad, as if it is intended to be completed online but you are trying to on your phone (as this is often the only device people have) then it is really difficult to see all the information on the small screen.’**

These issues and barriers were felt even more strongly by older people living with certain health conditions – including sight loss, hearing loss, arthritis, Parkinson’s disease and Alzheimer’s – which made using websites, making appointments or reading correspondence even more difficult.

**‘My mother, late 80’s, hard of hearing, not very mobile, husband with Alzheimer’s. So a very vulnerable person anyway, and never used internet (or computers in any sense), unable to grasp even mobile phone technology.’**

**‘Mum is 82 with Parkinson’s, doctors appointments over phone, can’t remember what was said, now can’t even use a mobile phone. She lives in Wales and all services are either phone or Internet related and even though my mum has a diploma in computer studies some years ago now those basic tasks are impossible.’**

**‘I have problems with my sight and severe rheumatoid arthritis in my hands and fingers. Using a mobile phone is almost impossible for me.’**

Older people also shared that certain websites ‘time out’ too quickly when they attempt to enter information, not only leaving people unable to access the services they need or want to, but also leaving people feeling that they are too slow, or lack the necessary digital skills.

**‘The link for my GP surgery is a nightmare. Doesn’t give you time to answer the questions or the screen just disappeared.’**

**‘House bound and disabled. Time out when ordering food online. Can’t book appointments.’**

These examples also highlight how an inability to access online services without help and support can leave older people feeling that they have lost independence and autonomy.

## Language

In addition to the potential difficulties of navigating life in an increasingly digital world, Black, Asian and Minority Ethnic older people often face additional barriers due to language when trying to access information and services online, as highlighted in a small number of responses.

**‘I work as Service manager for Syrian and Afghan refugees who have settled in the North Wales area since 2016. In addition to the obvious barrier of the digital challenge – especially for those who come from less developed countries, there is also the language barrier. In addition a significant number of this population are also illiterate in their first language, making the digital exclusion even more significant. This results in a long term dependence on services such as the British Red Cross for everything from making GP appointments, booking and paying for anything at school using PayPal, or completing simple forms using a word document. I have observed even those who are well educated and literate in their first language struggle to complete a basic form because they are unfamiliar with keypad strikes such as ‘delete’.’**

**‘Booking appointments for older parents / relatives who cannot speak English / Welsh. This has been difficult for the individual (lack of independence / autonomy), as well as for me (sometimes not being allowed to help with follow up etc. because I am not the named person). Availability of translation also varies - sometimes people don’t turn up even when booked.’**

# Impact on older people's day-to-day lives

As highlighted above, the Commissioner was keen to examine the impact of digital exclusion upon older people's lives, not only in terms of access to services and barriers to getting online, but also in terms of how this makes people feel about themselves and about growing older.

For some older people, digital exclusion was clearly having a significant impact on their health and well-being, with some individuals sharing that the issues and barriers they face leave them feeling inadequate, that they are not valued by society and that they are being left behind.

**'Depression, loneliness, and humiliation, to name but three. We are being abandoned and no one gives a damn for those who cannot cope with the scope and speed of the changes. We hear a lot about choice, and in the market place, it seems to be the road to success for business, but convenience for the profiteers, means misery for a large part of our society.'**

**'Don't feel valued as an older person. Just don't understand technology. Frustrated and fed up.'**

**'Old! Older. Inadequate. Invisible. Frustrated.'**

**'Makes me feel frustrated and feel let down.'**

For others, not being online left them feeling excluded and unable to do the things that matter to them, something that can lead to feelings of loneliness and isolation, and related issues.<sup>16</sup>

**'I am in my 70's and do feel I am increasingly excluded from things because I do not have a Smartphone. For example I can no longer attend matches/events at the Stadium in Cardiff which insists on tickets on a Smartphone only.'**

**'Does not use a computer or e-mail address. Difficulty in buying tickets for an event (online). Unable to make investments - online. Also, missing out on good deals because of the inability to go online. Difficulty in buying a car without being online. Video consultations with Doctor is difficult. Difficulty with online shopping. Difficulty with parking app.'**

**'I find competitions in magazines that I would like to try but it's all on-line'.**

For some older people, these kinds of barriers meant they had to rely on help and support to get online, something they were often reluctant to do as it left them feeling dependent and reliant on others.

**'I hate having to rely on other people.'**

**'For my husband, it impacts on his sense of wellbeing having to rely on me.'**

**'If around, have to ask family members to do things for me. Feel useless I can't always remember all the instructions.'**

# Improvements suggested by older people

As well as inviting older people to talk about the impact that digital exclusion has on their lives, the Commissioner also wanted to hear from older people about practical solutions that would help to tackle the issues they experienced.

Many of the suggestions shared by older people emphasised the importance of choice and not forcing people to do things online, highlighting that effective non-digital alternatives are still crucial.

**‘NHS/ Social Care – everyone should be asked as standard what their preference is in how they are contacted. This should be the only means of contact to save confusion. Telephone contacts – all companies should be made to have a telephone number with a person on the end to contact. My Parents could not use a chat function.’**

**‘Offer paper form when people phone and ask for them, or provide support to fill in forms. Such as: tablets, training or offer to come to property and support.’**

**‘There shouldn’t be an absolute reliance on smartphones. Cash or cards should be available to use at car parks.’**

Older people also made suggestions about how access to online information and services could be improved, through improving the simplicity and accessibility of websites and making digital skills training available to more older people.

**‘Better testing of websites to make them more accessible, also need better screen reader accessibility testing of websites.’**

**‘Have a much simpler website – it’s not even easy to find local library site!’**

Some people wanted lessons or training, to give them the digital skills needed to use technology.

**‘Desires lessons to go online, wants computing classes. Local library offered classes but is no longer available.’**

**‘Investment, training, empathy, staffing. You’ll all be old one day and even if you are digitally literate now aging process can take that away.’**

**‘Computer training. Giving people a choice.’**

# Summary of responses from local authorities and health boards

As part of the current work, local authorities and health boards were asked to provide an update on any further actions or measures that they have put in place since the Commissioner published her Guidance in 2021. Some of the main points are outlined below.<sup>17</sup>

## Accessing information and services by non-digital means

Local authorities and health boards reported continuing efforts to assist older people to access information and services via non-digital means in various ways, many of which are similar to those previously outlined in the Commissioner's earlier work on digital exclusion.

### Examples shared by local authorities include:

- Providing printed copies of information through libraries or by Community Single Point of Access (SPOA) based within Councils.
- Providing Age Friendly bulletins in some areas.
- Using Community Hubs to disseminate services and information.
- Holding groups, forums and information sessions in the community to raise awareness, including sessions on online fraud and scams.
- Delivering training for staff to improve support for older people when accessing information and services.

### Examples shared by health boards include:

- Producing newsletters, letters and information leaflets, some of which were in large print.
- Enabling patients to request GP appointments via telephone or face-to-face.
- Using volunteers within hospital sites to help signpost patients to services.
- Using paper copies of questionnaires to obtain feedback from patients.

One particularly interesting example shared by one health board is the development of a hybrid 'print and post' service, which aims to improve how correspondence is received by patients and will include safeguards to ensure that people who do not have the means to engage digitally are not excluded. The system will include preferences to enable opt-in / opt-out but also to cover the Welsh Language (Wales) Measure 2011 and the Equality Act 2010. Where a digital letter has been sent to a patient and it has not been read, the new system will automatically then print and post the letter to ensure delivery.

## Enabling and supporting older people to get online

As above, much of the activity reported in updates from local authorities and health boards builds upon the information provided in September 2022 in response to the Commissioner's formal Guidance, and examples of ongoing activities include device loan and gifting schemes, support via libraries and community hubs, training for staff to provide support (e.g. with Blue Badge applications) and surveys to assess local needs and barriers.

### Other examples shared by local authorities include:

- Working with partners (including Community Connectors and Men's Sheds) to promote digital skills.
- Improving website design / accessibility.
- Linking older people living in care homes up with members of youth groups to provide intergenerational digital learning sessions.
- Distributing the 'Icon Booklet'<sup>18</sup> to hubs and libraries to provide information about some of the most commonly used apps available to smartphone users.

### Other examples share by health boards include:

- Creating designated roles and responsibilities to assist people to get online.
- Providing IT equipment to enable older people to attend virtual appointments.
- Using the Health Education and Improvement Wales (HEIW) Digital Capability Framework<sup>19</sup> to empower staff to develop their digital skills, which will, in turn enable them to support patients.
- Developing packages of support focused on raising the digital literacy and digital health literacy skills of the population.
- Considering digital exclusion and the potential barriers older people may face as part of the development of the NHS Wales App.

# Other issues and future challenges

Older people raised a wide variety of digital exclusion issues in our call for information, but the scope of those discussed with the Commissioner has been even broader. For example, there are increasing concerns about public transport and the difficulty of accessing bus timetables in particular.

Similarly concerns have been shared about how the rise in the number of public consultations that are online-only risks losing the voice of older people who do not use the internet. This means people cannot have their say or input their ideas, leading to further marginalisation and ultimately poorer service design.

Another significant issue on the horizon, which will affect large numbers of older people, is the Voice over Internet Protocol (VoIP), currently being rolled out across the UK. The technology that is currently being used to make landline phone calls is being upgraded over the next few years. This means that the use of landlines in their current analogue form is due to end in December 2025.

In the future, landline calls will be delivered over digital technology, called Voice over Internet Protocol (VoIP). Customers who want to keep a landline phone will need to move to a VoIP service.

Communication about this change has been inconsistent, leading to concerns that landlines will not be available at all in the future, and that certain devices – such as care alarms, health pendants or security systems will cease to function and need to be reconfigured or replaced. This was reflected by some of the older people who shared their experiences as part of this report.

In order to ensure that older people can continue to be able to access services and information without being online, uninterrupted access to the telephone network is essential. Telecoms providers need to ensure that this is the case.

As digital technology continues to develop, the potential for positive improvements and efficiencies to services remains high. However, it is vital that all such developments take account of the needs of people, including older people, who are not online from the outset. Access to good quality information and services must not be restricted to only those people with high levels of digital skills and devices such as smartphones.



# Conclusions

The experiences shared by older people demonstrate that digital exclusion negatively affects people's everyday lives in a wide range of ways, as illustrated so powerfully by the quotes above.

As the world has become increasingly digital, many older people have found themselves feeling excluded and left behind, and facing stress and anxiety when undertaking everyday tasks they previously found straightforward.

Poor quality offline alternatives mean that older people who are not online are finding it increasingly difficult, if not impossible, to access the information and services they need, including health services, which is particularly concerning. This risks exacerbating existing inequalities, as those who are likely to need services the most, who are also more likely to be digitally excluded, may find themselves essentially prevented from accessing them.

Older people told us they felt there was not enough support available to overcome the barriers that lead to and reinforce digital exclusion, such as skills or cost barriers, and that maintaining digital skills can be particularly challenging due to the speed at which technology changes. This often leaves older people feeling reliant on others, which undermines their confidence and independence.

The action being taken in response to the Commissioner's Guidance by local authorities and health boards to make information and services available offline and support people to get online is welcome.

However, it is clear from the experiences shared that much more needs to be done to ensure that older people who are not online or those with limited digital skills are not excluded and that their rights are upheld.

This includes practical actions – such as promoting telephone services or making websites more accessible – as well as action at a strategic level to ensure a consistent approach throughout Wales (see Recommendations section below)

The Welsh Government and other public bodies have a crucial role to play in ensuring that increasing digitalisation does not lead to older people being socially excluded and not feeling part of society. This means organisations must meet their legal obligations as well as work together to ensure that the needs of people who are digitally excluded are central to decision-making and service design, so that everyone can play a full part in society, whether they have digital skills or not.

While responsibilities differ in the private sector, businesses do have duties under the Equality Act 2010 and need to make sure that they do not discriminate against older customers.

The consequences of not taking action to tackle digital exclusion are severe and wide ranging. It will lead to ever greater numbers of older people and other groups who do not use the internet

being further marginalised as digitalisation affects more and more areas of everyday life. This will not only have an impact in terms of access to information and services, but also make it much harder, or even impossible for citizens who do not use the internet to participate, have a voice and have a say on the future, something that will leave us poorer as a nation in so many ways.

In order to achieve a healthy and inclusive Wales, one where we can all age well, and one which meets the Welsh Government's vision of an age-friendly Wales, action is needed to tackle digital exclusion as a matter of urgency.

# Recommendations

The responsibility for ensuring that older people are able to access information and services without having to be online lies with a number of stakeholders.

Recommendations for action from individual agencies are set out further below.

## The Welsh Government

### Short term

- Write to all bodies that it funds reminding them of the Welsh Government's expectations in relation to digital inclusion and provision of information and services offline, as well as their obligations under the Equality Act, Human Rights Act and other relevant legislation.
- Use its own engagement with citizens across Wales as an opportunity to demonstrate good practice in relation to digital inclusion, for example by ensuring phone numbers are clearly displayed on webpages, consultations are available for response via non-digital methods, and providing hard copy information where relevant.
- Finalise the development of the measurement for the 'Status of digital inclusion' National Indicator of the Well-being of Future Generations Act, and report against the measurement in the Wellbeing of Wales, 2024 report. The measurement should enable data to be broken down by 5-10 year age bands in order to assess progress on digital inclusion among different age groups.
- Use its influence when meeting with banks, utility companies and other similar organisations to promote the need for further action on digital exclusion and for these organisations to ensure that they are taking all possible steps to ensure customer choice in the way that information and services are provided, with offline services being provided to the same standard as online.
- Ensure that there is sufficient funding and investment in non-digital services such as phone lines and provision of hard copy information in order to ensure that everyone can access information and services.
- Provide the necessary funding to organisations to enable to the delivery of training and support to older people to combat digital exclusion.

### Medium term

- In order to promote consistency, develop and publish guidance on digital inclusion in relation to the provision of information and services which applies to all bodies that it funds. This should clarify expectations in relation to supporting people who are not online.
- Embed a right to digital inclusion, as well as a right to access information and services by non-digital means, into its development of a possible Human Rights (Wales) Act.

- Publish detailed plans on how it intends to deliver on the ‘Digital inclusion’ section of the Digital strategy for Wales: delivery plan which states that the Welsh Government will ‘work with all sectors to ensure alternative options for engaging are available for everyone and designed to the same standard as those expected of digital’.
- Use the opportunities presented by the Social Partnership and Public Procurement (Wales) Act 2023 to promote socially responsible procurement which should specifically ensure that procured services are available to people who are not online or do not have a smartphone.

## Public Bodies

### Local Authorities

- Ensure that services that they provide or for which they are responsible are available to an equivalent standard for people who are not online or do not have a smartphone.
- Display phone numbers for public enquiries clearly on the home page of websites and make sure that websites comply with the Public Sector Bodies Accessibility Regulations 2018.
- Invest in effective ways to help older people who want to be online to get online, and that this support delivers what older people want and is available on a sustainable basis.
- Designate a Cabinet Member with lead responsibility for digital inclusion, ensure that feedback is regularly sought (including by the use of relevant committees and internal structures), and this issue is reported upon in annual reports and strategic equality plans.
- Use the Digital Service Standards for Wales (developed by the Centre for Digital Public Services) and involve older people, especially people not online, in the design of services, systems and relevant research from the beginning to co-produce better and more accessible services and policies.
- Restore access to hard copy leaflets and information across all sites, such as libraries or hubs, where this has not already returned post-pandemic.

### Health Boards

- Ensure that services that they provide or for which they are responsible are available to an equivalent standard for people who are not online or do not have a smartphone.
- Display phone numbers for public enquiries clearly on the home page of websites and make sure that websites comply with the Public Sector Bodies Accessibility Regulations 2018.
- Ensure that a member of the Board at each Health Board leads on digital inclusion, that feedback is regularly sought (including by the use of relevant committees and internal structures), and that this issue is reported upon in annual reports and strategic equality plans.

- Use the Digital Service Standards for Wales (developed by the Centre for Digital Public Services) and involve older people, especially people not online, in the design of services, systems and relevant research from the beginning to co-produce better and more accessible services and policies.
- Restore access to hard copy leaflets and information across all sites where this has not already returned post-pandemic.

## **Audit Wales**

Continue their focus on the digital agenda including digital inclusion, for example by continuing to scrutinise, and report on, local authority digital strategies, and by holding events to raise awareness and share good practice on providing effective services.

## **Healthcare Inspectorate Wales (HIW)**

Strengthen the focus on digital exclusion whilst inspecting NHS services, and regulating independent healthcare providers, and report regularly on digital exclusion.

## **Care Inspectorate Wales (CIW)**

Incorporate the issue of digital exclusion into future work, including inspections and national reviews, and provide regular reports.

## **Equality and Human Rights Commission**

Consider digital exclusion as a specific area of inequality in its future work, including development of its next Strategic Plan.

## **UK Government**

- Publish an updated digital inclusion strategy and provide funding to ensure that this can be properly implemented. The updated strategy should take account of the increasing move to digitalisation in the decade since the last strategy was published and set out how services and information will be fully accessible to people who are not online.
- Work with regulatory bodies (including the Financial Conduct Authority, Ofwat, Ofgem and Ofcom) and provide strategic input to help ensure that services are accessible to customers who are not online and that the issue of digital exclusion is taken into account consistently in regulatory guidance on dealing with vulnerable customers.

## **Relevant regulatory bodies**

- Work together on examining the extent to which existing guidance for vulnerable customers fully addresses the issue of digital exclusion, with a focus on consistency across different sectors where possible.
- Ensure that providers are supporting customers who do not use the internet to receive equivalent levels of service to those who are online and complying with relevant guidance for vulnerable customers, and take appropriate action to address instances where this is not the case.

## Utilities and banking sector

- Utilities, including water companies, should consider what more they can do to ensure that older people are aware of their right to sign-up to a Priority Services Register (PSR) to receive extra help, highlighting that being included on the register provides assistance such as access to information in an accessible format. The process should also be made as streamlined and easy as possible.
- Utilities, including water companies, should also consider whether their approach to digitalisation and provision of services fully meets any regulatory guidance in relation to vulnerable customers, and take action to improve services in areas where this falls short.
- Firms subject to the Financial Conduct Authority (FCA) should consider whether their approach to digitalisation and provision of services fully meets the FCA Guidance FG21/1<sup>20</sup> Guidance for firms on the fair treatment of vulnerable customers, and take action to improve services in areas where this falls short.

## Broadband providers

- Offer social tariffs designed to support those on a low income, include receipt of Pension Credit in their eligibility criteria, and actively promote these to older people.

## Telecoms providers

- Ensure that older people have uninterrupted access to the telephone network during the switch to Voice over Internet Protocol and that communications about the switchover are timely, clear and easy to understand.

# Action by the Commissioner

Drawing on the information shared by older people, including as part of this report, the Commissioner will continue to highlight issues around digital exclusion, the serious impact this has on older people's ability to undertake everyday activities, and take appropriate action.

## Specifically, the Commissioner will:

- Write to key bodies (including the Welsh Government, UK Government, health boards, local authorities and regulators) with the power to implement change highlighting this report and its recommendations, asking what action they will take, and monitoring this.
- Continue to raise awareness of the issue of digital exclusion, and the increasing impact it has on the day to day lives of older people, with the Welsh and UK Governments, local authorities, health boards and other decision makers.
- Highlight older people's rights in relation to accessing public services and receiving information under the Human Rights Act and Equality Act, and provide information to older people – including via hard copy guides - on existing rights and how to uphold them.
- Provide support to older people experiencing digital exclusion to challenge poor practice, including via the Advice and Assistance Service.
- Scrutinise policy developments and strategy, highlighting areas of digital exclusion, the changes needed to ensure older people can continue to access information and services, and the need for proper Equality Impact Assessments to be undertaken where applicable.
- Issue an update on progress six months after the publication of this report.

# Appendix A - Local Authorities and Health Boards who contributed to this report

## Local Authorities

- Blaenau Gwent County Borough Council
- Bridgend County Borough Council
- Cardiff Council
- Carmarthenshire County Council
- Conwy County Borough Council
- Denbighshire County Council
- Flintshire County Council
- Gwynedd Council
- Isle of Anglesey County Council
- Merthyr Tydfil County Borough Council
- Neath Port Talbot County Borough Council
- Newport City Council
- Pembrokeshire County Council
- Rhondda Cynon Taf County Borough Council
- Swansea Council
- Torfaen County Borough Council
- Vale of Glamorgan Council

## Health Boards

- Aneurin Bevan University Health Board
- Cwm Taf Morgannwg University Health Board
- Hywel Dda University Health Board
- Powys Teaching Health Board
- Swansea Bay University Health Board
- Velindre University NHS Trust



# References

- 1 UK Parliament, Communications and Digital Committee (2023) Digital exclusion. 3rd Report of Session 2022-23 - published 29 June 2023 - HL Paper 219. Available at: <https://publications.parliament.uk/pa/ld5803/ldselect/ldcomm/219/21905.htm>.
- 2 OFCOM (2022) Digital exclusion: A review of Ofcom's research on digital exclusion among adults in the UK. Available at: [https://www.ofcom.org.uk/\\_data/assets/pdf\\_file/0022/234364/digital-exclusion-review-2022.pdf](https://www.ofcom.org.uk/_data/assets/pdf_file/0022/234364/digital-exclusion-review-2022.pdf)
- 3 Welsh Government (2022) National Survey for Wales April-June 2021. Available at: <https://gov.wales/national-survey-wales-results-viewer>.
- 4 *ibid.*
- 5 Viktor Sunnemark and Michael Goodier 'Over-70s are UK's most online adults after twentysomethings, survey shows' The Guardian (5th January 2024) Available at: <https://www.theguardian.com/society/2024/jan/05/over-70s-online-time-ons-survey>
- 6 Older People's Commissioner for Wales (2021) Ensuring access to information and services in a digital age: Guidance for Local Authorities and Health Boards. Available at: <https://olderpeople.wales/wp-content/uploads/2022/05/S12-Guidance-Ensuring-access-to-information-and-services-in-a-digital-age.pdf>.
- 7 *ibid.*
- 8 UN International Covenant on Civil and Political Rights (Article 19) - Available at: <https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-civil-and-political-rights>. European Convention on Human Rights (Article 10) - Available at: [https://www.echr.coe.int/documents/d/echr/convention\\_eng](https://www.echr.coe.int/documents/d/echr/convention_eng). Human Rights Act 1998 - Available at: <https://www.legislation.gov.uk/ukpga/1998/42/contents>.
- 9 Equality Act 2010. Available at: <https://www.legislation.gov.uk/ukpga/2010/15/contents> (s.29).
- 10 Welsh Government (2022) Digital Strategy for Wales. Available at: <https://www.gov.wales/digital-strategy-overview>.
- 11 Welsh Government (2021) Age friendly Wales: our strategy for an ageing society. Available at: <https://www.gov.wales/age-friendly-wales-our-strategy-ageing-society>.
- 12 Equality and Human Rights Commission (2023) Equality and Human Rights Monitor: Is Wales Fairer? Available at: <https://www.equalityhumanrights.com/sites/default/files/2023/Is%20Wales%20Fairer%20Equality%20and%20Human%20Rights%20Monitor-%20Cymraeg-%20accessible%20PDF.pdf>, p.105.
- 13 See <https://www.digitalcommunities.gov.wales/>
- 14 Welsh Government (2023) Towards a Welsh Minimum Digital Living Standard: final report

(summary). Available at: <https://www.gov.wales/towards-welsh-minimum-digital-living-standard-final-report-summary-html>.

15 Centre for Social Justice (2023) Left Out: How to tackle digital exclusion and reduce the poverty premium. Available at: <https://www.centreforsocialjustice.org.uk/wp-content/uploads/2023/08/CSJ-Left-Out.pdf>.

16 Older People's Commissioner for Wales (2023) Briefing: Tackling Loneliness and Isolation in Wales – December 2023. Available at: <https://olderpeople.wales/resource/briefing-tackling-loneliness-and-isolation-in-wales-december-2023/>.

17 Older People's Commissioner for Wales (2022) Access to information and services in a digital age: Summary of responses from local authorities and health boards. Available at: <https://olderpeople.wales/resource/s12-summary-of-responses/>

18 Open University (2022) Icon Booklet: 'Adapt Tech, Accessible Technology'. Research Project 2020-2021. Available at: <https://www5.open.ac.uk/health-wellbeing/sites/www.open.ac.uk/health-wellbeing/files/files/icon-booklet-2020-2021-en.pdf>.

19 NHS Wales (2023) Digital capability framework for healthcare in Wales pilot. Available at: <https://heiw.nhs.wales/news/digital-capability-framework-for-healthcare-in-wales-pilot/>

20 Financial Conduct Authority (2021) Guidance for firms on the fair treatment of vulnerable customers. Available at: <https://www.fca.org.uk/publications/finalised-guidance/guidance-firms-fair-treatment-vulnerable-customers>





Comisiynydd Pobl Hŷn Cymru  
Older People's Commissioner for Wales