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galwadau yn Gymraeg

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Dear Sir/Madam,

Thank you for the opportunity to respond to the consultation on your proposed Plan of Work 2021/22 – 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 look forward to continuing to engage closely with Eleanor Marks, Ofcom's Director in Wales and considering how the proposed plan of work for 2021/22 will meet the needs of older people throughout Wales.

Digital Inclusion

The COVID-19 pandemic has highlighted the importance of accessible, high-quality communication services and there has understandably been an increased use of digital platforms to share important information during this period. However, 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 41%.ⁱ This digital exclusion is particularly felt in single pensioner households where only 55% have access to the internet.ⁱⁱ 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

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.

discounted costs. Research suggests that offline households miss out on savings of up to £560 a year from shopping and paying bills online.ⁱⁱⁱ

I therefore 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. I also welcome the ongoing commitment 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.

Online Safety

Whilst it is important to support older people to make use of the internet, I have concerns for the online safety of some of the older people taking on digital connectivity as beginners with limited skills and confidence. I am therefore pleased to see that your work plan identifies a continuation of the work to tackle nuisance calls, scams and online harms, including work with other partners as part of the "Stop Scams UK" initiative.

However, whilst the word 'scams' is often easily understood, it can suggest a lightness of approach that does not properly convey the seriousness of the crimes being committed or the full devastating impact that these acts have on those who have been targeted. Use of words such as "crimes" and "abuse" as part of this work could help to improve understanding.

Ageism and Age Discrimination

One of my three priorities as Commissioner is to end ageism and age discrimination. Two of the actions I have identified that will help to achieve this are to improve older people's access to training and employment and to tackle discrimination against older people in the workplace.

I therefore welcome Ofcom's commitment to delivering a Diversity and Inclusion Programme to build a diverse workforce to better reflect the UK population. I hope you will be including commitments to retain and recruit older workers alongside considering how you can implement improved flexible working policies, to build an inclusive culture within the workplace.

Finally, I welcome Ofcom's commitment to continue to improve content standards through the Broadcasting Code. I am aware of concerns about ageism in regulated services and would like to see more action taken to address this.

I hope that these comments are helpful. If I can be of any further assistance, please do not hesitate to get in touch.

ⁱ 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].

ⁱⁱ *ibid*

ⁱⁱⁱ 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].