



‘Digital By Default’ Should Not Mean ‘Digital Only’

Age Action is Ireland’s leading advocacy organisation promoting equality for all of us as we age



Rialtas na hÉireann
Government of Ireland



Age Action is part-funded by the Scheme to Support National Organisations 2022-2025, which is funded by the Government of Ireland through the Department of Rural and Community Development

Age Action Ireland, 30-31 Camden Street Lower, Dublin D02 EC96, Ireland
Phone: (01) 4756989 — Email: advocacy@ageaction.ie — Web: <https://www.ageaction.ie/>
CRO 198571, CHY 10583, RCN 20027254

Age Action	2
Introduction	3
Executive Summary	4
‘Digital Only’ is a Growing Problem	6
Examples of Digital Exclusion	8
The Impact of COVID-19	11
Internet Use by Age	12
Digital Skills.....	13
The Absence of Digital Skills Training for Older Persons.....	14
Digital Exclusion	16
National Strategies and Plans	19
Ability, Affordability and Access	20
Offline Channels Need Resources	21
Online Criminality and the Risk of Abuse	22
Problems with ‘Assisted Digital’	23
The Evolution of ‘Assisted Digital’ in the UK.....	25
Public Sector Equality and Human Rights Duty	29
Age Action’s Recommendations	29
Specific Recommendations	29

Age Action

Age Action is the leading advocacy organisation on ageing and older people in Ireland. Age Action advocates for a society that enables all older people to participate and to live full, independent lives, based on the realisation of rights and equality, recognising the diversity of experience and situation. Our mission is to achieve fundamental change in the lives of all older people by eliminating age discrimination, promoting positive ageing, and securing the right for all of us to comprehensive and high-quality services.

Introduction

The UN recognises that the environments in which we are born, grow, work and live strongly influence the opportunities available to each of us as we age. The WHO states that a significant proportion of the diversity in older age is due to the cumulative impact of health inequities across the life course, arising from people's physical and social environments and the impact of these environments on their opportunities and health behaviour.¹ Increasingly, our social environments include digital environments that have the potential to be a support or a barrier to our independence and autonomy as we age.

This paper updates the figures for digital exclusion that Age Action published in July 2021 and develops our analysis in response to key government strategies, including *Digital For Good: Ireland's Digital Inclusion Roadmap* (August 2023). The paper presents examples of digital exclusion as well as the facts in relation to internet use and digital skills among Ireland's older adult population. National strategies are examined to see how well they are likely to work to overcome the barriers of ability, affordability and access facing older persons.

Ireland's Public Sector Equality and Human Rights Duty is the framework within which everyone should have equitable access to all publicly funded services, and recommendations are made to fulfil the Public Sector Duty in the context of increasingly digitalised public services. Given the emphasis in the programme for government and across public policy on the Sustainable Development Goals pledge to leave no one behind, it is incumbent on public services to be flexible and adaptable to meet individuals' diverse needs.

¹ <https://www.who.int/news-room/fact-sheets/detail/ageing-and-health>

Executive Summary

There are many examples in Ireland where publicly funded services and private businesses have effectively adopted a 'digital only' approach, which systematically discriminates against and excludes people who are not using the internet or who have a low level of digital skills.

Many older persons (almost 300,000 people aged 60 or older) were not using the internet at all in 2022. When those not using the internet are combined with those with below basic digital skills, they represent more than 6 in 10 people aged 60 or older (628,000 out of one million). While 'digital only' policies during the COVID-19 lockdowns could be excused as necessary during the emergency, there is a risk that some public services continue to push digitalisation to an extent that systematically excludes older persons.

The need for traditional channels of offline communication (phone, post and in-person) is a feature of digital exclusion. Those who are digitally excluded often need a non-digital option rather than to be forced online. While the recent state *Digital Inclusion Roadmap* focuses on the positive (inclusion) rather than the negative (exclusion), it has the effect of bypassing the issue of offline access to publicly funded services and instead focuses on assisting people to overcome the barriers to ability, affordability and access. It is understandable that organisations tasked with digitalisation are solely focused on getting people online and supporting them in that environment. The risk is that no organisation takes responsibility for ensuring offline access for those who are digitally excluded. Age Action proposes that digital inclusion strategies should make clear reference to existing public service strategies and customer service promises that underpin quality of offline access to services, as well as to the Public Sector Equality and Human Rights Duty as the ethical framework that calls for equitable access for all.

'Inclusive digital' is a preferable concept to 'assisted digital', as it implies designing digital channels of communication to be as accessible as possible to all users, rather than segregating those service users who need extra support. Nonetheless, the term assisted digital is still embedded in national strategies and the value of using this term at all needs to be robustly challenged.

In the context of inclusive digital, the Public Sector Duty can be seen as a requirement to ensure that publicly funded services are accessible to all on an equitable basis. It is offensive to force a person to use the internet to access their basic human rights such as access to health services or other services that support their autonomy and independent living. In this context, given that most people will choose digital given its convenience, the goal should not be for everyone to use digital public services in a meaningful way but rather the goal should be that everyone should be able to access public services through whatever communication channel they can use or wish to use.

Ultimately, there is a major risk that the drive for efficiencies and cost-savings through digitalisation will mean that publicly funded services become inadequately resourced to provide a quality service via the traditional channels of phone, post and in-person.

There is a need for strong guidelines from the Department of Public Expenditure on the level of offline service provision that publicly funded services are required to provide and for which they can expect to be adequately resourced.

Age Action makes nine specific recommendations in relation to delivering public services in the context of digitalisation:

1. Prohibit the 'digital only' provision of any publicly funded service.
2. Require publicly funded services to adopt a rights-based approach to service design and delivery that promotes privacy and autonomy.
3. Oblige all publicly funded services to deliver a minimum level of customer service for offline transactions.
4. Shift focus from 'assisted digital' to inclusive service design.
5. Publicly funded services providing smart technology at home should enable people's capacity to give meaningful consent to the impact of the technology, including how their data will be used.
6. Introduce adult safeguarding legislation.
7. Resource the CSO to provide data to Eurostat and the EU Digital Economy and Society Index (DESI) on internet use and digital skills of people aged 75 and older.
8. Fund adult digital literacy training.
9. Provide income supplements to assist people to overcome cost barriers to being online, such as grants to purchase digital devices or subscriptions.

'Digital Only' is a Growing Problem

There are many examples in Ireland where publicly funded services, as well as private businesses, have effectively adopted a 'digital only' approach, which systematically discriminates against and excludes people who are not using the internet or who have a low level of digital skills.

In theory, public services are meant to prioritise the use of digital alongside maintaining traditional channels of communication (phone, post and in-person), but some services are either adopting 100% online approaches or are making offline alternatives so hard to access that they might as well be non-existent.

The *Public Service ICT Strategy* (2015) provides the framework for government departments and public agencies to improve their use of digitalisation. One of five strategic objectives in the strategy is 'Digital First', meaning that "Government should use the appropriate mix of electronic channels of communication and engagement to improve citizen satisfaction in service delivery, reach new levels of engagement and trust, and increase efficiency within the Public Service."² More recently, the term used is 'digital by default'.

The *eGovernment Strategy 2017-2020* included a policy of 'digital by default' through which the state "will deliver services digitally as the preferred option through a single contact point or a one-stop-shop and via different channels." Importantly, the strategy commits that the state will "still keep other channels open for those who are disconnected by choice or necessity" and it "will explore 'assisted digital' for those who feel they would benefit from such a service."³ Its successor, *Connecting Government 2030: A Digital and ICT Strategy for Ireland's Public Service* (2022), reinforces the digital by default message, "building towards the target for 2030 set by the Civil Service Renewal strategy of ensuring that 90% of applicable services are consumed online." However, the strategy emphasises that "Digital by default does not mean digital only. Consequently, we will use digital to improve the off-line experience for those who are unable to consume services digitally. By enabling those who can use digital services to so do, we can redirect resources in a range of ways to provide a much better service to those who may need assistance, for example through our public offices and libraries."⁴

Age Action's concerns are:

- Some publicly funded services have operated a de facto digital only approach, in breach of the guidelines.
- People are often unaware or not informed that they have the option of using traditional channels of communication (phone, post or in-person).

² <https://ictstrategy.per.gov.ie/ictstrategy/files/Public%20Service%20ICT%20Strategy.pdf>

³ <https://assets.gov.ie/123191/98dd9614-6e59-4ec2-8322-a5c8cee18a49.pdf>

⁴ <https://assets.gov.ie/220390/79ac70c6-f2d9-4b5e-8960-c833a0b40efb.pdf>

- Offline channels of communication can be poorly resourced, leading to an inferior experience of accessing publicly funded services (e.g. long waiting times, restricted office hours). In 2022, research by the Citizens Information Board found that not only did people have difficulties navigating digital public services, but people reported increased delays with offline options.⁵
- The target of 90% of public service transactions conducted digitally by 2030 does not align with the goal of 80% of people having at least basic digital skills. It implies that at least 10% of engagements with digital public services could be with persons who lack basic digital skills. It may be higher, as those who lack basic digital skills may have other disadvantages that bring them into more frequent contact with state support schemes.
- To date, there is no agreed set of protocols around what is meant by 'assisted digital' and, as detailed later, the whole concept of 'assisted digital' is flawed and should be abandoned in favour of inclusive service design. In the Citizens Information Board research, most information providers working with people struggling with digital public services felt the solution was for the State to provide non-digital options, rather than for digital services to be improved or for people to receive digital skills training.⁶
- When it comes to Government administrative forms (e.g. for applications), older people are the most likely to report lack of skills or knowledge as the reason why they do not submit official forms online.⁷
- The push towards digital can be so insistent that people feel obliged to transact online, even if they feel uncomfortable or ill equipped to do so.
- With the drive for many activities to be done online, many older people are forced to either take risks with their personal data, or else rely on others who are more digitally literate. Reliance on others can reduce a person's autonomy and often requires sharing confidential or private information with others, whether they are family, friends or professionals.
- Reliance on others to transact online can create disempowering relationships of dependency and can heighten the risk of financial abuse.
- Private enterprises, including those offering essential services such as banking, are increasingly pushing people towards digital or operating digital only approaches, which deepen digital exclusion.

⁵ https://www.citizensinformationboard.ie/downloads/social_policy/social_policy_digital_exclusion_june2022.pdf

⁶ https://www.citizensinformationboard.ie/downloads/social_policy/social_policy_digital_exclusion_june2022.pdf

⁷ 10% of 60-74 years old internet users who didn't submit online government forms said it was due to lack of skills or knowledge in 2020, down from 18% in 2019. This compares to much lower levels among younger people, at 4% of those aged 45-59 1% of those aged 30-44; CSO (2020). Information Society Statistics, Households. Available at: <https://www.cso.ie/en/releasesandpublications/ep/p-isslh/informationstatistics-households2020/e-government/>

- Retail and services, including cafes and sporting organisations like the GAA, are increasingly adopting cashless policies, which deepen digital exclusion. The assumption that cashless is easy ignores the fact that someone not using the internet cannot check their balance to remain in control of their spending if they use cashless transactions.
- It cannot be assumed that everyone today or even in twenty years' time will use the internet and have at least basic digital skills. For example, a significant proportion of people aged 75+ today may never adapt to the internet, yet they are entitled to the full realisation of their human rights and equal access to goods and services, including publicly funded services. Equally, 20% of those aged 40-59 have 'below basic' digital skills and this may not change for many of them by the time they become the older persons of the future.

It cannot be assumed that everyone today or even in twenty years' time will use the internet and have at least basic digital skills.

Noting the digital divide between younger and older generations, the United Nations Economic Commission for Europe (UNECE) recently highlighted key actions to ensure older persons' digital inclusion, including ensuring equal access to goods and services involving digital technology, enhancing digital literacy to reduce the digital skills gaps, and ensuring the protection of the human rights of older persons in the digital era, including the rights to dignity, autonomy, privacy, and free and informed consent to the use of digital technology; "The choice to opt out of the use of digital technologies needs to remain, and maintaining continued offline access to essential services and human contact should be ensured."⁸

Examples of Digital Exclusion

- When the Road Safety Authority shifted to an appointment-only system for driver license renewal in 2020, appointment booking was only available online. Driving is essential for many older people's mobility and autonomy, particularly in rural areas or for those with limited walking stamina. Many older people were forced to allow others to manage their affairs to maintain their ability to drive. Age Action took many calls from drivers with nowhere else to turn, who handed over personal identity information such as PPS numbers so that appointments could be made for them. This scenario highlights risks such as elder abuse, identity theft or fraud, all because a public service chose to operate a digital only approach.
- When Revenue sought the revaluations for Local Property Tax (LPT), only some people received the option of transacting offline and most people were instructed to comply online with no information that there was an offline alternative.

⁸ <https://unece.org/media/Population/press/358156>

Revenue assumed that prior online engagement was an indication that people could and would choose to transact online, but this was not the case, including for bereaved individuals whose late spouse had transacted online previously. As part of its 'efficiency' in this process, Revenue did not print sufficient forms to allow for a wider distribution of this postal option even once the problems with their digital approach surfaced. However, Revenue did conduct a review afterwards including engagement with Age Action to understand the concerns of older persons.

- Many older people have experienced being forced to book online to use their Free Travel Cards. It is commonplace to be required to book online—and to pay a booking fee—to use Free Travel. Those who simply wait at a bus stop can be refused entry if the bus is 'full' based on the numbers who have booked online. Age Action continues to hear from older people who have this experience.
- Many public consultations held by government or public bodies are essentially online only because the relevant documentation is online, and in some cases the opportunity to participate is solely through completion of an online form. For example, Irish Rail held a public consultation process on the upgrading of a local train station exclusively online.
- Choice-based letting for social housing is through an online system only, with time-sensitive applications. This clearly disadvantages those who are not online, or who access internet only intermittently at a library for example.⁹
- Older learners are often excluded from programmes for digital skills, including state programmes. Employment is negatively affected for many older people as digital skills are the gateway to accessing a broad range of jobs, to perform a wider range of jobs or to access promotions, and most importantly since the COVID-19 pandemic, to work remotely. Of those who had their employment affected by COVID-19, those over 55 were among the least likely to have started remote working.¹⁰
- GAA cashless ticketing removed the option of purchasing a ticket using cash at the stand just before a match, requiring some people to either pay in advance at a retailer or else rely on someone else to pay on their behalf. Older people have been excluded from matches due to this policy. While this is not a public service, millions of euro are given annually in support of sporting and cultural organisations such as the GAA.
- Outside of the public sector, banks and other financial institutions are pushing digital through towards cashless branches and often require bank account

⁹ The Housing Agency. *Social Housing Waitlists and Allocations*. Available at: <http://www.housingagency.ie/housing-information/social-housing-waiting-lists-and-allocations>

¹⁰ CSO (April 2020). *Employment and Life Effects of COVID-19*. Available at: <https://www.cso.ie/en/releasesandpublications/er/elec19/employmentandlifeeffectsofcovid-19/>

holders to have smartphones to use two-factor authentication. A smartphone can be a significant monthly expense to those relying on the State Pension, and two-factor authentication is difficult to use for those with arthritis or other mobility difficulties. Banking is such an essential service that it should not be online only.

- Some private GP practices only process requests for repeat prescriptions or sickness certificates by email.

These cases are accompanied by personal stories from the people affected, who feel a loss of independence and privacy, a loss of control over their own affairs, and a sense of being dismissed by society. In one poignant example, a couple in their 80s had their marriage delayed due to the online system. As one of their daughters describes “It had been the pair's wish for a long time to get married, but they had difficulty with the paperwork... Nowadays everything is online and on the internet and they just couldn't manage it”.¹¹

“Most offers/reductions are only available online. Those not comfortable with online business pay more.”

“I'm not using [Free Travel] due to having to book online now.”

[Older people need] “adequate technical skills to end life as a compliant citizen instead of being frustrated to tears by the bullying, brow-beating ‘it's easier online’ arms of the state.”

“A lot more help with technology. I would like to be able to book somewhere I could go and get help with my laptop or phone.”

“That older people are given assistance in relation to real difficulties around computers.”

“Modern technology should be free for older people on low income.”

“People need a subsidy to pay for broadband so they can stay connected, informed and avail of medical monitoring, etc.”

Respondents to Age Action's Pre-Budget 2022 Consultation

¹¹ RTÉ (24 October 2020). ‘Elderly Offaly couple marry 40 years after they first met’. Available at: <https://www.rte.ie/news/ireland/2020/1023/1173586-covid-19-wedding/>

The Impact of COVID-19

While COVID-19 accelerated the move to using the internet, there remain many people who are not using it or who have below basic digital skills, as detailed below. The number of older persons using the internet did not increase hugely during the pandemic, however the intensity of use by those already using the internet increased significantly, which deepened the digital divide.

COVID-19 lockdowns had a disproportionately negative effect on people who are digitally excluded. Public health services and other public services were moved online at a fast rate. People who were not using the internet were either at a disadvantage when it came to accessing services, or simply could not access services. Across Europe, response measures taken during the pandemic could leave victims of elder abuse in further isolation without access to assistance or support services, and may have made it even more difficult for them to seek help or to report abuse.¹² The UN has noted that barriers that older persons face related to literacy and language may have been magnified during the COVID-19 pandemic.¹³

While public policy in Ireland during the pandemic successfully prevented a greater number of deaths among older people, the way in which policy was implemented had the unnecessary side-effect of reinforcing ageism and discrimination against older people, including digital exclusion. For example, one radio advertisement promoting public mental health supports during the pandemic exclusively referred people online to access further information. Another example was the case of many older people in nursing homes who—in the face of restricted visiting—did not have the devices and/or skills to maintain connection with family members, which meant they were left without social interaction or the support of family members in making decisions about their care. Systemic issues also arose in relation to certain policies. For example, the COVID-19 tracker app and e-health tools were rolled out without any supports to enable older people to engage.

Being comfortable and competent with technology is not just related to being online. During the pandemic many shops refused to accept cash as a preventative public health measure.¹⁴ As a result many people felt they had no choice but to hand their financial affairs to someone more digitally literate or to opt into digital services they did not understand. Another example of digital only was the COVID-19 Passenger Locator Form. This form was only available online and it was a legal requirement for certain passengers arriving in Ireland to complete the form with substantial penalties for failing to do so.¹⁵ Someone without access to ICT was forced to ask someone else to go online

¹² Age Platform EU (May 2020) *COVID-19 and human rights concerns for older persons*. Available at www.age-platform.eu.

¹³ UN Secretary General (May 2020) *Policy Brief: The Impact of COVID-19 on older persons*. Available at <https://www.un.org/development/desa/ageing/wp-content/uploads/sites/24/2020/05/COVID-Older-persons.pdf>.

¹⁴ See <https://www.ecb.europa.eu/press/blog/date/2020/html/ecb.blog200428~328d7ca065.en.html>.

¹⁵ <https://www.gov.ie/en/publication/ab900-covid-19-passenger-locator-form/>

to download the form, complete it and email it to the Department of Foreign Affairs on their behalf.

While digital only policies during the COVID-19 lockdowns could be excused as necessary during the emergency, there is a risk that some public services continue to push digitalisation to an extent that systematically excludes older persons, rather than reverting to an appropriate balance between online and offline channels of communication.

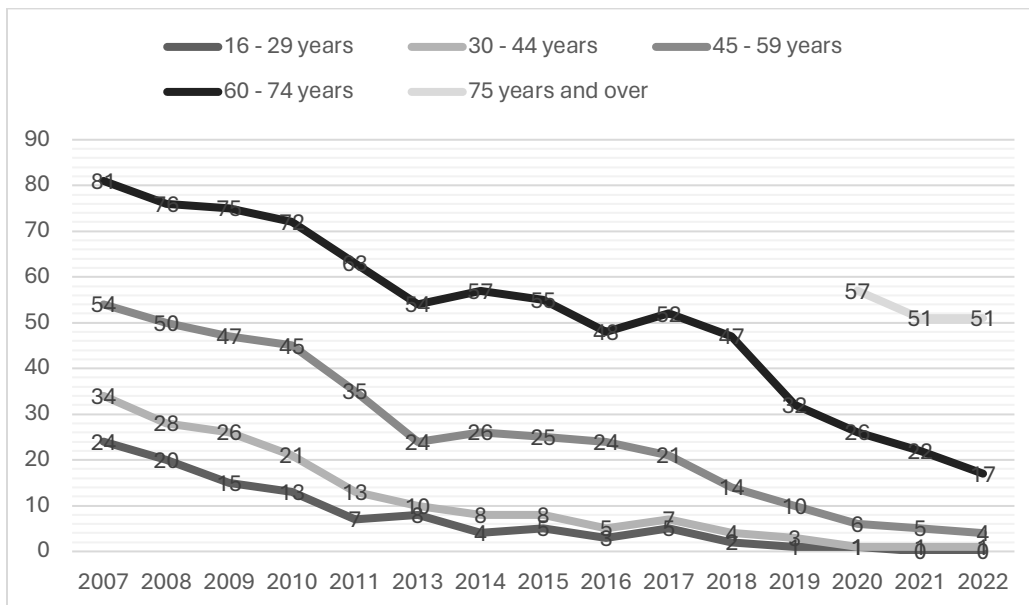
Internet Use by Age

As shown in the annual survey data on internet use (Figure 1), there has been a steady decline in the number of people who are not using the internet. The COVID-19 lockdowns are likely to have accelerated that trend. Nonetheless, a clear finding from the data is that many older persons (almost 300,000 people aged 60 or older) were not using the internet in 2022.

In 2022, 45% of people aged 75 or older had never used the internet and a further 6% had not used it in the last three months, for a total of 51% or 183,000 people. Among those aged 60-74, 15% had never used the internet and 2% had not used it in the last three months, for a total of 17% or 115,000.

A further 50,000 people aged 16-59 were not using the internet in 2022, mostly people in the 45-59 age group.

Figure 1. Percentage of people not using the internet (CSO – break in data series from 2017)¹⁶



¹⁶ Data from <https://data.cso.ie/table/ICA05> and <https://data.cso.ie/table/ICA76> Data for 'never used the internet' and 'used, but not in the last three months' were combined to give the total number not using the internet. Data on people aged 75 or older is only available from 2020 onwards.

There are two important questions raised by this data. Firstly, how many people using the internet have sufficient digital skills to engage in complex transactions with publicly funded services? And secondly, will there always be a cohort of people not using the internet?

Digital Skills

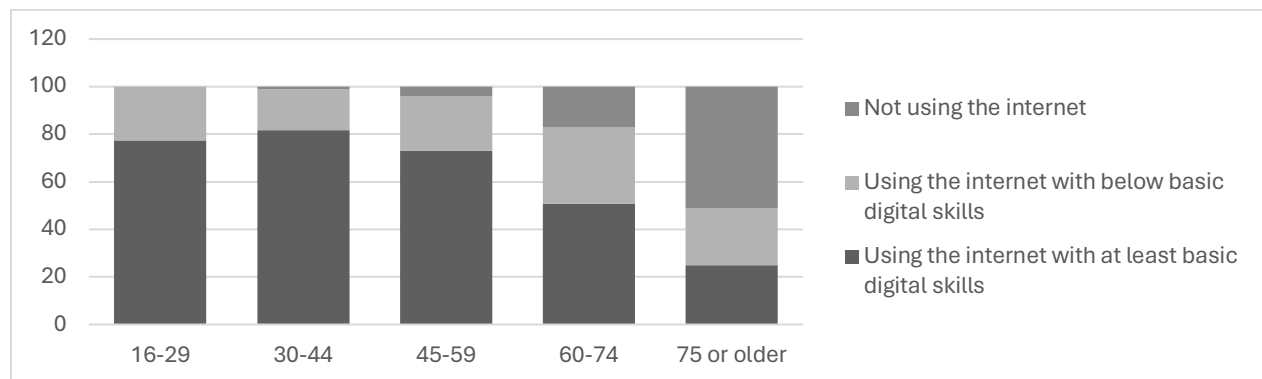
The European Union’s Digital Economy and Social Index (DESI) includes a question on people’s level of digital skills.¹⁷ This data is used to inform progress on Irish national targets for improving digital skills across the population.

In 2021, for Irish individuals aged 16-74 who used the internet in the last three months, 71% of had basic or above digital skills, up from 59% in 2019. Of those aged 55-64, 61% had basic or above digital skills, and for those aged 65-74, it was 51%.¹⁸ People aged 75 or older in Ireland were not included, although five European countries (Albania, Italy, Latvia, Norway and Spain) do include statistics on internet users aged 75 or older.

To align data on digital skills with the above data on internet use, a conservative estimate is that the figure of 51% digital skills applies to everyone aged 65 or older who is using the internet, even though it is likely that digital skills among internet users aged 75 or older are lower than this estimate.

When the data on internet use is combined with data on digital skills a more nuanced picture emerges, showing the large numbers of people who may be online, but who are not enabled to perform complex tasks online. For example, almost everyone aged between 16 and 59 is using the internet, but only four out of five have at least basic digital skills. Across the adult population (16+), there are 1.3 million people either not using the internet or using the internet with below basic digital skills, including 670,000 people under the age of 60.

Figure 2. Proportion of people not using the internet, using the internet with below basic skills and using the internet with at least basic skills.



¹⁷ <https://digital-strategy.ec.europa.eu/en/policies/desi>

¹⁸ https://ec.europa.eu/eurostat/databrowser/view/isoc_sk_dskl_i21/default/table?lang=en

The Absence of Digital Skills Training for Older Persons

There is a need to restore public funding for in-depth training and skills acquisition programmes for those not using the internet or with below basic skills. No replacement for the Digital Skills for Citizens programme was developed, despite a programme for government commitment that the government will “explore a new digital skills for citizens grant scheme, focusing on one-to-one training”. Government digital skills training feedback shows that 44% of digital literacy training participants feel less isolated after completing training.¹⁹ First-hand experience from Age Action’s programmes shows the difference that digital literacy training and support can make to people who want to become digitally engaged. People can find their lives enriched in ways that are meaningful to them, and that promote health, connection and engagement. Digital skills training can be expected to be an ongoing need as technology continues to evolve at pace, and the planning of digital skill acquisition programmes should account for this in setting an approach and principles to determining firstly, what constitutes digital knowledge required to participate effectively in everyday life and, secondly, to allow for broadening of training scope in future to accommodate digital needs as technology advances.

Digital skills programmes need to be adequately resourced so that they can include one-to-one classes that are learner-led. Many older learners benefit from one-to-one training, especially if they are nervous about approaching technology, if they have negative memories of learning or if they have cognitive difficulties that require tailored delivery or time to reinforce content. Since 2006, Age Action has been providing classes for older people in computers and internet use and has helped over 44,000 people through this programme. Our learner-led and one-to-one tuition ensures that older people gain the necessary depth and breadth of skills and information that they need to be confident, competent and safe online.²⁰ The content of digital literacy training should be focused on that which is meaningful to people’s lives. This means there is need for some digital outreach and familiarisation supports focused purely on engagement and understanding the basics and the potential of the internet, and not formatted as formal training, certification or set modules. Once there is initial engagement, further engagement can be structured according to identified outcomes or priorities. The EU DIGITOL project echoes this approach and showed that where older people have digital skills, they are willing to improve skills in similar online domains as younger people, such as paying taxes, banking, shopping, engaging in public consultations and identifying fake news.²¹

¹⁹ Bill Morrissey, DCCA (2019). Statement to Joint Committee on Education and Skills. Available at: https://data.oireachtas.ie/ie/oireachtas/committee/dail/32/joint_committee_on_education_and_skills/submissions/2019/2019-11-19_opening-statement-bill-morrissey-principal-officer-department-of-communications-climate-action-and-the-environment_en.pdf

²⁰ <https://www.ageaction.ie/how-we-can-help/getting-started-computer-training>

²¹ AGE Platform (2020) *AGE input to the consultation: Digital Education Action Plan*. Available at www.age-platform.eu.

Government-funded general digital skills training for older people should be grounded in a lifelong learning approach. In practice, this means flexible content guided by the learner's needs and pace—including time to learn the basics of using a mouse, keyboard and computer where needed—as well as training offered in the older person's home or residential institution where this is needed. A strong focus should be placed on building people's confidence and achieving long-term outcomes through bringing people up to a high level in the European Digital Competence Framework for Citizens where they can be autonomous and safe online. This level of training requires a much greater investment of time than the previous Government approach of limiting funding for training to a maximum of ten hours per person in their lifetime.²² A lifelong learning approach would provide support to people to update their skills on a regular basis, as well as to provide them with support when they encounter new difficulties when using technology.

Publicly funded programmes for digital skills should take account of the lived experience and learning needs of older people, and be flexible and accommodating of people's limitations and competing commitments. Previously, programmes imposed a maximum number of hours and people lost hours that they were unable to attend. Age Action saw many enthusiastic learners unable to complete training due to factors outside their control. For example, some older people have chronic conditions that may flare up, have medical procedures or emergencies, be caring for others who may have medical procedures or urgent needs, or be reliant on others for transport which may fall through, among many other reasons that interrupt structured learning times. Allowances should be made to enable people in these situations to continue training.

Public programmes should also be funded to support continued outreach, engagement and technical support by older learners of digital skills, including a free telephone helpline. Through the years of providing digital training, Age Action has continued to receive calls for technical support from students long after classes have ended. Many relate to auto-updates on devices or simple software issues. Without the capacity for ongoing technical support some people can end up locked out of or unable to use their devices. As part of a comprehensive approach to supporting the maximum number of people to be digitally included, this level of support should be stable, long-term and with sufficient capacity to meet the needs of the number of older people in need of ongoing digital support and opportunities to maintain their digital skills over time.

²² <https://www.gov.ie/en/publication/cb7ce-digital-skills-for-citizens-scheme/>

Digital Exclusion

The EU has recognised multiple barriers to digital inclusion: “For some people, the digital world is not yet fully accessible. For others, it is not affordable. And others were not taught the skills to participate fully.”²³

From the mid-1990s, warnings have been given about a likely social and economic divide between those who adopt ICT and internet technology and those who do not.²⁴ Research has shown that other forms of social exclusion manifest in greater digital exclusion, and digital exclusion can exacerbate other forms of social exclusion.²⁵

The OECD defines the ‘digital divide’ as “the gap between individuals, households, businesses and geographic areas at different socio-economic levels with regard to both their opportunities to access information and communication technologies (ICTs) and to their use of the Internet for a wide variety of activities.” When it comes to explaining the divide, “the digital divide among households appears to depend primarily on two variables, income and education. Other variables, such as household size and type, age, gender, racial and linguistic backgrounds and location also play an important role.”²⁶

A key question for public policy is whether there will be a significant number of people not using the internet in the coming years. Public services must provide for them on an equitable basis to those using the internet. For example, the government’s ambitious 2030 target for the share of adults with at least basic digital skills to be 80% still implies that 20% of people will have ‘below basic’ digital skills. One UK estimate is that up to 10% of people there will never develop basic digital skills.²⁷

Out of the population of over four million people under the age of 60, it is reasonable to imagine that most of them will use the internet, although not necessary with a high level of digital literacy. But for the one million people aged 60 and older, it is likely for the next twenty years that many people in this age cohort will not use the internet or will not have basic digital skills. Some older people also choose not to use the internet, which is a legitimate decision, as recognised by the UNECE.²⁸

²³ <https://digital-strategy.ec.europa.eu/en/policies/digital-inclusion>

²⁴ For example, Ingersoll (1993) and Friedmann (1995), cited in Breathnach (2000)
http://mural.maynoothuniversity.ie/3093/1/PB_niche_transnational_cities.pdf

²⁵ Carnegie UK Trust (2016) *The role of digital exclusion in social exclusion*.
https://d1ssu070pg2v9i.cloudfront.net/pex/carnegie_uk_trust/2016/09/LOW-2697-CUKT-Digital-Participation-Report-REVISE.pdf

²⁶ OECD (2001) ‘Understanding the Digital Divide’, OECD Digital Economy Papers, No. 49, OECD Publishing, Paris
<https://doi.org/10.1787/236405667766>

²⁷ http://files.nesc.ie/nesc_reports/en/154_Digital.pdf

²⁸ <https://unece.org/media/Population/press/358156>

The existence of a significant cohort of people who are digitally excluded means that traditional 'offline' channels, like phone, post and in-person, must be adequately funded in all public services. When offline services are unavailable or inadequately resourced, digital exclusion is reinforced.

A more difficult question for public services is how to serve those who are using the internet but who have a low level of digital skills and who find many online tasks difficult, such as finding specific information, completing application forms or making financial transactions online. Some people with low digital skills will need to transact through traditional offline channels. In other cases, people may choose to transact online with the support of another person or agency, but this should be a choice not an imposition that robs them of their independence and privacy.

The assumption seems to be that a person with 'basic' digital skills, as defined by DESI, is capable of transacting online with most public services. This is a questionable assumption, as many people with even advanced digital skills can struggle with complex online transactions or unfamiliar interfaces. For this paper, based on the assumption that those older internet users whose digital skills are basic or above can transact online with public services, it is assumed that those with below basic digital skills cannot do so.

Out of one million people aged 60 and older,²⁹ 280,000 are not using the internet, leaving 720,000 older internet users. It can be estimated that at most 405,000 older internet users have basic or above digital skills while at least 347,000 have below basic digital skills.³⁰ **When people not using the internet are combined with those with below basic digital skills, they represent more than 6 in 10 people aged 60 or older (628,000 out of one million).**³¹

Table 1. Estimate of the Minimum Extent of Digital Exclusion Among Older Adults in Ireland

Age Group	Population (2022)	Offline (A)	Online	At Least Basic Digital Skills	Below Basic Digital Skills (B)	Digitally Excluded (A+B)
60-64	239,867	23,987 (10%)	215,880 (90%)	131,687 (61%)	84,193 (39%)	108,180 (45%)
65-74	435,220	73,987 (17%)	361,233 (83%)	184,229 (51%)	177,004 (49%)	250,991 (58%)
75+	358,113	182,638 (51%)	175,475 (49%)	89,492 (51%)	85,983 (49%)	268,621 (75%)
TOTAL (aged 60+)	1,033,200	280,612 (27%)	752,588 (73%)	405,408 (54%)	347,180 (46%)	627,792 (61%)

²⁹ 2022 population estimate; see

https://www.ageaction.ie/sites/default/files/reframing_ageing_state_of_ageing_in_ireland_2022_published.pdf

³⁰ Based on 61% of those aged 60-64 and 51% of those aged 65 or older having at least basic digital skills.

³¹ Figures based on 10% of those aged 60-64, 17% aged 65-74 and 51% of those aged 75 or older not using the internet, combined with 61% of those aged 60-64 and 51% of those aged 65 or older having at least basic digital skills.

In addition, many older persons do not have internet access via a computer at home. Only half (50.6%) of households headed by people aged 65+ have a personal computer and just over half (51.3%) have broadband internet access. Another 5.1% have internet but not broadband. However, nearly half (46.3%) do not have a personal computer and two in five (40.8%) do not have internet access. Of older people living alone, two-thirds (65.6%) do not have a computer and three in every five (60.8%) do not have internet access.³²

More recently, Census 2022 found 96,080 households with persons aged 65+ lacking internet access of any kind.³³

As of 2023, at least a quarter of older internet users (aged 60-74) used a phone or tablet to access the internet rather than a desktop or laptop.³⁴ This may restrict what they can do online, including completing lengthy forms.

Many older persons will continue to be digitally excluded during the next twenty years, or will choose not to use the internet, and the challenge to public policy is to ensure that they receive equitable treatment in their interactions with publicly funded services. Likewise, as noted in the UK, some people may never develop basic digital skills and will need alternatives.

“Too many older people remain digitally excluded. This was an issue during the last year+. Those online had a ‘better quality lockdown’ than those who had no access.”

“I find the drive to do everything online, e.g. tax returns and banking, most stressful and unfair to older people. I also regret that one has to have a smartphone to exist in Ireland today.”

“Finding it hard to cope with trying to find so much information online and practically being forced to go in that direction by Government (e.g. mygov.ie), banks and utilities, etc. No respect shown to older people by any of these organisations. They just make it more and more difficult for older people to get accurate information.”

“Not everything should be online! I want to talk to a real human and not a robot.”

Respondents to Age Action’s Pre-Budget 2022 Consultation

³² Census 2016, <https://data.cso.ie/table/E1057> (data not available for Census 2022)

³³ <https://data.cso.ie/table/F2013>

³⁴ <https://data.cso.ie/table/LCA102>

National Strategies and Plans

Digitalisation of publicly funded services is a fast moving and evolving area of public policy, and several major strategies were launched in recent years.

In June 2020, following previous commitments to EU e-government frameworks, Ireland was party to an ambitious set of European Council conclusions on *Shaping Europe’s Digital Future*.³⁵ COVID-19 has accelerated the move online, and digitalisation is seen as central to post-pandemic recovery and to the achievement of Europe’s climate targets. The European Union declared a ‘digital decade’ from 2021, with ambitious targets for 2030, including having 80% of the population aged 16-74 acquire basic digital skills and having 100% of key public services online. The EU plans to develop a set of digital principles and rights to complement the European Pillar of Social Rights, including protection of personal data and privacy, and universal access to internet services and to digital health services.³⁶ The PANEL principles (participation, accountability, non-discrimination and equality, empowerment, and legality) also provide a rights-based framework for the design of all public services.³⁷

The main Irish government strategy has been the *National Digital Strategy* (2013),³⁸ which was revised and relaunched as *Harnessing Digital: The Digital Ireland Framework* (2022).³⁹ Both strategies recognise that older people are among those least likely to be online and who are especially vulnerable to being left behind by the digital transformation.⁴⁰ Other relevant recent strategies include: the *National Broadband Plan* (2020),⁴¹ *Adult Literacy for Life: a 10-year adult literacy, numeracy and digital literacy strategy* (2021),⁴² and *Digital For Good: Ireland’s Digital Inclusion Roadmap* (2023).⁴³ All city and county councils are required to develop a digital strategy and a number of these are complete.

In July 2021, NESC published *Digital Inclusion in Ireland: Connectivity, Devices and Skills*.⁴⁴ The report recognises that “a number of groups are poorly engaged with ICT, in particular those who are older, have lower levels of education, lower incomes, and live in rural areas.” According to the report, “the key dimensions of digital exclusion are connectivity, access to devices, skills, and the confidence to engage with ICT.” The report notes that “Older Irish people have much lower levels of digital skills than their counterparts in other EU countries. For example, 33 per cent of Irish people aged 65-74 had never used the internet in 2019, compared to 11 per cent in Britain.” The report

³⁵ <https://data.consilium.europa.eu/doc/document/ST-8711-2020-INIT/en/pdf>

³⁶ https://ec.europa.eu/info/strategy/priorities-2019-2024/europe-fit-digital-age/europes-digital-decade-digital-targets-2030_en

³⁷ See, for example, <https://www.scottishhumanrights.com/projects-and-programmes/human-rights-based-approach/>

³⁸ <https://www.gov.ie/en/publication/f4a16b-national-digital-strategy/>

³⁹ <https://www.gov.ie/en/publication/adf42-harnessing-digital-the-digital-ireland-framework/>

⁴⁰ See, for example, page 30 of *Harnessing Digital*.

⁴¹ <https://www.gov.ie/en/publication/c1b0c9-national-broadband-plan/>

⁴² <https://www.gov.ie/en/publication/655a4-adult-literacy-for-life-a-10-year-literacy-strategy/>

⁴³ <https://www.gov.ie/pdf/?file=https://assets.gov.ie/267401/a898d78c-e234-465f-bedd-7ccd0655b7d2.pdf>

⁴⁴ http://files.nesc.ie/nesc_reports/en/154_Digital.pdf

refers to research about those who may continue to need offline services rather than digital or assisted digital.⁴⁵

The European Commission's *Green Paper on Ageing* notes that:

“access to goods, services, including public services, and participation in political, social and cultural life increasingly requires digital skills. Technological developments may amplify older persons' vulnerability, for example if they are less familiar or at ease with digital tools, or have limited access to digital technology. This may make them more prone to fraud, scams and rogue trading as we have seen during the pandemic and lockdowns. Older people living abroad or owning assets abroad may also be particularly vulnerable due to the barriers of foreign languages and unknown administrative and legal systems and specific measures for protection may be needed in cross-border situations.”⁴⁶

Ability, Affordability and Access

Research on digital inclusion, such as the UN *e-Government Survey 2022*, identifies the intersection of three barriers: ability, affordability, and access.⁴⁷ Measures to help people overcome these barriers are central to the *Digital Inclusion Roadmap*. Ability refers to digital literacy even to the extent of understanding the potential opportunities available from digital connectivity, and digital literacy in turn relies on people having a sufficient level of basic literacy and numeracy. Affordability refers to a person being able to afford internet access (especially broadband), mobile devices and e-services involving fees. Access refers to access to internet and mobile infrastructure, but also access to relevant content and services.

While welcoming the focus on overcoming these barriers, Age Action has some major concerns.

The barriers in relation to a person's digital 'ability' should include the ability of a person to avoid online criminality and to avoid risky situations that could lead to abuse. Neither concern is adequately addressed in national strategies. For example, guidelines are needed so that publicly funded bodies are not pushing people online to such an extent that this creates more situations that are potentially risky and increases the exposure of people with low digital skills to those risky situations. This can easily occur if people feel they have no alternative but to transact online, as some of the earlier case studies illustrate. As an example, the Central Bank's Consumer Protection Code requires financial institutions to assess their customers' attitudes towards risk and to clearly explain risks to them. A similar level of care is needed across publicly funded services, to clearly signal and mitigate risks to service users.

⁴⁵ http://files.nesc.ie/nesc_reports/en/154_Digital.pdf

⁴⁶ https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12722-Demographic-change-in-Europe-green-paper-on-ageing_en

⁴⁷ <https://desapublications.un.org/sites/default/files/publications/2022-09/Report%20without%20annexes.pdf>

A central target for the government is to achieve 80% of the population having at least basic digital skills by 2030, as measured by the EU's Digital Economy and Social Index (DESI). DFHERIS assured Age Action that this target does not have an age limit and applies to all adults, however DESI data for Ireland only refers to people aged 16-74. Ireland should move to provide data to Eurostat/DESI for people aged 75 and older, which is currently being done by Albania, Italy, Latvia, Norway and Spain.

Offline Channels Need Resources

The need for traditional channels of offline communication (phone, post and in-person) is a feature of digital exclusion. By definition, those who are digitally excluded need a non-digital option. However, while the framing of 'inclusive digital' focuses on the positive (inclusion) rather than the negative (exclusion), it has the effect of bypassing the issue of offline access to publicly funded services. The entire focus of inclusive digital is on assisting people to overcome the barriers to ability, affordability and access, and it is understandable that organisations tasked with digitalisation are solely focused on getting people online and supporting them in that environment. The risk is that no organisation takes responsibility for ensuring offline access for those who are digitally excluded. The reality of digital exclusion is that publicly funded services must continue to offer transitional channels of communication. Age Action proposes that digital inclusion strategies should make clear reference to existing public service strategies that underpin quality of offline access to services as well as to the Public Sector Equality and Human Rights Duty, as the ethical framework that calls for equitable access for all, including via offline channels.

There should be a role for customer service promises and other quality control processes. For example, the Department of FHERIS has a clear statement of its promises in relation to telephone and written communication, and in-person visits, including that they will "take your details and call you back at a suitable time, if we cannot give you an answer straight away" and "do our best to respond to voicemail messages within one working day", and similarly, for written communication, they will "aim to acknowledge your communication within five working days of getting it" and "provide a final reply within 20 working days".⁴⁸ What many older persons want is simply to be assured that a quality level of traditional service will continue to be provided, which in turn requires that it is funded and supervised to deliver an adequate level of quality.

Ultimately, there is a major risk that the drive for efficiencies and cost-savings through digitalisation will mean that publicly funded services become inadequately resourced to provide a quality service via the traditional channels of phone, post and in-person. There is a need for strong guidelines from the Department of Public Expenditure on the level of offline service provision that publicly funded services are required to provide and for which they can expect to be adequately resourced.

⁴⁸ <https://www.gov.ie/en/organisation-information/0d96a-our-customer-service-promise/>

Online Criminality and the Risk of Abuse

A concern in relation to inadequate digital skills is that people with a basic level of skills are more susceptible to fraud and other criminal activity online, which are increasing in both frequency and sophistication.⁴⁹

The Department of Justice defines cybercrime as comprising a mixture of “traditional offences (e.g. fraud, forgery and identity theft); content related offences (e.g. online distribution of child sexual abuse material, hate speech or incitement to commit acts of terrorism); and offences unique to computers and information systems (e.g. attacks against such systems, spread of malware, hacking to steal sensitive, personal or industry data and denial of service attacks to cause financial and/or reputational damage).”⁵⁰

While more people are going online, they are not all acquiring the skills to stay safe from fraudulent practices. Large numbers of people experience online fraud on an annual basis. A Eurobarometer survey found that more than one in eight people (13%) have experienced internet fraud and one in 11 (9%) have experienced identity theft.⁵¹

A special Eurobarometer report published in January 2020 examined public concern about cybercrime.⁵² Across Europe, just over half of respondents (52%) feel well informed about cybercrime, but only 11% feel very well informed. Three quarters (76%) believe that the risk of becoming a victim of cybercrime is increasing. However fewer (52%) think they can protect themselves sufficiently against it, and this represents a decline of nine percentage point since 2018. Only a minority in each country are aware of official channels for reporting these crimes.

At least six in ten are concerned their online personal information is not kept secure by websites (68%) or public authorities (61%), and almost eight in ten (78%) avoid disclosing personal information online. Respondents have changed their behaviour in some way, such as not opening emails from unknown persons (42%), installing antivirus programmes or applications (42%), only visiting websites they know and trust (32%), or only using their own computer.

Half of all respondents knew of someone who has been a victim of one of the cybercrimes asked about, with the most mentioned being receiving fraudulent emails or phone calls asking for personal details (25%) or discovering malicious software on their device (21%). Many respondents had personally been victims of cybercrime, with the most common being receiving fraudulent emails or phone calls asking for their personal details (36%) or discovering malicious software on their device (28%).

Irish respondents were ranked fifth highest (at 53%) among those who “are concerned about someone misusing their personal data” (EU average 48%). Irish respondents

⁴⁹ <http://www.justice.ie/en/JELR/Cybercrime - Current Threats and Responses.pdf/Files/Cybercrime - Current Threats and Responses.pdf>

⁵⁰ <http://www.justice.ie/en/JELR/Pages/Cybercrime>

⁵¹ <https://www.irishtimes.com/business/technology/13-of-irish-internet-users-have-suffered-online-fraud-1.209978>

⁵² <https://europa.eu/eurobarometer/surveys/detail/2249>

were most concerned (at 52%) about the security of online payments (EU average 41%). Yet Irish respondents were among the lowest ranked (at 38%) for changing their behaviour online due to security concerns. More than a third (37%) of Irish respondents felt “not well informed” about the risks of cybercrime (EU average 47%).

Across the Eurobarometer survey data, older people are generally less trusting or feel less informed than younger people. Recent CSO data shows that people aged 60-74 were least likely of all age groups to undertake personal data management actions, such as checking that a website was secure or refusing use of their personal data for advertising.⁵³

Financial fraud and abuse are significant issues facing older persons in Ireland and are likely to be under-reported, especially when family members are involved and, unfortunately, family members are the most common offenders. In the last HSE National Safeguarding Office annual report (2022), 850 cases of financial abuse of someone aged 65+ were reported.⁵⁴

The push to digitalisation often leads to a situation where older persons rely on family members, neighbours, volunteers or others to assist them, which can involve sharing passwords and PINs as well as divulging private information such as date of birth, PPS numbers and bank details. Well-meaning frontline staff in some public bodies sometimes go as far as to encourage older persons to ask their children to help them. While this may be a person's preference in some cases, often it is not, and in too many cases there is a real risk of financial abuse occurring.

The evidence suggests that many older people lack confidence and competence online, which either leaves them unsafe during digital activities, or which restricts the range of digital activities that they are willing to engage in.

Problems with 'Assisted Digital'

Various national strategies—including *Digital For Good: Ireland's Digital Inclusion Roadmap*—have proposed 'assisted digital' as a support to those who are using the internet with a below basic level of digital skills. But scant detail has been published about what it means in practice. There is a major risk that services are pushing to get people online on the assumption that assistance will be readily available and sufficient to make it work for anyone who is struggling with digital skills. This is far from the case at present, and any illusions about assisted digital needs to be dispelled.

'Inclusive digital' is a preferable concept to 'assisted digital', as it implies designing digital channels of communication to be as accessible as possible to all users, rather than segregating those service users who need extra support. Nonetheless, the term assisted digital is still embedded in national strategies and the value of using this term at all needs to be robustly challenged.

⁵³ CSO (2020) *Information Society Statistics - Households 2020*. Available at www.cso.ie.

⁵⁴ <https://www.hse.ie/eng/about/who/socialcare/safeguardingvulnerableadults/nationalsafeguardingreport2022.pdf>

Problems with assisted digital include:

- It is poorly defined to date in Irish strategies or policies, and there is a lack of protocols on safeguarding and other key concerns.
- It may assume that the need for assistance is generic, and that technical add-ons can meet that need, versus the diversity of assistance that people may require.
- It may assume that assistance will be provided externally to core publicly funded services, with those services relying on libraries, post offices or Citizens Information Services to assist people to transact online rather than examining the accessibility and inclusiveness of their own service provision.
- It assumes, in some cases, that certain services like post offices or libraries have the capacity to take on the role of providing assistance for public service transactions with a large proportion of the population.
- It may assume that most people have family who are willing to help with online transactions, and also that the person in question is willing to accept help from family members, both of which are often not the case.
- It assumes that people will accept to surrender information or control over their transactions to a third party.
- It can imply that digital channels of communication may be the only channels available on the basis that 'assistance' is sufficient for everyone to use them.
- It relies on people having sufficient digital skills to engage with digital forms of assistance such as email 'tickets' for helpdesks or live chat online.
- It places undue focus on digital channels of communication, as opposed to the Public Sector Duty to eliminate discrimination, promote equality of opportunity and protect the human rights of public service users, all of which implies focusing on the person and providing them with a service.
- The whole concept of assisted digital is paternalist, as it forces someone into a relationship of dependency rather than fostering their autonomy and independence.

Connecting Government 2030 refers to public offices and libraries in the context of assisted digital. *Harnessing Digital* refers to "assisted digital approaches, where individuals can get the necessary help to enable them over time to grow their confidence and capability in digital transactions" and also "assisted digital facilities safeguarded through appropriate consents and protocols". But these are not further elaborated.

NESC calls for "Protocols on assisted digital services [...] to deal with safeguarding, consent, GDPR and security". NESC recommends "protocols in organisations, such as recognition that a third party may be the email contact, as the service user does not have an email address." NESC also notes groups that might provide digital assistance,

including Citizens Information Centres, libraries, post offices and Broadband Connection Points (BCPs) established under the National Broadband Plan.⁵⁵

Adult Literacy for All is focused on assistance for people to acquire digital literacy, which overlaps with some descriptions of assisted digital. The strategy proposes “a core skills framework [...] to help embed a person-centred approach to literacy that helps learners and practitioners to understand needs.” It also acknowledges “the desire of many people for more informal, unaccredited support” in developing their skills, alongside structured learning programmes.

The HSE’s National Service Plan 2023 refers to accessible, high-quality digital services through *hse.ie* and non-digital and assisted digital options through HSELive. Key Objective 4 implies that non-digital and assisted digital may include phone, email, webchat, SMS and social media channels.⁵⁶

The *Digital Inclusion Roadmap* states that “Provision of inclusive, accessible and literacy-friendly digital public services should mean that digital is complemented by approaches that either support assisted digital, such as chat bots and service desks, or provide direct personal support. Such approaches are particularly important for those who run into difficulties when using digital public services.”⁵⁷ The last point (“direct personal support”) is most important, as many people lack the requisite digital skills and familiarity with online environments to use ‘chat bots’ or online service desks.

Research by the Citizens Information Service (CIS) in County Wicklow found that most older persons would be unhappy to access financial services with the assistance of a trusted professional services such as the CIS, despite that those surveyed were largely people already using CIS services.⁵⁸ By extension, it seems likely that a similar level of concern would arise among older persons in relation to being assisted by CIS to make sensitive public service transactions, such as declaring income or savings for means tests.

The Evolution of ‘Assisted Digital’ in the UK

The concept of ‘assisted digital’ is borrowed from the UK, and while there is greater guidance there as to what it means, it still carries a degree of ambiguity. Ireland has the opportunity to guard against difficulties experienced in the UK. The approach in the UK has evolved from a segregated model of assisted digital in 2012 to the 2022 digital strategy, which does not mention the concept of assisted digital at all.

⁵⁵ http://files.nesc.ie/nesc_reports/en/154_Digital.pdf

⁵⁶ <https://www.hse.ie/eng/services/publications/serviceplans/national-service-plan-2023.pdf>

⁵⁷ <https://www.gov.ie/pdf/?file=https://assets.gov.ie/267401/a898d78c-e234-465f-bedd-7ccd0655b7d2.pdf#page=28>

⁵⁸ Weafer, J A and Rhatigan, F (2022) *A Review of Older People’s Capacity to Access Financial Services Online and to Independently Conduct Their Own Financial Affairs*. South Leinster CIS.

Concerns and issues with the UK's assisted digital approach included the following:

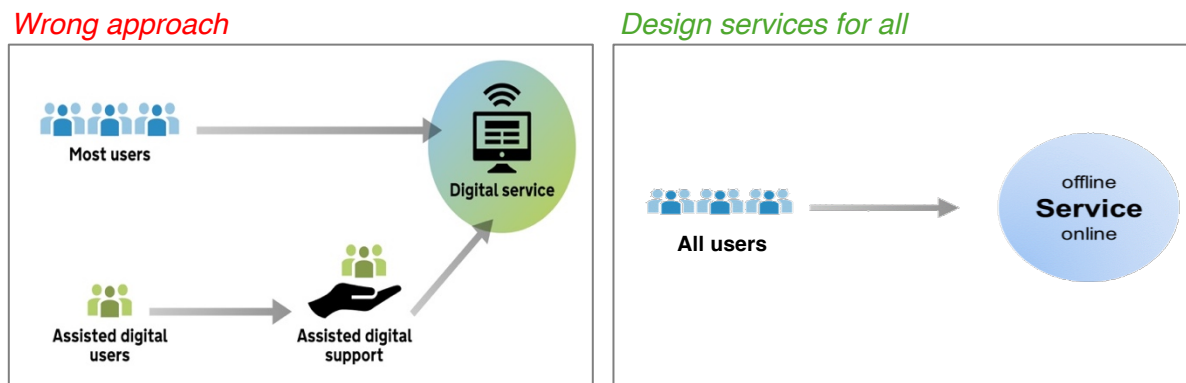
- It was unclear who can receive assisted digital support. In the UK, there was often a cap on the amount of hours an individual could avail of from assisted digital support services.
- It was unclear who will provide assisted digital support. In the UK, it was often outsourced to charities or private companies, rather than being delivered by civil service frontline staff.
- There was a lack of standards. In the UK, there are high level guidance documents, but each public service has responsibility for designing and implementing its own assisted digital strategy, including through researching their user base. It could happen over the phone, through home visits, drop-in services to welfare offices, or public spaces such as libraries. Assisted digital may imply people filling out online forms on behalf of applicants, digital skills training, or providing guidance on using online systems while in the same room as the person in need of assistance.
- It was unclear how assisted digital sits alongside other, non-digital specific forms of assistance, like decision-making supports, mobility assistance, or translation services. This issue includes addressing the overlap between lacking basic digital skills and lacking literacy and/or numeracy. Not speaking English proficiently is also a barrier to accessing online services, which is particularly problematic when public services to do with migration and integration are chiefly online.
- Users could misunderstand what kind of assistance the service offers and apply for assisted digital support when they really need assistance with non-digital aspects of the process. This issue is compounded because those who require assisted digital support often have complex needs or are categorized as 'vulnerable' and may need other forms of support simultaneously.
- Privacy issues often arose due to lack of a private space to use a service or having to share personal information with others.
- The supports available were often generic and not tailored to the specific needs of recipients.

Ireland's *eGovernment Strategy 2017-2020* stated that assisted digital supports would be explored to be made available to those who feel they might benefit from them. This implies that there would be no test to determine whether someone is entitled to receive assisted digital support. It should be available to people who do not use online services for reasons of mistrust, and to people who may potentially receive informal support from family or friends, but who are uncomfortable with doing so.

Matt Knight critiques the generic approach to assisted digital as follows:

“talking about ‘assisted digital’ needs at any point should be a red flag, because it’s a false divide. There is not a generic average user who uses our service most of the time, and a small group of users who have some specific issues that we need to give them extra assistance with. Users are never that easily classifiable. Rather, there is a broad range of users with needs that may relate to digital skills, access to connectivity or devices, disabilities, language use, and a whole range of other factors that impact their ability to use services. Some of these needs may be temporary, some may be permanent. Addressing some user needs may result in an improvement of the service for other users.”⁵⁹

Figure 3. Segregation of ‘assisted digital’ is now seen as the wrong approach, versus designing a service that everyone can access.⁶⁰



The inventor of the term ‘assisted digital’, Tom Loosemore, now argues against using that term, “no-one should have to tick a box that says ‘I need help with this entire service.’ Rather, the service should provide help when necessary.” The focus should shift to service design:

“The service design should be flexible enough to grant them the assistance they need, and adapt itself when necessary. Not everyone can self-serve, and not everyone wishes to, all the time. If we’re going to take our commitment to service design seriously, the design of the whole service should reflect that reality and meet all the relevant user needs. [...] We shouldn’t try to force a small subset of users – often more vulnerable individuals who could do without the hassle, frankly – to go out of their way to simplify our lives as service providers. It’s supposed to be the other way round.”⁶¹

Service design should address as many barriers as possible in the design of a service and to provide as many channels of communication as are needed to enable everyone to access that service on an equitable basis. The 2019 Scottish Approach to Service

⁵⁹ <https://www.iterate.org.uk/why-we-should-stop-talking-about-assisted-digital/>

⁶⁰ Adapted from <https://www.iterate.org.uk/why-we-should-stop-talking-about-assisted-digital/>

⁶¹ <https://public.digital/2018/09/21/i-should-have-renamed-assisted-digital>

Design (SAAtSD) is an example of good practice in the design of public services to make them as accessible and person-centred as possible.⁶²

One aspect of service design is that it should comply with Universal Design principles.⁶³ Universal Design is key to the autonomy and opportunity of older persons in Ireland, not least the 21.5% affected by frailty, the 4% living in residential care settings, or the 48,000 people with dementia, a number which is expected to double by 2030.

Most older persons are in good health and are perfectly capable of living independently with little support. However, needing support should not be portrayed as an anomaly, outside the norm of human existence. It is a part of all our lives, to varying degrees and in varying forms. One of the strengths of Universal Design is that it can mainstream, and thus destigmatize, supports. Research demonstrates that everyone, of all ages and ability, find universally designed environments easier and more comfortable to navigate. This includes in the digital sphere.

All digital public services should align with Universal Design principles of website design.⁶⁴ Currently, many are only partially compliant with the Web Content Accessibility Guidelines. The European Union (Accessibility of Websites and Mobile Applications of Public Sector Bodies) Regulations 2020 require Irish public sector bodies to make their websites and applications “more accessible”, so long as doing so doesn’t disproportionately burden them. If the state is adopting a digital by default approach to the delivery of public services, there needs to be stronger pressure on them to fully realise Universal Design standards in their websites and apps.

The National Disability Inclusion Strategy 2017-2021 pledged to “promote the design of public sector websites in accordance with universal design principles.”⁶⁵ The *eGovernment Strategy 2017-2020* promotes inclusiveness and accessibility (including adoption of universal design principles) and it refers to the EU Directive COM (2012)721 that requires the websites and mobile apps of public sector bodies to be more accessible, and to the Disability Act 2005 (Code of Practice) (Declaration) Order 2006.⁶⁶ Following Ireland’s ratification of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), more could be done to ensure comprehensive digital access for everyone with a disability. For example, The Internet Society has published guidance for policymakers on increasing internet use by people with disabilities,⁶⁷ and the National Disability Authority (NDA) have a Code of Practice on Accessibility of Public Services and Information Provided by Public Bodies.⁶⁸

⁶² <https://www.gov.scot/publications/the-scottish-approach-to-service-design/pages/maturity-assessment-matrix/>

⁶³ See, for example, <https://universaldesign.ie>

⁶⁴ <https://universaldesign.ie/Technology-ICT/>

⁶⁵ <http://www.justice.ie/en/JELR/dept-justice-ndi-inclusion-strategy-booklet.pdf/Files/dept-justice-ndi-inclusion-strategy-booklet.pdf>

⁶⁶ <https://www.gov.ie/en/publication/63a31-egovernment-strategy-20172020/>

⁶⁷ <https://www.internetsociety.org/wp-content/uploads/2017/08/bp-accessibilitypaper-20121105-en.pdf>

⁶⁸ <http://nda.ie/Good-practice/Codes-of-Practice/Code-of-Practice-on-Accessibility-of-Public-Services-and-Information-Provided-by-Public-Bodies-/>

Public Sector Equality and Human Rights Duty

The Public Sector Equality and Human Rights Duty is a statutory obligation for public bodies, set out in Section 42 of the Irish Human Rights and Equality Commission Act 2014. It requires public bodies, in the performance of their functions, to have regard to the need to eliminate discrimination, promote equality and protect human rights of staff and people availing of their services.⁶⁹

In the context of inclusive public services, the Public Sector Duty can be seen as a requirement to ensure that publicly funded services are accessible to all on an equitable basis. It is not reasonable to expect all older people to use the internet. Moreover, it is offensive to force a person to use the internet to access their basic human rights such as access to health services or other services that support their autonomy and independent living. In this context, given that most people will choose digital given its convenience, the goal should not be for everyone to use digital public services in a meaningful way but rather the goal should be that everyone should be able to access public services through whatever communication channel they can use or wish to use. While the state has given rhetorical support to this, it remains to be seen whether that will be met by the necessary annual funding to provide adequate offline access to publicly funded services.

Age Action's Recommendations

To enable true inclusion of all older people in the context of digitalisation, **Age Action calls on the state to adopt a rights-based approach to public service delivery**, meaning that all publicly funded services should be made as accessible as possible and should provide equitable access to those not using the internet.

As part of this, the state should implement a comprehensive strategy to maximise internet access, including providing greater support for skills acquisition, providing income supports to enable people to be digitally included and making digital communications accessible to all (i.e. overcoming the barriers of ability, affordability and access).

At the same time, all publicly funded services must be adequately resourced to maintain traditional 'offline' channels of communication to ensure equal access for those who are not using the internet or who do not have the requisite digital skills to transact online.

Specific Recommendations

1. **Prohibit the 'digital only' provision of any publicly funded service**, including services that impose obstacles or disincentives to accessing offline options, or inadequately signpost their existence. Ensure public services are designed to assist those who have literacy and/or numeracy difficulties, which often lie behind digital exclusion. This should also apply to essential services in the private

⁶⁹ For more detail on the Public Sector Duty, see <https://www.ihrec.ie/our-work/public-sector-equality-and-human-rights-duty-faq/>

sector, such as mainstream banking, and to private or voluntary bodies supported by state grants, such as arts or sporting organisations.

2. **Require publicly funded services to adopt a rights-based approach to service design and delivery that promotes privacy and autonomy.** Publicly funded services should not make a naïve assumption that all older people have adult children who can assist them or that they would want that.⁷⁰
3. **Oblige all publicly funded services to deliver a minimum level of customer service for offline transactions** and require them to demonstrate how they will provide sufficient staff and other resources to achieve that standard. There should be equality audits to determine whether everyone has equal access.
4. **Shift focus from 'assisted digital' to inclusive service design**, which should include highly accessible and inclusive digital channels alongside the option of offline channels of communication. There should of course continue to be assistance and support for people to use digitalised services, but such supports should be person-centred and specific to different types of need, rather than the current approach which seems to envisage that all the problems of ability, affordability and access will vanish if a service simply provides webchat or refers people to their local library for support. Service design should be informed by Universal Design and the PANEL principles. They should also be fully accessible to people regardless of any disability, such as sight loss or learning difficulties.
5. **Publicly funded services providing smart technology at home should enable people's capacity to give meaningful consent to the impact of the technology, including how their data will be used.** There is increased reliance on smart technology to aid people to live at home independently for longer, including e-health services. This is a desirable objective, but there is currently a gap in some people's ability to give informed consent.
6. **Introduce adult safeguarding legislation** and establish safeguarding protocols for publicly funded services to safeguard those offline who currently hand over their affairs to others that are more digitally literate.
7. **Resource the CSO to provide data to Eurostat and the EU Digital Economy and Society Index (DESI) on internet use and digital skills of people aged 75 and older**, as is currently being done by Albania, Italy, Latvia, Norway and Spain. This is essential as the digital literacy target of 80% of the population is for adults of all ages.⁷¹ As part of this, research the digital skills of older adults (50+), disaggregated by decade of age, and including the oldest adults who are neglected in many studies.

⁷⁰ Moreover, assistance from family is quite obviously not possible for the many couples and single individuals who do not have children. For example, despite Ireland's overall high birth rates, one in five (19%) women do not have children [<https://www.oecd.org/els/family/database.htm>]. Assistance from adult children is also not possible for the many older people whose children may not live near them or who may not be able or willing to support them.

⁷¹ Confirmed to Age Action by officials from the Department of Further and Higher Education.

- 8. Fund adult digital literacy training.** Despite a programme for government commitment to examine this, the Digital Skills for Citizens funded was never continued. The remit for digital access and supports currently sits across several government departments. One department or agency should lead on digital skills training, and it should coordinate other relevant agencies.
- 9. Provide income supplements to assist people to overcome cost barriers to being online, such as grants to purchase digital devices or subscriptions.** The Telephone Allowance in the household benefits package should be replaced with a Digital Allowance for those who need it. For many older people, seven in ten of whom rely on the State Pension for most of their income, the costs involved digital communications can be prohibitive, especially given the effective requirement to replace or upgrade obsolete devices or software on a regular basis, as well as the monthly cost of smartphones and broadband internet subscriptions. Age Action consistently receives feedback across our classes that the cost of devices and broadband, and poor quality of internet access in many regions, continue to be major barriers to digital inclusion.