

# AGE DISCRIMINATION BILL

Goods, Facilities & Services



— INDEPENDENT —  
CLAIRE SUGDEN

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## 1. Introduction

The proposed Member's Bill seeks to prohibit unjustified age discrimination in the provision of goods, facilities, and services in Northern Ireland. While age discrimination is already prohibited in employment, there are currently no equivalent protections outside the workplace. This leaves individuals vulnerable to unjustified differential treatment in areas such as healthcare, insurance, housing, retail, and leisure.

The Bill aims to close this legislative gap by establishing clear legal standards to ensure fairness and equality. Its purpose is to promote equitable treatment across all age groups, fostering a more inclusive society in which age does not limit access to services or diminish quality of life.

Comparable protections already exist in Great Britain under the Equality Act 2010 and in Ireland under the Equal Status Act. In Northern Ireland, anti-discrimination provisions apply to race, sex, and disability in the provision of goods, facilities, and services, but age is not currently included. This represents a clear gap in the equality framework.

This Summary Report outlines the responses gathered during the most recent consultation process. It summarises stakeholder and public perspectives and provides a basis for refining the Bill's provisions into targeted and effective legislation.

### Policy Context

Commitments to address the absence of age discrimination protections in goods, facilities, and services have appeared in successive government strategies and agreements, including the Programme for Government (2011–2015), the Active Ageing Strategy (2016–2021), and the New Decade, New Approach agreement (2020).

In 2015, the Executive Office launched a consultation on extending age discrimination protections to goods, facilities, services, charities, public functions, and education. Those proposals suggested limiting the legislation to people aged 16 and over. Despite strong engagement, no Bill was introduced.

The main barrier to progress was disagreement over scope — specifically whether the legislation should apply to all ages or exclude children and young people. Some stakeholders expressed concern that extending coverage to children might undermine parental responsibility or create unintended consequences. However, subsequent legal analysis confirmed that legislation covering all ages is workable, consistent with international best practice, and can be drafted to protect parental rights and preserve statutory age limits on matters such as voting and driving.

Because of these unresolved debates, the 2015 proposals did not progress beyond consultation. The current Bill seeks to resolve this by adopting a clear, inclusive approach.

## 2. Process Summary

The public consultation on the proposed Bill to prohibit unjustified age discrimination in goods, facilities, and services was conducted from **24 March 2025 to 20 June 2025**. The consultation was publicised via social media and supplemented by direct correspondence with a range of stakeholders, who were invited to share the consultation within their networks and with interested parties to encourage wider engagement. While the main consultation document was available to submit responses online, it was offered that individuals wishing to respond via hardcopy could contact me directly to receive a paper version.

### Number and Breakdown of Responses

A total of 68 responses were received. This included 19 detailed submissions provided separately from the main consultation process, alongside 49 responses submitted via the main online consultation form. Stakeholders represented a diverse spectrum, including:

- **Public Bodies and Councils:** Derry City & Strabane District Council
- **Statutory Commissioners:** Equality Commission for Northern Ireland (ECNI), Commissioner for Older People for Northern Ireland (COPNI), Northern Ireland Commissioner for Children and Young People (NICCY)
- **Legal and Professional Bodies:** Law Society of Northern Ireland
- **Trade Unions and Professional Associations:** Unite the Union, UNISON
- **Charities and NGOs:** Action for Children, NSPCC, Stroke Association, Age NI
- **Interest Groups and Advocacy Organisations:** Children's Law Centre, Women's Policy Group, Women's Regional Consortium, National Pensioners Convention (NPC NI Region)
- **Political Organisations:** Workers Party
- **Private Sector and Businesses:** Specsavers
- **General Public:** Numerous individual submissions via the online form

### Summary of Direct Engagement with Stakeholders

The consultation process included targeted direct engagement individual meetings with key stakeholders such as ECNI, NICCY, COPNI and Age NI. These engagements significantly influenced the consultation's detailed understanding and highlighted the critical importance of age discrimination protections.

### Consideration of Assembly Legal Advice and Research Papers

Prior to launching the consultation, relevant Assembly legal advice and research papers on legislative competence, human rights compliance, and equality impacts were thoroughly reviewed. This comprehensive consideration ensured the legislative proposal was robust, legally sound, and aligned with international standards. The findings also informed the scope and structure of the consultation document and questions.

## **Input from Human Rights and Equality Bodies**

Essential inputs were provided by the Equality Commission for Northern Ireland (ECNI), the Commissioner for Older People for Northern Ireland (COPNI), and the Northern Ireland Commissioner for Children and Young People (NICCY). These organisations highlighted the need for comprehensive protection against age discrimination, aligning with international human rights frameworks including the European Convention on Human Rights (ECHR) and the United Nations Convention on the Rights of the Child (UNCRC).

## **Ministerial and Departmental Input**

Active engagement with The Executive Office and Ministers was undertaken during the consultation, affirming the strategic relevance and compatibility of the proposed legislation with government priorities.

Overall, the extensive consultation process demonstrated clear and robust support for the introduction of comprehensive age discrimination legislation, with input gathered representing a broad cross-section of Northern Ireland society.

## **Input Outside of Consultation.**

While the Northern Ireland Human Rights Commission did not provide a formal response to this consultation, it directed attention to the position set out in its *Annual Statement 2024*, where it highlights the continuing gap in legal protection from age discrimination in Northern Ireland in the context of goods, facilities and services. The Commission has categorised this as a “red” issue, noting that Northern Ireland remains the only part of the UK without such protections.

In that Statement, the Commission identifies age discrimination legislation as an outstanding requirement to bring Northern Ireland into line with international human rights standards and best practice across the UK and Ireland. It further warns that the absence of such legislation leaves both older and younger people vulnerable to unequal treatment in key areas of daily life, including access to transport, health insurance, and financial services. The Commission has recommended that the Northern Ireland Executive and Assembly take forward measures to extend protection on this basis as a matter of priority.

Accordingly, while not providing a bespoke submission, the Commission’s published position supports the need for legislative reform in this area, consistent with the objectives of the proposed Private Member’s Bill.

### 3. Support and Opposition for the Proposal

#### *Support for the Proposal*

The consultation process revealed overwhelming support for the proposed Bill. Across the 68 total responses, including 49 submitted via the online consultation form and 19 detailed submissions, there was broad consensus that unjustified age discrimination in goods, facilities, and services should be prohibited in Northern Ireland law.

Support came from a wide range of sectors:

- **Equality and Human Rights Bodies:** ECNI, NICCY, COPNI
- **Legal and Professional Organisations:** Law Society of Northern Ireland
- **Charities and NGOs:** Age NI, NSPCC, Stroke Association, Action for Children
- **Trade Unions:** UNISON, Unite the Union
- **Advocacy Groups:** Women's Policy Group, Women's Regional Consortium, National Pensioners Convention NI, Children's Law Centre
- **Political Organisations:** Workers Party
- **Councils and Public Bodies:** Derry City & Strabane District Council
- **Private Sector:** Specsavers

Supporters consistently welcomed the proposed legislation as an essential and overdue step to align Northern Ireland's equality framework with the rest of the UK and Ireland. ECNI, COPNI and Age NI argued that protections are urgently needed to close a recognised gap in the law, while the Children's Law Centre and NICCY emphasised that excluding children would itself amount to discrimination and risk breaching international obligations such as the UNCRC. COPNI further highlighted that Northern Ireland could position itself as a leader in age equality, setting a higher standard of protection for older people. The Law Society NI endorsed the Bill while noting that it should be considered a stepping stone towards a broader Single Equality Act.

Respondents also highlighted the Bill's potential to enhance dignity, autonomy, and equal access to services for all age groups, and called for protections to extend to all ages.

#### *Opposition to the Proposal*

There was limited formal opposition to the general principle of the Bill among respondents. Only one respondent (1.47%) stated they were opposed to the bill. An overwhelming majority of individuals and organisations welcomed the introduction of legislation to address unjustified age discrimination in goods, facilities, and services. However, several respondents offered feedback and cautions:

- Some raised concerns about ensuring that legitimate age-based practices (e.g. free travel, youth support programmes, age-based health screenings) could continue. These were framed not as objections to the Bill, but as areas where clarity would be needed in drafting permissible exceptions.

- A few respondents flagged potential challenges for implementation, particularly for smaller service providers, and recommended awareness campaigns and accessible guidance.

## Statistical Analysis

From the 48 online responses:

- **93.88%** (46 out of 48) explicitly supported the introduction of the legislation.
- **75%** supported extending protection to all age groups.
- **80.85%** agreed that exemptions should be narrowly defined and justified by clear social benefit.

Among the 19 detailed submissions:

- **100%** supported the legislation in principle.
- **78.95%** explicitly supported applying the Bill to all age groups.
- The majority urged for protections to be explicit, enforceable, and aligned with international obligations (e.g. ECHR, UNCRC).

## Reflection on Potential Changes or Modifications

Several points of feedback are under consideration in relation to refining the Bill:

- **Explicit Inclusion of All Age Groups:** The strong and consistent recommendation to ensure protections for people of all ages will be reflected in the Bill's language.
- **Defined and Limited Exceptions:** Feedback suggests exceptions should be minimal, clearly defined, and based on social or public interest justification, not administrative convenience or budget.
- **Digital Access and Healthcare:** Specific references to discrimination arising from digital-only services and age-related barriers in health and audiology services will inform potential illustrative examples in guidance or explanatory notes.
- **Enforcement and Awareness:** Respondents recommended building in mechanisms for awareness-raising and accountability. These suggestions will be explored in terms of implementation planning and supporting infrastructure.

## Additional Written Submissions

This section of the consultation clearly demonstrated a high level of both broad and deep engagement:

- **Quantitative evidence** was gathered through the online consultation form, with 49 members of the public and stakeholders contributing concise views.
- **Qualitative evidence** came through the 19 comprehensive submissions, many of which provided legal, social, and policy analysis. Additionally, direct meetings and ongoing dialogue with ECNI, NICCY, COPNI, Age NI, the Children's Law Centre, and others enabled more nuanced understanding of structural concerns and implementation issues.

This combination of quantitative and qualitative evidence confirms wide-ranging support for the proposal and has helped shape the final approach to drafting the Bill.



## 4. Proposals for Improvements or Alternatives to Legislation

### Proposals from Respondents

Respondents offered a range of proposals regarding the Bill's design, implementation, and long-term impact. These included:

- **Explicit Inclusion of All Ages:** A clear majority of respondents recommended that the legislation apply across the life course, from birth through later life. Some respondents, particularly among the online submissions, expressed a preference for age thresholds or prioritising older people. These perspectives are acknowledged, but the Bill will adopt a broadly inclusive approach.
- **Clear and Narrow Exceptions:** Several respondents, including ECNI, Age NI, COPNI, and the Law Society, emphasised that any legitimate exceptions should be minimal, clearly defined, and based on social or public interest justifications rather than administrative convenience or budgetary considerations. Some individual respondents also noted that certain forms of age-based treatment, such as free travel and health screening, can have positive impacts.
- **Positive Action Provisions:** Several stakeholders, including ECNI and the Women's Policy Group, suggested that the Bill should explicitly allow for positive action to address age-related disadvantage, particularly in relation to older women and digitally excluded groups.
- **Implementation and Awareness Measures:** Many submissions recommended that implementation be supported by public education, accessible guidance for service providers, and a clear enforcement mechanism. Respondents warned that without proactive measures, the Bill could suffer from low visibility and under-enforcement.
- **Alignment with International Standards:** Respondents across sectors advised that the Bill align explicitly with human rights frameworks, including the European Convention on Human Rights and the UN Convention on the Rights of the Child, to enhance legal clarity and protect against future dilution.
- **Monitoring and Evaluation:** Age NI and others proposed regular review and evaluation mechanisms to ensure the legislation remains effective and responsive to emerging challenges.

### Refining the Proposal in Response to Feedback

Several of these suggestions are being considered:

- **The Bill will extend protections to all age groups**, reflecting the majority view expressed during the consultation, while recognising that some respondents opposed this approach.
- **Permissible exceptions** will be tightly defined in the legislation and/or guidance, based on a clear and justifiable social or public interest purpose.
- Provisions for **positive action** will be examined during drafting to ensure service providers can lawfully address disadvantage without breaching the legislation.

- While the Bill itself will focus on legal protections, the accompanying materials will outline the need for **awareness, enforcement, and guidance**, in anticipation of post-legislative planning.
- The Bill's drafting will reflect **international legal standards** to strengthen compliance and provide a clear interpretative framework.

## Alternatives to Legislation

63% of online respondents stated there was no alternative solution, while 27% provided specific examples. The most common alternative suggested was the introduction of a Single Equality Act, raised by around 6% of all respondents and almost a quarter of those who proposed alternatives. Other suggestions included the implementation of an Anti-Poverty Strategy, a Fuel Poverty Strategy, increased education initiatives, and policies to reduce reliance on online practices. It is worth noting that while 27% of respondents proposed alternative policies or legislation, 10% of these also expressed support for the Bill within the same response.

Among those who provided more detailed submissions, no respondent suggested that there were alternatives to legislation. Instead, several emphasised that the Bill should be complemented by wider measures, most prominently the introduction of a Single Equality Act. The Law Society NI reiterated its support for such an approach while welcoming the Bill, and Unite the Union stated that the legislation should be a stepping stone towards a broader Single Equality Act. Others noted that existing protections are inadequate and that non-legislative measures, such as voluntary codes or guidance, have consistently failed to provide enforceable safeguards.

Overall, 97.01% of respondents supported the Bill. Given this context, legislative action was considered by a majority of respondents as both necessary and proportionate. The Bill is seen as a vital tool in addressing a recognised gap in Northern Ireland's equality framework, particularly in comparison to other UK and ROI jurisdictions.

Accordingly, no viable non-legislative alternative was proposed, and none is recommended for adoption in place of the Bill.

## **5. Convention Rights and Other Competence Issues**

### **Legislative Competence and Human Rights Compliance**

No substantive concerns were raised during the consultation regarding the legislative competence of the Northern Ireland Assembly to introduce protections against age discrimination in goods, facilities, and services. The Equality Commission for Northern Ireland (ECNI), the Northern Ireland Human Rights Commission (NIHRC), and the Commissioner for Older People for Northern Ireland (COPNI) all expressed strong support for the Bill and confirmed that the proposed legislation would be compatible with existing human rights obligations.

### **Engagement with Human Rights and Equality Bodies**

The Equality Commission for Northern Ireland (ECNI) provided detailed guidance emphasising the need for the Bill to align with:

- The European Convention on Human Rights (ECHR), particularly Article 14 (prohibition of discrimination)
- The UN Convention on the Rights of the Child (UNCRC)
- The UN Principles for Older Persons

The Northern Ireland Commissioner for Children and Young People (NICCY) and the Children's Law Centre both referenced the Bill's necessity in fulfilling obligations under the UNCRC. They welcomed the proposal's potential to provide children with protections equivalent to those available to adults, reinforcing Northern Ireland's international human rights commitments.

### **European Convention on Human Rights (ECHR)**

Respondents highlighted that the current absence of protection against age discrimination in goods, facilities, and services may be incompatible with Article 14 of the ECHR, particularly in combination with rights under Article 8 (right to private and family life) and Article 1 of Protocol 1 (peaceful enjoyment of possessions). Stakeholders, including ECNI and Age NI, argued that the Bill would help remedy this gap, promoting greater legal clarity and equality.

### **Section 6(2) (ca) of the Northern Ireland Act 1998 and Windsor Framework**

No stakeholders identified concerns under Section 6(2)(ca) of the Northern Ireland Act 1998 or Article 2(1) of the Windsor Framework. The Bill does not conflict with the UK's international obligations under the Brexit withdrawal agreement, and in fact aligns with the rights-based commitments set out in Article 2(1), which protects rights contained in the Belfast/Good Friday Agreement.

If anything, the legislation was viewed as positively contributing to Northern Ireland's post-Brexit human rights framework by ensuring that domestic protections remain aligned with EU-derived equality rights.

## Addressing Potential Competence Issues

No direct legal or constitutional barriers were identified by stakeholders. The Law Society of Northern Ireland and ECNI did, however, advise that careful drafting would be required to:

- Clearly define legitimate exceptions to avoid breaching the proportionality requirements under the ECHR
- Ensure that positive action is permitted but not mandatory, in line with case law

These considerations will be addressed during the drafting process to ensure the Bill remains within competence and compatible with human rights obligations. Ongoing consultation with ECNI, NIHRC, and relevant others will continue to guide this process.

In conclusion, the proposed Bill is considered to fall squarely within the competence of the Northern Ireland Assembly, and consultation responses strongly affirmed that the Bill can be drafted in with Convention rights and international human rights frameworks.

## 6. Financial Implications

### Summary of Views on Financial Impact

Analysis of consultation feedback indicates that stakeholders generally see the proposed Bill as affordable, proportionate, and likely to deliver long term benefits that outweigh any short-term costs.

From the 48 online survey responses, 41.6% believed the legislation would benefit business, 18.75% anticipated a cost to business, 33.33% expected no additional costs, and 6.25% gave other views. Regarding the public purse, 37.5% saw a potential benefit, 31.25% anticipated a cost, 27% expected no cost, and 4.16% gave other views.

From the 19 in depth written responses, 15.8% stated there would be a cost to businesses, while 84.2% did not directly address business costs. 15.8% identified a benefit to the public purse. The Equality Commission for Northern Ireland stated that it would require sufficient funding to fulfil any new powers and duties conferred by the legislation, which was taken as indicating potential costs to the public purse.

Most stakeholders emphasised that the Bill represents a cost effective and necessary intervention to improve equality, social participation, and access to services. Organisations such as Age NI, ECNI, COPNI, NICCY, and the Women's Policy Group argued that any short-term implementation costs would be outweighed by longer term gains in public health, economic participation, and social cohesion. Several noted that the societal costs of continuing age discrimination, including exclusion from digital services, delayed healthcare, and poor treatment in retail and housing, provided a strong case for legislative change.

### Impact on Service Delivery

A small number of submissions noted that public bodies and service providers may need to revise policies, update training, and improve staff awareness to meet new legal duties. These were not considered major financial burdens. Respondents encouraged government departments to provide practical guidance and templates, particularly for smaller organisations, to minimise compliance costs.

Some trade union and advocacy groups, including UNISON, Unite, and the Children's Law Centre, stressed the importance of resourcing enforcement and awareness mechanisms to ensure meaningful impact. Suggested measures included:

- Public education campaigns
- Accessible complaints pathways
- Oversight or advisory functions within existing equality structures such as the Equality Commission for Northern Ireland

No stakeholders suggested that the Bill would significantly divert resources from other public services. Many believed that reducing discriminatory practices could improve service efficiency, particularly in health, social care, and housing.

### **Overall Reflection**

Feedback indicates that the financial implications of the Bill are manageable and proportionate to its aims. Where additional resources may be needed, particularly for awareness raising, compliance support, and enforcement, stakeholders advised using existing equality infrastructure rather than establishing new administrative bodies. Overall, the Bill is viewed as an affordable and strategically beneficial reform, with no evidence to suggest it would have an adverse impact on existing public service delivery.

## 7. Refinement of the Proposal

The initial proposal aimed to prohibit unjustified age discrimination in the provision of goods, facilities, and services in Northern Ireland, closing a recognised legislative gap. Following a comprehensive consultation process, the proposal has been refined to ensure legal clarity, strengthen its policy impact, and to align with human rights and equality frameworks.

Key refinements include:

- **Explicit Inclusion of All Age Groups:** Respondents strongly supported extending protections from birth through to later life. The Children’s Law Centre emphasised that there is no legal or practical reason to exclude children, noting that parental responsibility and statutory age limits on activities such as voting or driving can still be safeguarded. As a result, the Bill will clearly state that it applies to people of all ages, not just older adults.
- **Narrow and Defined Exceptions:** Concerns raised by ECNI, Age NI, COPNI and others highlighted the need for tightly defined exceptions. Age NI in particular stressed that budgetary constraints are not a legitimate basis for differential treatment. In response, the Bill will only permit exceptions where there is a clear and justifiable social or public interest purpose, such as positive action or socially beneficial schemes like free travel for older people. COPNI also pointed to international best practice where proportionality tests are used, which will inform the drafting.
- **Focus on Positive Action:** Equality and advocacy groups, including ECNI, Age NI and the Women’s Policy Group, recommended provisions to allow service providers to address structural disadvantage. The Bill will therefore explicitly permit positive action, particularly for groups such as older women, young carers and those experiencing digital exclusion.
- **Alignment with International Frameworks:** Respondents consistently urged that the Bill should align with international standards including the European Convention on Human Rights and the UN Convention on the Rights of the Child. This approach will strengthen compliance and provide a clear framework for interpretation.
- **Implementation Considerations:** While the legislation itself will focus on establishing legal protections, stakeholders emphasised the need for guidance, education and enforcement powers. Explanatory materials will therefore be developed to support awareness and compliance, and options for enforcement — including ECNI’s role in bringing proceedings — are under consideration.

## Engagement and Policy Focus

Engagement with stakeholders, both through broad public consultation and detailed submissions from legal experts, equality bodies, children's organisations and older people's advocates, has been instrumental in refining the proposal. This process has strengthened the clarity and precision of the policy aim, identified common areas of concern such as digital exclusion, access to healthcare and housing, and highlighted the real-world impact of inaction.

Consultation responses have helped shape a focused policy objective: to introduce a clear and enforceable legal prohibition on unjustified age discrimination in the provision of goods, facilities, and services, applicable to all age groups, and supported by limited exceptions grounded in public interest



## 8. Conclusion

The consultation on the proposed Bill to prohibit unjustified age discrimination in goods, facilities, and services has demonstrated overwhelming support for legislative reform. The 68 responses received, including 48 online submissions and 19 detailed stakeholder contributions, provided a strong and varied evidence base confirming both the necessity and timeliness of the proposal.

Respondents consistently agreed that the absence of legal protection in this area leaves people of all ages, particularly children, young adults, and older people, vulnerable to unfair treatment in key aspects of everyday life. Stakeholders from across civil society, the legal sector, equality and human rights bodies, trade unions, and the public have offered clear, constructive feedback that has directly shaped the proposal. There was no opposition to the Bill's core aim, and all detailed responses endorsed the need for legislation.

The consultation has refined the proposal into a tightly focused legislative objective that meets the requirements set by the Speaker of the Northern Ireland Assembly and aligns with Northern Ireland's legal and constitutional framework. It will:

- Extend protections to people of all ages,
- Define clear and limited exceptions grounded in public interest.
- Align with international human rights standards (ECHR, UNCRC).
- Encourage positive action to address structural disadvantage.

These refinements reflect deep engagement with stakeholders and have strengthened the policy's clarity, purpose, and enforceability.

### *Next Steps*

Informed by this strong and consistent support, the next stage will be the formal drafting of the Bill. Continued engagement with legal advisers, the Equality and Human Rights Commissions, and relevant departments will ensure the text remains legally sound, clear in its scope, and capable of effective implementation.

Explanatory notes, guidance materials, and further outreach will be developed in parallel to ensure service providers and the public understand the law and how to comply with it. Consideration will also be given to ongoing monitoring and evaluation mechanisms post-enactment.

In conclusion, the consultation has affirmed the need to finally close this longstanding gap in Northern Ireland's equality law. The forthcoming Bill will deliver a proportionate, human rights-based solution to a widely recognised injustice.

**Claire Sugden MLA**

## **Annex A: Copy of the Consultation Document**

**Title:** *Consultation on Addressing Age Discrimination in Goods, Facilities and Services*

**Description:**

The consultation invited views on a proposal to introduce legislation in Northern Ireland to prohibit unjustified age discrimination in the provision of goods, facilities, and services. It was open from **24 March to 20 June 2025**, published via Google Form, and promoted through stakeholder networks and political channels. Additional detailed responses were accepted by email.

**Consultation Questions (see Annex C)** included support for the proposal, scope of age protections, appropriate exceptions, examples of age discrimination, and views on implementation.

## **Annex B: List of Respondents**

### **Organisations That Submitted Detailed Responses:**

- Equality Commission for Northern Ireland (ECNI)
- Commissioner for Older People for Northern Ireland (COPNI)
- Northern Ireland Commissioner for Children and Young People (NICCY)
- Children's Law Centre
- Age NI
- NSPCC
- Stroke Association
- Action for Children
- Law Society of Northern Ireland
- Unite the Union
- UNISON
- Women's Policy Group -WRDA
- Women's Regional Consortium
- National Pensioners Convention NI Region
- Civil Service Pensioner's Alliance
- Derry City & Strabane District Council
- Workers Party
- Specsavers
- Derry City & Strabane District Council Children and Young Peoples Coordinator

### **Online Responses (48):**

Individual members of the public and professionals from a range of sectors. These responses were anonymised unless explicit consent to publish was given.

Organisations which responded to the online consultation and consented for their details to be shared include:

- Hourglass
- Culmore Women's Group
- Children in Northern Ireland
- Parenting Focus
- Greater Belfast Seniors Forum
- North Belfast Senior Citizens Forum

## Annex C: Consultation Questions

1. Do you support the introduction of legislation prohibiting unjustified age discrimination in the provision of goods, facilities and services in Northern Ireland?
2. Should the legislation apply to all age groups (including children and young people)?
3. Do you think any exceptions should be allowed? If yes, which ones and why?
4. In which sectors or settings do you believe age discrimination is most prevalent?
5. Do you have personal or professional experience of age discrimination that you would like to share?
6. Are there any areas you feel should be specifically included or excluded?
7. Do you have any other comments on how the legislation should be drafted or implemented?

## **Annex D: Summary Table of Responses**

- **Online Consultation Responses: 48**
- **Detailed Stakeholder Submissions: 19**
- **Total Responses: 68**

## **Annex E: Thematic Summary of Detailed Stakeholder Responses**

This annex provides a synthesis of the 19 detailed submissions received from key organisations and stakeholders. The responses have been grouped thematically to highlight areas of consensus, divergence, and issues requiring further consideration.

### **1. Support for the Bill**

- All stakeholder organisations expressed support for the introduction of legislation prohibiting unjustified age discrimination in goods, facilities and services.
- Several described the Bill as “long overdue” and “necessary to align Northern Ireland with the rest of the UK and Ireland.”

### **2. Scope and Age Coverage**

- Strong consensus that protections should apply to people of all ages, from birth onwards.
- ECNI, NICCY, Age NI, COPNI, NSPCC and the Children’s Law Centre all argued that restricting coverage to adults would undermine human rights obligations and perpetuate existing gaps.

### **3. Exceptions**

- Broad agreement that exceptions should be narrow, specific, and justified by clear social or public interest purposes (e.g. free travel for older people, youth work programmes, targeted health screening).
- Several warned against vague or overly broad exceptions which could undermine the purpose of the legislation.

### **4. Positive Action**

- ECNI, the Women’s Policy Group, Age NI and others recommended explicit provision for positive action, enabling service providers to address structural disadvantage faced by specific age groups (e.g. older women, digitally excluded people, young carers).

### **5. Enforcement and Awareness**

- Many organisations stressed that legislation must be accompanied by:
  - Accessible public guidance
  - Training for service providers
  - A clear redress mechanism through existing equality structures (e.g. ECNI)
- Without awareness and enforcement measures, stakeholders cautioned that the law might have limited practical impact.

## 6. Human Rights and Equality Compliance

- Stakeholders emphasised the importance of ensuring consistency with international obligations, particularly:
  - The European Convention on Human Rights (ECHR)
  - The UN Convention on the Rights of the Child (UNCRC)
  - The UN Principles for Older Persons
- Several noted that legislation would help remedy the current incompatibility between Northern Ireland's framework and these standards.

## 7. Additional Themes Raised

- Digital Exclusion: Concern that older and younger people are disadvantaged where services move online without alternatives.
- Financial Services and Insurance: Examples provided of age-based barriers to mortgages, credit, and insurance products.
- Healthcare Access: Highlighted issues included age-based rationing of services (e.g. audiology, fertility, screening programmes).

## Annex F: Legal and Human Rights Advice Considered

During the development of the proposal, the following legal and policy sources were reviewed:

- **Assembly Legal Advice:** On Compliance of the Initial Proposal For the Bil with s6 of the Northern Ireland Act 1998.
- **European Convention on Human Rights:** Article 14 (non-discrimination) in conjunction with Articles 8 and Protocol 1.
- **UN Convention on the Rights of the Child:** Highlighted by NICCY, CLC, and others as justification for applying protections to under-18s.
- **Equality Commission Guidance:** ECNI confirmed the Bill aligns with best practice and is necessary to close an existing legal gap.
- **Human Rights Commission Input:** NIHRC raised no concerns and endorsed the principle of equal protection.
- **Windsor Framework and Article 2(1):** Considered to ensure alignment with post-Brexit equality guarantees.

These sources confirmed that the Bill would be a proportionate, rights-compliant, and constitutionally sound legislative measure to address a clear policy need.