



## **Consortium for the Regional Support for Women in Disadvantaged and Rural Areas**

### **Response to: Consultation on Addressing Age Discrimination in Goods, Facilities and Services**

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**Foyle Women's  
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## **Women's Regional Consortium: Working to Support Women in Rural Communities and Disadvantaged Urban Areas**

### **1. Introduction**

**1.1** This response has been undertaken collaboratively by the members of the Consortium for the Regional Support for Women in Disadvantaged and Rural Areas (hereafter, either the Women's Regional Consortium or simply the Consortium), which is funded by the Department for Communities and the Department of Agriculture, Environment and Rural Affairs.

**1.2** The Women's Regional Consortium consists of seven established women's sector organisations that are committed to working in partnership with each other, government, statutory organisations and women's organisations, centres and groups in disadvantaged and rural areas, to ensure that organisations working for women are given the best possible support in the work they do in tackling disadvantage and social exclusion.<sup>1</sup> The seven groups are as follows:

- ♀ Training for Women Network (TWN) – Project lead
- ♀ Women's Resource and Development Agency (WRDA)
- ♀ Women's Support Network (WSN)
- ♀ Northern Ireland's Rural Women's Network (NIRWN)
- ♀ Women's TEC
- ♀ Women's Centre Derry
- ♀ Foyle Women's Information Network (FWIN)

**1.3** The Consortium is the established link and strategic partner between government and statutory agencies and women in disadvantaged and rural areas, including all groups, centres and organisations delivering essential frontline services, advice and

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<sup>1</sup> Sections 1.2-1.3 represent the official description of the Consortium's work, as agreed and authored by its seven partner organisation

support. The Consortium ensures that there is a continuous two-way flow of information between government and the sector. It also ensures that organisations/centres and groups are made aware of consultations, government planning and policy implementation. In turn, the Consortium ascertains the views, needs and aspirations of women in disadvantaged and rural areas and takes these views forward to influence policy development and future government planning, which ultimately results in the empowerment of local women in disadvantaged and rurally isolated communities.

1.4 The Women's Regional Consortium appreciates the opportunity to respond to Claire Sugden's consultation on Addressing Age Discrimination in Goods, Facilities, and Services.

1.5 We wish to endorse the response made by the Women's Policy Group (WPG) of which the Women's Regional Consortium is a member and the response by our colleagues in Age NI.

## 2.0 General Comments

We fully support the proposals being consulted on for the reasons outlined by our colleagues in Age NI:

*“Age does not have parity with other protected characteristics in Northern Ireland and this needs to change urgently.*

*Northern Ireland is also the only region of the UK or Ireland without legal protection against age discrimination outside of employment.*

*The proposed Bill would bring NI into line with other regions by making it unlawful to treat someone unfairly because of their age when accessing services like financial products, transport, insurance or healthcare.”*

We believe that gender must be a consideration within these proposals given that women are more likely to live longer than men. The most recent figures on life expectancy are 78.8 years for males and 82.5 years for females – meaning that women in Northern Ireland can expect to live 3.7 years longer than males.<sup>2</sup> This could potentially mean that women are more likely to face detriment without access to protection from discrimination in relation to goods, facilities and services.

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<sup>2</sup> Life Expectancy in Northern Ireland 2021-23: Headline Figures, Department of Health, December 2024  
<https://www.health-ni.gov.uk/sites/default/files/publications/health/hscims-life-expectancy-ni-2021-23-headline-figures.pdf>

### **3.0 Specific Questions**

#### **1. Evidence of Age Discrimination**

**Have you ever experienced a situation where you felt your age influenced how you were treated when accessing goods, facilities, or services?  
Please summarise what happened and how it affected you.**

This response is being made on behalf of the Women's Regional Consortium not an individual.

#### **2. General Opinion on the Proposal**

**Do you support the proposal to address age discrimination in the areas of goods, facilities, and services?**

**Agree**

Age is the only one of the equality grounds which does not have protection against discrimination in the areas of goods, facilities and services. The Women's Regional Consortium believes strongly that there should be the same protections on grounds of age that already exist for the other protected characteristics.

As stated by our colleagues in Age NI, Northern Ireland is the only region in the UK or Ireland not to have this protection and these proposals would bring Northern Ireland into line with other regions.

#### **3. Scope of Protection**

**Should age discrimination protection apply to all ages, or should it start from a specific age?**

**All ages**

The Women's Regional Consortium supports the views of Age NI, the Equality Commission for NI, the Children's Law Centre, the NI Children and Young Peoples Commissioner and the WPG that protections against age discrimination relating to goods, facilities and services should be extended to all ages.

#### **4. Priority of Issues**

**Which areas of the proposed legislation are most important to you?  
Please rank in order of importance (1 = most important).**

**Other (please specify below):**

We are responding as an organisation not an individual so we are unable to provide a ranking or select specific areas as we represent a wide range of women who may all have different views on these areas according to their own experiences.

We would suggest that all these areas are important and have the potential to be important to people at different stages of their lives. For example, young people under the age of 18 may be more likely to rank education as the most important whereas older people may be more likely to rank health and social care and financial services as more important. We are therefore uncertain as to the usefulness of this question as it is individualistic and will often come down to people's own experiences.

#### **5. Definitions and Clarity**

**Are the definitions of "goods, facilities, and services," "service provider," and "public functions" as outlined in Northern Ireland's other anti-discrimination legislation clear and appropriate for this legislation?**

***For reference:***

***Goods: Tangible products available for purchase or distribution.***

***Facilities: Access to physical spaces, infrastructure, or amenities.***

***Services: Intangible benefits or assistance provided to individuals.***

**Yes**

We have no issue with the current definitions.

#### **6. Rights and Equality**

**a) How should the legislation address human rights and equality concerns?**

**Incorporate input from the Equality Commission/Human Rights Commission**

**Address explicitly in specific provisions**

**Other**

The Women's Regional Consortium believes that legislation should address human rights and equality concerns through the incorporation of input from the Equality/Human Rights Commission, be addressed explicitly in specific provisions and through other means. We endorse the views of Age NI who argue that relevant stakeholders should be involved in all stages of the development of the legislation.

We support the comments made by our colleagues in the Women's Policy Group around the need for understanding discrimination from a gendered perspective. This helps to embed intersectionality into equality analysis allowing an understanding of how multiple factors influence the way discrimination is experienced.

**b) How do you think the proposed legislation would affect human rights and equality?**

**Enhance**

We can only see extending protections against discrimination relating to goods, facilities and services extended to age being a positive development for human rights and equality.

**7. Costs and Feasibility**

**Do you anticipate any financial impact from implementing the proposed legislation?**

**a) For businesses:**

**Benefit to Businesses**

The Women's Regional Consortium believes that everyone is entitled to equal treatment and protection from discrimination regardless of cost. We do however believe that implementing this legislation would result in benefits to businesses. We support the assertion by AgeNI that prohibiting age discrimination will be of overall financial benefit for businesses as it will result in a more favourable business environment for older customers. We also believe that this would be the same for younger customers.

**Do you anticipate any financial impact from implementing the proposed legislation?**

**b) For public funds:**

**Benefit to the public purse**

The Women's Regional Consortium believes that everyone is entitled to equal treatment and protection from discrimination regardless of cost. We do however believe that implementing this legislation would result in benefits to the public purse. Implementing this legislation should not necessarily result in increased spending but rather ensure that older and younger people have equal access to the available resources.

**8. Forms of Age Discrimination**

**What forms of age discrimination have you experienced or witnessed? (Select all that apply)**

We are not responding as an individual but rather as an organisation. We suggest referring to the following resources in relation to age discrimination in the provision of goods, facilities and services:

- Are you ageist?, Commissioner for Older People for Northern Ireland, March 2024  
<https://copni.org/news/articles/commissioner-for-older-people-launches-new-report-are-you-ageist>
- Inquiry into Gaps in Equality Legislation: Age NI; Commissioner for Older People for Northern Ireland, 25 September 2024  
<https://aims.niassembly.gov.uk/officialreport/minutesofevidencereport.aspx?AgendaId=33788&eventId=17162>
- Age Equality Policy Priorities and Recommendations, Equality Commission for NI, December 2017  
<https://www.equalityni.org/ECNI/media/ECNI/Publications/Delivering%20Equality/AgePolicyPriorities-Full.pdf>



- Strengthening protection for children and young people when accessing goods, facilities and services, NICCY and ECNI  
<https://www.niccy.org/wp-content/uploads/media/1300/niccy-gfs-young-persons-report-oct-13.pdf>
- Goods, Facilities and Services Case Studies, NICCY  
<https://www.niccy.org/wp-content/uploads/media/1512/gfs-case-studies-july-15.pdf>
- Strengthening Protection for All Ages against Age Discrimination outside the Workplace, Examples to illustrate older people's experiences when accessing goods and services, Institute for Conflict Research for the Equality Commission, March 2014  
<https://www.equalityni.org/ECNI/media/ECNI/Publications/Delivering%20Equality/Age-Discrimination-ICR-Final-Report-Final.pdf>

## **9. Age-Based Practices and Exceptions**

**Some age-based practices may be justified, such as age-based discount programs or private clubs related to age. How should these be handled?**

### **Allow exceptions for specific cases**

Equality law allows for exemptions based on legitimate aims and we see no reason why this should not also be the case for this legislation. The Women's Regional Consortium agrees with Age NI in urging caution over exemptions that are too broad. We support Age NI's recommendation that only exceptions that fulfil a social policy aim should be allowed. This means exceptions that are for the social good, not for financial gain.

### **Can you provide an example of a justifiable or unjustifiable age-based practice?**

An example of a justifiable exemption would be offering discounted rates to pensioners so that they are able to more easily access amenities such as discounted or free travel on public transport. In terms of membership groups, such as youth groups, setting an upper age limit would be another example of a justifiable age-based practice.

## **10. Enforcement and Accountability**

**What measures should be in place to enforce the legislation and hold violators accountable? (Select all that apply)**

The Women's Regional Consortium agree with Age NI that the measures put in place to enforce the legislation and hold violators accountable should be the same as those that exist for discrimination with regards to the other protected groups. A complaint of discrimination in the provision of goods, facilities and services must currently be made to the County Court within six months of the date the discrimination took place. Support is available for people thinking of making a complaint from the Equality Commission.

## **11. Mitigation and Alternatives**

**a) Do you foresee any potential adverse impacts of the legislation?**

We do not see any potential adverse impacts of the legislation but rather positive impacts.

**b) Are there alternative policies that might better promote equality?**

The Women's Regional Consortium do not have any alternative policies that might better promote equality and believe that the introduction of this legislation is essential to provide protections against age discrimination in the provision of goods, facilities and services.

However, we do believe there are other Strategies and legislation which could strengthen equality further, be fully intersectional and provide increased protections on discrimination namely the full suite of Social Inclusion Strategies (Gender, Anti-Poverty, Disability and LGBTQIA+), the introduction of a Bill of Rights for Northern Ireland and the introduction of a single Equality Act.

## **12. Additional Comments**

**Do you have any further comments or suggestions about the proposed legislation or its potential impact?**

The proposed legislation is likely to have positive outcomes for people of all ages.

We restate our earlier comments that women have greater life expectancy than men and are therefore likely to see greater positive impacts from the introduction of this legislation.