

Preventing Abuse of Older People Consultation response

October 2022

1. Do you agree that the three overall objectives are appropriate? If not, what should they be?

We tend to agree.

Age Cymru welcomes the positive development of an action plan to tackle some of the root causes and effects of harm and neglect in relation to older people. We feel that the plan would benefit from some restructuring:

- i. Clearer direction is needed on how the individual elements of the plan come together with an overarching aim. We believe that the focus of the plan must be preventing the abuse and neglect of all older people, irrespective of their need for care and support.
- ii. A time for delivery of the plan should be included, with review dates.
- iii. Clear commitments set out as goals and targets, specific timescales, clarity around who will be involved in delivery, and what “better” will look like.
- iv. Clear commitments set out as goals, with detail regarding deliverables and accountability, including specific measures with the data to be used.
- v. Clarity is needed within the plan on which projects, agencies and services are able to contribute to ending the abuse and neglect of older people and the extent of the role they can play. This will assist with identifying where any existing and additional resourcing should be targeted to be most effective

Current data around abuse largely relates to outputs not outcomes, such as the number of victims, safeguarding referrals and numbers supported through specialist services. Age related data is scarcer for a number of reasons, but it is important that this is captured in order to see any changes that need to be made in order to ensure that the various age groups of older people’s needs are being addressed.

Objective 3 as it currently reads ‘Older people receiving care and support are protected from becoming at risk of abuse or neglect,’ may inadvertently exclude older people who are not in receipt of care and support through social care to many readers. Age Cymru Advice has seen a marked increase in the number of people contacting us asking about privately sourcing community care in the last year, which we believe is closely linked to the staffing crisis in domiciliary care. Our *Why are we Waiting?*¹ report on delays in access to social care highlights the length of delays

¹ www.agecymru.org.uk/why-are-we-waiting

many older people are experiencing trying to get the right care and support they need at the right time and in the right place. We also know that victims of abuse can be isolated by their abuser from health and care services they need.

As such, it is important that the language and wording used in the plan is inclusive of all. We suggest 'Older people are protected from becoming at risk of abuse or neglect,' if this aim/objective is used in the final version.

We welcome the references in the Action Plan to issues of ageism in society, as ageist attitudes and assumptions create a climate which helps perpetuate abuse and neglect. We have heard from older survivors through engagement sessions that they feel there is a perception that the abuse 'can't be that bad' if they have stayed with the abuser for many years, and such perceptions need to be tackled.

2. Are the specific issues facing older people in respect of potential abuse and neglect captured appropriately and set out in a clear and useful way? If not, what else should be captured (and how)?

Unsure.

We felt that most risk factors were covered. Many of the issues are covered in narrative format from which the actions should be drawn out and presented as suggested in our response to section 1.

Some of the actions in the action plan focus on past actions taken to help address the issue of abuse. More detailed actions are needed on how Welsh Government will work with various organisations on newer initiatives. Whilst it is important that these previous actions are acknowledged and understood, the plan must demonstrate progress if the commitment to ending abuse is a serious one. A clear plan is needed that includes actions and timescales.

We welcome the action to develop new practice guidance on self-neglect to support practice across relevant settings. The 2014 Social Services and Wellbeing Act does not mention self-neglect and nor does the guidance. This contrasts with England (mentioned in the Care Act guidance) and Scotland (referred to as self-harm in the legislation). Whilst some good work has been done since the VAWDASV Act, it is difficult to know what concrete results have been achieved. However, it is good that greater recognition is now given to older people who experience domestic abuse.

A significant amount of financial abuse is perpetrated by those known to older people and this is often more difficult to identify than scams. More work needs to be focussed on how financial abuse can be prevented, taking into account the potential increased risk of this happening in the midst of a cost-of-living crisis.

3. Are approaches to meeting the care and support needs of older people at risk of abuse or neglect set out in a clear and useful way?

Tend to agree.

The plan would benefit by detailing how Welsh Government commitments in the plan will require partners such as local authorities and regional health boards to implement actions from the plan. The Social Services and Well-being (Wales) Act includes a requirement for service user involvement, and this is not explicit in the plan as it stands.

We feel that further consideration is needed on which agencies have a role to play in preventing abuse and neglect. For example, the section at the top of page 9 states that the victim/survivor can be supported to stay in their own home and refers to target hardening and changes in renting law in Wales as a means of supporting this. We are aware of reductions in target hardening resources in recent years, as well as inequalities across Wales in levels of provision. Target hardening certainly has a role to play, but other agencies also have a part in enabling older people to stay in their own home thereby maintaining local support networks that may breakdown if the survivor moves. The role of local authority housing services is key, and more details of how they contribute to preventing abuse should be included.

Linked to this, we are aware of cases where target hardening has only been offered weeks after the disclosure of abuse and the victim has by this time paid for private target hardening measures themselves. By this time further harm can have taken place, particularly given how a disclosure can trigger increased risk to the victim/survivor. Consideration is needed on whether services can provide the right help at the right time, and whether the survivor's voice is central to decision making on their care, support and safeguarding they receive.

With the implementation of Liberty Protection Safeguards which replaces DoLS, and the associated guidance for Wales, we would like to see the details of how the new guidance is reflected in this plan in preventing abuse.

We welcome the efforts of Welsh Government on retention and recruitment of care staff and the additional financial commitment to carer's support. We are concerned at the drastic increases in care that unpaid carers have been undertaking and how this may be contributing to an increase in abuse and neglect – simply through exhaustion where there is no ill intent. We have heard from older carers how terrible they feel that they are so exhausted from providing personal care that they do not have the energy to meet their loved one's wellbeing and mental health needs and the drastic affects this has on theirs and their loved one's daily lives. We recognise the national challenges in delivering on sufficient levels of care available in both residential and community care. Improvements here will support the prevention of abuse and neglect.

From April 2023 Wales will have the new Citizens Voice Body to represent the opinions of the people of Wales on health and social care. It is important that this is well publicised in a variety of media channels to ensure that the people of Wales have a voice on health and social care. This should have an additional focus on offline channels for older people who are digitally excluded. This can contribute to

improvements in earlier intervention for people at risk of abuse, particularly in care settings.

We welcome the inclusion of how information sharing should not be a barrier to good safeguarding practice and that non statutory guidance will be developed on information sharing. A lack of information sharing has long been a recurring factor in serious case reviews. It is vital that the guidance is robust and clear on why sharing information is vital to reduce risk and prevent abuse.

We feel that the section on older people's rights should feature at the start of the document as they set the scene. References should be made to Welsh Government's commissioned report (2022) 'Strengthening and advancing equality and human rights in Wales,' and Welsh Government's response to the findings of the report.

As the Action Plan acknowledges, many older people are digitally excluded, and this is increasingly a challenge in a digital world. Callers to our information and advice service tell us they feel that they are not able to be as independent as they would like each time they have to ask family and friends to find things out for them online. As more information and services are made available mainly or exclusively online, there are real risks of excluding older people. For some people it is impossible for them to get online - they don't have the financial ability to buy computers, smart phones or commit to paying a monthly internet service payment. It is important that information about what constitutes abuse and what services and support are available in printed format in a range of community settings.

Older people who wish to do so must be supported and encouraged to acquire digital skills and get online if they are able to and can afford to. We are fully supportive of the training services that are referenced in the Action Plan. We would emphasise that services provided online need to be high quality and easy to use, whilst offline services should be of equal quality and fully accessible. We support references in the Plan regarding 'for people who cannot, or decide not to, participate digitally, we will continue to apply the principles of user centred design so that there are alternative ways to access public services in Wales - alternative access routes which will be as good as those offered online,' and we would welcome further details regarding the accessibility of such available services in the context of preventing abuse.

4. Do you agree that the Action Plan addresses the major risk factors facing older people at risk of abuse or neglect? If not, what else should be addressed?

Tend to agree.

We would generally agree that the Action Plan addresses the major risk factors.

We believe there is an opportunity through these developments to increase awareness amongst older people of risk and dangers of scams. Older people are at increased risk of scams, as has previously been seen through changes in technology

(e.g. TV aerials, telephone lines). More could be done to communicate some of the risks and raise awareness amongst older people of the risks and dangers and how to avoid falling victim to some of the harms. We would like to see what preventative plans there are to educate older people about types of scams e.g., TV, radio and local newspaper campaigns.

Another important aspect is ensuring that the public, as well as professionals, know how to go about reporting concerns relating to abuse or neglect. The processes for reporting or raising concerns would benefit from being simplified and made clearer.

5. We would like to know your views on the effects that the Welsh Government Action Plan on Preventing the Abuse of Older People would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

It is vital that Welsh language provision is available in both residential and community care for people whose first language is Welsh and particularly for those living with dementia. It has been four years since the Welsh Language Commissioner's report on the lack of Welsh language care and 10 years since the strategic framework, More Than Just Words was published. In this time, we have heard from families who have had to take their loved ones out of care homes as no Welsh speaking staff were available and so their needs could not be met.

The pandemic has seen a more rapid decline in functioning of many people living with dementia², and so it is vital that improving quality of care through such a simple thing as being able to meet care needs through the Welsh language in Wales is given high priority.

6. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

A clearer picture would be beneficial on the data around the domestic abuse of older men and women, their risk factors and the services they may need when they seek help and support. The Older People's Commissioner's report, "Improving support and services for older men experiencing domestic abuse" report³ includes a series of recommendations for reducing abuse of older men and these need to be reflected in

² [https://www.thelancet.com/journals/eclinm/article/PIIS2589-5370\(21\)00327-8/fulltext](https://www.thelancet.com/journals/eclinm/article/PIIS2589-5370(21)00327-8/fulltext) accessed 17/10/2022

³ [Improving Support and Services for Older Men Experiencing Domestic Abuse - Older People's Commissioner for Wales](#)

the action plan. Learning from other research, such as that from the Dewis Choices project at Aberystwyth University, should be utilised to help tailor the development of support services more appropriate to older people's needs. Older people may be unaware that they are experiencing is abuse. We would like to see further inclusion of increased low-level targeted prevention campaigns within the plan. Research demonstrates that a disclosure of abuse is more likely to be made to someone that the victim has built a relationship of trust with. Since the pandemic more appointments, assessments and support sessions are done remotely and not face to face. There is a danger that this will reduce opportunities for agencies to see signs of abuse and be able to ask questions around safety. Public services need to consider the increased risk of signs being missed in the move to online and telephone services.

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