



Llywodraeth Cymru
Welsh Government

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Welsh Government
Consultation – summary of responses

National Action Plan to Prevent the Abuse of Older People

April 2023

Mae'r ddogfen hon ar gael yn Gymraeg hefyd / This document is also available in Welsh
Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg / We welcome correspondence and telephone calls in Welsh

Overview

The draft action plan aims to:

- help older people live independently and with dignity
- give older people who are at risk of abuse or neglect adequate support from safeguarding services
- help older people experiencing domestic abuse or sexual violence access relevant support
- protect older people receiving care and support from abuse or neglect

Action Required

This document is for information only.

Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

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Additional copies

This summary of response and copies of all the consultation documentation are published in electronic form only and can be accessed on the Welsh Government's website.

Link to the consultation documentation: [hyperlink](#)

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National Action Plan to Prevent the Abuse of Older People

Section 1

Introduction

The proposals in the draft Action Plan to Prevent the Abuse of Older People build upon work undertaken with the Action Group on Abuse established by the Older People's Commissioner for Wales in April 2020. It is a cross government piece of work with a focus, not only on addressing abuse and neglect of older people, but on creating the circumstances in which abuse and neglect of older people is less likely to take place. The Action Plan also flows from the Welsh Government's Strategy for an Ageing Society 'Age Friendly Wales: Our Strategy for an Ageing Society' published in October 2021. The UN Principles for Older Persons state that 'Older persons should be able to live in dignity and security and be free of exploitation and physical or mental abuse'. The Welsh Government is clear that abuse or neglect in any form against older people will not be tolerated. Age does not diminish an individual's right to live with dignity and respect. The Action Plan sets out a series of measures which the Welsh Government will put in place across Government to ensure that older people are protected from all types of abuse, and to prevent them from being at risk of abuse. It builds upon much good work done under the Social Services and Well-being (Wales) Act 2014, the Regulation and Inspection of Social Care (Wales) Act 2016, and the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015.

A consultation was conducted on the draft action plan and ran from 8 August 2022 to 17 October 2022.

The consultation was distributed to:

- ADSS Cymru
- Age Cymru
- BASW
- Both Parents Matter
- Cardiff and Vale Safeguarding Adults Board
- Care Inspectorate Wales
- Church in Wales
- Cwm Taf Morgannwg Safeguarding Adults Board
- DEWIS Choice
- Dyfed Powys Police
- EROSH
- Get Safe On-line
- Gwent Police
- Gwent Safeguarding Adults Board

- Hourglass Cymru
- Llamau
- Mid and West Wales Safeguarding Adults Board
- Older People's Commissioner Action Group on Abuse
- Members of the Ministerial Advisory Forum on Ageing
- Merthyr Valley Homes
- North Wales Safeguarding Adults Board
- National Independent Safeguarding Board for Wales
- National Trading Standards
- Neighbourhood Watch
- NHS Safeguarding Network
- North Wales Police
- Public Health Wales
- Rhondda Cynon Taf People First
- Royal College of Nursing Wales
- Social Care Wales
- South Wales Police
- Trading Standards (Wales representative)
- Wales Violence Prevention Unit
- WCVA
- Welsh Ambulance Service Trust
- Welsh Women's Aid (Live Fear Free Helpline)
- West Glamorgan Safeguarding Adults Board
- West Wales Domestic Abuse Services

In total 57 responses were received. A list of respondents (where they chose not to remain anonymous) is attached at Annex A. A summary of consultation responses together with Welsh Government analysis can be found in Section 2.

Consultation Events

No specific consultation events were held but the draft action plan was developed with the Older People's Commissioner's action group on preventing abuse and presented and discussed at many events including:-

- Older People's Commissioner Stopping Abuse Action Group – 23 March 2021 and 9 November 2021
- Open Meeting hosted by the Older People's Commissioner on Stopping the Abuse of Older People – 7 December 2021
- Presentation to Safeguarding Board Business Unit Managers – 10 March 2022

- Safeguarding Board Chairs – 26 January 2022 and 23 November 2022
- 2 Presentations during Safeguarding Week 2021; Adult Safeguarding Conference hosted by the National Independent Safeguarding Board 17 November 2021 and Advocacy 'Big Event' 18 November 2021 hosted by Age Cymru.

All events were held virtually and were intended to promote engagement with the consultation and provide a base level of understanding to key stakeholder groups of the areas we were consulting on. Welsh Government social media channels were also used to distribute information about the consultation.

Section 2

Welsh Government Analysis

Overall, the majority of respondents were positive in their reactions to the proposals outlined in the consultation document and comments were generally favourable, though with some suggestions for ways the plan could be improved and older people better protected from experiencing or being at risk of abuse and neglect.

Key themes from the responses are the need to:

- Broaden the overall objectives to include those not in need of care and support
- Provide for a reporting mechanism on implementation of the Plan. In response, the Welsh Government will undertake to publish a delivery report within 12 months of publication
- Provide a stronger focus on the rights of older people
- Address the needs of older people experiencing domestic abuse.
- Promote further research to identify early intervention and preventative strategies, to prevent the abuse of older people
- Reflect and encourage work under way in Care Inspectorate Wales and Social Care Wales to support positive cultures in social care services.

These points are addressed in the revised draft.

Response to the Consultation Questions

In each case percentages are of those who responded to the question

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

		Percentage	Total
1	Agree strongly	38.89%	21
2	Tend to agree	40.74%	22
3	Disagree strongly	5.56%	3
4	Tend to disagree	11.11%	6
5	Unsure	3.7%	2

A large majority of respondents who provided a response to this question tended to agree, or agreed strongly, that the objectives were appropriate, clear and relevant. Some suggestions were made that attention needs to be paid to how older people find the relevant information for them to have their needs met, that there should be a specific 'Information Hub for the Older Person' which houses all the information they need both online and out in the community. The Welsh Government believes that the Age Cymru information and advice pages (<https://www.ageuk.org.uk/cymru/information-advice/>) perform a similar function and we will seek to find ways to strengthen this function.

The need for training in different ways to communicate and pinpoint signs of abuse/neglect was also highlighted, along with the pressures currently facing the social care sector. The Welsh Government believes that the National Safeguarding Training, Learning and Development Standards (<https://socialcare.wales/resources-guidance/safeguarding-list/national-safeguarding-training-learning-and-development-standards>) launched by Social Care Wales in October 2022 seek to ensure that Training, learning and development opportunities will match the role of the practitioner so that they are well prepared and skilled to carry out their role.

One respondent suggested it would strengthen the document to have a clearer vision statement for an Age Friendly Wales (as described in the introduction), where the rights of Older People are upheld, and to see this specific plan clearly set out in that context, and that the third objective "Older people receiving care and support are protected from becoming at risk of abuse or neglect" should come first. It was further suggested that this objective be amended to be more inclusive of older people

regardless of their needs for care and support. Also, that the language of ‘empowerment’ should be strengthened and that would be in accord with the Social Services and Well-being Act 2014. The Welsh Government believes it is important to state that this Action plan neither re-places or supplants ‘An Age Friendly Wales’ but is intended to supplement it.

One respondent suggested the draft was not inclusive of male victims of violence. Perpetrators of violence include women, children and other family members as well as friends. This is recognised, and addressed the VAWDASV strategy 2022-2026 (<https://www.gov.wales/violence-against-women-domestic-abuse-and-sexual-violence-strategy-2022-2026-html>)

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)?

		Percentage	Total
1	Yes	53.19%	25
2	No	31.91%	15
3	Unsure	14.89%	7

The majority of respondents agreed that the issues facing older people in respect of potential abuse and neglect were set out in a clear and useful way.

A significant minority did not, though, and a number of useful suggestions were made. Domestic abuse was one area where it was suggested the needs specific to older people should be given greater attention. This is recognised and will be taken forward through the Older People’s workstream under the VAWDASV strategy. The need for clearer and more time-sensitive allocation of actions was suggested. The Welsh Government will publish a delivery report within 12 months of publication of the final action plan.

Support for Carers was seen to be an issue of concern. The Welsh Government believes it is important to draw the linkages between strategies and action plans addressing different areas of policy, in this instance so that the existing Strategy for Unpaid Carers is appropriately informed by Safeguarding concerns.

While references to producing practice guidance were welcomed, support for implementation was encouraged. Some respondents felt the disproportionate Health needs of older people could be recognised, in particular, in the concept of ageism.

Some respondents suggested that the potential links between cost-of-living pressures, social isolation and financial abuse should be better drawn out, along with the specific challenges around leaving abusive relationships in later life.

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?

		Percentage	Total
1	Agree strongly	18%	9
2	Tend to agree	50%	25
3	Disagree strongly	8%	4
4	Tend to disagree	20%	10
5	Unsure	4%	2

Several respondents argued for a greater degree of co-production with voluntary and statutory agencies, and with older people. One suggested that there could be more focus on the expansion of registration and regulation of social care workers.

The production of guidance on cases of self-neglect and greater recognition for unpaid carers was welcomed though a focus on non-financial support for unpaid carers was encouraged. The need for greater clarity around timescales was, again, raised, as was the need for more granular data on the nature of abuse experienced by older people who fall within different groups.

Age specific training and recognition of the challenges associated with terminating abusive relationships in later life, were pointed to as areas where focus would be beneficial.

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?

		Percentage	Total
1	Agree strongly	20.4%	10
2	Tend to agree	46.94%	23
3	Disagree strongly	14.29%	7
4	Tend to disagree	18.37%	9
5	Unsure	0.00%	0

Several comments focussed on the need to address pressures facing older people during the pandemic period, in particular, in relation to health and social care services and arising from loneliness and isolation, including access to digital technologies. One respondent commented ‘The Covid-19 pandemic has highlighted significant health inequalities across all sections of UK society. Research and policy reports have identified the poorer outcomes in support services for people from marginalised and racialised community backgrounds. Abuse and neglect are a threat to people of all backgrounds and it is important to recognise and address this by working with trusted community third sector and VCSE [Voluntary, Community and Social Enterprise] organisations with roots in diverse communities to ensure that the plan is effective for all older people in Welsh society’.

The focus on identifying and responding to domestic abuse and its’ affects for older people was welcomed and the need for suitable refuge accommodation was emphasised.

Attention to promoting older people’s rights was welcomed. Data and the technical practicalities of information sharing between agencies were identified as areas that would benefit from attention.

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? Please comment:

Open-Ended Question - 71.92%, or 41, responded

Several respondents pointed to the importance of receiving services in the language of preference, and that this may be even greater significance for older people with certain conditions, such as dementia. Others suggested that the high demand for, and cost of, translation services, emphasised the importance of providing services in the preferred language of the service user from the first point of contact.

Others pointed to the need to further deliver the 'Active Offer' approach suggested by 'More than just words' (<https://gov.wales/sites/default/files/publications/2019-04/delivering-the-active-offer-information-pack-social-services-and-social-care.pdf>)

One stated that the implementation of live translation technology would enable individuals and professionals to communicate more fluently and give the individual greater opportunity to speak in their preferred language.

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:

Open-Ended Question - 71.92%, or 41, responded

Several respondents addressed the general challenges facing the Health and Social Care Sector in workforce and financial terms. The importance of 'respite' care was emphasised, as was the need for more person-centred care. The inter-relationship between carers allowance and the state benefit system (pensions) was raised.

One called for greater clarity and specificity around the actions and associated timescales, perhaps by way of a summary or appendix, while several others stated that the action plan is comprehensive and covers a significant number of areas that require focus and priority, with clear headings and responsibilities.

One suggested the need for more current data collection.

One respondent suggested there should be a greater focus on the treatment that older people receive from health services as well as from social care.

One suggested that the lockdown period had led to an increase in the incidence of self-neglect and hoarding behaviour and that this needs to be addressed, and that the plan should recognise the importance of support to achieve a warm, safe, accessible home as a method of improving resilience and preventing abuse at home.

Annex A - List of respondents

No	Confidential	Confidential	Name	Organisation/On behalf of
1.		No	Wendy Williams CBE	HMI Inspectorate of Fire and Rescue Services
2.	Yes			
3.		No	Russell Goodway	Community Pharmacy Wales
4.		No	Mandy Nichols-Davies	Hywel Dda University Health Board
5.		No		National Independent Safeguarding Board for Wales
6.		No	Linda Anderton	NHS Wales Safeguarding Network VAWDASV Sub-group
7.		No	Kylie Sisson	Christian Science Committee on Publication
8.		No		Flintshire County Council Social Services
9.		No	SG Milsom	Cymru Older Peoples Alliance
10.		No	Jennifer Mills	Welsh Women's Aid
11.		No	Dr Alex Walker	Wales Violence Prevention Unit
12.		No	Alwyn Fortune	Royal Pharmaceutical Society Wales
13.		No	Melanie Minty	Care Forum Wales
14.		No	Mark Bowler	Conwy County Borough Council
15.		No	Ceri Wood	Gwent Safeguarding Boards
16.		No	Jane Harris	Age Concern Pontarddulais
17.		No	Jake Smith	Carers Wales
18.		No	Ceri Cryer, Helen Twidle, Louise Hughes	Age Cymru
19.		No	Stewart Blythe	Welsh Local Government Association
20.		No	Moussa Haddad	Vegetarian for Life
21.		No	George Parish-Wallace	Alzheimer's Society Cymru
22.		No	Katherine Lowther	Royal College of Psychiatrists
23.	Yes			
24.		No	Helena Herklots CBE	Older People's Commissioner for Wales
25.		No	Christopher Williams	Age Alliance Wales

No	Confidential	Confidential	Name	Organisation/On behalf of
26.	Yes			
27.	Yes			
28.	Yes			Individual
29.	Yes			Individual
30.	Yes			Individual
31.	Yes			Individual
32.	Yes			
33.	Yes			
34.	Yes			
35.	Yes			
36.		No	Peter Bowler	Newport City Council
37.		No	Richard Harrison	Flintshire 50+ Action Group
38.		No	Maria Molyneux/Madeleine Thomas	Total Care Ltd
39.	Yes			Individual
40.	Yes			
41.	Yes			
42.		No	Bernadette Grabowska-Kirk	Individual
43.		No	Delyth Pridding	Wrexham County Borough Council
44.		No	Alaw Pierce	Cyngor Sir Ddinbych
45.		No	Jeremy Bacon	Individual
46.		No	Tina Jenkins	Velindre University NHS Trust
47.		No	Sarah McCarthy	Social Care Wales
48.		No	Dawn Griffin	Swansea Bay University Health Board
49.		No	Dereck Roberts	National Pensioners Convention Wales
50.		No	Isobel Lloyd	Pobl Group
51.		No	Diana Owen	Individual
52.	Yes			
53.		No	Danny Tatlow	Hourglass
54.		No	Gaynor Daniel	Individual
55.		No	Anastasia Fadeeva, Polina Obolenskaya, Sally McManus, Ladan Hashemi	Violence and Society Centre, University of London
56.		No	Becky Ricketts	Care and Repair Cymru
57.		No	Sarah Taylor	City and County of Swansea