

**Consultation  
Response Form**

Your name: S G Milsom

Organisation (if applicable): Cymru Older Peoples Alliance

email / telephone number:  
Cymru.older.peoples.alliance@gmail.com

Your address: C/o Age Cymru, Mariners House, east Moors Rd, Cardiff CF24 5TD

<b>National action plan to prevent the abuse of older people</b>		
<b>1. Do you agree that the three overall objectives are appropriate? If not, what should they be?</b>		
<b>Agree Strongly</b> <input type="checkbox"/> <b>Tend to Agree</b> <input checked="" type="checkbox"/>	<b>Disagree strongly</b> <input type="checkbox"/> <b>Tend to Disagree</b> <input type="checkbox"/>	<b>Unsure</b> <input type="checkbox"/>
Please comment:  The three overall objectives in themselves are appropriate but an overarching aim is needed to demonstrate that Welsh Government are serious about this issue and are giving it greater priority		
<b>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)?</b>		
<b>Yes</b> <input type="checkbox"/>	<b>No</b> <input type="checkbox"/>	<b>Unsure</b> <input checked="" type="checkbox"/>

Please comment:

Many of the issues are covered in well-written narrative format but the actions to be taken are sometimes a little vague e.g., pages 9,16,17,19,21. The actions – “we will” statements - are difficult to easily identify. There are no details of what the outcome will be, who will take action and by when or with what resources. An action for Unpaid Carers is needed. A summary table of actions would be helpful

**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?**

**Agree Strongly**   
**Tend to Agree**

**Disagree strongly**   
**Tend to Disagree**

**Unsure**

Please comment:

Little mention is given as to how Welsh Government commitments will require partners such as Councils, LHBs to implement e.g., funded programmes, statutory guidance, regulation etc. Also, co-production of the policies and involving older people as service users from the outset is not explicit – as required by the SSWB Act 14. It feels as if it is all being “done” to older people not “with them”

**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?**

**Agree Strongly**

**Tend to Agree**

**Disagree strongly**

**Tend to Disagree**

**Unsure**

Please comment:

Generally, agree but in respect of Human Rights it is all vague and no mention is made of the Report published in 2022 by Welsh Government "Strengthening and advancing equality and human rights in Wales" (Swansea University) and what actions will be taken in respect of its recommendations including "Welsh Government should introduce primary legislation to give effect to international human rights in Welsh law through a Human Rights (Wales) Act "

**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:

An implicit reference is needed to "More than Just Words" and the "First Offer" in the context of abuse of older people

**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:**

Please comment:

Other issues not covered (or sufficiently) are the subject of recent reports by the Commissioner for Older People:

- More tailored support for older people being abused
- Controlling and coercive behaviour
- Support for men experiencing domestic abuse
- Tackling ageism and age discrimination
- Abuse where LPAs are misused for financial gain

**Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:**