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Submitted to Consultation draft of the National Plan to End the Abuse and Mistreatment of Older People 2024-2034
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Questions about you

What is your name?

Name:
Anne-Maree Amies

What is your email address?

Email:
anne-maree.amies@wyndham.vic.gov.au

Do your views officially represent those of an organisation?

Yes

If yes, please specify the name of the organisation:
Wyndham City Council

Questions about your organisation

Which category best describes you/your organisation?

government

Please expand on your response:

Local Council

Where is your organisation based?

Victoria

What category best describes your organisation's region?

Choose::
Metropolitan

National Plan

I support the Attorneys-General of each Australian state and territory working towards ending the abuse and mistreatment of older people.

Strongly agree

Expand on your response:

Wyndham City Council supports the proposed governance structure for implementation of the National Plan through the Standing Council of Attorneys-General (SCAG). Council is committed to raising awareness of the mistreatment and abuse of older people, ensuring that our older residents can live with dignity and respect. Despite its prevalence, the abuse of older people is often underreported and requires a concentrated advocacy and education effort. Abuse of older people affects our people from across all social, economic, and demographic backgrounds and can take many forms, including financial, emotional, psychological, physical, sexual, spiritual, and social abuse both within the home and outside the home. Wyndham supports the efforts of the Attorneys-General in addressing the mistreatment and abuse of older people and recognises the vital role that local government areas play in advocacy, education, and partnerships to tackle this issue.

I agree with the vision of the National Plan.

Agree

Expand on your response:

Wyndham City Council supports the National Plan's vision but recommends a stronger emphasis on shared responsibility and accountability across all levels of government, care and service providers, and the community. We recommend including an acknowledgment at the forefront, like family violence, elder abuse is everyone's responsibility.

Additionally, the vision should explicitly recognise social inclusion, self-determination, and the agency of older people. A more comprehensive vision could state: 'All older people deserve dignity, safety, inclusion, and respect; their rights protected and upheld; freedom from abuse; and equitable access to services and support in culturally safe environments'.

I support a 10-year National Plan.

Strongly agree

Expand on your response:

A 10-year timeframe is consistent with the Federal Government's Policy Futures in shaping our desired future. It provides a necessary long-term outlook to create sustainable, actionable and measurable, systemic change across ever-changing national and state political agendas. It is important to highlight the need for ongoing evaluation and adaptation throughout this period, as well as clear resourcing and funding commitments across the full term to ensure measurable progress and outcomes.

I support the implementation of the National Plan through two 5-year action plans.

Strongly agree

Expand on your response:

Dividing the Plan into two five-year action plans enables structured implementation, action planning, and periodic review to refine priority actions as new challenges and evidence emerge. It is expected that each five-year action plan will provide more actionable implementation at various levels of government to the broader Plan. Splitting the action plan into five-year terms provides an opportunity to revise and refine the current state of the language used in the Plan, shifting from broad and ambiguous terms to clearer, more measurable actions. This ensures clear and ongoing accountability, transparency, and progress tracking by the Attorneys General of each state and territory.

I agree that the appropriate priority groups are recognised in the National Plan.

Strongly agree

Expand on your response:

We believe this list is comprehensive but recommend adding the word 'Older' before 'Women' for clarity. Additionally, it is essential to recognise that ageing is a complex and multifaceted experience. Intersectional factors shape the needs of each priority group, meaning their experiences cannot be considered in isolation. Each group will likely have additional needs that intersect with other priority areas, requiring a holistic and nuanced approach.

To what extent do you agree that the key principles address a suitable range of areas for ending the abuse and mistreatment of older people?

Agree

Expand on your response:

Wyndham works to address ageism through the EveryAGE Counts campaign, advocating for respect, inclusion, and equal opportunities for people of all ages. Council reinforces its commitment to tackling the mistreatment and abuse of older people through annual awareness campaigns aligned with World Elder Abuse Awareness Day. Additionally, Wyndham City Council's Aged and Disability Service Access Policy ensures equitable service access, promoting inclusion and support for older residents.

Wyndham City Council broadly supports the principles outlined in the Plan, particularly its emphasis on a human rights approach, combatting ageism, and listening to older people and diverse communities. However, to have a greater impact, these principles must be actioned through clear, measurable strategies that translate into systemic change. This includes embedding human rights protections at all levels of governance, ensuring co-designed solutions that reflect lived experiences, and providing sustained investment in frontline services.

Principle 1 & 2: Taking a human rights approach & combatting ageism
• Ensure a human rights-based approach to combating ageism with evidence-based practices at systemic (national and state), community, and individual levels. Advocacy and care must be sustained before, during, and after abuse occurs through long-term safeguards, early identification and intervention, continuous support, and sustainable community-government partnerships. Prevention must extend beyond reporting to drive lasting protection and systemic change.
• Strengthen recognition of vulnerabilities among older refugees, First Nations people, and those with disabilities, by prioritising self-determination within a human rights framework. This includes ensuring culturally safe, accessible, and empowering approaches that respect their unique experiences and needs.

• The Plan acknowledges the value of social and intergenerational connections but lacks clarity on how these connections are fostered and their role in mitigating the impacts of mistreatment and abuse. It should further address how social isolation affects older individuals experiencing abuse and reinforce social inclusion as a key protective factor, outlining concrete strategies to strengthen community connections and reduce isolation.
• Enhance local data collection systems to strengthen baseline reporting, enabling more accurate measurement of program impact and long-term change. This will support evidence-based decision-making and improve the effectiveness of interventions.

Principle 3: Listening and learning from the experiences of older people and diverse communities
• Engage diverse communities across various local areas in co-designed feedback loops to ensure programs reflect lived experiences. Tailor local initiatives to community needs, avoiding one-size-fits-all solutions, even within a national agenda.

Principles 4, 5, and 6: Early Intervention, Legal Frameworks, and Trauma-Informed Responses
• Develop locally adapted, adequately resourced, and sustainably funded services to address underreporting and disclosure barriers. The Plan lacks clarity on funding sources, requiring further detail is needed to ensure long-term viability and impact.
• Expand protections to keep older people central to care decisions, adopt a national adult safeguarding framework and strengthening safeguards. This includes but is not limited to ensuring ongoing support for those leaving abusive situations, with access to legal and financial assistance, safe and sustainable housing, trauma-informed counselling, legal protections, and coordinated case management. Safeguarding must extend beyond immediate intervention to help older people rebuild their lives with dignity, safety, security, and autonomy. Expand safeguarding measures to address safety concerns before, during, and after reporting, ensuring protection from retaliation, coercion, and re-victimisation through safe housing, financial support, trauma-informed care, and legal advocacy.
• Promote trauma-informed and culturally appropriate approaches across national and state services, ensuring frontline workers, including interpreters receive the necessary training, resourcing and support for older people facing abuse. Adequate funding should be allocated to sustain this training and implementation effectively in an ongoing manner.

To what extent do you agree that the focus areas address a suitable range of areas for ending the abuse and mistreatment of older people?

Agree

Expand on your response:

Focus Area 1: Increase Whole-of-Community Awareness, Education, and Engagement
• Ensure the Plan incorporates a transparent and sustainable resourcing and funding allocation framework by outlining clear funding mechanisms, identifying specific funding sources, and establishing accountability measures. As actions are implemented and integrated into the five-year action plan, provide detailed reporting on resource distribution and financial sustainability.
• The funding scheme should cover all stages of support at national, state, and local with regular assessments to meet rising demand. Targeted funding must be allocated to support CALD, refugee, and First Nations communities, which face added challenges due to intersectional complexities. This includes supporting non-local interpreters, as diaspora communities often rely on the same interpreters across families, which can create confidentiality concerns.
• Broaden Escaping Violence Payment eligibility to include older people experiencing abuse from non-intimate partners, recognising the risk of abuse by family members, carers, and others in positions of trust. This ensures a more inclusive approach to financial support and strengthens protections for older people facing abuse beyond intimate partner violence, embedding a better understanding of the risks posed by non-intimate perpetrators of abuse of older people.
• While the Plan acknowledges that older women are at higher risk of mistreatment and abuse, it lacks specific activities, services, and engagement strategies to raise awareness, prevent harm, and provide targeted interventions for this cohort. To strengthen its approach, the Plan should further integrate the Gender Impact Assessment (GIA) in alignment with the Gender Equality Act 2020.
• It is important to note that the Plan does not explicitly recognise the care and service provider environment as a key stakeholder in the shared responsibility for preventing the mistreatment and abuse of older people. To ensure accountability, care and service providers are integrated as duty holders, with their responsibilities clearly defined within the safeguarding framework. Strengthening this clarity will reinforce their role in prevention, intervention, and long-term support.
• While awareness efforts rightly focus on supporting victims, the Plan should also recognise and address older people who perpetrate elder abuse, ensuring they have access to education, support, and intervention programs. This includes culturally appropriate approaches that consider family dynamics, intergenerational relationships, and community expectations. By incorporating preventative education and behaviour change initiatives, the Plan can help reduce instances of elder abuse while maintaining a trauma-informed and culturally responsive approach.

Focus Area 2: Enhance Legal Frameworks and Adult Safeguarding Responses
• Legal frameworks should reflect local population differences, including the challenges faced by older residents in CALD, refugee, and First Nations communities. In Wyndham, intergenerational dynamics, mistrust of service and care providers and government more generally, financial constraints, small community dynamics, and cultural barriers hinder abuse reporting.
Key gaps include insufficient protections and emergency funding for family violence in non-intimate contexts, limited access to and understanding of legal support for marginalised groups, inadequate culturally and trauma-informed responses due to blanket policies and resourcing, and a lack of protections against or awareness of Power of Attorney misuse.
• Adopt the Disability Royal Commission's recommendation for a national adult safeguarding framework to standardise protection across local government jurisdictions.
• Highlight the need for better information-sharing across services within existing legal frameworks.

Focus Area 3: Strengthen the Capacity and Capability of Services, Including Targeted Education and Training for Professionals
• Targeted education and training for service providers should be clearly defined and include culturally safe, trauma-informed care, along with strategies for supporting older people from diverse backgrounds. This should also extend to interpreters to ensure effective and sensitive communication in culturally appropriate ways.

Focus Area 4: Address Gaps in the Evidence Base and Increase Collaboration
• Establish a standardised data collection framework across agencies, with potential for a centralised database to improve data sharing and analysis.

Enable timely reporting of relevant data and support local governments in accessing area-specific abuse statistics, including underreported cases, to inform targeted interventions.

To what extent do you agree that the priority actions that accompany each focus area are suitable?

Strongly agree

Expand on your response:

Develop a detailed five-year action plan roadmap outlining achievements, ongoing actions, gaps, and aspirational outcomes from the first National Plan to enhance transparency and accountability. Currently, the National Plan lacks clarity on implementation, evaluation measures, and expected outcomes, leaving national, state, and local governments, care services, and providers—as duty holders—without a clear path forward. Further consultation with states, councils, and care providers is essential as five-year implementation plans are developed. While the National Plan provides a high-level framework, the detailed implementation and accountability measures should be embedded in these plans to ensure alignment with national commitments and effective service delivery.

The Program Logic

The short-term outcomes and benefits are good examples of SMART targets and goals.

Agree

Expand on your response:

• Short-term outcomes should recognise that broad national guidance must be tailored to meet the needs of the priority cohorts identified earlier, ensuring messaging is relevant and effective for each group.
• Online awareness campaigns should prioritise channels, mediums, and methods that effectively reach older and diverse populations, rather than relying on what is most convenient for organisers. This includes printable guides and resources tailored for culturally and linguistically diverse (CALD) communities, developed in local languages and designed by the communities who will use them. Ensuring accessibility and cultural relevance will improve engagement and the effectiveness of awareness initiatives.
• Social connection and inclusion, while referenced in the Plan, require more detailed explanation within the Program Logic to ensure these concepts are meaningfully integrated into actionable strategies.
• The legal frameworks and safeguarding focus use vague terms such as “progress,” “clarify reporting pathways,” and “identify.” We recommend stronger, action-oriented language to clearly link activities to measurable outcomes, such as mandate, implement, establish, ensure, required, etc.
• The capacity and capability-building activities noted in the Program Logic do not currently address the critical need for sustainable funding to support long-term outcomes and implementation of the Plan. This should be explicitly acknowledged and incorporated into the Plan.
• Inhibitors should include a focus on resourcing. Additionally, a significant barrier is not merely the lack of engagement from older people, but also the absence of culturally contextual understanding of mistreatment and abuse among individuals, carers, and care and service providers. This includes recognising the various barriers and reasons that prevent people from seeking services or reporting abuse from a culturally significant lens.
• Reporting and data collection requires enhancement. The activity on "Improved data collection by services" should include mechanisms to provide local municipalities with relevant, timely data to better support their residents, including disaggregated crime statistics.

The medium-term outcomes and benefits are good examples of SMART targets and goals.

Agree

Expand on your response:

• Sustained funding to meet growing demand should be explicitly included in the outcomes to ensure long-term success.
• The outcome related to community awareness should be reframed to highlight that all residents are aware of, can identify, and appropriately respond to mistreatment and abuse, with the necessary support to take action.
• The outcome "Older people are supported to have meaningful social connections" requires further development and greater clarity. The Plan should specify how this will be achieved through concrete activities, as outlined in the short-term outcomes, and clearly articulate why fostering social connections is essential for preventing abuse, reducing isolation, and improving overall well-being.
• The outcome "Increased equity of access to services" should also address accessibility, ensuring services are physically, culturally, and socially accessible to all.
• The Plan omits an important outcome related to the self-determination, dignity, independence, autonomy, and wellbeing of older people. This needs to be included as a key priority, including in the long-term after an older person has been impacted by mistreatment and abuse.
• The outcome "Improved data quality" should encompass reporting at all levels. Additionally, the national evidence-based prevention framework must account for the needs of priority groups rather than focusing solely on the general population. We suggest SCAG approach the Australian Bureau of Statistics to determine the best approach.

The long-term outcomes and benefits are good examples of SMART targets and goals.

Agree

Expand on your response:

• Sustained funding to meet demand should be incorporated into the outcomes to ensure that support and services are consistently available and able to address ongoing and future needs.
• Reframe Medium Term outcome 1 to state ‘A whole-of-community and systems approach must uphold culturally safe and responsive practices,

ensuring the awareness, identification, prevention, and response to abuse and mistreatment.'
• Include an outcome that states: "Older people feel more valued and appreciated within their local area, with an enhanced sense of dignity, independence, and personal autonomy to age well in place."
• Ensure consistent and relevant data is available at the national, state, and local levels to inform targeted and effective responses. This can be achieved by developing a standardised data collection and reporting framework in collaboration with the Australian Institute of Family Studies (AIFS) or the Australian Institute of Health & Welfare (AIHW).

Supporting documents

Upload your attachment

Upload your attachment:
Wyndham Accessibility and Inclusion Plan 2023-2025 14th November 2023.pdf was uploaded