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Llywodraeth Cymru  
Welsh Government

Welsh Government  
Consultation – summary of response

## **Guidance on 'Safeguarding Older People in Wales'**

Information and guidance on domestic abuse.

Date of issue: 22 June 2017

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.  
This document is also available in Welsh.

**Audience:** All individuals and organisations with an interest in issues related to violence against women, domestic abuse and sexual violence aimed at older people in Wales. This includes Specialist Services, Local Authorities, Health Services, Police and Fire and Rescue Services.

**Overview:** This document provides a summary of the consultation responses and the Welsh Government's response to them.

**Action required:** None – for information only.

**Further information:** Enquiries about this document should be directed to:

Violence Against Women, Domestic Abuse and Sexual Violence  
Community Safety Division  
Education and Public Services  
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**Additional copies:** This document can be accessed from the Welsh Government's website at:  
<https://consultations.gov.wales/consultations/information-and-guidance-domestic-abuse-and-sexual-violence-safeguarding-older-people>

**Related documents:**

- The Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015

## Introduction

This document outlines the key themes of the responses received from the public consultation on the *'Information and guidance on domestic abuse: Safeguarding older people in Wales'* guidance. The 12 week consultation ran from 7 December 2015 – 29 February 2016.

It outlines how the responses have informed how the Welsh Government intends to amend the guidance. The report will outline the general themes of the feedback and focus primarily on those pieces of feedback we received multiple times.

It is not possible in this document to represent individual comments or one-off pieces of feedback but each response received to the consultation has been considered individually. The full responses from each individual or organisation have also been published separately.

The Welsh Government would like to thank each individual and organisation who submitted a response to the consultation. Each response submitted as part of this exercise is valued and has been considered carefully.

## Respondents

The consultation exercise engaged 41 individuals and/or organisations. A summary of respondents is provided below:

<b>Organisation profile</b>	<b>Number of individual responses</b>
Housing	2
Local Government/Local Authority	11
Health	9
Fire and Rescue Authority	2
Police/PCC	2
Probation	1
Specialist sector/interest groups	14
<b>Total</b>	<b>41</b>

*This list does not include those individuals or organisations that requested anonymity.*

- Abertawe Bro Morgannwg University Health Board
- Action on Elder Abuse Cymru
- Age Cymru
- Aneurin Bevan University Health Board
- Bridgend, Cardiff and the Vale of Glamorgan Collaboration
- Care Council for Wales
- City of Cardiff Council
- Community Housing Cymru
- Conwy and Denbighshire Community Safety Partnership
- Cwm Taf University Health Board
- Denbighshire County Council/Community Support Services/Adult Social Care
- Diverse Cymru
- Gwent VAWDASV Regional Team
- Gwynedd Council Community Safety Partnership
- Hywel Dda University Health Board

- Mid and West Wales Fire and Rescue Service
- National Offenders Management Service in Wales
- National Partnership Forum of Older People in Wales
- New Pathways
- North Wales Safeguarding Adults Board
- Port Talbot and Afan Women's Aid
- Royal College of General Practitioners Wales
- Safeguarding Childrens Service Public Health Wales
- Safe Lives
- South Wales Fire and Rescue Service
- Stepping Stones North Wales
- Survivors Trust
- Tai Pawb
- Vale 50+ Strategy Forum
- Vale of Glamorgan Council
- Vale of Glamorgan Social Services
- Valleys to Coast Housing Association
- Welsh Ambulance Service NHS Trust
- Wrexham County Borough Council
- Velindre NHS Trust
- Welsh Women's Aid

### **Stakeholder engagement**

The Welsh Government worked closely with the Older People's Commissioner for Wales during all stages of producing the guidance. A Steering Group formed of stakeholders with specialist knowledge of issues relevant to older people who experience, or have experienced, domestic abuse, oversaw the development of the guidance.

The Group saw representation from the Office of the Older People's Commissioner for Wales, relevant Welsh Government departments specialist services, Local Authorities, Health organisations and a prominent academic with expertise in this area of work.

## **Summary of the consultation responses**

Respondents were generally content with the guidance as drafted. However, clarity was requested on definitions used throughout the document, as well as further information on safeguarding, reporting processes and referral pathways. Additional information on working with perpetrators and services in multiple languages was requested.

Many respondents highlighted the importance of case studies to provide real-life examples of how referrals may be carried out in practice.

## **Analysis of response by question**

**Question 1: This guidance states an intention to provide good practice information. Does it go far enough in this regard?**

### **What additional information is required?**

1. A number of respondents stated that the definitions within the guidance were overcomplicated, particularly for:
  - Domestic Abuse
  - Older people
  - Elder abuse
2. Several comments were received that sexual violence was not adequately covered.
3. Respondents identified a number of gaps in relation to the National Training Framework e-learning and other specific models; local support & contact details.
4. Concern was raised that the focus of the tools recommended for use are from one provider (e.g. Safelives tools – IDVA/ISVA (Independent Domestic Violence Adviser/Independent Sexual Violence Adviser)).
5. Both positive and negative feedback (but overall more positive) was received about MARAC (Multi-Agency Risk Assessment Conference). This included seeking clarity on the distinction between MARAC and POVA (Protection of Vulnerable Adults) meetings. Respondents noted the work of MARAC across multi agency forums.
6. Comments were raised that the guidance was strategic/policy led rather than guidance for practitioners/frontline staff.
7. Suggestions were raised around producing separate documents to explore issues/solutions in more detail. Although conversely, comments were also raised that it may be confusing to practitioners to have further guidance specifically in relation to older people.
8. More detail was requested regarding availability of services, referral processes, criteria, support and signposting.
9. Respondents noted the flexibility with 'Ask & Act' to tailor to organisational needs.

10. A number of respondents commented on the coercive control section, particularly querying whether the section was adequate.
11. Comments were raised that the guidance was repetitive.
12. Comments raised around 'Ask and Act' guidance and timelines for publication of both documents.
13. Respondents commented about the implementation of the Social Services and Well-Being (Wales) Act 2014, particularly highlighting the 'Duty to Report' and 'Duty to Enquire'.

**Question 2: What examples of good practice are available across Wales which should be referenced in this guidance? Please consider examples of service provision, tools, documentation and partnership arrangements.**

1. MARAC process mentioned by many – mainly positive.
2. There was a lot of mention of various local Domestic Abuse and Sexual Violence forums across Wales sharing good practice and ensuring consistency.
3. Respondents suggested that narrative should be included about how the MARAC process assists victims.
4. Aberystwyth University 'Choice' project raised as an example of good practice.
5. Several respondents referenced the DASH – RIC (risk checklist).
6. Respondents were in agreement that daily checks are invaluable.
7. It was suggested that the Probation Integrated Domestic Abuse programme should be added.

**Question 3: It is important that services for older people experiencing domestic abuse and sexual violence integrate with existing statutory safeguarding processes. What more should this guidance include to clarify practice around these issues?**

1. Respondents suggested the following:
  - Case studies;
  - Contact details for main services;
  - Duty/referral pathways and criteria need to be clearer;
2. A number of respondents commented that the flowchart was confusing; a suggestion was to have more than one flowchart showing separate pathways and clearly intersecting would be more helpful.
3. As comments were raised around the practicalities of the guidance, some respondents thought a Practitioners guidance note would be helpful.

4. Other comments mentioned singularly but to consider:
  - Alignment of Domestic Abuse & Safeguarding likely to depend heavily on local resources;
  - Consistent representation at MARACs by adult safeguarding;
  - Include links between adult risk process/POVA/ MARAC;
  - No reference to documents: 'In Safe Hands' or 'Protection of Vulnerable Adults' – gaps that professionals will question.
  - Domestic abuse needs to be recorded in own category so there is a better indication of what services are needed;
  - No clear distinction between statutory and voluntary processes and organisations;
  - Reference to other guidance and training programmes should be included;
  - There needs to be clear reference to the 'Ask and Act' corporate responsibility - safe and legal information sharing process between relevant authorities, appropriate training to ask etc.; and
  - Consideration of mechanism for integrating adult service processes and safeguards into the MARAC process as part of the implementation of 'Ask & Act'.

**Question 4: How could this guidance provide opportunities to use the Welsh language? Do you have concerns this guidance could have an adverse effect on opportunities to use the Welsh language?**

1. Respondents felt that the Guidance lacks detail about bi-lingual provision of services.
2. It was suggested that provision needs to be made for all information/training/assessment to be made available in language of choice; first language of victims to be considered and services offered accordingly. Unclear what actions there will be at operational level to facilitate this (and how the services will be monitored).
3. It was widely felt that this Guidance may increase numbers of clients coming forward – impact on service needs to be considered.
4. Respondents were emphatic that there should be equality of access to all those using services.
5. It was felt that the Welsh Government should remind organisations/authorities of their obligation/s in relation to the Welsh Language and should recommend there are sufficient numbers of Welsh trainers on regional training consortia.
6. It was stated that research shows using a person's first language is a support and right in Wales.

**Question 5: 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**

1. Comments raised include:

- Age consistency across guidance/strategies would be welcome; 60+ could be barrier to disclosure (early 60s will struggle);
- Guidance regarding referrals to, for example, SARC (Sexual Assault Referral Centre) and ISVA (Independent Sexual Violence Adviser) would be helpful;
- More info on perpetrators needed;
- 'Survivor' term should be utilised not 'victim';
- Every organisation should have a workplace policy on VAWDASV (violence against women, domestic abuse and sexual violence) issues;
- Clarification on the term carer/care giver/family care needed;
- Welsh Government media campaign would be helpful to highlight issues regarding older people;
- Limited information on sexual violence (including prevalence);
- Lack of clarity in the guidance; particularly what are the links between elder abuse and domestic abuse;
- Guidance on consistent recording and reporting of incidents would be helpful; also clarification on boundaries/escalation procedures;
- The guidance should consider demands/impact on carers; and
- The guidance should focus on protection plan to safeguard individuals.



## **Next Steps Statement**

The Welsh Government is grateful to all individuals and organisations that responded to the consultation on the 'Safeguarding Older People in Wales' Guidance.

Suggested improvements to the Guidance were considered by Welsh Government officials and the Office of the Older People's Commissioner for Wales. Amendments have been made where appropriate, including the addition of case studies and greater emphasis on the unique experiences of groups with protected characteristics.

The document has been restructured to address feedback that more detail should be provided upfront and the safeguarding and domestic abuse content has been aligned. More content has been included on working with perpetrators and a review of relevant documentation has been undertaken and links made where possible.

The document has not been amended to reflect feedback where the subject of that feedback is related to tools or processes that are not "owned" by the Welsh Government. This is because responsibility for such amendments lie with other bodies/organisations. Moreover, these tools and processes are subject to wide ranging feedback and development from many sources which have resulted in ongoing reviews. However, feedback on these processes or tools (such as the MARAC and the DASH) will be communicated to those organisations that are responsible for their ongoing development.

The definitions used in this document have been reviewed and amended where appropriate. However, several definitions are sourced directly from legislation (i.e the Social Services and Well-being (Wales) Act 2014 and the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015. Where this is the case, they have not been amended.

Impact Assessments for Equality, Rights of the Child; and the Welsh Language have been drafted and these are available with the amended guidance document.

The Guidance will be published under Section 60 of the Government of Wales Act 2006 by the Cabinet Secretary for Communities and Children in June 2017.