

# **Support Services for Older People Experiencing Abuse in Wales**



Comisiynydd Pobl Hŷn Cymru  
Older People's Commissioner for Wales

# The Older People's Commissioner for Wales

The Older People's Commissioner for Wales protects and promotes the rights of older people throughout Wales, scrutinising and influencing a wide range of policy and practice to improve their lives. She provides help and support directly to older people through her casework team and works to empower older people and ensure that their voices are heard and acted upon. The Commissioner's role is underpinned by a set of unique legal powers to support her in reviewing the work of public bodies and holding them to account when necessary.

The Commissioner is taking action to end ageism and age discrimination, stop the abuse of older people and enable everyone to age well.

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# Introduction

The primary aim of the research upon which this report is based was to:

- Undertake a comprehensive mapping exercise of the services throughout Wales to support older people experiencing or at risk of abuse
- Identify the availability and type of services being delivered in Wales
- Consider whether the support currently available is sufficient to ensure older people can access the help they need, when and where they need it

This information has been used to develop a new Abuse Support Services directory – available via [www.olderpeoplewales.com/abusesupport](http://www.olderpeoplewales.com/abusesupport) – which can be used by older people and stakeholders to find the services available in their area, and nationally, that can provide help and support when someone is at risk of or experiencing abuse, or is concerned about someone else.

But undertaking this research also provided wider opportunities to explore, in more detail, the current policies and practice in place to support older people, the systems and structures through which these are delivered, and potential gaps in delivery.

Furthermore, it provided a chance to hear directly from stakeholders throughout Wales, including survivors of abuse, about the realities of accessing services, examples of good practice, and the issues, challenges and barriers that can impact upon older people and prevent them from getting the support they need.

This report, which also draws upon wider evidence and research relating to older people's experiences of abuse, provides a summary of the experiences shared and the issues identified, highlighting key areas where change is needed, as set out on page 31 below.

The appendices also provide readers with further, more detailed information about the services, systems and structures in place in Wales to protect older people from abuse and provide them with support, and the different roles played by a large number of organisations throughout Wales.

The Commissioner would like to thank everyone who contributed evidence to this research for sharing such a useful range of views and experiences.

The research on which this report is based was undertaken between November 2020 and January 2021 by Dr Norma Barry and Rhian Bowen-Davies of Inside Out Organisational Solutions. The Commissioner would like to thank them for providing a rich evidence base for this report.

# Definitions and prevalence of abuse

Abuse can take many forms and, as explored in more detail below, has a significant impact upon older people.

The Violence Against Women Domestic Abuse and Sexual Violence [VAWDASV] (Wales) Act 2015 defines a range of offences as abuse, including domestic abuse, sexual violence, violence against women – such as sexual harassment and exploitation – and coercive and controlling behaviour.

Alongside these types of abuse, older people may also experience financial abuse, which may include having money or other property stolen, being defrauded, being put under pressure in relation to money or property, or having money or other property misused.

Despite a growing awareness about the abuse of older people, we still do not have a clear picture of the number of older people experiencing or at risk of abuse as the data available has significant limitations, as examined in the sections below.

Some estimates put the number of older people experiencing abuse in Wales in the tens of thousands, whilst other research suggests this figure is much higher – a study by the World Health Organisation (WHO) indicated that, worldwide, 1 in 6 older people is experiencing some form of abuse. This means the figure for Wales could be over 140,000.<sup>1</sup>

Furthermore, given that the number of older people in Wales is forecast to increase significantly – to over a million by 2030 (up from approximately 830,000 today) – thousands more older people could experience abuse or find themselves at risk in the years ahead, unless action is taken.

# Development and implementation of legislative and policy frameworks in Wales

Policy and practice relating to preventing abuse and protecting individuals experiencing or at risk of abuse in Wales is underpinned by the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act, which was passed in 2015 and built upon the 2010 'Right to be Safe Strategy'.<sup>2</sup>

The purpose of the Act is to improve measures for preventing violence against women, domestic abuse and sexual violence (VAWDASV), as well as improving the protection and support for victims. The Act placed responsibilities on Ministers, local authorities and health boards to prepare strategies for implementation.

This led to the publication of the Welsh Government's 'National Strategy on Violence against Women, Domestic Abuse and Sexual Violence – 2016-2021', which outlines the ways in which the Act will be implemented.<sup>3</sup>

The Strategy also introduced six objectives linked to principles of prevention, protection and support:

- Increase awareness and challenge attitudes of violence against women, domestic abuse and sexual violence across the Welsh population;
- Increased awareness in children and young people of the importance of safe, equal and healthy relationships and that abusive behaviour is always wrong;
- Increased focus on holding perpetrators to account and provide opportunities to change their behaviour based around victim safety;
- Make early intervention and prevention a priority;
- Relevant professionals are trained to provide effective, timely and appropriate responses to victims and survivors; and
- Provide victims with equal access to appropriately resourced, high quality, needs led, strength based, gender responsive services across Wales.

Further action to support the implementation of the Act also includes:

- Statutory guidance issued to relevant authorities e.g. the National Training Framework (NTF) and Commissioning VAWDASV Services
- Standards and good practice guidance relating to working with perpetrators
- Whole education approach good practice guidance
- Development of National VAWDASV indicators

- Development of a National VAWDASV Communication Strategy, including campaigns such as “Crossing the Line” and “Don’t be a Bystander”
- Establishment of National Survivor Engagement Framework

The Act, National Strategy and all relevant policies apply to any individual who may be experiencing any form of VAWDASV. Whilst the Welsh Government recognises that women and girls are disproportionately affected by VAWDASV, its legislative and policy frameworks are clear that ‘VAWDASV terminology’ should be applied to any victim, however they might identify in terms of gender or ethnicity. Statutory guidance relating to the Act also includes a duty to consider the needs of people with protected characteristics when commissioning VAWDASV services in Wales.

This guidance also states that support for people experiencing VAWDASV may come from a range of different organisations – such as community or third sector organisations, local authority statutory providers, health bodies or criminal justice agencies – as well as from specialist services (these are delivered through organisations that are independent of the state and whose core business is to support those impacted by VAWDASV, by staff with specialised, in-depth knowledge).

This has enabled the Welsh Government to collaborate with other statutory bodies and third sector organisations to shape policy and deliver a number of initiatives to provide support to people affected by VAWDASV, including:

- Funding the Live Fear Free Helpline to provide help, advice and emergency support.
- Funding Independent Domestic Violence Advisors (IDVAs) and Independent Sexual Violence Advisors (ISVAs) to provide direct help and support to victims.
- Developing and delivering the National Training Framework, providing statutory guidance for all key public sector and specialist provider professionals across Wales to increase their understanding and knowledge of violence against women, domestic abuse and sexual violence, resulting in improved responses to disclosures.
- Introducing ‘Ask and Act’ - a process of targeted enquiry across the public sector, which aims to increase identification of, and improve responses to, those experiencing violence against women, domestic abuse and sexual violence. Ask and Act is being rolled out across the relevant authorities laid out in the Act, namely local authorities, local health boards, the Fire and Rescue Services Authorities and NHS trusts.
- Developing and implementing a National Communications Framework in partnership with key stakeholders to raise public awareness of, and challenge attitudes, behaviours and practices in relation to all forms of violence against women, domestic abuse and sexual violence. Activities delivered under this framework include:
  - Campaigns such as ‘This is Me’, aimed at tackling gender stereotyping and gender inequality, and ‘Don’t be a Bystander’, which encourages anyone to positively intervene or do something when they are worried someone they know may be experiencing violence against women, domestic abuse and sexual violence;
  - The development of a National Survivor Engagement Framework to ensure that

the needs and experiences of survivors, including the most marginalised, are understood.

- Appointing National Advisors for Violence against Women, Gender-based Violence, Domestic Abuse and Sexual Violence to provide advice on how to implement the 2015 Act and work with survivors and with other stakeholders to shape and inform improvements in the way services are planned, commissioned and delivered.
- Publication of a set of National Indicators which align with the national well-being indicators.

## Scrutinising the implementation of the Act

In 2019, the Wales Audit Office (WAO) published a report that examined progress in implementing the VAWDASV Act. The report presented findings and recommendations across three key areas:

### Working together

The report concluded that, in general, local authorities and their partners do not have a full understanding of the VAWDASV services available, or the demand for them. It recommended that needs assessments were carried out, alongside working with stakeholders to map available services, to provide an accurate picture of services and identify gaps in provision.

The report also recommended that public bodies should produce comprehensive information, in a variety of formats, on the full range of services available to protect and support victims and survivors; create a joint pathway for victims and professionals to access services and support; and promote arrangements widely.

### Prevention

The report acknowledged that some progress had been made in terms of prevention, highlighting that social housing landlords are generally working well to support victims and survivors, and that there had been effective collaboration in some parts of the country.

However, the report identified potential gaps in prevention activity relating to working with perpetrators to prevent abuse, highlighting that only 1 in 5 services providing appropriate perpetrator support.

The report called for delivery bodies to review their approaches to regional working to better integrate services and maximise the impact of services for victims and survivors, as well as training for staff and managers, and new data sharing protocols, to ensure that information could be shared effectively.



## Funding and commissioning

The report raised concerns about the nature of the financial support available for VAWDASV services, which was often fragmented, complex, inconsistent and short-term, as well as highlighting weaknesses in evaluating performance and assessing value for money.

The report therefore called on local authorities to review commissioning arrangements to avoid duplication or overlap between different approaches, improve efficiency, streamline and standardise commissioning arrangements, and set appropriate targets, performance measures and benchmarks.

## Welsh Government draft Strategy for an Ageing Society

The Welsh Government's Strategy for an Ageing Society is due to be published in autumn 2021, following a consultation held between December 2020 and March 2021.<sup>4</sup>

The proposed strategy includes ending the abuse of older people as a specific priority and makes a commitment to publish and implement a national plan to prevent the abuse of older people by the end of 2021, working with the Commissioner and other key partners.

Given the particular ways that abuse can affect older people, and the issues and barriers they can face in accessing support, this commitment to deliver action targeted specifically at older people is an important step forward from the current strategy<sup>5</sup>, where action to tackle abuse is mainstreamed within policies aimed at people of all ages.

## UK legislation

Much of the legislation and policies relating to abuse made in Westminster do not directly affect Wales, but key areas such as policing, the wider justice system and the welfare system remain non-devolved, and decisions made in the UK Parliament can also impact upon funding available for Wales.

The Commissioner therefore monitored the passage of the Domestic Abuse Bill in Westminster, which was undergoing parliamentary scrutiny during the period in which the research was being undertaken, providing briefings to Members of the House of Lords to influence discussion and debate, with a particular focus on the importance of improving the data available relating to older people's experiences of abuse.

A number of new provisions were included within the Bill:

- A legal definition of domestic abuse which incorporates a range of abuse beyond physical violence, including emotional, coercive or controlling behaviour, and economic abuse.

- New protections and support within the courts system, including abusers no longer being allowed to directly cross-examine their victims in the family and civil courts, and providing victims with better access to special measures in the courtroom to help prevent intimidation – such as protective screens and giving evidence via video link.
- New powers for Police, including Domestic Abuse Protection Notices to provide victims with immediate protection from abusers.
- New powers for the courts to hand out Domestic Abuse Protection Orders to help prevent offending by forcing perpetrators to take steps to change their behaviour.
- Establish in law the office of Domestic Abuse Commissioner for England and Wales and set out the Commissioner’s functions and powers.

The Bill subsequently received Royal Assent, and the Domestic Abuse Act 2021 came into force on 29 April 2021.<sup>6</sup>

Alongside this, the Commissioner also worked with Age UK and others to successfully press for the upper age limit of 74 for the England and Wales Crime Survey to be removed; the UK’s National Statistician at the Office for National Statistics has confirmed that the full set of all-ages data will be available from 2023.

# VAWDASV and older people

The type of abuse experienced by older people, as with people of other ages, covers emotional and psychological, physical, sexual, and financial abuse as well as neglect. In many cases concerning older people, coercive and controlling behaviours are also elements of abuse. In Wales, these offences are grouped together under VAWDASV – violence against women, domestic abuse and sexual violence.

Older people often experience a combination of these forms of abuse, which can be exacerbated as a result of particular vulnerabilities due to ageing, such as cognitive impairment, ill health or disability. In many cases, an older person may have experienced abuse for a number of years, with perpetrators often in positions of trust, such as friends or family relations.<sup>7</sup>

Evidence indicates that, on average, older victims experience domestic abuse for twice as long as those under the age of 61 before seeking help and that older people are ‘hugely under-represented’ amongst domestic abuse services.<sup>8</sup>

A number of barriers have been identified that may prevent older people from accessing support, including a lack of awareness of the services available, a perception that support is not for older people, lack of financial resources, a sense of shame or embarrassment; and fear of the consequences of reporting. These barriers can be particularly acute for survivors who have been subject to years of prolonged abuse, are isolated within a particular community through language or culture, are experiencing long term health impacts or disabilities, or those who are reliant on their abuser for their care or money.

There is also evidence that shows that agencies that may come into contact with older survivors and perpetrators do not always identify domestic abuse or provide the right response<sup>9</sup>, which may delay or prevent access to support.

## Prevalence of VAWDASV

Due to significant gaps in the data available relating to older people’s experiences of abuse, and the fact that domestic abuse amongst older people is frequently under-reported and under-recorded<sup>10</sup>, estimates on the prevalence of the abuse of older people vary significantly.

Official statistics relating to the abuse of older people are very limited, particularly as the Crime Survey for England and Wales only captured data for older people aged between the ages of 60 and 74 (following calls from the Commissioner and other organisations, the upper age limit has now been removed; the first all-ages data will be published by the ONS in 2023).

Data for the year ending March 2019 estimates that around 280,000 people aged 60-74 experienced domestic abuse in England and Wales. Extrapolating based on population indicates that for Wales this figure would be approximately 15,000.

Under the Social Services and Well-being (Wales) Act 2014, local authorities have a duty to keep a record of safeguarding reports on adults at risk of abuse or neglect. In 2018-19, a total of 13,089 incidents of suspected abuse or neglect reported to local authorities related to people over the age of 65, 52% of total reports (25,265).

However, other research suggests that these figures significantly underestimate the prevalence of the abuse of older people.

For example, an international study undertaken by the World Health Organisation in 2017<sup>11</sup>, found that 1 in 6 people over the age of 60 is affected by abuse, which would put the figure for Wales at over 140,000, while research from Hourglass indicates that as many as 1 in 5 older people – 170,000 older people in Wales – has experienced abuse in some form.<sup>12</sup>

## Risk factors

The World Health Organisation has identified a number of broad factors that may increase the potential for abuse of an older person, including shared living situations, poor family relationships and increased dependency, as well as social isolation and a lack of social support.

Evidence also indicates that people with certain characteristics may also be at greater risk of abuse, or face additional barriers that may prevent them from accessing support.<sup>13</sup>

For example, data available through local authority safeguarding reports indicates that older women experience higher levels of abuse than other groups: 33% of local authority safeguarding reports related to women aged over 65, compared with 28% for women aged 18-64 and 18% for men aged 65+.

Furthermore, research indicates that 1 in 4 domestic homicide victims is over the age of 60, and that the majority of these victims are female.<sup>14</sup>

Living with a disability increases the likelihood of an older person experiencing domestic abuse as their circumstances may reduce their capacity to defend themselves, or to recognise, report and escape abuse.<sup>15</sup> Other factors, such as a person's reliance on care, physical and environment inaccessibility and social isolation can also increase the risk of abuse. People living with a disability also face additional barriers to accessing support, such as health and social care services and domestic abuse services.<sup>16</sup>

People living with dementia are also at higher risk, particularly when they are dependent on others for care, with a 2013 report from the National Centre for the Protection of Older People, identifying a prevalence rate of between 27.9% and 55%.<sup>17</sup> This means that between 11,500 and 22,700 people living with dementia in Wales could be experiencing abuse.

Evidence relating to the experiences of people from BAME communities indicates that underreporting is more acute within minority communities, and that BAME women are more likely to stay in abusive relationships for longer due to barriers associated with leaving.<sup>18</sup> These may include mistrust of the police or other agencies, leading people to seek informal support<sup>19</sup>; socio-economic status and social isolation<sup>20</sup>; language difficulties and immigration status<sup>21</sup>; and concerns about bringing shame to the family and/or community.<sup>22</sup> It is also important to note that BAME women are 'over-represented' in refuge spaces: BAME women occupy 6 in 10 refuge spaces, despite making up only 13% of the population.

Similar issues and barriers affect LGBTQ+ older people, who are 'by and large invisible in the mainstream support system'.<sup>23</sup> Evidence demonstrates that LGBTQ+ people are unlikely to access help and support and that 60-80% of victims/survivors have never reported incidents to the police to find advice or protection from services.<sup>25</sup> Data also shows that just 2.5% of

survivors accessing domestic abuse services in England and Wales identify as LGBTQ+.<sup>26</sup> Barriers to accessing support include a distrust of services due to previous experiences of homophobia and transphobia<sup>27</sup> and limited understanding amongst some professionals of domestic abuse within the LGBTQ+ community, which results in prejudice, stereotypes and inappropriate responses.<sup>28</sup>

Older people living in rural communities who experience abuse also face additional issues and barriers to accessing support services.<sup>29</sup> Abuse in rural areas is likely to last about 25% longer than in urban areas, something that might partly be due to the fact that reporting in rural areas is lower than in urban locations. Particular barriers include social isolation, services being located some distance away, limited (or possible no) public transport options, and poor broadband connections. Furthermore, people living in rural areas who experience abuse and wish to escape either face a major upheaval by moving to more urban areas, or must continue to live in a community where anonymity is difficult and they are likely to come across their perpetrator.

## Impact of Covid-19

Whilst we do not yet have a full picture of the ways that the pandemic has affected older people experiencing abuse, lockdown increased isolation and reduced contact with family, friends and support networks, as well as with services and professionals, factors that are known to increase the risk of abuse occurring.

At a UK level, there has been an increase in the number of calls to domestic abuse helplines, as well as increased demand for refuge services. There was also a 9% increase in the total number of domestic abuse-related offences recorded by the police during April to June 2020 compared with the same period in 2019, and it has also been reported that the rate of domestic homicides in the UK has doubled since spring 2020.<sup>30</sup>

The picture in Wales appears to be more complex: some members of the Stopping Abuse Action Group<sup>31</sup>, which was established by the Commissioner at the start of the pandemic, reported an increase in contacts from people seeking help from their services or services they worked with, while others highlighted that numbers had fallen, potentially reflecting uncertainties about what services were available amongst people needing support and what their options might be if they wished to escape abuse.

# Findings from stakeholder research

## Research methodologies

The research team used a variety of methods to gather evidence across a number of key areas relating to VAWDASV and the delivery of services and support:

- Dissemination of questionnaires to 29 organisations, including specialist VAWDASV services (38% of these were returned)
- Dissemination of questionnaires to all housing associations in Wales (whilst the number of returns was relatively low, the responses received were representative in terms of geography, size and service provision)
- Presentations to the National Advocacy Network and Welsh Government Covid-19 Strategy Group, followed up with interviews with independent advocates
- Focus group with Independent Sexual Violence Advisers (ISVAs)
- One-to-one discussions with survivors of VAWDASV, Regional VAWDASV Advisers, specialist VAWDASV service managers, Independent Domestic Violence Advisers (IDVA) academics, and an IRIS Educator Advocate
- Review of available reports and data relating to VAWDASV.

Key findings based on the information and evidence captured are set out below.

## Service delivery

Analysis of completed questionnaires from the specialist service providers that responded showed they were all of the view that their services were available and suitable for anyone over the age of 16, although there was recognition that services needed to adapt to improve their appeal and responses to older people experiencing VAWDASV. Particular issues were also highlighted in terms of access to services in rural areas, support for people experiencing mental health issues, and the limited availability of Welsh language services, which may present additional barriers to older people accessing services.

Responses indicated that a lack of older people's voices in the development of services, and a failure to take account of their VAWDASV experiences, is a major factor as to why so few services are adapted to focus specifically on the need of older people.

Some work is already underway to address this, such as IDVA and ISVA services increasing knowledge and awareness of older people's needs through Safe Lives training to improve the way services respond. Similarly, New Pathways has appointed an ISVA with a specific focus on improving engagement with older people who have experienced sexual violence and abuse. It was noted, however, that whilst these organisations have recognised the need to improve their services for older people, this approach is not consistent across the system.

It was suggested that adapting current service models – to allow more time to establish trust and confidence and deliver longer-term interventions, for example – could help to ensure that services were able to meet older people’s needs more effectively. Furthermore, practitioners said that cases of older people experiencing VAWDASV should be dealt with on an individual basis to determine the best approach for meeting personal, identified need, although current processes appear to work against this principle at a local level.

It was suggested that VAWDASV and safeguarding could be better integrated at both operational and system levels to improve responses to older people, particularly in cases where there is conflict as to whether individuals should be supported through MARAC (Multi-Agency Risk Assessment Conference) or safeguarding processes. In addition, strengthening links between specialist VAWDASV services and adult services would help to ensure that older people who do not meet the thresholds for statutory safeguarding and MARAC have a clear pathway for seeking information, advice and support.

Alongside changes to systems and processes, some responses also highlighted the importance of ensuring that VAWDASV is recognised by adult services staff and that appropriate referrals are made. They said that adult services staff have a key role to play in identifying and safeguarding older people experiencing VAWDASV, but they do not always recognise abuse is taking place and consequently the issue is overlooked. This appears to be reflected in the referrals data shared by some specialist services, which showed that only 4-9% of referrals related to older people.

## **Good practice: Dewis Choice project**

The Dewis Choice project was co-designed with older people following research undertaken by Aberystwyth University which found that older people were not being appropriately referred to specialist domestic abuse services or the police, and often received little follow-up support.

Dewis Choice provides support to 20 older people through a Choice Support Worker, who invests time in developing a relationship with the older person by working intensively with them to give them the information they need to enable them to make their own decisions and choices. There is also a focus on providing a holistic, coordinated and person-centred service that takes account of the wider needs an individual might have.

The project shares learning to support a better understanding of what works in terms of supporting older people experiencing domestic abuse and inform improvements in practice, and has delivered wider work to grow knowledge and understanding within public services:

- Delivery of evidence-based bespoke training based on the research findings, which has been delivered to over 7,000 health and social care practitioners in Wales and Scotland.
- Developed online training and resources for practitioners working with older people experiencing domestic abuse.
- Developed and published a Practitioners Handbook that can be used by organisations that work with older people who might be experiencing abuse, such as the police and third sector organisations.
- Working with SafeLives to develop a pilot training programme for IDVAs to equip them with additional skills and knowledge to support older people.

## Housing and accommodation

In November 2020, the Commissioner held a roundtable event to examine issues relating to the accommodation available to older people who need to leave abusive relationships and identify changes and improvements needed.<sup>32</sup> The event was attended by members of the Stopping Abuse Action Group<sup>33</sup> and other key stakeholders, including the Deputy Minister for Health and Social Services and the Domestic Abuse Commissioner for England and Wales, Nicole Jacobs.

Delegates heard directly from a domestic abuse survivor, who described the significant difficulties and barriers she had faced which had meant it was almost impossible for her to leave her abusive husband. In addition, the event provided an opportunity to examine the findings of a survey of Directors of Social Services in Wales, undertaken on behalf of the Commissioner, which showed that there appeared to be a particular shortage of accommodation for older people living with disabilities and/or mobility issues, and that there can be difficulties when trying to help people move from emergency provision into alternative accommodation.

Delegates used this evidence to identify several areas where action was needed, both immediately and in the longer term, including:

- Improving housing and support options, including the provision of accessible accommodation with support for those who need it
- Improving access to existing services, including a review of the current policy of charging abuse victims for refuge accommodation.
- Developing more specialist services for older people and ensuring that appropriate services are being commissioned.
- Improving access to justice, including improving access to legal aid and support

The evidence gathered for this research reflects the findings of the roundtable and report, indicating that, in general, the needs of older people impacted by VAWDASV are not catered for by the current provision of alternative housing / accommodation in Wales, and cases were cited where older people have left refuges to return to live with the abuser because they have felt out of place in the accommodation.

Whilst a small number of examples were shared where older people experiencing abuse have been offered more specialised accommodation – often utilising spaces in extra care housing schemes – it appears that older people are frequently offered accommodation that does not meet their needs.

For example, the physical make-up of refuge spaces is often inappropriate for older people's care and support needs, and older people may feel uncomfortable mixing with individuals at different stages of their lives, who may be experiencing issues that older people they feel they cannot relate to.

Particular concerns were also shared about challenges relating to finances and accessing Housing Benefit, as well as the lack of suitable accommodation options for older men who are experiencing domestic abuse or sexual violence.



Increased availability of dispersed units with wrap around support would offer a more appropriate option for older people needing to leave their homes. Welsh Government capital funding made available during the pandemic has enabled some regions to apply for financial support for the provision of such dispersed units.

## Role of housing associations

Responses from housing associations highlighted the ways in which they protect and safeguard older people and ensure they can access support.

Most housing associations have domestic abuse policies and safeguarding processes in place, and provide awareness training for staff whose roles are customer facing. Within housing schemes, housing managers and wardens generally provide emotional support and signpost tenants to relevant services such as local safeguarding teams, the Live Fear Free Helpline and local Women's Aid organisations.

Practical support for tenants includes expediting relevant repairs and waiving charges; securing doors and windows; providing CCTV and window and door alarms in serious cases; offering of alternative accommodation for both victim and perpetrator tenants in particular circumstances; providing safe accommodation; delivering therapeutic support; and involving Safeguarding, MARAC or the police as appropriate.

Some examples were also shared of additional support provided by staff whose roles are focused specifically on the need of older people, such as a Head of Older People role, an Older Persons' Service team and an in-house tenancy support service for people over the age of 55. One housing association highlighted that it employs domestic abuse case officers who work within its community safeguarding team and receive relevant training about the ways they can support older people.

In addition, housing associations highlighted a number of other processes and initiatives that operate alongside domestic abuse policies and safeguarding processes to protect and support people experiencing or at risk of abuse:

**Cause for Concern (Charter Housing)** – enables any staff member who has witnessed or heard anything that was worrying from a safeguarding perspective to raise a concern through a referral process, with a panel meeting regularly to collectively decide action in relation to these referrals. It was estimated that there is currently at least one domestic or financial abuse case referred daily on average.

**Strive (Linc Housing Association)** – provides information, advice and assurance to tenants, and identifies an individual's potential support networks. Following the completion of a DASH (Domestic Abuse, Stalking, Harassment and Honour based violence Assessment Tool) risk assessment, an action plan is agreed with the individual to improve personal safety and enable access to support services and alternative accommodation where necessary. In high risk cases, referrals are made to MARAC and IDVA services, with case workers participating in MARAC meetings. The case workers work side by side with the victim until the action plan is completed and all outstanding tenancy matters have been dealt with. On exit, discussions are held with individuals to ensure they feel safe and know how to re-engage with the service, if needed in the future.

**Free from Fear** – a number of social housing providers in the Gwent area have come together to form Free From Fear Wales, which identifies best practice and innovation in responding to those experiencing domestic abuse and has produced a toolkit for the use of housing operational staff. The organisations involved are committed to ‘providing a gateway through which people experiencing abuse can access support to enable them to achieve greater independence, improved resilience and life Free from Fear’.

Whilst these initiatives do increase the support available to people experiencing or at risk of abuse, it is important to note that they are aimed at people of all ages, rather than being tailored for the needs of older tenants, and are limited to particular areas / particular organisations.

## **Risk assessment**

There was a strong view amongst some respondents that DASH, the current risk assessment tool for victims of domestic and sexual abuse is not age appropriate and does not respond to the changing requirements for domestic abuse support throughout the course of a lifetime.

The assessment does not consider the risk presented by family members and seven of its 24 questions are irrelevant to older people which makes it difficult for them to reach the high-risk threshold for referral to MARAC, meaning that in some cases referrals are being made to MARAC based on professional judgement, rather than an assessed score.

Whilst there is a DASH adapted risk assessment for older people that can be used by practitioners, MARAC leads can be reluctant to accept these scores. This suggests an unwillingness amongst some agencies to take account of the adapted risk assessment, which could result in an insufficient focus on, and response to, particular risk factors for older people experiencing VAWDASV.

## **Good practice: Owls Project – West Wales Domestic Abuse Service**

The OWLS project was established due to concerns that existing risk management tools were not properly capturing the experiences of older people and that service models were often not responsive or flexible enough to meet their needs. The project aims to deliver the following outcomes:

- Improved effectiveness of services for older women experiencing domestic abuse
- Improved inter-agency knowledge of how to work with older women experiencing domestic abuse
- Improved understanding of domestic abuse and its effects.

The project is underpinned by a set of principles to ensure that sufficient time is available to build a relationship with an older person and work with them to understand and respond to their individual needs; person-centred support focused on listening and understanding; and

the deployment of staff with an enhanced knowledge of and experience in older people's experiences of domestic abuse.

The project has delivered the following in order to achieve its outcomes:

- Case work focused on meeting the holistic needs of older women in terms of services and community support;
- Development of a volunteer scheme to help direct victims to support organisations
- Development of a bespoke Recovery Programme, developed in partnership with older people, to raise awareness and build confidence amongst survivors to enable them to build connections within their communities.
- Establishment of a peer support and befriending scheme
- Development of awareness raising training, which has been delivered to partner organisations
- Work with community organisations to develop referral pathways for information and support.

## Training and accreditation

Practitioners highlighted that the training tools available to support tackling VAWDASV – including Ask and Act training and the National Training Framework – do not take into account older people's specific needs and experiences, which leads to gaps in knowledge and understanding amongst key staff, as described above.

For example, when Ask and Act training is delivered to safeguarding practitioners and those working in adult/care services, participants often ask numerous questions on topics relating to older people, such as dementia, disability, mental capacity and carer roles, because these are not covered by the training.

Furthermore, the National Training Framework only applies to relevant authorities as defined by the VAWDASV Act. This means that those working in wider public and third sector support services who need to have greater knowledge and awareness of VAWDASV issues relating to older people in order respond appropriately to their needs – including police officers, people working within housing associations and legal professionals – are not covered by the Training Framework, despite the potential benefits that access to this kind of training could bring.

This has resulted in some housing associations, for example, sourcing training for staff from England, which may not provide sufficient details of the Welsh context in terms of policy, legislation and service delivery.

Practitioners from both domestic and sexual abuse services also spoke about how gaps in knowledge and understanding could impact upon the experiences of older people living with dementia or other forms of cognitive impairment. They said there is evidence to suggest that older people's disclosures of abuse are not taken seriously if they have signs of dementia or

cognitive impairment and that in such cases the focus tends to be on the individual's presenting health need rather than a willingness to identify and respond to allegations of abuse.

Similarly, they also indicated that if an older person's needs were complicated in terms of health and disclosure of abuse, services may not respond appropriately, leaving the older person feeling isolated and let down. It was suggested that this may happen because practitioners do not consider they have the skills to respond effectively to older people whose presenting needs are complex.

Whilst the co-existence of dementia (or other complex needs) and domestic abuse presents additional challenges to supporting an individual, Dewis Choice has demonstrated that adopting a holistic, person-centred approach, delivered by skilled, knowledgeable and experienced practitioners can help to ensure that these kinds of cases can be dealt with more effectively.

## Promotion and publicity

The survivors of abuse interviewed indicated that they had not been aware of the kinds of services that could support them until someone had provided them with information about what was available. This suggests that information about VAWDASV services is not sufficiently visible or accessible within communities.

This may be compounded by the fact that campaigns and promotional materials relating to abuse rarely focus on or include older people in the imagery and language used, which often leads to a perception that services are primarily for younger people, an issue highlighted by various respondents.

Practitioners also suggested that older people may not always identify with the kind of language used relating to VAWDASV and support services, which could act as a further barrier to awareness of, and access to, the support available.

In addition, a number of respondents highlighted that wider public narratives relating to VAWDASV are not inclusive of older people's experiences and that the media is often reluctant to report on and raise awareness of the particular ways that VAWDASV can affect older people.

## Data

As highlighted above, there is a concerning absence of accurate and comprehensive data in relation to older people and VAWDASV, and the data that is available is often inconsistent and contradictory. This means that older people's experiences are at risk of being 'invisible' when it comes to policy making and service development.

Analysis of the Regional Safeguarding Annual Reports indicates that the arrangements for safeguarding adults at risk remains less developed than the arrangements for safeguarding children, and it is also evident that there is insufficient data and information about older people's experiences of VAWDASV in Wales.

According to the National Independent Safeguarding Board's 2019-20 report<sup>34</sup>, limited progress has been made in amending the Technical Guidance for the Social Care Performance

Framework to include information about the abuse of older people by collecting data broken down by age group.

However, there was concern amongst respondents that without better data relating to older people, inaccurate assumptions could be made about the ways that older people experience or are affected by abuse, resulting in a lack of understanding of their needs and inadequate services and support.

## Good practice examples: Common elements

There are a number of common elements that have supported the successful delivery of the Dewis Choice and OWLS good practice examples highlighted above:

- Co-production of the service model with older people
- Assertive advocacy by building trust and investing in the relationship by being onsite and alongside for as long as necessary
- Ease of engagement
- Enabling and empowering through listening being person-centred and exploring options to facilitate individuals to self-determine their own solutions
- Educating and providing relevant information
- Providing holistic support with the help of other service providers from a variety of agencies as well as those living in the community who are able to support the individual
- Equality of treatment to everyone concerned, including those in the individual's network
- A skilled workforce knowledgeable in respect of older people's experiences of domestic abuse.

Both models advocate the need to build capacity, knowledge and expertise of practitioners to deliver tailored support for older people who are experiencing domestic abuse.

## Role of health services

It is important to recognise the crucial role that health services often play in identifying potential abuse and connecting older people with services and support.

The information available about the work underway in health boards in Wales, which was reviewed as part of the research, indicates that all health boards contribute to the funding of sexual violence and abuse services in their areas, and highlights a number of other initiatives in different areas, such as:

- Employing Independent Domestic Violence Advocates (IDVAs)
- Employing a Domestic Abuse Nurse Specialist
- Training for staff and awareness raising
- Specific referral pathways following any disclosure of domestic or sexual abuse.

It should be noted, however, that these initiatives were often limited to single health board areas, and that individual health boards are at different stages in terms of implementing their duties under the VAWDASV Act.

One initiative that has been taken forward by multiple health boards is IRIS, which has been delivered by Cardiff and Vale University Health Board and Cwm Taf Morgannwg University Health Board since 2015, and has recently been piloted by Swansea Bay University Health Board. Aneurin Bevan University Health Board and Powys Teaching Health Board are also considering implementing the initiative.

IRIS is a domestic violence and abuse training, support and referral programme for GP practices. The programme is based on the principles of ongoing training and education for clinical teams and staff within primary health care settings, clinical enquiry and a referral pathway to specialist to domestic abuse services.

It is a collaboration between primary care and third sector specialist domestic abuse organisations and involves the employment of a specialist Domestic Abuse worker, known as an Advocate Educator, within GP general practices to work alongside a Clinical Lead.

Since implementing IRIS, referrals in Cardiff and Vale UHB have increased from 315 in 2015 to 810 in 2020, while referrals in Cwm Taf UHB have increased from 281 to 591 over the same period.

An evaluation report<sup>35</sup> concluded that IRIS reaches an older demographic of women who are normally less well represented in specialist domestic abuse services. It is a positive feature of IRIS being able to reach an otherwise invisible groups of survivors. The evidence suggests that IRIS is a sustainable intervention and that the programme reached a higher proportion of older people than would be seen within the specialist services, primarily because this group of people are more likely to disclose issues to their GP with whom they have often built a relationship of trust and respect.

## Impact of Covid-19 in Wales

Whilst many of the issues highlighted above reflect long-standing issues, the Covid-19 pandemic has created additional pressures to supporting older people who are experiencing VAWDASV.

Whilst some specialist VAWDASV services have continued to provide face-to-face support throughout the pandemic (where this has been essential for safety or other reasons), there has also been a need to deliver support services over the telephone or online, which has meant organisations providing people with IT equipment to access services in some cases.

Whilst older VAWDASV survivors said they appreciated the flexible approach of service providers, they also expressed a preference for face-to-face contact.

Practitioners also highlighted the importance and value of dealing with clients in person so that they can build a rapport and assess first-hand any deterioration in health or well-being.

# Financial and economic abuse and older people

Financial abuse is defined in Welsh and UK legislation as ‘a type of abuse which includes:

- having money or other property stolen;
- being defrauded;
- being put under pressure in relation to money or other property; and
- having money or other property misused.<sup>36, 37</sup>

As highlighted by Age UK, financial abuse can be committed by anyone, such as a partner, relative or criminal.<sup>38</sup> Financial abuse could involve:

- Relatives, friends or a care worker pressurising someone to lend/give money to them (this could include frequent requests for small amounts of money).
- Pressurising or threatening someone to sign over a house or property, or to change a will.
- Family members moving into someone’s home without their consent and without a prior agreement on sharing costs.
- Taking charge of a person’s money and/or welfare benefits and not giving them all their money (or preventing someone from accessing their money).
- Taking money or using a credit/debit card without permission.
- Fraud or scamming.
- Arranging less care than is needed to save money to maximise inheritance.
- Denying assistance to manage and/or monitor financial affairs.
- Denying assistance to access benefits
- Exploitation of a person’s money or assets, e.g. unauthorised use of a car.
- Misuse of a power of attorney, deputy, appointeeship or other legal authority
- Rogue trading – e.g. unnecessary or overpriced property repairs and failure to carry out agreed repairs or poor workmanship<sup>39, 40</sup>

There are a number of signs that could indicate that an older person may be experiencing financial abuse.<sup>41</sup> These include unexplained large withdrawals of money from the older person’s account, inclusion of additional names on the bank account, or signatures on cheques that do not represent the older person’s signature or are signed when the older person has difficulty writing.



Other signs include sudden changes to an older person's will, an unexplained transfer of assets to a family member or someone outside the family, misuse of power of attorney, disappearance of funds or valuable items, or unpaid bills. The deliberate isolation of an older person from family and friends could also indicate that financial abuse is occurring.

More recently the concept of economic abuse has emerged, which is a wider definition of financial abuse as it can also restrict access to essential resources such as food, clothing or transport, and denying the means to improve a person's economic status. It has been described as a common form of domestic abuse, involving an abuser restricting a person's ability to acquire, use and maintain money or other economic resources.

The charity Surviving Economic Abuse differentiates between financial and economic abuse by stating that the former refers to control, exploitation or sabotage of money and finances whilst the latter refers to more broad economic resources such as food, clothes, money, transport and accommodation.<sup>42</sup>

Evidence shows that financial and economic abuse often occurs alongside other forms of abuse. For example, research has shown that people who are prevented from managing their own finances by an abuser are often at risk of other forms of violent, sexual and psychological abuse.<sup>43</sup> Other research highlighted that 85% of people who had experienced economic abuse also experienced other forms of domestic abuse.<sup>44</sup> The National Network to End Domestic Violence states that financial abuse occurs in 98% of domestic violence cases.<sup>45</sup>

According to Women's Aid, financial abuse seldom occurs in isolation as it is an aspect of coercive control, which limits and controls victims' current and future actions and freedom of choice.<sup>46</sup>

## Fraud and scams

In addition to the kinds of financial abuse described above, older people are also often the target of a wide range of fraud and scams. Criminals use increasingly sophisticated methods<sup>47</sup> to trick people into buying good or services that don't exist, or share personal information, targeting people by post, phone, text, email and online.

Examples of fraud and financial scams can include:

- Phone calls, text messages and emails impersonating banks, government departments or other organisations and companies requesting payment or personal information
- Investment scams / mis-selling financial products
- Online shopping scams where products are ordered but never arrive
- Fake prize draws
- Bogus charities
- Romance scams

The impact of fraud and financial scams on older people can be significant: apart from the financial impact, older victims of fraud and financial scams often experience depression, withdrawal and isolation from family and friends and a deterioration of physical and mental health. Furthermore, those defrauded in their own homes are 2.5 times more likely to go into residential care or die within a year of being scammed.<sup>48</sup>

# Prevalence of financial abuse

Research by the World Health Organisation suggests that financial abuse affects 6.8% of people over the age of 60 worldwide, making it the second most common form of abuse.<sup>49</sup>

Based on evidence available at a UK level, Age UK estimated that around 130,000 people over the age of 65 (between 1% and 2%) had experienced, or were experiencing, financial abuse in the community.<sup>50</sup> For Wales, this figure would be around 6,000. They stressed, however, that in reality the figure was likely to be much higher as many cases of financial abuse go unreported.

Research examining economic abuse found that 16% of adults reported experiencing economic abuse, with 39% experiencing 'behaviours which suggest they have experienced economic abuse, but don't recognise it as such'.<sup>51</sup> This research also found that around a third of those who experienced economic abuse had told no-one about what they were experiencing, and that a significant majority – 85% - of those experiencing economic abuse were also experiencing other forms of domestic abuse.

In terms of financial scams and fraud, evidence from National Trading Standards indicates that over half of people over the age of 65 have been targeted by scammers.<sup>52</sup> This reflects research undertaken by Age UK, which found that over 5 million people over the age of 65 in the UK believe they have been targeted by scammers.<sup>53</sup> This research found that around 12% of those who were targeted responded, which potentially means that around half a million people aged 65+ – over 23,000 in Wales – had fallen victim to fraud or scams. As it is estimated that only about 5% of fraud or scams are reported as crimes, it is also important to note that the true figures could be far higher than the research suggests.

## Risk factors

As with other forms of abuse, there are a number of factors that can increase the risk of financial abuse and/or fraud and scams.

For example, as people get older they may become more reliant on others to manage their finances due to limited mobility, a need for care and support, or because of dementia or other forms of cognitive impairment, which makes them more vulnerable to abuse. Family members may also abuse their knowledge and close connections to financially abuse parents or other family members. Age UK research suggests that 70% of financial abuse of older people is perpetrated by family members<sup>54</sup>, with reports suggesting these kinds of incidents are rising significantly.<sup>55</sup>

In terms of fraud and scams, evidence shows that older people are often deliberately and repeatedly targeted by scammers<sup>56</sup>, and that the average age of a victim of a postal scam is 75.<sup>57</sup> A number of additional factors can also put older people at greater risk:

- Having disposable income or assets
- Living with dementia or another form of cognitive impairment
- Living alone
- Being digitally excluded<sup>58</sup>

A lack of understanding of financial abuse within the financial services sector and other agencies, which has meant that older people do not receive the advice and services they need, has also been acknowledged, which has led to initiatives being introduced to support people experiencing financial abuse more effectively.<sup>59, 60</sup>

It is also important to consider the role that the justice system may play in older people's experiences: there appears to be little within the justice system to deter perpetrators, given the low number of prosecutions and convictions for crimes against older people.<sup>61</sup>

# Findings from stakeholder research

## Research methodologies

To capture information about the kinds of services and support available for older people who may be experiencing financial abuse, as well as the issues and challenges people may face in accessing support, questionnaires were circulated to Trading Standards Departments, Citizens Advice Organisations and Housing Associations throughout Wales. Alongside this, one-to-one discussions were held with staff from Trading Standards and Citizens Advice, as well as with advocates for older people.

Key findings based on the information and evidence captured are set out below.

## Accessing help and support

As demonstrated by the wider research cited above, there is a lack of awareness about financial abuse and the ways it can affect older people, including amongst older people themselves. If an individual is unable to recognise they are being financially abused, they will not consider seeking help and support.

This issue has been recognised by Trading Standards and housing associations, who shared details of the work they do to raise awareness about financial abuse, which includes delivering training sessions on fraud, scams and rogue traders targeted at older people, and disseminating key information and messages through a variety of channels to ensure people know what to look out for and where to go for help.

Details were also shared of the ways they work with individuals to help to ensure they can access the support they need.

For example, any cases identified through Trading Standards' outreach work that present evidence of financial abuse or signs of vulnerability, are referred to relevant agencies. Cases involving criminality are also investigated and, where appropriate, perpetrators are prosecuted and compensation is sought for victims. In addition, they highlighted that staff visit individuals who have responded to fraud or scams to provide information about how people can protect themselves in the future, and signpost people to relevant agencies and support.

Responses from housing associations included examples of the ways that staff provide support to tenants who may be being financially abused, building relationships and trust, and highlighted their work with other agencies, including MARAC staff, to make referrals and share information on a case-by-case basis. They also shared examples of support provided through in-house financial inclusion / money advice teams.

It is important to note, however, that this support is not tailored for older people and there does not appear to be a standard approach to providing support to older people experiencing financial abuse.

The Covid-19 pandemic has also created additional challenges, particularly as opportunities for face-to-face support have been severely restricted, some examples were shared of additional

work to protect people, such as additional safeguarding exercises with those who may be particularly vulnerable.

## **Good Practice: Delta Connect**

Established by the West Wales Regional Partnership Board, the Delta CONNECT programme aims to identify potential victims of financial abuse and fraud, and direct them quickly to the relevant agency.

This support is provided by CONNECT Community Well-being Officers, who are trained to recognise the signs of financial abuse and fraud, and also identify other risk factors, such as loneliness, cognitive decline or impairment, financial issues or personal problems. Where these kinds of issues are identified, steps are taken to address them.

The programme has been recognised as a ‘national flagship’ by the Welsh Government, and has attracted interest from across the UK and further afield.

## **Reluctance to report financial abuse**

Even when an older person recognises they are being financially abused, the evidence received indicates they still may not seek support or wish to take action for a number of reasons.

For example, a number of advocates highlighted that many older people who are being financially abused are reluctant to take action – such as involving safeguarding teams or the police – either because they do not wish to acknowledge that it is happening, or are fearful that they may lose the support and company of the abuser.

This was reflected in evidence from Citizens Advice, which highlighted that alongside fears about losing the support of an abuser, victims may be reluctant to seek help as they feel shame or embarrassment, or do not view the actions of perpetrators as a direct threat.

## **Wider system barriers**

Evidence shared relating to financial abuse also highlighted the ways that systems and services may create additional barriers to older people accessing support.

For example, evidence from Trading Standards suggested that the use of language can affect the way that a concern is dealt with, which could impact on the outcome for an older person: something described as a scam tends to be directed to Trading Standards, financial abuse / exploitation to social services, and fraud to the police.

Advocates also highlighted that there can be challenges in getting social services safeguarding teams involved in cases where the individual being abused refuses to give consent and there is either limited evidence or the level of financial abuse is judged to be not particularly significant. This was reflected in evidence from Citizens Advice, which described the difficulties involving safeguarding teams without an individual’s consent unless they are at significant risk or do not have mental capacity.

Evidence also indicated limitations in the data that is collected about older people's experiences of financial abuse. Responses highlighted that not all local authorities collect data on the number and type of financial abuse cases dealt with on an annual basis. Of those that do, some break statistics down by age, gender and/or ethnicity, whilst others do not.

For example, whilst data collected by Bridgend, Cardiff and Vale of Glamorgan councils (who work together under the Shared Regulatory Services banner) was able to identify an increase in the overall number of cases of financial abuse and scams, no statistics were available on the number of people over the age of 60 who were affected.

As highlighted above, without robust data to provide a full picture of older people's experiences, it is challenging to understand the services and support they require and allocate resources accordingly.

## **Good Practice: Financial Exploitation Safeguarding Scheme (Fess), Carmarthenshire**

“Safeguarding is everyone's business”

The FESS project is a multi-agency safeguarding network created by Carmarthenshire's Trading Standards team, to detect and prevent financial exploitation of people who may be vulnerable. The project aims to enable those at risk to access social services support, encourages early intervention, promotes preventative approaches and supports partnership working.

In addition, the project includes a formal research element with Cardiff University, with 36 other local authorities involved as part of a UK network. Data is inputted through survey to provide intelligence about operational issues relating to Trading Standards, in order to improve services and enable better integration and support.

FESS has also established a financial safeguarding network, which incorporated private and third sector partners – including high street banks, Citizens Advice and other key organisations – to deliver a multi-disciplinary response in cases of financial abuse and exploitation. All bodies involved sign up to a safeguarding protocol, agreeing to identify potentially vulnerable people and refer them to Trading Standards.

A number of other projects make up the FEE initiative, including:

- Truecall Nuisance Call Blockers / victim risk analysis
- Debt and mental health interventions
- Vulnerable consumer advice interventions / expert advocacy
- No cold calling zones
- Buy with Confidence (code of practice for local traders)
- Consumer financial education / awareness raising
- Banking Safeguarding Protocols

# Conclusions and key recommendations

Given the particular risk of experiencing VAWDASV and financial abuse faced by older people, as illustrated by a broad range of evidence included in this report, it is crucial that the right services are in place to protect and support them.

Whilst the systems, policies and legislation in place have helped to ensure that support in some form is available throughout Wales, the evidence shared by stakeholders illustrates a significant lack of services designed specifically for older people, reflecting a lack of older people's voices in the development of services.

Furthermore, a lack of awareness amongst some policy-makers and practitioners about the specific ways that older people may experience abuse, and the kinds of support that would have the most beneficial impact – compounded by a lack of robust data – results in services that are not fully responsive to older people's needs, and approaches that could be acting as a barrier to older people seeking help and support.

Older people with protected characteristics, who may also be particularly vulnerable, can face additional barriers preventing them from accessing the support they need, which can put them at even greater risk of significant harm.

Whilst it is encouraging to see a growing body of good practice developing in Wales – underpinned by a focus on partnership working, greater integration and a more person-centred approach – as well as examples of support being provided to older people at a community level, it is clear that action is needed to deliver change and improve the services and support available for older people who are experiencing or at risk of abuse.

The team who carried out the research on which this report is based also proposed a series of recommendations for action to improve services and support for older people. Key recommendations are set out below and the Commissioner will work with the Welsh Government, public bodies and other key stakeholders to ensure that progress can be made. Alongside this, the Commissioner will work with the Stopping Abuse Action and Steering Groups to examine the wider concerns and recommendations highlighted by the research team, and determine the action needed to drive and deliver change for older people.

## Services and support

- Policy makers, commissioners and providers of VAWDASV services should be encouraged to review existing policies and procedures to ensure that they are inclusive and do not inadvertently marginalise or present older people from all protected characteristic groups with additional barriers to accessing information and support.
- Policy makers, commissioners and service providers should consider how the needs of older people living in rural areas can be met through development of services to address the particular challenges.

- Specialist service providers should identify and/or consider recruiting Welsh speaking staff and where available and feasible consider sharing Welsh language resources on a regional basis.
- Welsh Government and housing providers should consider increasing the availability of dispersed units with wrap around support for older people who have experienced VAWDASV.
- Commissioners of the Housing Support Grant should be encouraged to consider the accommodation needs of older people experiencing violence against women, domestic abuse and sexual violence when commissioning services.
- Local Authorities and the specialist VAWDASV sector should be encouraged to review and amend procedures to ensure that those older people experiencing abuse and not meeting the thresholds for safeguarding or MARAC have clear pathways to accessing information and support.
- Future design of services post the pandemic should take account of the need for face to face and longer term support for older people.

## **Awareness and understanding of older people's experiences**

- The Welsh Government, other public services and the third sector should be encouraged to be inclusive of older people when planning publicity campaigns and preparing marketing literature, and ensure information is available in community settings accessed by older people e.g. GP surgeries, pharmacies, community centres and supermarkets.
- There should be publicity campaigns to highlight financial abuse of older people and create greater awareness of the problem. This should consist of simple messaging setting out the signs of financial abuse by family members and others and, what to do in such situations.
- The media should be encouraged to consider featuring older people's experiences of VAWDASV in their reporting and programming.

## **Data collection**

- The Welsh Government and ONS should be encouraged to ensure that collation of statistics in relation to older people experiencing VAWDASV is comprehensive and covers all ages, in relevant groups from the age of 60 onwards.
- Specialist support service organisations should consider collating and monitoring age-related data on service users and developing their services to making them more accessible to and inclusive of the specific needs of older people experiencing VAWDASV
- Individual MARACs should consider the collation of age-related data on victims.



## Training

- Bespoke, evidence-based training modules relating to older people's experiences of VAWDASV should be included in the VAWDASV National Training Framework to improve identification and practitioner/service responses across all relevant authorities and specialist VAWDASV providers.
- Organisations falling outside the remit of the National Training Framework should be encouraged to include bespoke, evidence-based training on the experiences and needs of older people experiencing VAWDASV within their workforce development plans.
- Trading Standards staff should receive training in financial abuse, the Mental Capacity legislation and carrying out of mental capacity assessments.

## Policy, strategy and legislation

- Welsh Government should review its suite of relevant strategies and policies to ensure that they address the needs of older people, particularly in relation to VAWDASV and financial abuse as defined in this piece of work.
- Welsh Government to be encouraged to strengthen the emphasis on adult familial abuse within the National VAWDASV strategy.

# APPENDIX 1: Summary of delivery landscape in Wales – VAWDASV

The section below provides information about the organisations, structures, services and initiatives in place at a national, regional and local level to protect and safeguard older people in Wales and deliver support to individuals experiencing or at risk of VAWDASV.

## NATIONAL

### Welsh Women's Aid

Welsh Women's Aid (WWA) is a national charity with the prime aim of working to end domestic abuse and all forms of violence against women. It is the national umbrella body for third sector violence against women, domestic abuse and sexual violence (VAWDASV) specialist services in Wales. The organisation has 19 affiliated members and is part of a wider UK network.

The charity has the role of campaigning and influencing policy and programme development and delivers a range of services such as the Live Fear Free helpline, which is funded by Welsh Government; a National Training Service; a National Survivors' Network; and delivery of the Wales National Quality Service Standards, an accredited framework for VAWDASV specialist services in Wales.

WWA also runs pilot projects which aim to improve engagement with survivors and improve the support available:

- Survivors Empowering and Educating Services (SEEdS) – provides opportunities for VAWDASV survivors to use their experiences to influence policy and service development, which has led to the development of a good practice toolkit and a National Survivor Engagement Framework.
- Ask Me –community members become 'ambassadors' and receive training and support to find ways of starting conversations in their communities; identify opportunities to share knowledge; and, at the point of disclosure of abuse, provide a helpful supportive response including signposting to local specialist services.
- Change that Lasts – a cross-sector, strengths-based, needs-led model that aims to facilitate the shortest framework that facilitates the shortest and most effective route to safety, freedom and independence for each survivor based on their individual situation and the resources available.

### Live Fear Free Helpline

The Live Fear Free Helpline is the Welsh Government's all-Wales helpline, which aims to offer confidential, and quality information and support to all survivors and victims of gender-based violence, domestic abuse, and sexual violence. This encompasses groups subjected to, or at risk of, all forms of violence covered by the Violence against Women, Domestic Abuse and Sexual Violence (VAWDASV) Act, including honour based violence, female genital mutilation

and forced marriage. The service includes crisis intervention as well as general advice and information.

The Helpline is delivered via a 'hub and spoke model', comprising the core Helpline service (the 'hub') and a unique partnership-based model made up of a range of formal referral pathways (the 'spokes') to specialist VAWDASV services, statutory bodies and organisations, and other stakeholders. Each pathway is delivered in accordance with detailed guidance and agreements; the role of stakeholders in delivering the Helpline service is therefore clearly set out and understood.

The Helpline receives feedback from stakeholders and key partners at regular intervals, which is then used to monitor the implementation and delivery of each pathway and make any updates or changes, as required.

## Hourglass

Previously known as Action on Elder Abuse, Hourglass is a UK charity with the mission of ending the harm, abuse and exploitation of older people in the UK. As a specialist organisation, it focuses exclusively on the issue of elder abuse with the aim of preventing the abuse of older people by raising awareness; encouraging education; promoting research; and collecting and disseminating information.

The organisation's vision is a society which values older people and one in which they and other adults can live free from abuse perpetrated by those in whom they have an expectation of trust.

Hourglass has a presence in Wales and aims to:

- Lobby and influence the legal and criminal justice framework and the Welsh Government to protect older people from abuse and create a national conversation around safer ageing;
- Tailor communication in relation to all campaigns and services to Welsh audiences, with a commitment to investing in the Helpline to ensure the availability of a bilingual service; and
- Shed a light on institutional barriers to services for BAME and other minority groups in Wales by bringing together a diverse portfolio of case studies.

The organisation provides a free confidential helpline specifically for older people at risk of or experiencing abuse, or anyone concerned about an older person.

## The Dyn Project

The Dyn project which supports hetro-sexual, gay, bisexual and trans men experiencing abuse from a partner to access services in their local areas is run by safer Wales, which was established over 20 years ago to work with victims of domestic violence, rape, sexual abuse, exploitation and hate crime by providing practical support and advocacy.

## Victim Support

Victim Support is an independent charity supporting people affected by crime and traumatic incidents in England and Wales. The charity provides specialist services to help people cope and recover regardless of whether they have reported the crime to the police or when the crime occurred. Victim Support is part of specialist multi crime teams receiving referrals from three of the four police forces in Wales. The charity employs an IDVA as a Domestic Abuse case worker and offers support for standard and medium risk victims of domestic abuse with those identified as high risk being referred to the relevant IDVA service. Victim Support work closely with Age Cymru, Hourglass Cymru and specialist VAWDASV providers to ensure individuals are receiving support from the most appropriate service to meet their individual needs.

## Hafan Cymru

Hafan Cymru is a unique Wales wide housing association providing housing primarily for men and women, and their children suffering from domestic abuse across 16 of the 22 local authorities in Wales. As well as providing support to those suffering domestic abuse, it offers a comprehensive package of support for other individuals with complex or multiple needs such as those recovering from mental health, ex-offenders, substance misusers and young people leaving care. Hafan Cymru also runs a couple of projects such as Men's Shed to support men coming together in the community to overcome isolation and loneliness and, Spectrum which is a healthy relationship programme in schools.

## REGIONAL STRUCTURES

The Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 requires local authorities in partnership with local health boards to prepare, publish and implement strategies for tackling violence against women, domestic abuse and sexual violence. The legislation does not preclude local authorities and local health boards from working on a regional basis to develop and implement regional VAWDASV strategies and this is being encouraged by Welsh Government.

For the purposes of regional working, there are 6 regions, mostly coterminous with local health boards apart from Mid and West Wales which encompasses both Hywel Dda University Health Board and Powys Teaching Health Board. Regional strategies for these areas are expected to identify high level strategic priorities and be accompanied by regional delivery plans. Regional Strategies are expected to outline how the region will deliver against the 6 objectives of the National VAWDASV strategy referred to in paragraph 4.5 of Section 4 above.

VAWDASV strategies have been prepared for all regions and their delivery is overseen primarily by partnership boards, some of whom report to Regional Safeguarding Boards and others to Community Safety Partnerships.

The majority of regions have appointed Regional VAWDASV Advisers to coordinate the regional delivery work, although in two regions, Swansea Bay and Cardiff and the Vale, there are lead individuals within each of the Local Authorities.

# LOCAL STRUCTURES

## Specialist VAWDASV Services

There are 19 specialist VAWDASV services in Wales which are federated to Welsh Women's Aid. There are also a number of other specialist providers operating across Wales which are not members of Welsh Women's Aid. Several are more specialist organisations or have other functions as their main purpose.

For example, BAWSO focuses on those experiencing abuse from BAME and migrant communities; Llamau is primarily concerned with homelessness of young people; Hafan Cymru supports people with a variety of needs; Pobl is a major social housing provider in Wales which is also commissioned to deliver domestic abuse services in Pembrokeshire; and Clwyd Alyn Housing Association delivers domestic abuse support as part of its overall services.

The majority of VAWDASV services provided by specialist services are broadly similar but differ according to the body's particular field of interest, the communities being served and funding sources. Generally, core services consist of the following:

- Information, advice, support and guidance
- Drop-in services
- Safety planning
- Peer support groups
- Advocacy
- Access to Refuge accommodation
- Community and outreach support services
- Support for children and young people
- Therapeutic interventions

All services provided are available to those of all ages who are experiencing or impacted by VAWDASV, although only 2% of those accessing these services in 2019/20 were aged over 60<sup>62</sup>, which indicates that older people are not accessing these services.

There is limited evidence of services targeted at older people, although a small number were identified:

- EDGE Project, Thrive Women's Aid, Neath Port Talbot – provides specific support for older, disabled or Roma gypsy and traveller women subject to abuse. The project addresses violence and abuse amongst these particular groups by awareness raising and ensuring equality and diversity through engagement and education with individuals, communities and professionals.
- Reconnect Mentoring Project, Safer Merthyr Tydfil – provides individuals over the age of 50 who have experienced VAWDASV with mentoring support.

- Other examples of good practice of working with older people who have experienced VAWDASV are the Dewis Choice and OWLS projects, which are detailed above.

## Independent Domestic Violence Advisers

The role of independent domestic violence advisors (IDVA) is to address the safety of victims at high risk of harm from intimate partners, ex-partners or family members to secure their safety and the safety of their children. IDVAs are a victim's primary point of contact and normally work with clients from the point of crisis to assess the level of risk, discuss the range of suitable options and develop safety plans. Each local authority in Wales has an IDVA service, although some of these services are commissioned on a regional basis.

IDVAs are pro-active in implementing safety plans, which address immediate safety, including practical steps to victims can take to protect themselves and their children, as well as longer-term solutions. These plans include actions from the MARAC; sanctions and remedies available through the criminal and civil courts; housing options and services available through other organisations. IDVAs support and work over the short- to medium-term to put victims on the path to long-term safety. They receive specialist accredited training and hold a nationally recognised qualification.

The IDVA's role in all multi-agency settings is to keep the client's perspective and safety at the centre of proceedings.

The Safelives charity provides training and accreditation for IDVA services. It has developed a training programme to enhance IDVAs understanding of older people's experiences of domestic abuse, which focuses on how age-related factors may impact on a person's experience of abuse, risk factors for serious harm, and how to safety plan in a multi-agency context.<sup>63</sup>

## Sexual Assault Referral Centres (SARC) and Independent Sexual Violence Advisers

Sexual Assault Referral Centres are facilities where recent victims of rape or sexual assault are able to receive immediate help and support, including access to forensic medical examination and access to the police, subject to the victim's wishes. There are NHS led SARC services in Colwyn Bay and Cardiff, whilst New Pathways provides a similar service in Merthyr Tydfil, Risca, Swansea, Aberystwyth, Carmarthen, and Newtown through its subsidiary company, Mid Wales Rape Support Centre.

Independent Sexual Violence Advisers work with people who have experienced rape and sexual assault, irrespective of whether they have reported the act to the police. Their role is to support victims and survivors by providing accurate and impartial information, and emotional and practical support. There is ISVA provision for each local authority in Wales. In North Wales they work out of the Amethyst, North Wales SARC and the ISVA service in the rest of Wales is covered by New Pathways.

New Pathways runs projects such as Hear to Listen which provides remote counselling and support, and the Outlook project which supports offenders and ex-offenders who have been affected by domestic abuse, rape and other trauma. People who have been subject to human trafficking are also supported to recover through the L.I.B.E.R.A.T.E. project.

## Multi-agency Risk Assessment Conferences (MARAC)

Highest Risk domestic abuse cases are discussed by representatives of local police, health, child protection, housing practitioners, Independent Domestic Violence Advisors (IDVAs), probation and other specialists from the statutory and voluntary sectors at MARACs, which are local authority based. Information is shared at these meetings and the interests of victims are represented by an IDVA to agree to safeguard the victim whilst ensuring the safety of children and management of the perpetrator. No data is collated on the age of victims referred to MARAC.

## Independent Advocates

Under the Social Services and Well-being (Wales) Act 2014 local authorities are required to provide independent adult advocacy for those who are eligible for care; are carers; have a physical disability; have a learning or sensory impairment; is an older or vulnerable person; or is suffering from mental health problems.

## Local Authorities

Local authorities all have safeguarding responsibilities and are involved in MARAC discussions.

Many authorities simply refer enquirers to sources of information on domestic abuse, whilst others may set out details of the legislation as well as defining and describing what constitutes abuse.

A few authorities run 'one stop shops', multi-agency safeguarding hubs, or provide single points of contact for support for domestic abuse victims, whilst a number use Safer partnerships to deliver VAWDASV support or refer to their links with Community Safety Partnerships. Several participate in White Ribbon, which is a global campaign started by men and boys to end male violence against women and girls.

## Registered Social Landlords (RSL)

Housing associations provide a range of support services for tenants who may be subjected to VAWDASV and most have sound processes in place for dealing with cases. Support in the vast majority of RSLs is delivered as part of Associations' overall tenant support services. However, Pobl, Hafan Cymru, Grwp Cenefin and Clwyd Alyn have been commissioned to provide a range of community based VAWDASV services in their respective areas.

## OTHER PUBLIC SERVICE BODIES

Apart from local authorities, local health boards, the Welsh Ambulance Service Trust and Fire and Rescue Services are defined as "relevant authorities under the Violence Against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 and therefore have strategic responsibilities under the legislation. The Police are not covered by the Act as criminal justice functions are non-devolved.

However, both the Police and Police and Crime Commissioners have a key role to play in preventing, protecting and supporting individuals experiencing or at risk on VAWDASV.

## **Health boards**

All Health boards contribute to the funding of sexual violence and abuse services in their areas. However, individual health boards are at different stages in terms of implementing their duties under the VAWDASV Act.

## **The Welsh Ambulance Service Trust**

The Welsh Ambulance Service Trust (WAST) operates a domestic abuse routine enquiry procedure when dealing with suspected VAWDASV cases and where necessary follow referral pathways to specialist services through the Live Fear Free helpline.

## **Fire and Rescue Service**

Fire and Rescue Services provide crime prevention services for individuals who are experiencing or at risk of VAWDASV including home safety checks and target hardening. South Wales Fire and Rescue Service has committed a member of staff to undertake the IDVA qualification which will enable them to provide an enhanced response to individuals who are experiencing VAWDASV.

## **Police and Crime Commissioners and Police**

Police forces throughout Wales all recognise the importance of tackling VAWDASV, and a range of plans are in place which aim to prevent domestic abuse and protect individuals who may be vulnerable. It should be noted, however, that specific plans relating to abuse are not in place in all force areas; some plans sit within wider priority areas.

Police forces work in partnership with a wide range of stakeholders, including as part of the MARAC process, and use a variety of channels to provide information people within the community.



# APPENDIX 2: Summary of delivery landscape in Wales – financial abuse

The section below provides information about the organisations, structures, services and initiatives in place to protect and safeguard older people in Wales from financial abuse and deliver support to individuals.

## Police / Action Fraud

Older people who have been subjected to financial abuse can report incidents directly to either their local police force or Action Fraud. The latter initiative is a central portal for anyone to report, fraud or financial abuse either on-line or by telephone.

The service is operated by the City of London police. When reported, a case of fraud or financial abuse is assessed to ascertain whether there is a viable line of enquiry, if so, the relevant police force, which is usually that from where the perpetrator is likely to operate from or reside, is sent the case for investigation.

Action Fraud sends a weekly list of cases, detailing the victims, to all England and Wales Police Forces. The number of notifications are increasing but vary per authority depending on its demographics.

On receipt of notifications, the Financial Safeguarding officer within the force will contact those over 70 and others who are classified as vulnerable. Action Fraud also releases a monthly threat assessment of fraud showing the trends and age groups of victims. Covid 19 has impacted and data is being analysed.

## National Fraud Intelligence Bureau

The National Fraud Intelligence Bureau (NFIB) works alongside Action Fraud within the City of London Police. The Bureau receives all Action Fraud's reports of fraud and cybercrime, and uses this information to identify serial offenders, organised crime groups emerging types of crimes. NFIB also receives intelligence from other sources, such as individual police forces, major corporate organisations, the public sector and international intelligence gathering agencies.

The information is analysed and data matched to identify the criminals behind the frauds and reports are then sent to local police forces for investigation.

## National Trading Standards

National Trading Standards was set up in 2012 as an England and Wales body to protect consumers and safeguard businesses through cross boundary intelligence led enforcement projects. Various national teams, looking into matters such as e-crime, illegal money laundering and scams, are hosted by local authorities. The body combats rogue traders and tackles priorities. Its current priorities cover mass marketing fraud, doorstep crime and cold calling, fair trading in used cars and energy trading, and supply of counterfeit products.

National Trading Standards delivers national and regional consumer protection enforcement for England and Wales. Its purpose is primarily to protect consumers and safeguard legitimate businesses by tackling serious national and regional consumer protection issues and organised criminality. The role of National Trading Standards involves coordinating enforcement action to ensure the greatest level of protection for consumers and businesses. It is focused on leading investigations into trading standards offences.

## **National Trading Standards Scams Team**

The National Trading Standards Scams Team has been set up to protect consumers and safeguard businesses through cross-boundary intelligence-led enforcement projects in England and Wales. The Team helps to tackle mass marketing scams through partnership working to identify and support victims of mass marketing fraud. Local authority trading standards staff are provided with guidance and examples of best practice to enable them to be more effective in taking enforcement action and supporting victims locally.

The team works with trading standards and partner agencies to investigate scams and identify and support those who fall victim to them. Postal, telephone and doorstep scams are often targeted specifically at disadvantaged consumers or those in periods of vulnerability.

The aims of the NTS Scams Team are:

- To identify victims of scams.
- To intervene and protect victims from further victimisation.
- To investigate criminal activity.
- To inform local authorities and agencies on how to work with and support scam victims.
- To influence people at local, regional and national levels to take a stand against scams.

In relation to the last aim, the Scams team has launched the Friends Against Scams initiative that aims to protect and prevent people from becoming victims of scams by empowering communities to take a stand against scams. It is designed to inspire action, highlight the scale of the problem, change the perceptions of why people fall for scams and make scams a community, regional and national topic.

The National Trading Standards Scams Team receives data in potential scam victims from partner organisations. These are then referred to the relevant local authority Trading Standards Team to enable potential victims to be supported. The appropriate local team reports back on outcomes to the National Scams Team.

## **National Trading Standards eCrime Team**

The National Trading Standards eCrime Team monitors and investigates a number of online consumer and business frauds including website dating scams, misleading websites, subscription traps and online shopping frauds. The team provides national support to all local authority areas in England and Wales to help tackle the increasing threats to businesses and consumers from internet scams and rip-offs. The team provides advice and forensic support and undertakes intelligence-led investigations.

## **National Trading Standards – Friends Against Scams Initiative**

The National Trading Standards Team raises awareness of financial scams through its Friends against Scams Initiative which aims to protect people from becoming victims of scams through empowering them to take a stand by encouraging action, highlighting the scale of the problem, changing perceptions of why people fall for scams and making scams a community, regional and national topic. The initiative was launched at the end of November last year and at the time of writing this report there were over 4,500 Friends Against Scams in Wales, each of whom saves the UK economy £59. There were also 88 Champions, who train people as Friends Against Scams, and 28 Ambassadors, who are high profile public servants or politicians. Additionally, 20 organisations have signed up to supporting the initiative by encouraging staff to volunteer.

Scam Marshalls are also recruited from those who have been targeted by a scam and wants to take a stand against scammers by sharing their own experiences and helping others to recognise and support scams. They also send any scam mail they receive to the National Trading Standards team. At the time of the research there were 123 Scam Marshalls in Wales. Evaluation of the effectiveness of this initiative has shown that after three months nearly 90% of Scam Marshalls have not lost any money to scam mail and have reduced the amount of scam mail by nearly five pieces.

## **National Trading Standards Regional Investigations Teams**

National Trading Standards have a number of Regional Investigation Teams which operate across England and Wales to target criminals involved with doorstep crime, counterfeiting, consumer and business fraud and other related crime. In Wales the team operates through Wales Heads of Trading Standards (WHoTS)

## **Wales Heads of Trading Standards**

The Wales Heads of Trading Standards (WHoTS) represents the 22 local authority Trading Standards Services in Wales which work in partnership to provide a coordinated, consistent and improved service to Welsh consumers and businesses. It operates under the auspices of the Directors of Public Protection Wales and provides strategic leadership to Trading Standards functions in Wales.

A Scambuster Wales Team has now been established within WHoTS for over 10 years and is managed by Newport Trading Standards. It is comprised dedicated Trading Standards Officers and experienced former Police Officers. The team works alongside officers from the Police, HM Revenue & Customs and other enforcement agencies to address the hardest to tackle scams and rogue trading. It has targeted doorstep crime; bogus charity collectors; deceptive selling techniques; home working and other “get rich quick” schemes; shoddy and unnecessary building work; and large scale organised counterfeiting operations,

The team also has a proactive role in educating and building the confidence of consumers and businesses by raising awareness of rogue traders and counterfeiters, and making consumers better able to distinguish the rogues from the reputable businesses.

Trading Standards in Wales has also developed an intelligence analysis capability. The Wales Heads of Trading Standards employ a Regional Intelligence Officer (RIO) whose role is to develop the intelligence capability of all 22 services as well as assist the Scambuster Team. The RIO works with a National Intelligence Database that allows the sharing of information nationally among trading standards across the UK and with other enforcement agencies. This capability allows trading standards to have access to intelligence charts and analytical reports to support more complex investigative work.

The RIO has developed close links with the 4 Welsh Police Forces and organisations such as eBay.

The Wales Illegal Money Lending Unit (WIMLU), funded by National Trading Standards Board, also operates under WHoTS. The Unit is made up of specialist investigators, victim support officers and debt advisors and works closely with local Trading Standards Authorities. It targets illegal money lenders, otherwise known as loan sharks, and looks into related crimes as well as supporting victims. The Unit also provides training to local authority, housing association and advice organisation staff and volunteers on identification of illegal money lending. The team is hosted by Cardiff City Council.

## **Local Trading Standards**

Each of the 22 local authorities in Wales is concerned with trading standards in their respective areas. The activities are usually carried out under the Public Protection function and are focused on a set of agreed national priorities for Wales. These are protecting individuals from harm and promoting health improvement; ensuring the safety and quality of the food chain; promoting a fair and just trading environment for citizens and business; and improving the local environment to positively influence quality of life and promote sustainability.

Trading Standards are responsible for regulation in relation to a wide range of consumer products and services. The teams advise businesses, investigate complaints, undertake inspections and test and sample products and services to ensure they are safe and appropriate for consumers. The overall aim is to ensure fair and competitive markets, and honest enterprise, and good business in pursuit of economic development, community safety, environmental protection and a healthy population.

## **Citizens Advice**

The UK Citizen Advice's network runs an advice service on a wide range of matters for the general public. Citizens Advice offers its clients a holistic and integrated support service. Where necessary, clients are referred to other agencies that can assist with their wider issues. The main areas of advice are in relation to welfare benefits, debt and housing. Other areas include employment issues, discrimination, immigration, education and fuel poverty. Nationally, Citizens Advice runs a comprehensive public facing case management system, known as Tableau, which details demographics, geography, and the type and complexity of cases.

Specific advice is given on consumer rights through a consumer helpline, witnesses are supported in court through a Witness Service and those over 50 are provided with free pension guidance. The advice service works closely with Trading Standards. Apart from its advisory service, Citizens Advice also undertakes research and campaigns on particular issues.

## Citizens' Advice Cymru

Citizens Advice Cymru is part of the network of Citizen's Advice offices throughout the UK. There are 19 Local Citizens' Advice organisations throughout Wales, each are independent charities providing free, confidential advice online, over the phone or in person. One covers Caerphilly and Blaenau Gwent, another covers Cardiff and the Vale of Glamorgan, whilst one relates to Swansea and Neath Port Talbot. The remaining 12 are coterminous with the rest of the local authorities.

The Welsh arm has been successful in obtaining project funding, one of which is focused on maximising incomes in the local authorities of Rhondda Cynon Taf, Merthyr Tydfil and Bridgend. This work is being taken forward with partners and victims of domestic abuse are part of the target group. There is also a project in Mid and West Wales targeted at older people whereby any older person presenting themselves for help, who is assessed as at risk of abuse is, subject to their agreement, linked with other organisations that can meet their advice needs in addition to the extensive advice that can be provided from Citizens Advice.

Last year Citizens Advice secured £8.1 million Welsh Government funding to provide generalist and specialist advice across all of Wales. This has been used to develop Advicelink Cymru to provide a remote telephone and digital service for the whole of Wales in partnership with others to achieve a seamless customer experience.

## The Financial Conduct Authority

The Financial Conduct Authority (FCA) regulates financial services companies and financial markets. It aims to ensure that consumers get a fair deal and that the markets work effectively for individuals, businesses and the economy as a whole. Consumers report scams to the FCA in respect of unauthorised firms or individuals contacting them about investments, pensions, loans, insurance and warranty products, claims management and consumer credit. Through its ScamSmart initiative, the Authority offers advice on a variety of scams.

## Financial Ombudsman Service

The Financial Ombudsman deals with complaints from businesses and consumers about financial companies. A variety of disputes are handled in relation to bank accounts; payment protection insurance; loans; debt collection; mortgages; and financial advice, investments and pensions. It resolves customer complaints in relation for financial scams and provides advice on how to avoid being scammed.

During 2019, a voluntary code was introduced offering protection for "authorised push payment" fraud, following a 40% increase in complaints about banking fraud and scams during 2018-19.<sup>64</sup>

## Age Cymru

Age Cymru provides advice on various types of scams and how to respond to approaches. The most common types affecting older people are pensions; doorstep; postal; investment; and phone/cold calling.

## **Wales Against Scams Partnership (WASP)**

WASP is a partnership initiative founded jointly by Age Cymru and the Older People's Commissioner for Wales to act against financial scammers and fraudsters in order to protect older, vulnerable people. Partners include Trading Standards, Scambusters, Get Safe Online, Welsh police forces, Welsh Local Government Association, the Information Commissioner's Office, Barclays Bank, Lloyds Bank, the Halifax and British Gas. The overall aim is to make Wales a safer place for vulnerable, older people. A charter has been produced setting out commitments to which partners sign up.

## **The Money Advice Service**

The Money Advice Service provides information and advice on financial abuse, which is described as a crime.

## **Financial Fraud Action UK**

UK Finance represents 250 banking and finance companies with the aims of enhancing competitiveness, supporting customers and facilitating innovation. One of its priorities is to ensure that the UK is the safest and most transparent financial centre globally to safeguard its members and their customers. It does this by working with its members, law enforcement bodies, government and industry to make it difficult for criminals to infiltrate financial institutions.

UK Finance leads the "Take Five – To Stop Fraud" national campaign that offers straight-forward and impartial advice to help everyone protect themselves from preventable financial fraud. This includes email deception and phone-based scams as well as online fraud, particularly where criminals impersonate trusted organisations. The campaign is delivered through a range of partners in the UK payments industry, financial services firms, law enforcement agencies, telecommunication providers, commercial, public and third sector organisations.

The Take Five Charter is signed by 29 leading banks and financial institutions. It sets out how the signatories deliver the campaign through their customer communications and their commitment to delivery. The Take Five website provides advice on various types of scams, including banking fraud; cheque scams; courier fraud; doorstep scams; holiday scams; identity theft; impersonation scams; investment scams; purchase scams; and romance scams. It explains what these are, provides examples and advises on how to spot scams.

## **The Financial Services Compensation Scheme**

The scheme has been set up by Government to protect customers of financial services companies that have failed by paying compensation for claims. It is funded by the financial services industry through payment of annual levies. The scheme provides information on financial scams in the UK by listing the five most common scams and advising on how to fight them.

## Get Safe Online

Get Safe Online is a key source of unbiased, factual and easy-to-understand information on online safety. Get Safe Online's website provides practical advice for people to protect themselves from fraud, identity theft, viruses and other on-line problems through their computers and mobile devices. It covers detailed information on a number of related topics. Apart from providing valuable information through its website, Get Safe Online organises national events to raise awareness of online scams and works closely with law enforcement agencies and other bodies in relation to outreach activities. It was suggested by one interviewee that the information available could be improved to be more inclusive of marginal groups.

## Think Jessica

Think Jessica was founded in memory of an older lady who became victim to scammers. It was a successful campaigning charity aimed at protecting older and vulnerable individuals from fraud. However, since last year it has become primarily an information giving website, explaining how phone scams, postal fraud and cold calling crimes work and what can be done to protect older and vulnerable people who may be at risk of such crimes as well as providing educational material.

## Housing sector

Housing associations in Wales have processes in place to support tenants that may be subjected to financial abuse and in some cases account is taken of the specific needs of older people. The support available to tenants varies but can involve help in notifying banks or credit card companies; setting up new bank accounts; target hardening (e.g. alarms, cameras and lock changes); internal information sharing; and informing and making referrals to statutory agencies and third sector organisations.

When financial abuse is identified, associations work with other agencies, including the third sector to put in place safeguarding measures to protect the individual. The aim is to serve the best interests of the individual. The support that is available covers referrals to Local Authority Safeguarding Teams and relevant third sector support organisations; assistance in reporting to the police; involvement of the Associations' money advice staff; actions to deter perpetrators; and involvement in multi-agency meetings.

Housing associations tend not to tailor support on financial abuse for older people, but work in partnership with other organisations to deliver the necessary help. Some of the larger organisations which provide specific accommodation for those over 55 years of age, sheltered housing and extra care schemes provide in-house tenancy support for residents. Staff are trained in safeguarding and how to recognise abuse to ensure the welfare of residents and it is understood that in some cases staff are also trained in identifying financial abuse and when to refer matters to the police as well as provision of advice on financial issues.

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