

28 February 2025

Attorney-General's Department
Protecting the Rights of Older Australians Section
Via email: nationalplan@ag.gov.au

RE: Consultation draft of the National Plan to End the Abuse and Mistreatment of Older People 2024-2034

Carers Victoria welcomes the opportunity to provide feedback on the draft National Plan to End the Abuse and Mistreatment of Older People (the Plan) following our attendance at the in-person consultation session on Thursday 13 February 2025.

We commend the government's commitment to the Plan as an important step towards addressing abuse and mistreatment of older people, and have identified a range of areas in which we believe the current draft could be enhanced. In summary, we recommend that:

1. the Plan use the definition of carers set out in the Commonwealth Carer Recognition Act (2010)¹ as this supports clarity (in terms of who carers are) and consistency with other federal initiatives;
2. carers be recognised as a priority group in the Plan, due to their direct experiences of abuse and mistreatment. This is considered important to avoid the perception that carers are only perpetrators when the evidence illustrates that they may be victim/survivors; both perpetrators and victim/survivors; or neither;
3. priority actions in the Plan recognise the diversity of carers;
4. carers be included in shaping the design and implementation of Priority Actions, to ensure those actions meaningfully address the complexities of care roles; and
5. the Plan include specific reference to supporting carers to better understand supported decision-making practices and legal instruments that uphold the rights of people with cognitive impairment, and assist them in planning for the use of these.

Unpaid carers play a significant role in supporting older Australians...

Carers Victoria has a strong interest in the Plan because so many older people rely on unpaid carers, and/or are carers of older people themselves.

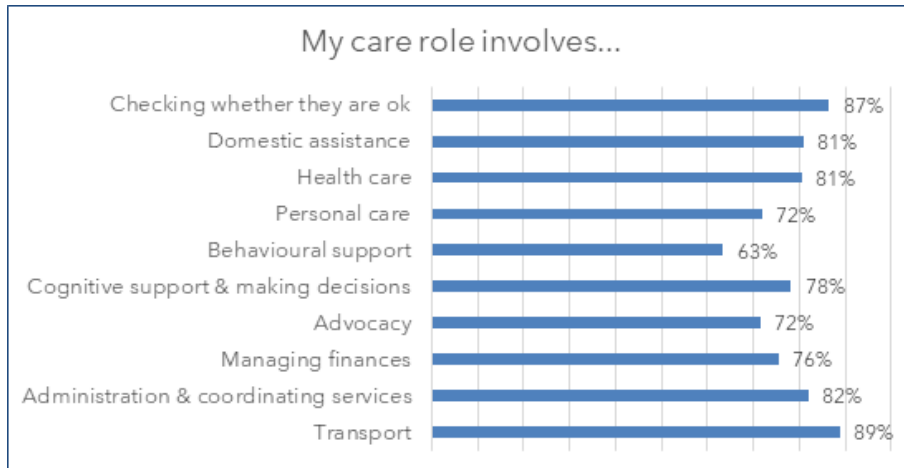
Indeed, unpaid carers are currently the main source of support for older people living at home and over 35% provide this care without complementary formal services for themselves or the older person.² As people 'age in place', increasingly with chronic conditions, it is likely the number of people providing unpaid care to older Australians will grow.

...and there is great diversity in both care relationships and their circumstances.

In care relationships, the evidence shows that carers can be victim/survivors and/or perpetrators of abuse or mistreatment.³ Carers Victoria believes it is important the Plan reflect a nuanced view of often complex family circumstances and an understanding of both the diversity of carer experience and the complexity of many care roles. For example, recognition of the factors which may contribute to the occurrence of abuse and mistreatment of older people such as stressful situations, financial stress and social isolation, can also be common features of carers lives and care roles.

The care role can often require support across a range of domains in all care relationships - ...but that does not automatically equate to mistreatment or abuse.

Unpaid carers often provide a range of supports including a number that, by their very nature, require a level of physical contact, management of finances or other such activities (see summary, below).



It should not however be presumed that because a carer is performing those tasks that they are exercising ageism or exerting control over the person or people in their care relationships. In most instances they are managed carefully and considerably without any mistreatment or abuse, and an unpaid carer being able to provide this kind of support is mission-critical to that person being able to remain safe and independent at home.

Given the prevalence of care relationships involving older Australians, carers should be actively involved in design and implementation.

There is however a strong case for unpaid carers to be included in the design and implementation of Priority Actions under the Plan to effectively address the risk of abuse and mistreatment of older people within the complexities of care relationships. Existing resources, such as those developed by the Victorian Office of the Public Advocate (OPA) to enhance supported decision making, could inform the planned review of communication resources on abuse and rights of older people.

Carers Victoria does however note that a whole-of-community approach to education and awareness is required. Targeted communication resources for - and informed by engagement with - carers, and consistent messaging to relevant cohorts such as health professionals and service providers is essential in achieving the Priority Actions.

Carers Victoria recognises the Plan as an important complement to the implementation of Australia’s regulatory framework upholding the rights of older people, ending their abuse and mistreatment.

Should we be able to assist further, please do not hesitate to contact Dr Margaret Boulos, Policy and Advocacy Lead at margaret.boulos@carersvictoria.org.au

Yours sincerely



Judith Abbott
Chief Executive Officer