COTA National Alliance Submission on the **National Plan to End the Abuse and Mistreatment of Older People 2024 – 2034**

COTA
For older Australians

COTA NATIONAL ALLIANCE

FEBRUARY 2025

About COTA National Alliance

As the leading not-for-profit organisations representing older Australians, the COTA National Alliance is deeply committed to safeguarding the rights, dignity, and well-being of older Australians and ensuring their voices are central to all policies and programs that impact their lives.

The Council on the Ageing (COTA) National Alliance comprises COTA Australia and the eight state and territory COTAs. The vision of the COTA National Alliance is that ageing is a time of possibility, opportunity, and influence within an equitable, just, and inclusive society in which the voices of older Australians are respected and strong. Our activities focus on advancing the rights, interests, and futures of Australians as we age.

COTA For older Australians

COTA NATIONAL ALLIANCE

COTA AUSTRALIA For older Australians

COTA NEW SOUTH WALES

COTA NORTHERN TERRITORY for senior Territorians

COTA QUEENSLAND

COTA SOUTH AUSTRALIA

COTA TASMANIA

COTA VICTORIA

COTA WESTERN AUSTRALIA for older Australians

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1 Executive Summary

The COTA National Alliance welcomes the second National Plan to End the Abuse and Mistreatment of Older Australians. However, to ensure the plan achieves meaningful and sustainable outcomes, we recommend a few changes that focus on clarity, accountability, and resources.

First, we encourage the adoption of measurable, action-oriented language throughout the plan. By setting specific, measurable goals and using decisive language, the plan can provide greater transparency and accountability, making it easier to track progress and ensure that that actions are achieved.

Additionally, it is important to build on the successes of the first National Plan while acknowledging and addressing gaps. Providing a clear roadmap that identifies completed actions, ongoing initiatives, and areas needing further development will ensure continuity and make the connection between the first and second National Plans transparent. This will increase confidence in the plan's direction and help communities and stakeholders understand how previous efforts are being carried forward.

Sufficient and sustainable funding is also important. As the demand for elder abuse prevention and response services increases, ensuring that these services are adequately resourced is crucial. We recommend assessing funding allocations to meet the growing needs of key services such as helplines, legal support, and crisis services, and expanding eligibility for programs like the Escaping Violence Payment to ensure age does not play an exclusionary role in support.

We also highlight the importance of addressing barriers that inhibit the integration of lived experience into the design and implementation of actions and services. Older Australians who have experienced abuse should be central to shaping the solutions that affect them. Creating safe and accessible avenues for their participation will ensure that the plan reflects their needs and addresses any barriers to their engagement.

Finally, we call for a focus on sustaining long-term funding to support the increasing need for services. Allocating resources to match the demand driven by increased awareness and providing consistent financial support for elder abuse services will ensure the National Plan's success over time. This includes funding to build workforce capacity in line with community need. Expanding the number of trained professionals and fostering collaboration through state-led forums will ensure a unified approach to elder abuse prevention and response.

By refining the language, building on past efforts, addressing funding needs, and addressing barriers relating to the integration of lived experiences, the second National Plan can deliver more effective, sustainable solutions for elder abuse and mistreatment. The COTA National Alliance looks forward to continued collaboration in shaping a future where all Australians can age free from abuse and mistreatment.

Additional submissions, that consider jurisdictional-specific challenges and recommendations, have been prepared by state- and territory-based COTAs.

2 Feedback on the second National Plan

While the second National Plan introduces commendable high-level principles, activities, and proposed outputs, we are concerned that it lacks adequate guidance as to the implementation of key actions, funding of services, jurisdictional alignment, and accountability. As such, this submission outlines the views of the COTA National Alliance and proposes actionable recommendations for strengthening implementation, accountability, and equity within the National Plan.

2.1 Actionable and measurable language

While the priorities and principles of the National Plan align with the direction advocated by the COTA National Alliance, the current language takes an overly soft and non-committal approach. To enhance accountability and drive meaningful change, we strongly recommend the adoption of actionable and measurable language throughout the National Plan.

For example, instead of the passive phrasing such as “improved governance”, “improved awareness”, “listening to and learning”, or “explore steps” we propose the more decisive language such as “mandate implementation of” or specification of what terms such as “improved governance” entails (e.g., forming dedicated oversight bodies, frequency of audits, or public reporting requirements).

The vision statement, proposed solutions, guiding principles, and focus areas also rely heavily on vague and aspirational terms, which should be underpinned by concrete metrics and actionable steps. The vision statement, for instance, “All older people feel safe, valued, and heard; have their rights protected and promoted; and live free from abuse and mistreatment” — this, for example, could include measurable goals with percentage increases/reductions by a set date.

Similarly, the National Plan’s proposed solutions and guiding principles include statements like “Our efforts to end the abuse and mistreatment of all older people requires us to be informed by, and responsive to, their experiences.” This could be made more concrete by setting clear actions, such as establishing advisory boards in specific communities by a specified date to inform decision-making. The principle of “a strong focus on prevention and early intervention” could include actionable steps, such as developing a set number of prevention programs by 2034 and measuring their effectiveness through incident tracking before and after implementation.

In its focus areas, the National Plan calls to “increase whole-of-community awareness, education, and engagement.” To make this actionable, the plan could outline specific objectives, such as delivering a certain number of educational workshops annually in collaboration with community organisations. Similarly, addressing gaps in the evidence base, such as “strengthening the capacity and capability of services,” could include measurable goals like recruiting and training a set number of professionals in elder abuse response each year.

By embedding measurable goals into its language, the second National Plan will ensure greater government accountability and reflect the level of commitment needed to

meaningfully address the abuse and mistreatment of older people. Action-focused and outcome-driven language is essential to maintaining this accountability and delivering on the plan's principles and actions.

2.2 Lack of distinction between new and carried over actions

The second National Plan would benefit from a clearer and more structured approach to building on the first National Plan to Respond to the Abuse of Older Australians 2019–2023. Strengthening the connection between the two National Plans will help ensure progress is transparent, accountability is maintained, and opportunities to enhance efforts to address elder abuse are fully realised.

For example, the Federal Government has allocated additional funding from 2022–2023 to 2025–2026 to continue to trial specialist elder abuse services and launched the 2024 "Ending the Abuse of Older People Begins with a Conversation" ad campaign. However, it remains unclear whether these initiatives fall under the first National Plan or are intended for the second. Clarifying this distinction would support sector engagement and provide a clearer understanding of what has been accomplished under the first National Plan, particularly as these initiatives were introduced before the second National Plan was published.

To provide greater clarity and direction, the second National Plan could go beyond simply distinguishing between new and ongoing initiatives. It could more explicitly outline which efforts require further development (carrying over commitment and resourcing), which need to be newly initiated (new commitment), and which should be embedded, sustained, or expanded. This structured approach would enhance transparency and accountability, ensuring a smooth and informed transition from the first to the second National Plan.

Furthermore, an assessment of the first National Plan's impact would be valuable. While progress has been made, the second National Plan could better identify gaps and areas of ongoing work, detailing how these will be addressed across different state jurisdictions. By integrating these elements into a clear and evidence-informed framework, the second National Plan can support a more cohesive and effective national response to elder abuse.

2.3 Barriers to lived experience must be explicitly addressed

Involving the voices of victim-survivors is key to turning abstract policy and program discussions into practical, actionable solutions. However, significant challenges persist in effectively integrating their lived experiences into the design and development process. While the inclusion of lived experience as a guiding principle in the second National Plan is a positive step, the National Plan must address the systemic and practical barriers that prevent older individuals from contributing their lived experiences to policy and program development.

Actionable strategies should be embedded within the National Plan's priority actions and focus areas, paired with a clear framework for implementation. Without this focus, the Plan risks overlooking key perspectives that are essential for shaping effective prevention and response efforts.

The challenges older people face in sharing their experiences vary widely. Physical factors like disabilities, mobility limitations, or cognitive changes can make participation difficult, especially when accommodations aren't proactively provided. Digital barriers, like unfamiliarity with technology or lack of access, can also make people feel excluded.

On top of that, emotional hurdles — such as fear, shame, or wanting to protect the image of the perpetrator — can make it even harder for someone to disclose their experiences. Furthermore, ageism, even when it's subtle, can create an environment where older individuals don't feel safe or valued in these conversations. And when victim-survivors have emotional or practical ties to a perpetrator, it can limit their ability to engage beyond just seeking immediate help.

These examples highlight the need for targeted engagement strategies that create safe, accessible, and supportive avenues for older individuals to share their experiences, needs, and aspirations. By actively confronting these barriers, the National Plan can foster a more inclusive, effective approach to addressing abuse and mistreatment in older populations. There are projects where this is already occurring across the country that the second National Plan can draw on, with one such example being the Tasmanian Older Voices for Change program.

2.4 Clearer accountability mechanisms

While the second National Plan commits to establishing an accountability framework, it would benefit from clearer identification of lessons learned from the first National Plan, particularly the need for clearer and more robust future accountability mechanisms. The Standing Council of Attorney Generals (SCAG) is proposed as the governing body, but its oversight might be inadequate due to the complexities of jurisdictional responsibilities.

For example, in Western Australia, Queensland and Victoria, responsibility for policy and implementation of matters dealing with elder abuse are widely disbursed, leading to confusion as to which organisation takes the lead in some situations. In Western Australia, the State Department of Health, the Department of Communities, Advocare, Legal Aid WA, the Alliance for the Prevention of Elder Abuse Western Australia and the Northern Suburbs Community Legal Centre Western Australia are just some of the many agencies involved in dealing with elder rights and elder abuse.

This fragmentation is counter-productive not only to effective policy and decision-making but also to the effective use of limited funds with so many agencies and organisations competing for them. Similarly, it highlights the need for clearer identification of the federal government's role as a leader in addressing elder abuse. The onus must lie with the government to provide strong, cohesive leadership and ensure accountability, rather than shifting responsibility back to the community. The federal government should take a proactive role in coordinating efforts across jurisdictions and sectors to ensure that strategies are implemented effectively and consistently.

Furthermore, the Implementation Evaluation Group (IEG), created in 2019 to assess the progress of the first National Plan, could be strengthened through greater transparency. While it is known that the group includes representatives from justice and social policy sectors and is supported by the Attorney-General's Department, there is a lack of publicly

available information regarding its membership, activities, and outcomes.

Without this transparency, the credibility and accountability of the evaluation process are limited. A clearer understanding of the IEG's workings would provide greater assurance to stakeholders, including the community, that government is holding itself accountable for the National Plan's success and addressing shortcomings in its implementation.

In sum, the second National Plan must address these accountability gaps by taking responsibility for leadership at the federal level, clarifying roles across jurisdictions, and ensuring transparency in the evaluation process. This will foster a more unified approach, strengthen trust, and ensure the plan's effectiveness in combatting elder abuse.

2.5 Funding uncertainty

A key objective of the second National Plan is to raise awareness of elder abuse and ensure older people have access to necessary support. However, the National Plan falls short by not committing to funding prevention efforts or response services to meet the increased demand that will likely follow greater awareness. While the plan's focus on long-term prevention, including addressing ageism, is positive, the immediate need for intervention and safeguarding services is not addressed. Without sustained funding for existing services or additional resources for specialist organisations, the impact of prevention measures may be undermined by insufficient response capacity. Funding is essential to supporting implementation of the National Plan – both to sustain existing activities that are stretched to capacity, and to address gaps that have been identified throughout the National Plan and similar research.

For example, Seniors Rights Victoria (SRV), the only state-wide legal centre dedicated to elder abuse in Victoria, saw over 12,000 calls for help in 2023–24, more than double the previous year's volume. Yet, recent state funding cuts have led to a 30% reduction in the number of people assisted, limiting support for older people and concerned third parties. This increase in demand is also evident in Western Australia and Queensland, where elder abuse calls and notifications continue to rise.

Similarly, those experiencing abuse require more than just immediate helplines — they are likely to need comprehensive, wrap-around support services, over an extended period. Crisis accommodation, secure and affordable rental housing, physical and mental health services, financial counselling, legal advice, employment support, and aged care system navigation may all be vital components of the recovery journey for many victim-survivors.

Despite this, state and territory members of the COTA National Alliance are aware that there is an acute shortage of support services, particularly housing. Where these services are available, they are often operating at full capacity. For example, COTA SA has recently engaged with numerous older women victim-survivors of domestic, family, and sexual violence who advise that crisis accommodation and social housing prioritises women of reproductive age or with dependent children.

Financial aid also remains largely inaccessible to older abuse victims due to ageist and restrictive criteria. For instance, the Escaping Violence Payment, intended to support individuals fleeing intimate partner violence, is not available to many elder abuse victims, whose perpetrators are often not intimate partners but rather family members or

caregivers.

The gap between community needs and service capacity is widening, underscoring the urgent need for expanded and sustained funding. Without a robust financial commitment, the second National Plan risks failing to meet its core objective of providing meaningful support to older Australians facing elder abuse.

3 Commentary on action areas

3.1 Focus Area 1: Awareness, education, and engagement

While we acknowledge the prioritisation of awareness, community, and engagement, we recommend reframing this focus area to place combating ageism at its heart. This reframing aligns with vision of this National Plan, by addressing societal attitudes towards ageing which is a foundational driver of abuse and mistreatment.

Although “combating ageism” is listed as a guiding principle, its importance justifies its elevation to a primary focus area. Tackling ageism requires a sustained, whole-of-community effort that transcends awareness campaigns. Addressing entrenched stereotypes about older people can significantly reduce the prevalence of elder abuse, as these stereotypes often underpin neglectful or harmful behaviours. As such, we recommend renaming this focus area to: “Increasing whole-of-community awareness, education, and engagement to combat ageism and elder abuse.”

To prevent ageism, the National Plan should develop national campaigns that challenge stereotypes about older people, highlight the value of older adults in society, and promote intergenerational understanding. Education systems should also embed discussions about ageism and elder abuse into school curricula, fostering respect for older individuals from an early age. Practical initiatives, such as promulgating the benefits of mentoring schemes in schools which operate in some states, also aid considerably in mitigating stereotyped views of older people.

Additionally, professionals in healthcare, legal services, and community support should receive targeted training to identify and counteract ageist attitudes in their work. It is essential to ensure that awareness programs are tailored to intersectional community needs.

Finally, success metrics such as regular community attitude surveys and tracking changes in elder abuse reporting rates (noting that with increased public awareness and acceptance of shared responsibility, we should expect reporting rates to increase at least initially) should be used to evaluate the impact of these initiatives. By placing ageism at the centre of this focus area, the National Plan can achieve a transformative cultural shift that reduces elder abuse and fosters greater respect for older Australians.

3.2 Focus Area 2: Legal frameworks and safeguarding

The National Plan does a good job of recognising strong legal frameworks protecting older people and acknowledging jurisdictions that do this well. However, it does not address situations where these frameworks are missing or inadequate. Both the priority area description and the action items focus on building upon existing successes, avoid any explicit acknowledgment of gaps.

Action items 2.1, 2.2, and 2.6 largely refer to ongoing activities, such as Enduring Powers of Attorney reforms, planning-ahead campaigns, and aged care reform. Since these initiatives are already in progress — and elder abuse remains a significant issue — it's reasonable to assume these efforts will continue regardless of their inclusion in the plan. Simply reaffirming them does little to advance progress.

The National Plan notes that commitments responding to the Disability Royal Commission will be made in future Action Plans. However, Action 2.3 only asks that jurisdictions "consider" the Commission's recommendations, rather than requiring their adoption. Similarly, Action 2.4 encourages jurisdictions to strengthen systems and clarify pathways for adult safeguarding. Yet, responsibilities tend to be spread across multiple agencies under different laws, and in some instances, without dedicated adult safeguarding legislation. Without stronger commitments in Action 2.3, the aspirations in Action 2.4 are unlikely to be realised.

The Disability Royal Commission has recommended a national adult safeguarding framework, with clear definitions and mandates for standardised data collection and reporting. Including this explicitly in the second National Plan would strengthen its impact and provide clearer direction.

While it is valuable to highlight successful initiatives in jurisdictions such as South Australia, New South Wales, and the ACT, ignoring areas with less-developed systems diminishes the plan's effectiveness. By focusing primarily on building upon past successes, the priority area fails to address shortcomings.

Ultimately, without explicitly acknowledging gaps and supporting stronger or new legal frameworks across all jurisdictions, this priority area risks perpetuating the status quo rather than driving meaningful progress in reducing elder abuse.

3.3 Focus Area 3: Services

The National Plan's acknowledgment of key issues, including the uneven distribution of specialist services, a tendency to seek help only in times of crisis, support for the services behind the 1800 ELDER HELP line, the need for cross-agency collaboration, and the role of professionals outside the elder abuse and family violence sectors, is welcome.

However, funding shortfalls highlight a structural oversight of the first National Plan; funding for raising awareness is not matched with resources needed to meet the resulting service demand. The issue identified in the second National Plan — where older people often wait until a crisis to seek help — has, in part, been perpetuated by these structural gaps.

For the Plan to succeed — and to support the wellbeing of both older people experiencing elder abuse and the professionals addressing it — the federal government must recognise the growing demand for support services as a barrier.

As noted earlier, demand for SRV — the integrated elder abuse service operating the 1800 ELDER HELP phoneline in Victoria — has exceeded the capacity of its lawyers and social workers. This has forced SRV to focus on those who are in crisis.

Additionally, systemic biases within aged care and overlapping sectors, such as health and family violence, must be addressed. Ageist attitudes often underpin the treatment of older people and can affect how elder abuse is recognised, reported, and responded to. Action must be taken to raise awareness of and challenge these biases through targeted education and training for professionals. This should include practical training for aged care workers, social workers, and other professionals to identify elder abuse and respond effectively while promoting respect for the dignity and autonomy of older people.

Greater clarity is also needed regarding action 3.3's reference to "improving the capacity of staff." It is unclear whether this refers to enhancing staff skills, increasing staff numbers, or both. Expanding the number of professionals is essential, as asking current staff — already overwhelmed by large and complex caseloads — to "work better" is neither realistic nor fair. Improving capacity must involve both additional staffing and comprehensive training to better equip professionals to meet the growing and diverse needs of older people.

3.4 Focus Area 4: Evidence and collaboration

While we have feedback for some of the action items under Focus Area 4, we support the logic and priorities outlined in this focus area.

For Action Item 4.2, we urge the government to ensure that the parties responsible for elder abuse public policy and programs are clearly identified and structurally linked to the second National Plan. Clear delineation of responsibilities across these agencies is essential to fostering accountability and streamlined implementation.

Regarding Action Items 4.4 and 4.5, it is essential that collaboration and engagement extend consistently to the state level, rather than being limited to national efforts. To support better information sharing and collaboration across the non-government sector, SRV and COTA Victoria established the Victorian Elder Abuse Strategic Alliance, enabling sector-wide collaboration.

Similar alliances exist in Western Australia (The Alliance for the Prevention of Elder Abuse) Tasmania (Tasmanian Lifelong Respect Community of Practice) and Queensland, where regional-based reference groups have formed to address the unique needs of rural, regional, and remote communities. These groups, primarily consisting of frontline and community-based services, sometimes involve legal, police, health agencies, and in rare cases, state government representatives. However, there remains no state-wide structure to oversee the performance of the elder abuse system across both government and non-government agencies.

Building on these examples, we recommend that the second National Plan advocate for the establishment of comparable, government-led forums in every state and territory.

These forums should convene regularly to:

- Advance the development and capacity-building of the elder abuse sector.
- Support the coordinated implementation of the second National Plan.
- Facilitate the sharing of best practices and innovative approaches.
- Share date between agencies, for example, health care, aged and community care systems, crisis support services, legal supports, and police services.

Without a dedicated mechanism for state-level collaboration, efforts to address elder abuse risk being fragmented and less effective. Establishing these forums is not only essential to ensuring the success of the second National Plan but also to fostering a unified and impactful response to elder abuse across Australia.

4 Recommendations for improvement

To ensure the success of the National Plan, we recommend adopting an approach that prioritises addressing ageism, embeds lived experience at every stage, and ensures robust measures for implementation and accountability. This includes clear jurisdictional alignment, sustainable funding commitments, and meaningful collaboration with stakeholders, as encompassed within the recommendations outlined below. We believe that uptake of these recommendations will better enable the National Plan to set a strong foundation for ending the abuse and mistreatment of older people in Australia.

4.1 Use actionable and measurable language to enhance accountability

- Revise the language of the second National Plan to replace soft or ambiguous terms with actionable and measurable language. This ensures clear accountability, transparency, and progress tracking.

4.2 Building on the first National Plan

- Develop a clear roadmap identifying achievements, in-progress actions, and gaps from the first National Plan to enhance transparency and accountability.
- Address unfinished work, outlining how shortfalls will be resolved under the second National Plan.
- Clarify whether ongoing initiatives outside the first National Plan's timeframe will be incorporated into the new plan to avoid confusion.

4.3 Addressing funding gaps and service demand

- Develop or provide transparency on the framework used for funding allocation under the second National Plan.
- Reassess funding allocations to ensure critical services, such as the 1800 ELDER HELP line, are adequately resourced to meet rising demand.
- Broaden the eligibility criteria for the Escaping Violence Payment to include older individuals experiencing family violence from non-intimate partners.

4.4 Elevating the fight against ageism and incorporating lived experience

- Reframe Focus Area 1 (Awareness, community, and engagement) to prioritise combating ageism at systemic, community, and individual levels.
- Develop targeted actions to integrate the lived experiences of older people into prevention programs, addressing barriers such as physical, emotional, and digital limitations.
- Ensure diverse perspectives, particularly from marginalised groups, are included and provide safe, accessible avenues for meaningful contributions.

4.5 Strengthening legal frameworks and safeguards

- Acknowledge where legal frameworks are missing or inadequate rather than only highlighting existing successes and reflect this in priority actions.
- Adopt the Disability Royal Commission's recommendation for a national adult safeguarding framework to standardise protection across jurisdictions.
- Emphasise the need for improved information-sharing provisions in existing legal frameworks.

4.6 Ensuring workforce capacity and collaboration

- Clarify the focus of "improving the capacity of staff," prioritising workforce growth to meet community needs.
- Establish state government-led forums or coordinating bodies for collaboration, sharing best practices, and ensuring state-wide policy and program consistency.

4.7 Ensuring sustainable, long-term funding

- Commit to sustained funding for elder abuse prevention and response services, supporting organisations dealing with complex, intersectional cases of elder abuse.
- Align resource allocation with the ability of services to meet growing demand generated by awareness campaigns.

4.8 Develop comprehensive community education campaigns

- Design and implement tailored awareness campaigns, in collaboration with older people and those with elder abuse experience, focused on ageism and elder abuse, starting from an early age and addressing diverse community groups.
- Highlight the impacts of ageism and promote understanding of nuanced or less visible forms of elder abuse.

4.9 Improving implementation and accountability

- Clearly define roles and responsibilities for federal, state, and local agencies.
- Implement transparent evaluation frameworks with regular reporting and consultation.
- Expand SCAG's oversight to include all relevant government departments and stakeholders.