The National Plan to End the Abuse and Mistreatment of Older People 2024-2034

February 2025

About The Salvation Army

The Salvation Army is an international Christian movement with a presence in more than 130 countries. Operating in Australia since 1880, The Salvation Army is one of the largest providers of social services and programs for people experiencing hardship, injustice and social exclusion.

The Salvation Army Australia provides more than 1,000 social programs and activities through networks of social support services, community centres and churches across the country. Programs include:

- Financial counselling, financial literacy and microfinance
- Emergency relief and related services
- Homelessness services
- Youth services
- Family and domestic violence services
- Alcohol, drugs and other addictions
- Chaplaincy
- Emergency and disaster response
- Aged care
- Employment services

As a mission-driven organisation, The Salvation Army seeks to reduce social disadvantage and create a fair and harmonious society through holistic and person-centred approaches that reflect our mission to share the love of Jesus by:

- Caring for people
- Creating faith pathways
- Building healthy communities
- Working for justice

We commit ourselves in prayer and practice to this land of Australia and its people, seeking reconciliation, unity and equity.

Further information about The Salvation Army can be accessed at:
https://www.salvationarmy.org.au/

Table of contents

Our commitment to inclusion

The Salvation Army Australia acknowledges the Traditional Owners of the land on which we meet and work and pay our respect to Elders, past, present and future.

We value and include people of all cultures, languages, abilities, sexual orientations, gender identities, gender expressions and intersex status. We are committed to providing programs that are fully inclusive. We are committed to the safety and wellbeing of people of all ages, particularly children. Our values are:

- Integrity
- Compassion
- Respect
- Diversity
- Collaboration

The Salvation Army is a worldwide movement known for its acceptance and unconditional love for all people. We love unconditionally, because God first loved us. The Bible says, “God so loves the world” (John 3:16, RGT). As both a church and charity, we believe all people are loved by God and are worthy of having their needs met. Everyone is welcome to find love, hope, and acceptance at The Salvation Army.

The Salvation Army Australia Territory wishes to acknowledge that members of the LGBTIQA+ community have experienced hurt and exclusion because of mixed comments and responses made in the past. The Salvation Army is committed to inclusive practice that recognises and values diversity. We are ensuring our services affirm the right to equality, fairness, and decency for all LGBTIQA+ people, rectifying all forms of discriminatory practice throughout the organisation.

We seek to partner with LGBTIQA+ people and allies to work with us to build an inclusive, accessible, and culturally safe environment in every aspect of Salvation Army organisation and services. Everyone has a right to feel safe and respected.

Learn more about our commitment to inclusion: https://www.salvationarmy.org.au/about-us/

Executive summary

The Salvation Army welcomes the opportunity to provide this submission to the Attorney-General's Department (The Department) regarding the consultation draft of the National Plan to End the Abuse and Mistreatment of Older People 2024-2034 (National Plan).

As a major provider of both church and social services, The Salvation Army is a trusted source of community and support for older people across the nation.

We commend The Department on the comprehensive and compassionate work that has already been done in developing this draft National Plan. From our work in the community, we have identified some additional considerations which we believe will strengthen the National Plan.

In this submission, we focus on:

- Financial abuse, including scams, fraud, unfair business practices and family pressures;
- The need for connectedness, including connection with services and community; and
- The profound impacts of failing to safeguard older people from these more subtle forms of abuse and mistreatment.

Descriptions of some of the relevant Salvation Army's services that encounter the abuse and mistreatment of older people, and were involved in the development of this submission, are available in Appendix A.

The Salvation Army has made **14** recommendations for The Department to consider. A summary of these recommendations follows on the next page.

Summary of recommendations

Recommendation 1

1.11 The Salvation Army recommends that the National Plan include a description of scams and fraud as a form of mistreatment and abuse.

Recommendation 2

1.15 The Salvation Army recommends that the National Plan's priority action to improve the coordination, scope and consistency of education for professionals include ensuring they are equipped to identify and appropriately respond to older persons impacted by scams or fraud.

Recommendation 3

1.16 The Salvation Army recommends that the National Plan's first Action Plan include strengthening scam and fraud response frameworks so financial institutions, utility providers and government services are legally responsible for providing the correct information, advice and referrals to older customers who have been impacted by a scam or fraud.

Recommendation 4

1.17 The Salvation Army recommends that the National Plan include under its *Appendix 1: Help and Support Services* the National Debt Helpline, IDCare, Australian Financial Complaints Authority (AFCA) and Scamwatch.

Recommendation 5

1.25 The Salvation Army recommends that the National Plan include a description of unfair and unconscionable business practices as a form of abuse and mistreatment.

Recommendation 6

1.26 The Salvation Army recommends that the National Plan include the equitable treatment of older people as an important role of the private sector.

Recommendation 7

1.27 The Salvation Army recommends that the National Plan's first Action Plan include the development of educational resources for businesses who sell products or services to older people. These resources should include guidelines for interacting with older customers and ways to identify apprehension or confusion when making a purchase or signing an agreement.

Recommendation 8

1.37 The Salvation Army recommends that the description of financial abuse in the National Plan distinctly include pressure to provide financial support as a form of financial abuse, encompassing inheritance impatience.

Recommendation 9

1.38 The Salvation Army recommends that the National Plan's community education and awareness initiatives describe pressuring an older person for financial support or accommodation as a form of abuse or mistreatment.

Recommendation 10

2.8 The Salvation Army recommends that the National Plan include increasing the capacity of health services to meet the needs and demand of older people as a priority action.

Recommendation 11

2.12 The Salvation Army recommends that the National Plan prioritise maximising choice in service provider to ensure older people can engage with providers suitable to their needs.

Recommendation 12

2.17 The Salvation Army recommends that the National Plan prioritise increasing the availability of crisis, short-term and long-term housing options suitable for older people.

Recommendation 13

2.24 The Salvation Army recommends that the National Plan include recent widows and widowers as a priority group.

Recommendation 14

2.32 The Salvation Army recommends that the National Plan work with key service providers to ensure service updates and changes are communicated in formats accessible to and preferred by older people. This should include but not be limited to:

- *financial institutions;*
- *utility providers;*
- *government services;*
- *healthcare providers; and*
- *public transport services.*

1 Financial abuse

1.1 To further strengthen the National Plan, The Salvation Army highlights the importance of specific forms of mistreatment being clearly outlined and addressed.

1.2 We understand that the National Plan has primarily adopted the World Health Organization's definition of elder abuse broadly encompassing many presentations of abuse. Through aiming to address not only the abuse but also the mistreatment of older people, the National Plan is uniquely positioned to include more subtle, culturally specific and debated forms of abuse.

1.3 Whilst these forms of abuse and mistreatment may not directly threaten the life or liberty of an older person, their pervasiveness contributes to and exacerbates the effects of ageism, leading to generalised distrust and fear among older people.[1] When striving for the vision of the National Plan, it is essential these forms of abuse and mistreatment be addressed.

Scams and fraud

1.4 The Salvation Army's experience working with older people shows that scams are a major concern. Whilst Australians overall reported a 13.1 per cent decline in financial losses from scams in 2023, people over the age of 65 were the only cohort to report an increase in losses at 13.3 per cent.[2]

> *"At least once a month an older community member will come to me worried they've been scammed."*
> **- A Salvation Army Corps Officer**

1.5 Scams and fraud carry not only a financial cost but can have far reaching psychological consequences for the affected older person. Older community members who have sought assistance from The Salvation Army have reported feeling distrustful, scared, insecure and helpless after experiencing a scam or a scam attempt, regardless of financial loss.

1.6 Common scams impacting older people include IT support, romance scams, investment scams, job opportunities, unexpected money (including lottery scams), travel scams, fake charities and impersonation scams.[3]

[1] Australian Banking Association. (2019). *Safe & Savvy: A guide to help older people avoid abuse, scams and fraud* https://www.ausbanking.org.au/wp-content/uploads/2019/11/Safe-and-Savvy-web.pdf
[2] National Anti-Scam Centre. (2024). *Targeting scams: Report of the National Anti-Scam Centre on scam activity in 2023* https://www.accc.gov.au/system/files/targeting-scams-report-activity-2023.pdf
[3] Australian Banking Association. (2019). *Safe & Savvy: A guide to help older people avoid abuse, scams and fraud* https://www.ausbanking.org.au/wp-content/uploads/2019/11/Safe-and-Savvy-web.pdf

Nancy's Story*

Nancy* is 75 and is an active member of a Salvation Army corps. Her brother, Nancy's closest friend, passed away, and seeking companionship, Nancy looked to buy a dog.

Nancy utilised Facebook Marketplace, where she found a breeder who was willing to set aside a puppy for her if Nancy sent a deposit of $2,000.

Nancy was apprehensive at first, but the seller kept sending photos of the puppy and insisted that the deposit needed to be paid quickly as they had many interested buyers. With her judgement clouded by the recent loss of her brother, and fears she would be lonely, Nancy transferred the money.

Nancy quickly became concerned that she had made a mistake and contacted her bank to reverse the transaction, but was told there was nothing that could be done.

This scam affected Nancy's finances, but also her confidence. She was comfortable opening up about the experience to her local Corps Officer and is now comforted that her story can be guidance for others in her community to avoid scams like this.

** Name changed*

1.7 Targeted scams, including scammers impersonating financial institutions, public services and aged care providers, take advantage of generally lower digital literacy, trust in established organisations and fear.

> *"They [older people] will receive a text message saying they have a debt to the ATO or that their power will be shut off. They are scared it's real but can't tell, and sometimes I can't either."*
>
> **- A Salvation Army Corps Officer**

1.8 Whilst older people are often a targeted cohort due to their perceived access to wealth, scams also greatly affect, and are targeted toward, older people on a low income.

Jenny's Story*

Jenny, a woman in her 80s, saw a social media post from "Salvos" offering a No Interest Loan Scheme (NILS) loan. Jenny was asked to provide her information, including her MyGov passwords and bank details, via private messaging. Jenny was also coaxed into sharing two factor authentication codes to allow access to her accounts. She did so as she believed she was communicating with a reputable organisation.

After some time had passed, Jenny contacted The Salvation Army's Moneycare Intake Line concerned she had been communicating with someone pretending to be "Salvos".

Jenny lost close to $8,000 from her pension being transferred to another account and a payment advance being requested, approved and paid to the account that was not hers.

Jenny was devastated as she had needed the funds to help pay for car repairs so she could continue to attend medical appointments.

Jenny contacted Services Australia who supported her to recover her online account and her pension payments have now been fixed. Jenny was also advised to contact her bank and Scamwatch to ensure all areas of her personal and financial identity were reviewed and protected.

** Name changed*

1.9 The far reaching societal and financial impacts of scams are being addressed through numerous government, private and community sector initiatives including the Exposure Draft Treasury Laws Amendment Bill 2024: Scams Prevention Framework, Scamwatch, Australian Banking Association's *Safe and Savvy* guide for older people[4] and IDCare.

1.10 The National Plan would benefit greatly from acknowledging this widespread form of abuse and mistreatment.

Recommendation 1

1.11 The Salvation Army recommends that the National Plan include a description of scams and fraud as a form of mistreatment and abuse.

[4] Australian Banking Association. (2019). *Safe & Savvy: A guide to help older people avoid abuse, scams and fraud* https://www.ausbanking.org.au/wp-content/uploads/2019/11/Safe-and-Savvy-web.pdf

A whole of community response to scams

1.12 A whole of community response is needed to aide in the prevention of, and recovery from, scams. As addressed by the National Plan, broad concerns of ageism and digital exclusion can create a point of vulnerability that can invite and facilitate elder abuse and mistreatment. The Salvation Army supports the National Plan's assertion that systemic ageism must be combatted by everybody.

1.13 Presently, much of the advice for stopping and recovering from a scam relies heavily on the assumed digital literacy of the victim. Changing all passwords, creating a new email account and replacing identification can entail prohibitively complex actions for an older person with limited digital literacy.

1.14 Whilst services such as financial counselling and IDCare can provide more comprehensive case management and scam support, it is essential that older people are correctly directed to these services when a scam is identified.

Recommendation 2

1.15 The Salvation Army recommends that the National Plan's priority action to improve the coordination, scope and consistency of education for professionals include ensuring they are equipped to identify and appropriately respond to older persons impacted by scams or fraud.

Recommendation 3

1.16 The Salvation Army recommends that the National Plan's first Action Plan include strengthening scam and fraud response frameworks so financial institutions, utility providers and government services are legally responsible for providing the correct information, advice and referrals to older customers who have been impacted by a scam or fraud.

Recommendation 4

1.17 The Salvation Army recommends that the National Plan include under its *Appendix 1: Help and Support Services* the National Debt Helpline, IDCare, Australian Financial Complaints Authority (AFCA) and Scamwatch.

Overselling and unfair business practices

1.18 The private sector can both play an important role in identifying and preventing the abuse and mistreatment of older people and also engage in behaviour that harms older people.

1.19 Unfair business practices, as defined by the Australian Competition and Consumer Commission (ACCC), include pressuring a customer into a sale, false or misleading claims and unconscionable conduct such as targeting consumers with a vulnerability.[5] Whilst older people are not inherently vulnerable, their increased likelihood of living with a disability or long-term medical condition, experiencing isolation or loneliness, and systemic ageism, can increase vulnerability when purchasing products or services.

Marvin's Story*

Marvin is a man in his late 70s who was feeling isolated and lonely when he saw an advertisement for a dating agency catering to older people. Feeling that dating may provide him with some socialisation and fulfilment, Marvin was initially interested in the services of the dating agency and went to their office.

A representative from the organisation applied significant pressure to Marvin to sign the contract authorising a $200 per fortnight subscription fee with a total cost of $2,500. Marvin expressed concern that he could not afford the services, but the representative applied hard sell tactics and attempted to distract him with suggestive photographs of possible matches. Despite already being in financial hardship, Marvin felt pressured and signed the contract.

Marvin came to see a Moneycare financial counsellor feeling embarrassed. Moneycare assisted Marvin to review his expenses and referred him to Seniors Rights Legal Centre who advocated for the contract to be rescinded.

** Name changed*

1.20 The Salvation Army's services including corps, Moneycare and NILS are frequently contacted by older community members who are facing financial hardship after purchasing goods or services that were unaffordable to them.

1.21 These older community members share with caseworkers and Corps Officers that they felt pressured into the sale by either a sense of urgency, necessity, or fear.

1.22 In our experience, older community members often cite trust in the provider and a lack of understanding of the product or service being sold as the reason they felt compelled to complete the purchase or agree to the contract despite their apprehension.

[5] Australian Competition & Consumer Commission. (2024). *Unfair business practices.* https://www.accc.gov.au/business/selling-products-and-services/unfair-business-practices

Wendy's Story *

Wendy is a woman in her mid-70s. After Wendy's husband passed away several years prior, she was worried about making ends meet on Centrelink income alone.

Wendy was proud to not have any debts as she wanted her estate, including the family home, to be inherited in full by her sons when she dies. A review of Wendy's bank statements revealed a $50 payment each fortnight to a buy now pay later (BNPL) provider.

Wendy explained that this was a government scheme she signed up to at the shop where she purchased hearing aids for $7,000. Wendy expressed frustration at the expense as she was told by her GP that she did not need hearing aids, didn't feel she needed them and hasn't used them once since she got them over a year ago. Wendy remarked "at least it won't be passed onto my kids when I go"; which her financial counsellor questioned.

Wendy explained that the hearing aid shop recommended the BNPL provider and told her how the debt would not affect her estate as it is a government scheme.

After reviewing the credit contact with Wendy, the financial counsellor concluded that it was not a government scheme she had signed up to and was instead a standard credit contract with no interest and high monthly fees.

Wendy recounted how she felt pressured to purchase the hearing aids and sign the contract, but at the time felt safe knowing it was a government scheme and that she should "trust the professional". Wendy shared with the financial counsellor that she now feels manipulated and naïve.

Wendy's financial counsellor guided her through her options for disputing the debt and returning the hearing aids and referred her to legal advice for estate planning.

** Name changed*

Colin's Story*

Colin, a man in his 60s, recently fell behind in his bills due to unexpected home repair costs. Colin's only income was the Disability Support Pension, and his disability made it difficult for him to explain his circumstances to creditors. He approached Moneycare for assistance with managing his debts including council rates arrears and the possibility of losing his home.

Upon reviewing Colin's financial circumstances, the financial counsellor found his monthly phone bill with a major telecommunications provider to be unusually expensive, and the cost unpredictable. Colin recounted that his phone was only meant to cost $55 a month, which was the cheapest option offered to him. He had also accepted a special offer of a tablet for $15 a month, for what he thought would cost a total of $70 a month.

Colin's financial counsellor contacted his phone provider, and it was confirmed that the contract he had signed at his local store was a lease plan with uncapped usage charges, a product more suitable for business use and not appropriate for Colin. Colin's financial counsellor negotiated with the phone provider to have all arrears waived, and the contract varied to cap his monthly phone bill at $70. Agreements were also reached for Colin to repay his other debts and his home is no longer at risk.

** Name changed*

Phil's Story*

Phil is in his late 60's living in supported accommodation. He has no immediate family and 80 per cent of his income - a combination of superannuation and the Aged Pension - is devoted to his accommodation costs.

Phil has engaged with a local support service for more than two years for advocacy and personal support. Phil had always been reluctant to discuss his finances with his support worker, but when he began to struggle to afford his accommodation, the support worker encouraged Phil to speak with a Moneycare financial counsellor. Moneycare discussed Phil's income and expenses, which included premiums for two life insurance policies. In late 2012 Phil was contacted by an insurer and took out a policy over the phone. In early 2013 the same insurer called Phil and persuaded him to take out a second life insurance policy.

Moneycare worked with Phil to discuss the suitability of these policies for his needs and contacted the providers to determine the particulars of his policies. With this information, Phil and Moneycare lodged an internal complaint due to the unsuitability of the policies, which should never have been issued. Phil received a full refund of the policy premiums paid, which repaid his accommodation arrears in full, and after further assistance from Moneycare, Phil was able to afford his ongoing accommodation costs.

** Name changed*

1.23 Older community members also seek assistance from The Salvation Army prior to completing a sale or signing a contract; at which time our community can assist to review the situation and discuss whether there may be suitable alternatives. Generally, assistance is sought when the product or service is unaffordable to the older community member, but they feel the purchase is essential.

Hetty's* Story

Hetty is a single woman in her late 60s who lived in her van. She took the van to a mechanic near to her house who quoted $1,800 for repairs.

Hetty presented to her local Salvation Army Corps distraught by the cost; not knowing how she would afford the work quoted. One of her friends in the corps suggested that the mechanic may have spotted her vulnerability and be attempting to over charge her. They encouraged Hetty to consider getting a second opinion.

The community suggested another mechanic who provided a much more reasonable quote for the minor repairs necessary, $400.

Hetty felt betrayed to have been taken advantage of by the first provider and was relieved at the lower cost for the repairs.

** Name changed*

1.24 Whilst some businesses specifically target older customers, many products and services needed by older people are universal. All businesses selling a product or service to older people should be aware of the potential for vulnerabilities and act appropriately.

Recommendation 5

1.25 The Salvation Army recommends that the National Plan include a description of unfair and unconscionable business practices as a form of abuse and mistreatment.

Recommendation 6

1.26 The Salvation Army recommends that the National Plan include the equitable treatment of older people as an important role of the private sector.

Recommendation 7

1.27 The Salvation Army recommends that the National Plan's first Action Plan include the development of educational resources for businesses who sell products or services to older people. These resources should include guidelines for interacting with older customers and ways to identify apprehension or confusion when making a purchase or signing an agreement.

Pressure to assist family

1.28 As acknowledged in the National Plan, family can be a source of support for older people, however, it is also true that family are the people who most often cause harm.[6]

1.29 Across The Salvation Army's services, frontline staff are reporting increased instances of older people feeling pressure to provide support to their adult children. Types of support vary widely and include being a guarantor for an adult child's property purchase, providing unpaid childcare, loaning money for living expenses and housing an adult child and their family.

Ian's Story*

Ian is a widower in his early 80s and is the sole carer for his adult son. Ian's son moved back into his home and was recovering from a prolonged period of substance use and significant mental ill-health. Ian described his son as angry and uncommunicative.

Despite being a retired professional, Ian had lost track of his financial situation and was beginning to experience financial and emotional stress as a result of his living situation. Ian sought guidance from a Moneycare financial counsellor, who discovered that his financial situation had deteriorated significantly, and that his house was at risk. Much of this hardship was due to a substantial loan Ian had extended to his son for an investment property, which his son was not repaying.

Ian described himself as feeling trapped in his situation as the lack of transparency and troubled relationship with his son made him worry for the future.

Moneycare was able to help Ian examine his financial situation, including the total amount of assets and liabilities he needed to consider. Moneycare helped Ian prioritise what issues he needed to bring up with an accountant and a solicitor to stabilise his financial situation. Critically, Moneycare assisted Ian to contact a relationship counsellor who helped him reframe the emotional and financial elements of his relationship with his son.

** Name changed*

[6] Qu, L., Kaspiew, R., Carson, R., De Maio, J., Harvey, J. & Horsfall, B. (2021). *National Elder Abuse Prevalence Study: Final Report* Australian Institute of Family Studies https://aifs.gov.au/research/research-reports/national-elder-abuse-prevalence-study-final-report

1.30 When addressing the growing prevalence of this form of financial abuse, it is important to consider the broader social context.

1.31 Older people, on average, have the highest household wealth in Australia, with much of this wealth derived from real estate. In a time where houses are largely unaffordable, younger people are increasingly reliant on "The Bank of Mum and Dad" to enable their property purchase; whether through loans disguised as gifts or providing a property guarantee.[7]

1.32 Whilst the pressure to provide assistance is more broadly introduced in the National Plan as "inheritance impatience", older people in financial hardship are increasingly experiencing pressure from family to provide financial assistance in ways that could not otherwise be inherited.

1.33 The decreasing affordability and availability of rentals is forcing many adult children, and potentially the adult child's family, to remain in or move back into their older parent or grandparent's home.[8] Whilst intergenerational cohabitation can provide many benefits to both the older parent, their adult child and any grandchildren, it is essential the arrangement is agreed to willingly by all parties.

1.34 Of the people who accessed The Salvation Army's Doorways service, 32 per cent of grandparents living with grandchildren reported feeling lonely "most or all of the time" in the last 12 months.[9]

1.35 Adult children who pressure their older family members to open their home can put the older person's financial security at risk by not contributing to household bills, damaging property and increasing rental costs in public and community housing - where rent is assessed as a percentage of household income. Where an arrangement may initially be agreed to willingly by the older person, failure of the adult child to uphold their agreed responsibilities becomes financial abuse, whether intentional or not. This pressure to provide accommodation can serve as a gateway to other forms of abuse and lead to the older person feeling unsafe in their own home.[10]

1.36 The Salvation Army suggests it is necessary that the National Plan to End the Abuse and Mistreatment of Older People 2024-2034 and the National Housing and Homelessness Plan consider the pressure the availability and affordability of housing places on older people.

[7] Cook, J. & Cook, P. S. (2024). *The 'Bank of Mum and Dad is exposing older Australians to the risk of financial abuse*. The Conversation https://theconversation.com/the-bank-of-mum-and-dad-is-exposing-older-australians-to-the-risk-of-financial-abuse-224361
[8] Selinger-Morris, S. (2023). *House prices and rents are forcing adult children back home. How should we handle it?* The Sydney Morning Herald https://www.smh.com.au/lifestyle/life-and-relationships/house-prices-and-rents-are-forcing-adult-kids-back-home-how-should-we-handle-it-20230425-p5d31j.html
[9] Verrelli, S., Russell, C., Taylor, E., & Xu, H. (2023*). Doorways Emergency Relief Survey Findings for the 2023 Red Shield Appeal*. The Salvation Army, Australia.
[10] Advocare. (2024). *The impact on older people when adult children move home*. https://www.advocare.org.au/news/the-impact-on-older-people-when-adult-children-move-home/

Recommendation 8

1.37 The Salvation Army recommends that the description of financial abuse in the National Plan distinctly include pressure to provide financial support as a form of financial abuse, encompassing inheritance impatience.

Recommendation 9

1.38 The Salvation Army recommends that the National Plan's community education and awareness initiatives describe pressuring an older person for financial support or accommodation as a form of abuse or mistreatment.

2 Connectedness

2.1 The Salvation Army provides a range of services to older people in person and remotely, and endeavours to deliver services in the community member's preferred format wherever possible. To effectively safeguard older people from, and respond effectively to, abuse and mistreatment it is essential that older people are connected with the right information, services, people and resources where and when they need them.

2.2 Older people are a large cohort at risk of social isolation and loneliness.[11] As explored in the National Plan, systemic ageism combined with increasing disability can limit an older person's autonomy and greatly affect how they experience the world and make social connections.

Strengthening the capacity and capability of services

2.3 The Salvation Army supports the National Plan's focus on strengthening the capacity and capability of services to respond to and prevent the abuse and mistreatment of older people.

2.4 Insufficient service capability can mean older people are unable to access essential services when they need them or are forced to engage with a service through a format they are not comfortable with, and at a price they cannot afford.

Health care

2.5 Access to health care is a significant concern among older people presenting to The Salvation Army. As bulk-billing services are becoming more scarce, older people experiencing financial hardship are subjected to lengthy delays whilst waiting for public care, going without essential healthcare, or compromising their financial security to pay for care.[12]

2.6 To facilitate older people achieving the highest attainable standard of mental and physical health, it is essential that public hospitals and community health networks Australia-wide receive adequate funding to meet demand.

> *"We will refer an older community member to a service and will have to wait 6 weeks for a call back. Their needs are urgent, and they need help now."*
>
> **- A Salvation Army Officer**

2.7 Even where an older person is able to pay for private medical care, they can be subjected to lengthy delays and unaffordable costs for essential care.

[11] World Health Organization. (2021). *Social isolation and loneliness among older people: advocacy brief.* https://www.who.int/publications/i/item/9789240030749

[12] National Seniors Australia. (2023). *Having trouble paying for healthcare? You're not alone*. https://nationalseniors.com.au/news/featured-news/having-trouble-paying-for-healthcare-you-re-not-alone

Mina's Story*

Mina attended her local Salvation Army Corps in search of support after being released from hospital.

Mina confided in the Corps Officer that she had been in the Mental Health Unit and received a significant diagnosis. She was told that she would need to find a psychologist and was unable to find one who would bulk-bill.

Uncomfortable with tele-health, Mina found the shortest waitlist in her area was 14 months. During this wait, Mina had several hospital readmissions resulting from her mental ill-health.

The Salvation Army Corps and community supported her during this time with socialisation and food support. Mina is happy with the psychologist she now sees but struggles to afford the cost.

** Name changed*

Recommendation 10

2.8 The Salvation Army recommends that the National Plan include increasing the capacity of health services to meet the needs and demand of older people as a priority action.

Fostering service relationships

2.9 When accessing a service, it is important that older people feel supported and understood. The Salvation Army agrees with the National Plan's goal to strengthen the cultural competency and diversity of specialist service staff and affirms the importance of a culturally safe and trauma informed approach.

> *"They [older community members] will be given a support worker who is over 50 years younger than them, and they feel misunderstood; like they have nothing in common."*
>
> **- A Salvation Army Officer**

2.10 Concerns around cultural and language barries limiting service effectiveness are also shared with Salvation Army staff. In circumstances where a multilingual caseworker has been available, the older community member has felt more comfortable sharing their circumstances, and as a result interventions can be enacted swiftly.

Isabelle's Story*

Isabelle, a woman in her 60s, joined a Mandarin language community at her local Salvation Army Corps.

Due to a language barrier, she had not been able to share her experience with other service providers. But through friends she made in the corps community, and the confidant she found in the Mandarin-speaking Doorways caseworker, she shared her story.

Isabelle had moved from her home country to Australia over a decade ago to be with her Australian-born husband. Shortly after arriving in Australia, Isabelle was met with criticism from her mother-in-law who disapproved of Isabelle's cultural heritage. This disapproval quickly escalated to emotional and physical abuse which Isabelle endured without intervention from her husband. Shortly before coming to The Salvation Army for support, her mother-in-law had forced Isabelle to leave the relationship.

Isabelle's belongings were thrown into the street, and she had been forced to couch surf ever since. During this time, she had experienced significant health issues including multiple cancers.

Isabelle shared that she found the racist treatment she received from her mother-in-law and while homeless very hard to cope with. The language barrier and her age only made it harder for her to defend herself and communicate her needs with services.

Isabelle was supported by the Doorways caseworker to find suitable accommodation and has become an active and valued member of the corps, particularly enjoying helping out in the kitchen with community meals.

** Name changed*

2.11 To facilitate and encourage early intervention, The Salvation Army acknowledges the importance of service providers building a trusting relationship with older people. Alongside enhancing cultural competency and the diversity of specialist service staff, older people being empowered to choose a provider they feel compatible with will contribute to more effective detection and prevention of - and early intervention in - abuse and mistreatment.

Recommendation 11

2.12 The Salvation Army recommends that the National Plan prioritise maximising choice in service provider to ensure older people can engage with providers suitable to their needs.

Housing

2.13 Homelessness and housing insecurity is a rapidly growing concern for older people, with older women a fast-growing demographic experiencing homelessness.[13] Homelessness and housing insecurity can have vast effects on the physical, mental and emotional wellbeing of an older person, and increase their risk of abuse and mistreatment.[14]

> *"Our Corps has four women in their 60's who are homeless. They are too young to access some services, and they aren't safe where they are sleeping."*
>
> **- A Salvation Army Corps Officer**

2.14 Older people experiencing homelessness often do not have support needs qualifying them for residential aged care but can face greater barriers to finding suitable crisis and long-term accommodation due to employment, limited mobility and health concerns.[15] Services delivered to older people need to be appropriate and safe and have capacity when needed by an older person; this includes housing.

2.15 Older people have also sought assistance from The Salvation Army where their previously suitable accommodation has become unsuitable due to their advancing age. The Salvation Army has supported numerous older people to find safe and suitable accommodation through the collaboration and colocation of internal and external services.

Henrietta's Story*

Henrietta is in her early 70s and lived in public housing in the centre of a capital city. New residents who were engaging in violence and substance use were making her feel unsafe. Henrietta applied to transfer to different public housing accommodation as a result. After a long time on the transfer list, she reached out to Doorways for assistance.

The Salvation Army was able to find suitable accommodation for Henrietta in one of our housing properties and, unable to afford removalists, the local corps assisted her in moving her furniture. Henrietta still regularly attends the corps Community Days where she has found a supportive community and is very happy in her new home where she has made friends with many of her neighbours.

** Name changed*

[13] Australian Human Rights Commission. (2019). *Older Women's Risk of Homelessness: Background Paper.* https://humanrights.gov.au/our-work/age-discrimination/publications/older-womens-risk-homelessness-background-paper-2019
[14] Stone, W., Reynolds, M., Veeroja, P., Power, E. R., Perugia, F. & James, A. (2023). *Ageing in a housing crisis: Older people's housing insecurity and homelessness in Australia.* https://doi.org/10.26185/87bq-4190
[15] Ibid.

2.16 People who are homeless experience extremely high levels of violence.[16] When aiming to end the abuse and mistreatment of older people, it is essential that an older person is able to access safe and suitable accommodation when they need it.

Recommendation 12

2.17 The Salvation Army recommends that the National Plan prioritise increasing the availability of crisis, short-term and long-term housing options suitable for older people.

Bereavement, social isolation and loneliness

2.18 Supporting older people to build positive connections and a sense of community is critical to preventing social isolation and loneliness, though is complex and requires broad interventions as described in the National Plan. The Salvation Army supports the National Plan's priority actions to increase community connections and foster an age-friendly society.

2.19 The death of a life partner will be experienced by many older people and can be a time of significant change and grief. It is common for partners to divide and share responsibilities including financial and domestic tasks. Where the division of responsibilities has endured for many years, essential skills can be lost and adaptations for the modern world missed.

> *"She managed all the money. Her funeral was the first bill he ever paid."*
> **- A Moneycare Financial Counsellor**

2.20 The bereaved partner can be exposed to significant vulnerabilities through the sudden need to navigate new obligations, systems and tasks while grieving. Unfortunately, some businesses and individuals can seek to take advantage of this vulnerable time.[17]

2.21 After the loss of a partner, many older people can rely on the support from their family and friends. The sudden need for increased emotional and practical support, coupled with the potential for significant wealth transfers, changes in living circumstances and care arrangements, can facilitate the emergence or increase the severity of abuse and mistreatment.

[16] Australian Human Rights Commission. (Undated). *Violence, Harassment and Bullying and Homelessness.* *https://humanrights.gov.au/our-work/commission-general/violence-harassment-and-bullying-and-homelessness#:~:text=Women%20who%20are%20homeless%20are%20also%20at%20greater%20risk%20of,shelters%20and%20on%20the%20streets*

[17] Council on the Ageing Victoria. (2019). *Death of a Partner: A practical guide for partners and families*. https://cotavic.org.au/wp-content/uploads/2019/04/Death-of-a-Partner-V3pdf.pdf

2.22 Where the bereaved older person is isolated or lonely and without an adequate support network, their partner's passing can have far-reaching and devastating impacts.

Hellen's Story*

Hellen, a woman in her late 60s, lived with her husband for many years. When they retired, they hired a caravan to take a year-long trip around Australia. Early into the holiday, Hellen's husband became ill. He was taken to the nearest regional hospital, where he later passed away. Hellen struggled following her husband's death as her late husband had largely managed the household. She experienced financial hardship and fell into homelessness.

She eventually found accommodation in a share house, but she felt unsafe, had her possessions stolen, and lived with housemates who failed to respect boundaries.

Hellen approached her local Salvation Army Corps, where she spoke to a Doorways caseworker, found community and has been able to process the grief of her husband's death. With the aid of her Doorways caseworker, Hellen has successfully found accommodation where she feels safe.

** Name changed*

2.23 A whole of community response is needed to support older people through this significant life event. The promotion of social inclusion and connection can protect older people from abuse and mistreatment where they may otherwise have become isolated or lonely.

Recommendation 13

2.24 The Salvation Army recommends that the National Plan include recent widows and widowers as a priority group.

Digital exclusion

2.25 As addressed broadly in the National Plan, moving resources and services online can isolate and exclude older people. Accelerated by the COVID-19 pandemic and inadequate service availability, this push for services and resources to be delivered remotely and online reinforces existing digital, cultural and linguistic divides in our community.

2.26 The Salvation Army's services assist older community members who have been impacted by digital exclusion in vast and varying circumstances. Many critical services are migrating away from traditional customer interactions and prioritising digitised service delivery.

2.27 Whilst this digitisation can increase service capacity, older people who may be less willing or able to use digital technology can feel excluded and discouraged. When an older person experiences an issue with a digital service, they may additionally be less likely to know their options and pathways for resolution, resulting in further harm or disadvantage.[18]

> *"My pension got reduced because I didn't upload a form. They didn't send me a real letter and I didn't see the e-letter because I hadn't opened my computer in a month! They expect us to sit on them [computers] all day like they do."*
>
> **- Older Salvation Army Community Member (Aged 91)**

2.28 Digital migration can see an older person become reliant on others to access information about and manage their personal affairs. This reliance on others can both impact self-esteem and create opportunity for abuse or mistreatment.

> *"When the local bank branch closed, our older community members were lost. They had the app, but said they would have to ask strangers for help."*
>
> **- Salvation Army Corps Officer**

2.29 When aiming to promote the independence and wellbeing of older people, The Salvation Army highlights the importance of designing and maintaining services that prioritise the engagement and participation of older people.

2.30 It is important that in-person and traditional formats of service delivery and communication are prioritised and accessible to older people. Maximising accessibility and availability is the best way to ensure that older people engage with available resources and services; facilitating the detection and prevention of abuse and mistreatment.

[18] COTA Australia. (Undated). *Digital Inclusion.* https://cota.org.au/policy/digital-inclusion/

Portia's story*

Portia is in her late 70s and has lived alone since moving to Australia.

One day, her home was broken into while she was out shopping, and several of her possessions were stolen. Portia went to her local police station to make a report, but was referred to an online form to report the crime.

Portia has limited access to the internet, struggles with computers and already experiences difficulty completing forms due to a language barrier.

She felt that her concern had not been taken seriously, and being unsure how to complete the form, she was dispirited and chose not to report the burglary.

** Name changed*

2.31 Older people can rely heavily on support and public services for their safety, mobility and autonomy. Where communication of service updates, changes and issues are provided in only a digital format, older people can be excluded from access to this information and be left with critical needs unmet.

Celia's Story*

Celia is a woman in her late 70s who relies on food relief from her local Salvation Army Corps, which she accesses by use of public transport.

Celia does not have a mobile phone and is not comfortable using the internet.

In late December 2024 the bus network in her city experienced unexpected strike action.

Due to the nature of the strike and her lack of access to the internet, Celia did not know why her bus was late, but due to her needing the food, she stayed at her bus stop expecting the next scheduled service would arrive.

Celia spent 2 hours at her bus stop before giving up. By the time she accessed local news and learnt about the cancellations, she had missed the window to access food relief.

Celia's local Salvation Army Corps had many community members who could not access the pantry on that day and made alternate arrangements to provide food relief where possible.

** Name changed*

Recommendation 14

2.32 The Salvation Army recommends that the National Plan work with key service providers to ensure service updates and changes are communicated in formats accessible to and preferred by older people. This should include but not be limited to:

- **financial institutions;**
- **utility providers;**
- **government services;**
- **healthcare providers; and**
- **public transport services.**

3 Conclusion

3.1 The Salvation Army thanks the Attorney General's Department for the opportunity to provide a written submission for the National Plan to End the Abuse and Mistreatment of Older People 2024 – 2034.

3.2 The Salvation Army would welcome the opportunity to discuss the content of this submission should any further information be of assistance. Further information can be sought from The Salvation Army's Department of Government Relations, at government.relations@salvationarmy.org.au.

The Salvation Army Australia Territory

February 2025

Appendix A The Salvation Army's services

Moneycare Financial Counselling service

Moneycare is The Salvation Army's financial wellbeing and capability service. It has been operating for over 45 years and has helped thousands of people experiencing, or at risk of experiencing, financial and social exclusion. Moneycare operates nationally, consisting of approximately 85 sites across Australia.

Through Moneycare, we deliver a range of free and confidential services, including Financial Counselling, financial capability support, financial literacy and capability workshops. These services build on The Salvation Army's values of empathy and dignity, with an emphasis on building trusting relationships with people accessing our services.

Moneycare services support people by addressing their immediate financial crisis situation and helping them build long-term capabilities and resilience in managing financial hardship.

Corps and Community Days

The Salvation Army's corps (churches) serve as both places of worship, and a welcoming hub of support for anyone in the local community. A diverse and extensive range of faith activities, services and connections are available to people.

Many corps host a Community Day, sometimes multiple times per week, with a cooked lunch, and staple items available through partnership with local supermarkets and other providers.

The Salvation Army's diverse range of services, from our Doorways Emergency Relief and Moneycare Financial Counselling attend, alongside external service providers, including community legal, utilities providers and Housing services.

These services all form part of the community and make the Community Days an accessible point of entry to many Salvation Army, and other essential supports and services.

Beyond being an example of flexible, and collaborative support, Community Days are an example of intergenerational community building, with everyone welcomed to join, eat together and connect with services.

Doorways Emergency Relief and Case Management services

Across Australia, The Salvation Army's financial relief service, Doorways, provides Emergency Relief and holistic Case Management with referral to internal and external support services.

We recognise that people who are disadvantaged and have complex needs require an investment of time, resources and commitment to support them. This has driven a change in the way that The Salvation Army delivers Emergency Relief support. Recognising that many people who access our Emergency Relief service are in intergenerational poverty situations, The Salvation Army provides extra support to those people through Doorways Case Management. Doorways caseworkers provide holistic Case Management, practical support, and make referrals to other services.

Microfinance – No Interest Loans Scheme and Salvos Loans

The Salvation Army is able to provide safe, affordable loans to community members on low incomes as part of the national No Interest Loans Scheme (NILS). By assessing the individual's income and helping to set a budget, NILS prevent people on low incomes entering into unsafe and inappropriate loans from other lenders.

The Salvos Domestic Violence Loan Program is a national program which allows victim-survivors of family and domestic violence to borrow up to $5,000 for essential products and services to support their finding of a safe and suitable environment for themselves and their children. The loans are also interest and fee free and can be repaid up to three years to ensure affordability. The program also incorporates financial education and our Positive Lifestyle Program to provide additional support and skills development to community members for ongoing financial confidence and security.