



Submission on the National Plan to End the Abuse and Mistreatment of Older People 2024–34 Public Consultation Draft

For further information please contact:

Fiona York, Executive Officer

Email: haag@oldertenants.org.au

About Housing for the Aged Action Group (HAAG)

Housing for the Aged Action Group (HAAG) is a member-based, community organisation specialising in the housing needs of older people. HAAG has over 900 members across Australia actively working towards achieving housing justice. Established over 40 years ago as a grassroots movement, HAAG has developed a robust service delivery arm in Victoria and has a strong presence in advocacy for older people experiencing housing and homelessness related issues across Australia. During the 2023-24 financial year, HAAG supported over 1,800 older Victorians.

In 2016, HAAG was funded by the Wicking Trust (a philanthropic organisation) to conduct research in every state and territory to understand the depth and breadth of housing and homelessness issues of older people. In consultation and engagement with services, people with lived experience, advocates and peak advocacy bodies across Australia, the research project produced a number of reports on the housing issues of older people.¹ HAAG was funded in 2020 for a further four years to continue this work.

HAAG welcomes the opportunity to provide input into the *National Plan to End the Abuse and Mistreatment of Older People 2024–34 Public Consultation Draft* (the National Plan). Housing stress, insecurity and homelessness is integrally linked to the abuse and mistreatment of older people, and the current housing crisis has exacerbated this. Without access to a safe, secure, affordable home of their own older people can find themselves living in situations – with adult children, relatives, or strangers – where elder abuse is more likely to occur. When elder abuse does occur, a lack of alternative housing options means it is difficult for older people to escape that abuse.

HAAG commends the *National Plan to End the Abuse and Mistreatment of Older People 2024–34 Public Consultation Draft*, and the commitment demonstrated by all Governments in Australia to do more to prevent and respond to the abuse and mistreatment of older people. This submission reflects HAAGs responses to relevant consultation questions about the National Plan. Our comments are based on our experience delivering housing and related support services to older people, research and lived experiences of older people in Australia experiencing housing stress, homelessness, and abuse and mistreatment.

Recommendations

- A fifth focus area be added to the plan: addressing the social determinants such as housing and poverty that result in older people being more vulnerable to abuse and mistreatment
- That the National Plan recognises the premature ageing experienced by older people experiencing homelessness
- That the National Plan include socio-economic factors, particularly precarious housing and poverty in Principle 4: Prevention and early intervention; and a description of these factors in the section on the 'Broader social context of this plan'

¹ See further: Housing for the Aged Action Group, Ageing on the Edge National Action Project, accessible at: <https://www.older tenants.org.au/ageing-edge-national-action-project>

Context

Having access to safe, affordable, accessible and long-term housing is fundamental to healthy ageing and wellbeing of older people. Cost of living pressures, mainly due to skyrocketing rent, coupled with the significant inadequacy of Age Pension and Jobseeker payment are pushing older renters into severe housing stress and poverty. The rental market is particularly challenging for older people who are on low-incomes or relying on government income support payments as their main source of income. Even before the current rental crisis, Retirement Income Review Final Report found that renters and involuntary retirees experience higher levels of financial stress and poverty than the working-age population.²

According to census data, about 700,000 people aged 55 and older rented from a private landlord, a 73% increase in ten years. There are at least 220,000 older people over 55 renting privately in the lowest two income quintiles.³ 67% of retired people who rent in the private market are living in poverty, and these rates are even higher among single men and single women, at 74% and 78% respectively.⁴ It is important to note that the data was collected prior to rental crisis started and it is likely that the number of older people in severe rental stress, experiencing or at risk of homelessness is significantly higher.

Older people who are renting experience such high levels of poverty and housing stress because rents in the private rental market are unaffordable. A single retiree who relies solely on income support can afford to rent just 4% of one-bedroom homes in Sydney, 13% in Brisbane, and 14% in Melbourne, after covering basic living expenses.

This housing vulnerability places older people at increased risk of abuse and mistreatment.

The abuse and mistreatment of older people can take a range of different forms: physical, sexual, psychological and emotional, financial, neglect, and cultural or spiritual abuse. It can be deliberate or unintentional.⁵ The National Elder Abuse Prevalence Study, released in 2021, found that one in six, or nearly 15%, of people aged 65 years or older experienced abuse in a 12-month period. Older people with disability or long-term medical conditions were twice as likely as others without such health problems to report experiencing any form of abuse (20.6% compared with 9.8%). Older women living in the community were more likely overall than older men to experience abuse (15.9% compared with 13.6%).⁶

² The Department of Treasury, Retirement Income Review Final Report, 2020, accessible at: https://treasury.gov.au/sites/default/files/2020-11/p2020-100554-00bkey-observations_0.pdf

³ W. Stone et al, Ageing in a Housing Crisis: Older people's housing insecurity & homelessness in Australia (Commissioned by Housing for the Aged Action Group), 2023, accessible at: <https://www.olderrenters.org.au/publications/ageing-in-a-housing-crisis-older-peoples-housing-insecurity-homelessness-in-australia>

⁴ Coates, B., Bowes, M., and Moloney, J. (2025). Renting in retirement: Why Rent Assistance needs to rise. Grattan Institute. <https://grattan.edu.au/wp-content/uploads/2025/02/Renting-in-retirement-Why-Rent-Assistance-needs-to-rise-Grattan-Report.pdf>

⁵ National Plan to End the Abuse and Mistreatment of Older People 2024–34 Public Consultation Draft <https://consultations.ag.gov.au/families-and-marriage/eamop/>

⁶ L Qu, R Kaspiew, R Carson, D Roopani, J De Maio, J Harvey, B Horsfall, National Elder Abuse Prevalence Study: Final Report, Australian Institute of Family Studies (AIFS), Australian Government, 2021, p 62.

The National plan to end the abuse and mistreatment of older people 2024-34

As the draft National Plan describes, the abuse and mistreatment of older people (sometimes referred to as ‘elder abuse’) is a complex health, justice and social issue that can have devastating physical, mental, financial, social and emotional wellbeing consequences for older people, their families, and communities.

HAAG commends the agreement across all Governments in Australia that more must be done to prevent and respond to the abuse and mistreatment of older people, and that this National Plan is extending on the builds on the work done under the first *National Plan to Respond to the Abuse of Older Australians 2019–2023*.

This National Plan, and its underlying Action Plans, seeks to provide the strategic architecture to unite action by governments, the sector and community over the next 10 years, to prevent, respond and ultimately end the abuse and mistreatment of older people.⁷ The draft National Plan consists of:

- a 10-year term, which will be underpinned by two 5-year action plans
- a vision framed in terms of ending (rather than responding to) elder abuse
- a human rights focus and a cross-portfolio approach to addressing underlying issues
- a commitment to monitor and evaluate the effectiveness of the plan and report publicly on implementation milestones.⁸

HAAG strongly supports the Attorneys-General of each Australian state and territory, together with the Federal Attorney-General, working towards ending the abuse and mistreatment of older people.

The draft National Plan includes detailed contextual information about the abuse and mistreatment of older adults. This includes: definitions and terminology; the various types of abuse and mistreatment (physical, sexual, psychological and emotional, financial, neglect, and cultural or spiritual abuse); the relationships and settings in which the abuse of older people can occur; knowledge about the abuse and mistreatment of older people; and specific considerations for First Nations older people.

HAAG endorses this level of detail being included in the National Plan, to provide readers with a clear explanation of the nuances and intersectional nature of the abuse and mistreatment of older people.

⁷ <https://consultations.ag.gov.au/families-and-marriage/eamop/>

⁸ <https://consultations.ag.gov.au/families-and-marriage/eamop/>

Vision

The vision of the National Plan is:

All older people feel safe, valued and heard; have their rights protected and promoted; and live free from abuse and mistreatment.

HAAG strongly agrees with the vision of the National Plan.

A 10-year National Plan.

The National Plan proposes a 10-year overarching plan, supported by two 5-year action plans.

HAAG strongly agrees with the implementation of the National Plan through two 5-year action plans.

Priority groups recognised in the National Plan.

The National Plan recognises that particular people or groups can experience abuse and mistreatment differently, and at different rates, based on their experiences of discrimination, disadvantage and stereotyping that intersects with ageism. These people or groups may face unique and more complex barriers in seeking and receiving help and supports. As such, the National Plan acknowledges the unique needs and experiences of the following groups of older people, which it collectively refers to as ‘**priority groups**’ including (but not limited to):

- First Nations peoples
- People with lived and living experience of abuse and mistreatment
- Culturally and linguistically diverse (CALD) people, including migrants and refugees
- LGBTQIA+ people
- Women
- People with disability, recognising the social model of disability and the diversity of experiences within the disability community
- People who experience mental ill health
- People with chronic health conditions
- Veterans and war widows(ers)
- People who live in remote or rural areas
- People who are financially or socially disadvantaged, including people who are homeless or at risk of homelessness
- People who are socially isolated

- People with low literacy (including low digital literacy or engagement).⁹

HAAG's experience confirms that these groups of older people have specific needs that increase their vulnerability to abuse and mistreatment, and **HAAG strongly agrees that these priority groups are recognised in the National Plan.**

6 key principles that underpin the plan

The National Plan identifies six underpinning principles:

1. Taking a human rights approach
2. Combatting ageism
3. Listening and learning from the experiences of older people and diverse communities
4. Focusing strongly on prevention and early intervention
5. Supporting individual decision-making, autonomy and dignity
6. Taking a person-centred and trauma-informed response.

HAAG strongly agrees that these key principles address a suitable range of areas for ending the abuse and mistreatment of older people.

In addition, HAAG notes that key protective factors against abuse and mistreatment of older people are that older people have the housing and economic security they need, and that these should be specifically articulated within Principle 4 'Focusing strongly on prevention and early intervention'.

Recommendation

That the National Plan include socio-economic factors, particularly precarious housing and poverty in Principle 4: Prevention and early intervention

Four focus areas

The National Plan identifies four focus areas that will guide the work to end the abuse and mistreatment of older people:

1. Increase whole of community awareness, education and engagement
2. Enhance legal frameworks and adult safeguarding responses
3. Strengthen the capacity and capability of services, including through targeted education and training for professionals
4. Address gaps in the evidence base and increase collaboration

⁹ National Plan to End the Abuse and Mistreatment of Older People 2024–34 Public Consultation Draft <https://consultations.ag.gov.au/families-and-marriage/eamop/> p17

These four identified focus areas are all vital to guide the work of the plan. However, there is no recognition within them of the need to address the social and economic disadvantage that is such a significant contributor to the abuse and mistreatment of older people.

Every day HAAG hears from older people whose lives are being impacted by Australia's housing crisis. These older people struggle to compete in the private rental market, are left to languish on social housing waitlists, or cut back on the essentials until they reach breaking point. Safe, secure and affordable housing is a human right, but it is increasingly beyond the reach of older people in Australia. That is especially true of those on the lowest incomes and particularly those who rely on government income and supports. It is these people who are most at risk.

The housing crisis is, for many older people, a gateway into the abuse and mistreatment of older people. Without access to a safe, secure, affordable home of their own older people can find themselves living in situations – with adult children, relatives, or strangers – where abuse is more likely to occur. When abuse or mistreatment of older people does occur, a lack of alternative housing options means it is difficult to for older people to escape that abuse.

For the past four years, around 5% of HAAG clients reported elder abuse impacting on their housing. The majority are women, but men experience elder abuse too – most often perpetrated by their adult children – daughters, sons, daughter in law, sons in law.

Almost two thirds of HAAG's clients come from CALD backgrounds, and around half of those experiencing elder abuse accessing our service come from culturally or linguistically diverse backgrounds.

This is partially a result of their housing. Culturally and linguistically diverse older people and Aboriginal and Torres Strait Islander older people experience housing crisis in a way that makes them particularly vulnerable to abuse.

Research has revealed that 95% of culturally and linguistically diverse older people who are marginally housed live in crowded dwellings.¹⁰ Similarly, living in severely overcrowded housing is the most common form of homelessness among older Aboriginal and Torres Strait Islander people.¹¹ There may be many generations under one roof, because of both cultural expectations, but also because of affordability – leading to overcrowding and increasing tensions and pressure within families.

Some of the experiences of abuse and mistreatment that directly impact on older people's housing, as described those contacting our service, are:

- An older man's stepson used powers of attorney over the older man's ex-wife in order to evict him from his home.

¹⁰ W. Stone, et al, Ageing in a Housing Crisis: Older people's housing insecurity & homelessness in Australia, 2023, accessible at: <https://www.older tenants.org.au/publications/ageing-in-a-housing-crisis-older-peoples-housing-insecurity-homelessness-in-australia>

¹¹ W. Stone, et al, Ageing in a Housing Crisis: Older people's housing insecurity & homelessness in Australia, 2023, accessible at: <https://www.older tenants.org.au/publications/ageing-in-a-housing-crisis-older-peoples-housing-insecurity-homelessness-in-australia>

- An older woman was living with her son's family, in an overcrowded house where she was sharing a room with her granddaughter, and was on the receiving end of constant verbal abuse from her daughter-in-law.
- Another older woman experienced verbal abuse while living with her son, but didn't want to take any action because she was worried about her living situation and fracturing her relationship with her son further.
- An older woman who had experienced family violence in her past, who decided to live with her daughter, and gave her some money from the sale of her home. She is now being verbally abused and being asked to leave. She has nowhere to go.

Farida's story illustrates the intersection between housing and the abuse and mistreatment of older adults in more detail.

Farida* is a woman in her mid-70's who only speaks a language other than English, and who has complex health needs, including needing a wheelchair and assistance with most activities of daily living. Farida was living with her adult son. She had purchased a home for him using her life savings, with the understanding that he would care for her as she aged. However, her son completely neglected her. She had been confined to bed as he had cancelled all her external care supports. He also did not allow her to seek medical treatment, controlled all her finances and communication with the outside world. She said she felt like 'a prisoner'.

Farida was connected to support services through a friend, and after many challenges due to language and physical barriers, elder abuse and her fearfulness of her son, Farida was able to access respite care while a more permanent housing option was found. Unfortunately, most housing options were not physically accessible and did not allow modifications for her mobility needs.

After advocacy from her case workers, Farida moved into a fully accessible modified and accessible unit in a suburb with appropriate cultural and community supports, and was close to her medical services. Farida now lives independently, with a home care package in place, and her health has significantly improved.

**Name has been changed and the person's consent was obtained to share the story*

To reduce older people's risk of abuse and mistreatment secure and genuinely affordable housing is essential. However, too many older people are living in insecure, precarious housing, or are experiencing homelessness.

The current housing crisis is having a significant impact on the housing security of older people. As noted earlier, an increasing number of older people are renting into retirement and struggling to afford escalating rents. More older people are retiring with a mortgage, placing them vulnerable to any increase in costs. At the same time, their children are also struggling with unaffordable rents and

rising housing costs. These combined vulnerabilities provide a fertile ground for the abuse and mistreatment of older people.

Despite the fundamental importance of housing, and other social determinants such as adequate income, it is not included as a focus in the National Plan. This is surprising as in the consultation report produced by Elder Abuse Action Australia to inform the National Plan – *From Insight to Action: Second National Plan to Prevent and Respond to Abuse of Older People in Australia* – described focus groups and interviews as identifying socio-economic factors contributors to the high prevalence of the abuse of older people in Australia:

‘...Socio-economic factors, particularly considering the cost-of-living crisis being experienced in many communities across Australia. Participants commented that poverty can significantly impact the experience of ageing and vulnerability to abuse, as it impacts all aspects of a person’s living situation, including housing and their ability to participate in a community, as well as access to services (including medical care, legal services and respite care if needed). One person summed it up as follows:

Wealth makes a big difference to how someone can navigate the system. There’s an alarming increase in the number of older people in poverty and that impacts their options.

Participants also commented that the current economic climate—with an increasing number of households experiencing financial strain due to the rising cost of living—may exacerbate risks for financial abuse, as people look to their parents’ assets to address their own needs.¹²

Consultations also noted that:

- achieving a bold vision of ending elder abuse would require a multifaceted approach that includes ‘attention to those social determinants that can make older people more vulnerable to elder abuse (including poverty and insecure housing).¹³
- That the principle of taking preventative action should include ‘the need for the prevention elements of the next National Plan to actively target protective factors such as social connectedness, health and wellbeing, secure housing, economic security and healthy relationships’

To ensure that older people have the secure and affordable housing they deserve to age in place, and that their children also have the housing they need, Australia needs to reorient the housing system back to one that prioritises ensuring that everyone has a home, and away from one that focuses on housing as a form of wealth creation.

¹² EAAA (2023) *From Insight to Action: Second National Plan to Prevent and Respond to Abuse of Older People in Australia* p26 <https://eaaa.org.au/publication/second-national-plan-research-consultation-report/>

¹³ EAAA (2023) *From Insight to Action: Second National Plan to Prevent and Respond to Abuse of Older People in Australia* p24 <https://eaaa.org.au/publication/second-national-plan-research-consultation-report/>

Building enough public and community housing and providing older people with more genuinely affordable housing options would keep many older people out of situations where they are more vulnerable to abuse.

The National Plan would be strengthened by including an additional Focus Area that addresses the structural issues that contribute to vulnerability – particularly secure, affordable housing and liveable income. The Draft plan acknowledges the importance of these social determinants ('older people have the right to an adequate standard of living, including adequate food, clothing and housing'¹⁴), yet there is no corresponding Focus Area or Priority Actions to address them. As housing and income are such fundamental contributors to the abuse and mistreatment of older people, the success of the actions identified in the National Plan will be limited if older people do not have the housing and income they need to maintain their independence.

Recommendation

HAAG strongly recommends that a fifth Focus Area be added to the plan: addressing the social determinants such as housing and poverty that result in older people being more vulnerable to abuse and mistreatment

Additional comments

'Key terminology' (p16)

This section notes that 'In Australia, an older person is typically defined as being aged 65 years or older, or 50 and older for First Nations peoples. This is the definition that will be used for the purposes of this National Plan. We recognise that the experience of ageing is different for everyone and that the ageing experience will be influenced by a wide range of factors.'

HAAG commends the recognition of the lower age group for First Nations peoples, in recognition of lower life expectancies and poorer health outcomes due to the impacts of colonisation.

People who experience homelessness are also more likely to experience premature ageing and premature death.¹⁵ A 2014 paper published in the Lancet found that 'homeless individuals aged 50 years and older have higher rates of age-related conditions (functional impairments, cognitive impairments, falls, and urinary incontinence) than a general population comparison that is 20 years older'.¹⁶ It is imperative that people who are prematurely aged as a result of homelessness (or at risk of homelessness) are able to access age-appropriate care. Research has shown that:

- People experiencing homelessness are more likely to prematurely age when compared to the general population.

¹⁴ National Plan to End the Abuse and Mistreatment of Older People 2024–34 Public Consultation Draft <https://consultations.ag.gov.au/families-and-marriage/eamop/> p34

¹⁵ Fazel, S., Geddes, J. R., & Kushel, M. (2014). The health of homeless people in high-income countries: descriptive epidemiology, health consequences, and clinical and policy recommendations. *Lancet* (London, England), 384(9953), 1529–1540. [https://doi.org/10.1016/S0140-6736\(14\)61132-6](https://doi.org/10.1016/S0140-6736(14)61132-6).

¹⁶ Ibid

- Chronic health conditions are generally more common amongst older people experiencing homelessness.
- Older and prematurely aged people who are experiencing homelessness often also experience mental illness, which may be the result of, or compounded by, traumatic experiences while homeless.
- The risk of death for older and prematurely aged people experiencing homelessness is higher than that for older and prematurely aged people with housing.
- Older and prematurely aged people may be experiencing homelessness as a result of abuse and have continued higher rates of abuse while homeless.¹⁷

Acknowledging the premature ageing experienced by people experiencing homelessness in the National Plan would draw attention to the additional vulnerabilities to abuse and mistreatment experienced by this group, and enable appropriate responses.

Recommendation

That the National Plan recognises the premature ageing experienced by older people experiencing homelessness.

‘Broader social context of this plan’ (p26 – 29)

As discussed above, socio economic factors such as precarious housing and poverty have a significant impact on an older person’s vulnerability to abuse and neglect. HAAG would like to see this articulated as part of the section on the broader social context of the plan.

The Australian retirement system is built on the expectation that older people will own a home at the time of retirement. However, our research demonstrates that this is not the reality for 42% or more older people over 55 years.¹⁸ A considerable proportion of older people over 55 years in the lowest income groups were paying off a mortgage on their primary residence at last census. The number of older people living in low-income households in homes with a mortgage nearly doubled in the decade to 2021.¹⁹

The rental market is particularly challenging for older people who are on low-incomes or relying on government income support payments as their main source of income. Even before the current rental crisis, the Retirement Income Review Final Report found that renters and involuntary retirees experience higher levels of financial stress and poverty than the working-age population.²⁰

¹⁷ See references in: Australian Association of Gerontology (AAG). Background Paper. Older women who are experiencing, or at risk of, homelessness. Melbourne; 2018 Aug
<https://www.aag.asn.au/documents/item/2234>

¹⁸ W. Stone, et al, Ageing in a Housing Crisis: Older people’s housing insecurity & homelessness in Australia, 2023, accessible at: <https://www.older tenants.org.au/publications/ageing-in-a-housing-crisis-older-peoples-housing-insecurity-homelessness-in-australia>

¹⁹ Ibid

²⁰ The Department of Treasury, Retirement Income Review Final Report, 2020, accessible at: https://treasury.gov.au/sites/default/files/2020-11/p2020-100554-00bkey-observations_0.pdf

Nearly a quarter of a million (227,565) older people were living in very-low (Q1) and low income (Q2) households that were paying unaffordable rents in the private rental sector in 2019-20. This number increased by 52% in the decade from 2009-10 to 2019-20, from a previous total of 149,528.²¹ It must be noted that this data is now several years old and collected before the rental crisis. From HAAG's service experience and member groups, it is clear that these numbers are a severe under representation.

These experiences – and older people's awareness of the lack of low-income housing – can result in older people being vulnerable to abuse or mistreatment, or having no options available if they wish to remove themselves from these situations. This is essential context for the National Plan, and should be included along with the other descriptions of the broader social context..

Recommendation

That the National Plan include a description of socio-economic factors, particularly precarious housing and poverty in the section on the 'Broader social context of this plan'

'Everyone's business' (p30 – 32)

This section of the National Plan describes the role of all levels of government, the private sector, non-for-profit sector, community services and community leaders, and the Australian community in ending the abuse and mistreatment of older people. A wide range of organisations and bodies are listed as interacting with older people and having roles in preventing and responding to abuse and mistreatment of older people.

HAAG recommends the addition of the following to these lists:

- Role of state and territory governments – include public and social housing providers, in addition to crisis accommodation
- Role of private sector – include the private retirement housing sector. Providers of retirement villages, residential parks, caravan parks with long term residents, and the like, are well placed to provide information and support about identifying and responding to the abuse and mistreatment of older people. Disturbingly, in HAAGs experience, many also contribute to the abuse and mistreatment of older people - both through poor management practices, and the financial arrangements they dictate - and urgently need to be the focus of specific education and regulation.
- Role of non-for-profit sector, community services and community leaders – include not-for-profit retirement housing providers, in addition to housing and homelessness services.

²¹ W. Stone, et al, Ageing in a Housing Crisis: Older people's housing insecurity & homelessness in Australia, 2023, accessible at: <https://www.older tenants.org.au/publications/ageing-in-a-housing-crisis-older-peoples-housing-insecurity-homelessness-in-australia>