



Consultation Response

Social Care Wales consultation on practice guidance for social care managers and social workers

November 2018

Age Cymru is the leading charity working to improve the lives of all older people in Wales. We believe older people should be able to lead healthy and fulfilled lives, have adequate income, access to high quality services and the opportunity to shape their own future. We seek to provide a strong voice for all older people in Wales and to raise awareness of the issues of importance to them.

The Golden Thread Advocacy Programme (GTAP) has been funded by Welsh Government to run alongside and support the implementation of Part 10 (Advocacy) of the Social Services and Well-being (Wales) Act 2014 in relation to adult advocacy. The programme is delivered by Age Cymru, in partnership with Age Connects and Diverse Cymru.

We welcome the opportunity to respond to Social Care Wales' consultation on draft practice guidance for social workers.

Practice guidance for social workers

We welcome the recognition of some people's need for advocacy in paragraph 5.5 of the draft guidance. However, we are concerned that the first sentence, "Sometimes it may be necessary to represent people's views when they are not able to do so themselves", may be confusing, as it implies that this is something the social worker themselves should automatically be doing. We believe it would be better to recast this as "Some people may need the support of an advocate to represent their views when they are not able to do so themselves."

We also think that this paragraph should then mention the different kinds of advocacy which may be appropriate, eg, informal advocacy by family and friends, peer advocacy, non-statutory independent advocacy, formal advocacy by other professionals as part of their role, Independent Mental Health Act Advocacy and Independent Mental Capacity Act Advocacy. The statement that "Independent professional advocacy has many benefits" does not reflect the fact that there is a requirement for local authorities and health boards to arrange provision of IPA under the Social Services and Well-being (Wales) Act 2014 Part 10 Code of Practice, and should be strengthened.

This is particularly important in view of the statement on page 7 that the guidance should be used to let individuals, families and the public know what they can expect from the social worker, as advocacy is not well understood by the general public.

Practice guidance for social care managers

We are concerned that the phrase in the fifth bullet point in section 4.2, "taking account of age", is open to the misinterpretation that someone's old age is itself a reason for treating them differently from other adults. In common with most other forms of discrimination, ageism is based on inaccurate stereotypes, and often in the case of older people, assumptions about a person's ability and competence due to their age. We would like to see this clarified in the guidance.

We would also like to see an additional section in Part 5, good communication, on the role of an advocate and the requirement in the Part 10 Code of Practice under the Social Services and Well-being (Wales) Act 2014 for local authorities to arrange Independent Professional Advocacy in certain circumstances.

In Part 6, Safeguarding individuals, we would like to see an additional section on protecting people from scams.

The Wales Against Scams Partnership (WASP) is a partnership of organisations that are committed to fight against scams and fraud.

WASP was founded jointly by Age Cymru and the Older People's Commissioner for Wales with the aim of making Wales more hostile to those who would scam older and vulnerable people. Its members includes Trading Standards, Scambusters, Get Safe Online, Welsh police forces, Welsh Local Government Association, the Information Commissioner's Office, and Barclays Bank, Lloyds Bank, Halifax and British Gas.

The group's aim is to make Wales a safer place for vulnerable people by working as a partnership of organisations that can influence change in areas where scammers currently operate. This includes on the doorstep, by phone, by post and online.

WASP has produced a charter which sets out the commitments we have collectively made to build a Wales that is more hostile to scams.

Being scammed or targeted by fraud can have a devastating impact on some of the most vulnerable people in Wales.

Scams target everyone and all of us could fall prey to them. At least 150,000 people in Wales are believed to become victims of scams each year.

In general older people suffer twice the detriment that younger people do and it is estimated that older victims lose on average £1,200 each. Some people are additionally vulnerable for a variety of reasons, including poverty, isolation, frailty, cognitive impairment and because they are specifically targeted.

We want to help create barriers that keep scams away from people. This will not be easy and we believe working in partnership is essential so we can share our knowledge of financial fraud and develop solutions.

We want Wales to be seen as a place where scammers and doorstep criminals do not flourish. We want to lead the rest of the UK in blocking those who want to scam and steal money from the most vulnerable people in our society.

Further information, including the WASP Charter, is available at <https://www.ageuk.org.uk/cymru/our-impact/policy/wales-against-scams-partnership/>