



Commissioner for **Older People**
for Northern Ireland

Victims Support Division
Department of Justice
Room A4.03
Castle Buildings
Stormont Estate
BELFAST
BT4 3SG

DSAStrategyConsultation@justice-ni.gov.uk

28 April 2023

**Re: Consultation Response to Draft Domestic and Sexual Abuse Strategy
2023-2030**

Dear Sir / Madam

I am writing on behalf of the Commissioner for Older People for Northern Ireland (COPNI).

COPNI welcomes the opportunity to respond to the consultation on the *Draft Domestic and Sexual Abuse Strategy 2023-2030*. We commend the focus on this pernicious form of offending and recognise the value of basing the Strategy around the four key pillars of Partnership, Prevention, Support and Justice.

Acknowledging that the details on each pillar will be expanded on in a series of action plans with timelines for implementation (*Draft Domestic and Sexual Abuse Strategy, 2023, p.1*), COPNI offers several points below for consideration in advance of the finalisation of the Strategy and action plans. Understandably, these points address matters of Domestic and Sexual Abuse from the perspective of older people and are informed by COPNI's casework and our research, including the report *A Different Crime: Offending Against Older People* (COPNI, 2023). The report is available at: <https://www.copni.org/media/1899/a-different-crime-2023-crime-report.pdf>

1) Poorer Outcomes and Greater Fear of Crime

Pillar 4: Justice

'Victims feel confident to report domestic and sexual abuse, barriers to participating in the justice system are reduced and justice responses are effective.'
(*Draft Domestic and Sexual Abuse Strategy, 2023, p.4*)

The overall Recorded Crime Outcomes rate (2020/21) for victims aged 65 plus is 14%—the poorest rate of all age categories.¹ The Crime Outcomes rate (2020/21) for violence without injury, involving victims aged 65 plus is 23.3%—the poorest of any adult age category other than 18-19 year old victims.²

Older people worry about crime and are impacted by ‘fear of crime’ more than other age groupings in society. The *2020/21 Northern Ireland Safe Community Telephone Survey* conducted by the Department of Justice found that 11% of respondents aged 75 plus had high levels of worry about crime.³ Respondents aged 65-74 and 75 plus were more likely than other age groupings to describe the effect of ‘fear of crime’ on quality of life as ‘moderate’ or ‘great’.⁴

To be effective, the *Domestic and Sexual Abuse Strategy* must take account of the context of older people, who are victims or are at risk of such abuse. The Strategy must address how it will overcome the distinctive challenges of engagement and support for this victim cohort.

2) Concerns about Under-Reporting of Behind Closed Doors Offending

Pillar 1: Partnership

‘A coordinated response to domestic and sexual abuse informed by victims’ voices and community engagement.’

(*Draft Domestic and Sexual Abuse Strategy*, 2023, p.3)

Statistics supplied by PBNI’s Victim Information Unit to COPNI in April 2022, show that of the 38 victims aged 60 plus who engaged with its service in 2021, 19 of the victims knew the perpetrator and 9 of these cases involved domestic violence. PBNI officials noted that the sample represented an increase in ‘known perpetrator’ crime, which may be explained by more instances of domestic abuse, more reporting of such abuse and/or more successful prosecutions of such abuse.

COPNI’s study *A Different Crime: Offending Against Older People* (2023) raises concerns expressed by professionals working in statutory bodies that reporting of abuse of older victims is sometimes thwarted: a) by the reliance of the victim on the

¹ See *Police recorded crime, crime outcomes and population rates by victim age and crime type*, Pivot Table 3, PSNI, November 2021, available at:

https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.psni.police.uk%2Fsites%2Fdefault%2Ffiles%2F2022-08%2Fpolice_recorded_crime_in_northern_ireland_1998-99_to_2020-21.xlsx&wdOrigin=BROWSELINK

² See *Police recorded crime, crime outcomes and population rates by victim age and crime type*, Pivot Table 3, PSNI, November 2021, available at:

https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.psni.police.uk%2Fsites%2Fdefault%2Ffiles%2F2022-08%2Fpolice_recorded_crime_in_northern_ireland_1998-99_to_2020-21.xlsx&wdOrigin=BROWSELINK

³ See *Findings from the 2020/21 Northern Ireland Safe Community Telephone Survey*, DoJ, March 2022, Table 7c, available at:

<https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.justice-ni.gov.uk%2Fsites%2Fdefault%2Ffiles%2Fpublications%2Fjustice%2Ffindings%2520from%2520the%25202020-21%2520niscts%2520-%2520excel%2520tables.xlsx&wdOrigin=BROWSELINK>

⁴ See *Findings from the 2020/21 Northern Ireland Safe Community Telephone Survey*, DoJ, March 2022, Table 8c, available at:

<https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.justice-ni.gov.uk%2Fsites%2Fdefault%2Ffiles%2Fpublications%2Fjustice%2Ffindings%2520from%2520the%25202020-21%2520niscts%2520-%2520excel%2520tables.xlsx&wdOrigin=BROWSELINK>

perpetrator for care; and b) by a reluctance on the part of the PSNI/PPS to advance such cases.

As an older victim may be subject to abuse by a perpetrator who is also a provider of care or a family member, it is vital that pathways with practical support for such victims be developed. The *Domestic and Sexual Abuse Strategy* must take account of the distinctive power that many perpetrators possess over frequently reliant older victims.

3) Limited Monitoring and Limited Adjusted Services for Older Victims

Pillar 2: Prevention

'Domestic and sexual abuse is identified and responded to earlier.'

Pillar 3: Support

'Victims including children are supported and feel safe regardless of diversity of need.'
(*Draft Domestic and Sexual Abuse Strategy*, 2023, p.3-4)

COPNI's study *A Different Crime: Offending Against Older People* (2023) highlights the lack of understanding about older victimhood and the consequent lack of adjusted services provided for older people by statutory justice agencies. The report concludes:

The Probation Board for Northern Ireland (PBNI), at staff and corporate level, has raised concerns that older victims may be targeted because they are older.

The Legal Services Unit of the office of the Commissioner for Older People for Northern Ireland, has received several reports of alleged criminal incidents involving older victims, which have not been pursued by the Police Service of Northern Ireland (PSNI) on the basis of not being designated 'a criminal law matter'.

The PSNI does not gather, publish or provide statistics on contacts made by the public which are unprocessed on the basis of not being designated 'a criminal law matter'. The PSNI does not have or operate an older victims' policy to support this victim cohort while gathering evidence during the investigation of cases.

The Public Prosecution Service (PPS) does not gather, publish or provide statistics linking the age of a victim to crime category. The PPS does not have or operate an older victims' policy to support this victim cohort in providing best evidence for the prosecution of cases.

(COPNI, 2023, p.46)

If older victims are to be served effectively by the *Domestic and Sexual Abuse Strategy*, then their experiences must be more effectively monitored. COPNI urges progress on monitoring in order to develop adjusted support services for older victims of domestic and sexual abuse.

Conclusion

COPNI maintains that consideration of the perspective of older victims is essential to achieving the Strategy's vision statement and ensuring that 'Domestic and sexual abuse is unacceptable within our homes and across all of society so that everyone can live without fear'.

Finally, COPNI wishes you success in the finalisation and implementation of the *Domestic and Sexual Abuse Strategy 2023-2030*.

Best wishes

Conn Mac Gabhann

Conn Mac Gabhann
Policy Unit
Commissioner for Older People for Northern Ireland
CONN.MACGABHANN@COPNI.ORG