

Submission to the Office for Older People
on the National Positive Ageing Strategy

Submission made on behalf of

The Carers Association and Care Alliance Ireland



1. Introduction

The Carers Association and Care Alliance Ireland thank the Department of Health and Children and the Office for Older People for the opportunity to participate in the consultative process regarding the development of a National Positive Ageing Strategy. We congratulate the Department on recognising the importance of providing a framework through which older people, their carers, and other interested parties have the opportunity to contribute to key decisions being made with reference to lives of older people and to ensure that strategies are put in place that enable them to live healthy, fulfilling lives for as long as possible.

This joint submission outlines the feedback of The Carers Association and Care Alliance Ireland and is based on our experience of supporting Family Carers in general, older Family Carers and older people who receive care within the home. The submission identifies the priority issues that must be addressed if the National Positive Ageing Strategy (NPAS hereafter) is to ensure that issues affecting older people are mainstreamed in policy-making at all levels and across all sectors and to facilitate coherence and integration in planning and implementing programmes for older people.

The Carers Association

The Carers Association is Ireland's national voluntary organisation for and of Family Carers in the home. Established in 1987 The Carers Association aims to provide Family Carers with emotional and practical supports and to promote the interests of Family Carers and those receiving care in the home through effective partnership, lobbying and advocacy and to gain recognition and social justice for carers invaluable contribution to Irish society. The Carers Association provides a number of services nationwide which are aimed at helping to increase the quality of life for the Carer and the person receiving care at home. Services include in-home respite, training, advocacy & lobbying, promoting carer rights and a Carers Help Line. The Carers Association has a nationwide network of 16 Carer Resource Centres and two Service Projects providing information, advice, advocacy, training and home-based respite care services. There are 37 full-time and 278 part-time people employed, with funding provided by the Departments of Health and Children, Social Affairs, FÁS, the HSE and Dormant Accounts.

Care Alliance Ireland

Care Alliance Ireland is the national network of voluntary organisations supporting Family Carers in Ireland. Established in 1995, Care Alliance Ireland aims to support organisations in their direct work of supporting Family Carers all over Ireland. The Alliance produce both qualitative and quantitative peer reviewed research relating to Family Carers, actively promotes and facilitates inter-agency collaboration through a Family Carer Research Group and through our co-ordination

of an annual National Carers Week (June 14th -20th 2010). Care Alliance Ireland have over 65 member organisations that represent a wide range of NGO's throughout the island of Ireland, all of whom are involved in supporting Family Carers in various ways. A number of statutory organisations are also associate members. Care Alliance Ireland sources and reviews international research and reports on issues affecting Family Carers and shares such information to those involved in supporting Family Carers. The Alliance produces a quarterly Newsletter, *Care Alliance Exchange* and organises seminars and conferences for the Family Carer sector. The organization has produced several position papers and is actively involved in making submissions to the Government and other national/regulatory bodies on Family Carer related matters.

2. Who Cares?

Family Carers are relatives, friends or neighbours who provide *unpaid* care for people with a disability, mental illness, chronic condition or frail older people. Because Carers must be constantly available due to the heavy demands and responsibilities of caring many are unable to take up employment and so are reliant on Government supports. In addition, there are significant financial costs associated with caring such as extra heating costs, special dietary requirements, transport and medical expenses which very often must be met by the Family Carer.

According to the Census of Population 2006 there are 160,917 Family Carers in Ireland, representing 4.8% of the total population. Of these 40,883 provide fulltime care (i.e. over 43 hours of care each week) - more than the 39,000 nurses employed by the HSE (HSE Annual Report and Financial Statements 2008). 43,569 Carers receive a Carers Allowance payment with 18,568 of these receiving a Half Rate Carers Allowance¹. A study undertaken by Care Alliance Ireland in 2008 among a sample of Carers in receipt of Carers Allowance showed that 41% of people being cared for are aged 70 years and older².

Table 1: Carer Demographics

	Total	% of all Carers
Total Carers	160,917	
Female Carers:	100,214	62%
Male Carers:	60,703	38%
Young Carers 15 – 19 years of age:	5,433	3.4%
Carers aged 20 – 39 years:	40,263	26%
Carers 40 – 64 years:	95,069	59%
Older Carers 65 years and older:	18,152	11%

¹ Introduced in 2007, the Half Rate Carers Allowance allows eligible Carers who provide fulltime care and receive another social welfare payment to retain their main payment and get a half rate Carers Allowance.

² O'Sullivan, 2008 : Health and Well-being of Family Carers in Ireland: Results of a survey of recipients of the Carer's Allowance.

Table 2: Numbers in Receipt of Income Supports

Payment	No. in Receipt
Carers Allowance	43,569
Half Rate	18,568 (included in 43,569 above).
Carers Benefit	2,200

Older Carers

18,152 Carers (11%) enumerated in Census 2006 were aged over 65 years, 8,819 of whom are providing more than 43 hours of care each week. Because of their age these older carers often experience unique challenges. Research shows that older Carers are most likely not receiving any outside help³, have often neglected their own health and wellbeing for the sake of the person for whom they provide care and are more at risk of experiencing social and economic deprivation. In addition older Carers face the stress of planning for the future and ensuring that their loved one continues to receive quality care after their death or when they are no longer able to provide care.

3. Contribution of Family Carers to Irish Economy

Family Carers provide over 3.7 million hours of care each week and save the State more than €2.8 billion a year, meaning that the average fulltime Carer saves the State €44,616 per year. The contribution of Family Carers to the Irish economy is calculated using the average number of hours of care provided per week, as outlined in Census 2006. The average number of hours is then multiplied by the total number of Carers enumerated in each category. The total financial contribution is calculated using the HSEs current lowest hourly rate of €14.28 as paid to Home Help workers. These calculations are set out in Table 3 below.

Table 3: Contribution of Family Carers to the Irish Economy

Hrs per Wk	Ave hrs	No. carers	No. carers by ave hrs / week	52 wks/year	€14.28 per hour
1-14 hrs	7 hrs	93,363	653,541	33,984,132	€485 293 405
15-28 hrs	21.5 hrs	17,093	367,499	19,109,948	€272 890 057
29 – 42 hrs	35.5 hrs	9,578	340,019	17,680,988	€252 484 509
43 + hrs	60 hrs	40,883	2,452,980	127,554,960	€1 824 035 928
Total		160,917	3,814,039	198,330,028	€2.8 billion

³ Pierce, Gill. 2007. Models of Support for Older Parents of People with a Disability. Carers Victoria. Australia

The savings made by Family Carers is even more apparent when one considers the cost of privately sourced care which is approximately €22 per hour⁴, the estimated cost of nursing home care which is in the region of €800-€1,000 per week, and the cost of acute hospital care which is in the region of €5,000 per week⁵.

4. Protecting Carers and Older People at a Time of Economic Uncertainty

2009 has been a difficult year for Ireland's older people and its 160,917 Family Carers. In Budget 2009 Government announced that over 70s would lose their automatic entitlement to a medical card, in March, Minister Mary Hanafin announced that the Government would not publish the National Carers Strategy, and more recently the report of the *Special Group on Public Service Numbers and Expenditure Programmes* (An Bord Snip Nua) and the Commission on Taxation have set out numerous recommendations which, if implemented, would be detrimental to Older People and their Carers, including phasing out the Half Rate Carers Allowance, the reduction of all Welfare payments by 3 to 5%, means testing Home Care Packages, the taxation of Social Welfare payments including the State Pension and Carers Allowance and the suspension of tax relief on long-term care.

A significant weakness of the reports of An Bord Snip Nua and the Commission on Taxation is their lack of consideration for the cumulative effect of cuts on older people when taken across all Government Departments and the need for a detailed social analysis of their potential impact on vulnerable groups. In fact the report of An Bord Snip warns that '*care will need to be taken to avoid the inadvertent accumulation of measures in individual cases*' (*Report of the Special Group on Public Service Numbers and Expenditure Programmes, p. 190*).

This '*accumulation of measures*' is clearly visible in the case of older people and Carers where they will be affected by proposed cutbacks in the Department of Social and Family Affairs (including the suspension of Christmas bonus payments to welfare recipients, a 3-5 percent decrease in income if proposed cuts to the welfare payments are implemented); Department of Health and Children – (reductions in the provision of frontline services, home help hours and home care packages and a reduction in spending on disability services provided by voluntary organizations by €50 million); Department of Transport (the proposed withdrawal of the Rural Transport Programme); Department of Health and Children (reduce the spending on disability services provided by voluntary organizations by €50 million) and in the Department of Community, Rural and Gaeltacht Affairs

⁴ Based on the DOHAC/HSE estimates of 1 hour home help costing approximately €22 per hour. Similar but not identical home care support provided by the private sector costs in the region of €21-26 per hour depending on the type of care required.

⁵ Age Action Ireland: A Fair Price for Care 2006

(withdrawal of Scheme of Community Supports for Older People on April 7th and the reduction in the allocation for community and voluntary sector supports).

National Carers Strategy

Government's decision not to publish the long awaited National Carers Strategy has dealt a bitter blow to Ireland's older people and their Carers. Family Carers are already denied many basic supports and the National Carers Strategy, which was committed to in Towards 2016 and the programme for Government, held the hope that once and for all Government would acknowledge the enormous contribution Carers make to the Irish economy and provide them with the supports and services which are vital to enable them to continue in their caring role. The publication of the Strategy is all the more important in these times of economic difficulty, when Carers need some form of recognition from Government and the fair shouldering of caring responsibility by the State.

5. Key Issues for Consideration in the NPAS

The UN General Assembly adopted the United Nations Principles for Older Persons in 1991, encouraging Governments to incorporate the principles into national programmes whenever possible (UN General Assembly, 1991). The UN Principles were incorporated into the Madrid International Plan of Action on Ageing in 2002 and subsequently into the Regional Implementation Strategy adopted by the members of the United Nations Economic Commission for Europe, including Ireland.

The principles call for action in many areas, among them:

- **Independence:** Older persons should have access to food, water, shelter, clothing, health care, work and other income-generating opportunities, education, training, and a life in safe environments.
- **Participation:** Older persons should remain integrated into community life and participate actively in the formulation of policies affecting their well-being.
- **Care:** Older persons should have access to social and legal services and to health care so that they can maintain an optimum level of physical, mental and emotional well-being. This should include full respect for dignity, beliefs, needs and privacy.
- **Self-fulfilment:** Older persons should have access to educational, cultural, spiritual and recreational resources and be able to develop their full potential.
- **Dignity:** Older persons should be able to live in dignity and security, be free of exploitation and physical or mental and be treated fairly regardless of age, gender and racial or ethnic background.

The Carers Association and Care Alliance Ireland recommend that the NPAS should embrace the UN Principles for Older Persons, and as such set out the key issues for consideration within the Strategy under these headings.

i. Independence

Since the publication of *'The Years Ahead: A Policy for the Elderly'* in 1988, it has been Government policy to favour home and community care over long term residential care. However, in practice, in-home supports such as home care packages, home help provision and assisting family and friends to provide care is vital if older people are to continue living independently in their own homes and communities. As a result, issues relating to care and carers has moved from being primarily 'private' issues within families to being issues of growing importance in public policy. It is vital that if Government policy is to be realised, that every effort must be made to address the growing need for community services and supports for Family Carers. The Carers Association and Care Alliance Ireland make the following recommendations with regard to enabling the independence of older people and their Carers.

- **Care Needs Assessment:** There is an urgent need to recognise and address the individual needs of Family Carers in their own right alongside an assessment of the needs of the care recipient in assessing care needs and allocation of care services, thus maintaining the Family Carers' health and supporting them in their role. It is also important that the changing needs of the Family Carer are taken into consideration, as the role of the Family Carer may dramatically intensify as the specific condition of the care recipient deteriorates. In the UK, The Carers Recognition and Services Act 1995 for the first time, gave carers the right to an assessment of their own needs. The Carers Outcome Agreement Tool (COAT) developed by researchers working collaboratively in Sweden and the UK (Hanson et, 2006) could be used as model for working with Family Carers in order to adequately address their own needs. Following several years of research, COAT views the carer as a 'co-expert'. Carers and practitioners therefore work together to agree the type of goals and outcomes that carers see as important, and the support needed to achieve this⁶.
- **Quality Standards and Performance Monitoring:** At present there is no uniform framework of quality standards in place for the delivery and performance monitoring of home care services, meaning that quality standards may differ between the various organizations involved in delivering in-home care. Because provider organisations are able to operate in a complete or partial "vacuum" in terms of policy guidelines and regulations, many have established their own procedures and protocols for areas such as staff qualifications and

⁶ <http://jrn.sagepub.com/cgi/content/abstract/13/5/391>

quality controls, performance management and health and safety⁷. The Law Reform Commission has recently called for such regulation⁸.

- **Hospital Discharge Strategy:** The majority of Home Care Package recipients originate from a hospital setting (SPARC, 2006). However, in the absence of any coherent discharge strategy or needs assessment protocol, patient care provision can be disjointed with significant disparities in the patients care needs and the level of services designated through the Home Care Packages and supports.
- **Scheme of Community Supports for Older People:** Government's decision to suspend the Scheme of Community Supports for Older People in 2009 will have a significant impact on vulnerable older people. The provision of security measures including personal alarm pendants, window and door locks, sensor lights etc had been hugely beneficial in giving independence to older people, especially those living in rural areas. It is essential that older people have a sense of security which substantially contributes to their quality of life.

ii. Participation

"Older persons should be able to seek and develop opportunities for service to the community and to serve as volunteers in positions appropriate to their interests and capabilities" (United Nations Principles for Older Persons, UN General Assembly Resolution 46/91).

For older people the ageing process is generally accompanied by a transition in their social and economic roles, with this transition often treated as a move from a productive role to a non-productive or dependent one. Far from withdrawing from participation in society however older people tend to continue to contribute actively to their household, to their families and to their community. Contributions may include voluntary work, providing child care, or caring for a neighbour, friend or family member. While such '*productive ageing*' does not carry any monetary value *per se*, it has an enormous human value and should be facilitated where possible. Very often however, older people are prevented from fully participating in their communities due to external barriers. The Carers Association and Care Alliance Ireland make the following recommendations with regard to enabling the participation of older people and their Carers.

- **Access to accessible and affordable transport:** One of the greatest barriers to the participation of older people is their access to accessible and affordable transport. The Rural Transport Programme has provided a vital link for the elderly and those living in rural

⁷ *No Place Like Home: Domiciliary Care Services for Older People in Ireland*. Social Policy and Aging Research Centre.

⁸ http://www.lawreform.ie/Press_Releases/CP%20Carers%20PR.pdf

communities in allowing them to access daily services such as shopping, banking, education, employment, health appointments, as well as engaging in civic, social and recreational activities. However proposals set out by An Bord Snip Nua recommend the abolition of the Rural Transport Programme. Rather than abolishing the scheme, Government must recognise the importance of the Rural Transport Programme for the elderly, mobility impaired and those who are rurally isolated and invest additional resources in maintaining the service.

- **Training for Participation through Information and Communication Technologies:** Information and Communication Technology (ICT) has pervaded people's lives not only in Ireland but all over the world. For older people ICT can help them carry out daily activities, keep in touch with family and friends, as well as monitor their health, create social networks and increase participation in society and augment safety. The use of technology can also facilitate social inclusion, improve their professional participation and quality of life and ultimately enhance independent living.
- **Community Participation and Volunteerism:** The responsibilities of caring often mean that Carers cannot participate fully within their communities. However when caring comes to an end, former carers may wish to become involved in community or voluntary activities. It is important that services and supports are available to assist them in doing so. Former carers also have a wealth of knowledge and experience that can be of tremendous value to those who are still caring and to their communities. The possibility exists to match these skills with volunteering opportunities.

iii. Care

Providing the support which enables older persons with care needs to stay at home as long as possible can help greatly to improve their situation, and it is what most want. What is more, supporting an older person in their own home generally costs less than keeping them in a nursing home or other residential care. A key factor in achieving this is to have a broad range of support services available, including respite care, which gives informal carers "time off", together with professional guidance to families (OECD Policy Brief, March 2005). However, demographic and social trends raise concern about the availability of Family Carers to care for older people⁹. The implications of fewer adult children available to share care giving tasks means that the responsibilities for providing care may place greater pressures on individuals within families. In addition, given the current economic recession, financial demands on families are likely to grow meaning that families will find it increasingly difficult to be able to afford to provide care in the

⁹ Keefe, J., Lagare, J and Carriere, Y.(2005) Developing New Strategies to support future caregivers of the aged in Canada.

home. Recognising the vital role played by carers and providing supports to assist them in their role is crucial if older people's wishes to be cared for at home is to be realised.

- **Publication of the National Carers Strategy:** Irelands ageing population make it imperative that Carers are put firmly at the centre of the Government's agenda. The publication of a National Carers Strategy, setting out the Government's vision for family and informal Carers and establishing a set of goals and actions in areas such as income support, health care, services, housing, information and transport, is a vital first step in recognizing the enormous contribution of Carers and will be integral in supporting the NPAS.
- **Ensuring Carers have the training necessary to provide end quality care:** As people grow older, it is often a Family Carer who will spend the highest proportion of time caring for them and who may undertake complex care tasks. In order for Family Carers to perform these tasks, and to increase the likelihood that the person they care for remains at home for as long as possible, it is vital that they receive training to ensure that they have the appropriate knowledge, skills and support to care for their loved one at home. The current once off funding in this area from the Dormant Funds Accounts, needs to be continued, following a full evaluation.
- **Health and Wellbeing of Carers:** Research undertaken by Care Alliance Ireland¹⁰ and The Carers Association¹¹ shows that the health and wellbeing of Carers can be adversely affected by their caring role. When caring severely restricts leisure/recreational opportunities Carers are a lot more likely to report that their health has suffered and/or a lower quality of life. This emphasises the importance of policy efforts to ensure that carers have breaks and time to themselves. Respite services have a key role to play in this, as well as active efforts to encourage and support carers to have a life beyond caring.
- **Additional Costs of Caring:** Caring for someone who is frail can bring with it many additional costs which can create an additional financial strain on the Carers. Such costs may include medication, travel costs, special dietary requirements or higher heating bills. Recent Government proposals to reduce welfare payments including the Carers Allowance and phase out the Half Rate Carers Allowance will place further financial strain on Family Carers who are already struggling to cope on limited incomes.

¹⁰ Health and Well-being of Family Carers in Ireland: Results of a survey of recipients of the Carer's Allowance (2008).

¹¹ Family Carers' Health Survey: The Carers Association and the Royal College of Psychiatrists. (2009)

- **Supporting Male Carers:** Rather than being exceptional, male Carers make up a significant proportion of those providing informal care for family members and older people. In Ireland 38% of Carers are male. A study undertaken by Care Alliance Ireland found that male Carers are almost twice as likely to have a lower quality of life than female Carers. While many of the issues faced by male and female Carers are the same, such as struggling to cope, having access to relevant information and the lack of formal recognition, experience in supporting Carers has shown that male carers can be more vulnerable to social isolation, are not adequately recognised as carers, have inadequate social support, and were more likely to use destructive coping mechanisms (particularly alcohol)¹². The creation of regional Carer Support Groups, targeted specifically for the needs of male Carers is urgently needed.
- **Ensuring Quality Long-term Care for Older People:** Older people who can no longer be cared for in their own homes should have access to affordable, quality nursing home care. Long-term care policies face numerous challenges where they overlap with other health and social services, as well as with informal care provided at home by family and friends. Problems in coordinating acute health care, rehabilitation and long-term care, for example, can lead to unsatisfactory outcomes for older people and can also result in inefficient use of both healthcare and long-term care resources. Policies to improve co-ordination must be put in place through a range of measures, including national strategic frameworks and multidisciplinary care assessment teams, which provide advice to households and older people about the available care alternatives and what might be the best choice individually.

Fair Deal Nursing Home Support Scheme: The Nursing Home Support Scheme, also known as Fair Deal, which is due to come into effect in late 2009, will make important changes in the way older people pay for their nursing home care. However, there is significant confusion among older people and their Carers about what the Scheme involves and how it will be operationalised. In addition, The Carers Association and Care Alliance Ireland are aware of a number of omissions in the legislation which may adversely impact on older people, including the methods of appointing Care Representatives, the year on year allocation of Scheme funding and the lack of financial protection for older people.

i.v. Self-fulfillment

The principle of self-fulfillment refers to the ability of older people to make informed choices, exercise influence, make valued contributions to society, participate in their communities and take advantage of services. These privileges can be taken for granted by most working-age adults, but

¹² An Exploration of the Needs and Issues Affecting Family Carers in South and East Cork: Commissioned by South and East Cork Area Development Ltd and undertaken by The Carers Association (2009).

often are not available to older persons for a variety of reasons, including poverty, poor health, low educational levels, lack of transportation and access to services, negative stereotypes about ageing, and overt or subtle age discrimination. Yet self-fulfillment and empowerment is vital to the quality of life of older persons and the health of society on the whole. The Carers Association and Care Alliance Ireland make the following recommendations with regard to enabling the empowerment and self-fulfillment of older people.

- **Coherent Healthcare and Pension Policies:** Fundamental to the facilitation of positive ageing is the commitment by Government to implement policies that protect older people from the effects of economic disadvantage and risks associated with their exit from the labour market and the unpredictable nature of health care costs that may arise in old age. More than half Ireland's pensioners are dependent on the State Pension as their main source of income. Almost a third of them have no savings (National Council for Ageing and Older People, 2005). With the rising cost of fuel and public services the need to protect the level of the State Pension and maintain health care costs has never been as great.
- **Core Grant Funding:** Ireland's ageing population represents a critical challenge to the development of appropriate health and social service provision, both for older people and their Carers. The government should continue to provide adequate core funding to older people and carer organisations, so that they can continue to advocate for and support older people and their carers. This funding should span all services provided by individual organisations and is a vital requirement for ensuring the sustainability and progress of these sectors in meeting the growing demands of our ageing population.

v. Dignity

As people become older they often experience health problems, dementia, bereavement and other significant changes in their lives. Such experiences can pose a threat to older people's sense of dignity. This stage of life also focuses attention on the future and the need to prepare for the end of life, when dignity is a major concern. In the later years older people often become dependent on a range of people, including health professionals and family members for support and care. This can leave them vulnerable to abuse, disrespect and mistreatment, both within their own homes and in health and social care settings. The Carers Association and Care Alliance Ireland make the following recommendations to maintain the dignity of older people.

- **Protecting Older People against Elder Abuse:** Elder abuse can take many different forms and takes place in different contexts. It includes poor treatment, neglect and physical, verbal, financial or sexual abuse of dependent elderly people, both in institutional and family settings.

A Eurobarometer study undertaken in 2007¹³ showed that abuse most often stems from a Carer – a professional or a family member – being overwhelmed and unable to cope, rather than any intent to harm or abuse. This finding further illustrates the need to support both formal and informal Carers in their caring role through the provision of skills training, respite care services, in-home support and stress management. Those working within the HSE and other agencies with a responsibility to identify, and prevent elder abuse need to be supported in developing a stronger and more mutually beneficial relationship with carers organisations. Such interventions may include joint home visits, assessments and follow up support for both the potential abuser and the older person.

- **Protection of Older People availing of Nursing Home Support through Fair Deal:** The current Fair Deal *model* provides insufficient safeguards to protect older persons deemed to be mentally incapacitated. Reporting obligations of Care Representative are not comprehensive enough and lend themselves to the financial abuse of the older person. Furthermore, in cases where an older person is deemed mentally incapable and is appointed a Care Representative by the Circuit Court, Fair Deal makes no contingency for review procedures to assess mental capacity thereafter - a violation of Section 5 of the European Court of Human Rights. This omission places the older person at risk and illustrates the danger that residential care may be looked upon as a place to gracefully decline, not as a place to maintain or better ones health status (Age Action Ireland, 2009).

Conclusion

Demographic predictions undertaken by the Central Statistics Office suggest that Irelands older population (i.e. those aged 65 years and over) will increase significantly from its 2006 level of 462,000 to around 1.4 million by 2041. The very old population (i.e. those aged 80 years of age and over) is set to rise even more dramatically, showing a four-fold increase. In this context, it is imperative that Government face up to the realities of our ageing populations by identifying the provisions that must be made to create a society in which the independence and dignity of every older citizen is assured.

In light of the issues addressed in this submission, The Carers Association and Care Alliance Ireland ask the Department to ensure that the following points be considered in the development of the National Positive Ageing Strategy:

¹³ Eurobarometer 67.3: Health Care Service, Undeclared Work, EU Relations With Its Neighbor Countries, and Development Aid, May-June 2007

- Family Carers are one of Irelands' greatest resources, contributing in excess of €2.5 billion to the Irish economy each year and enabling older people to be cared for in their own homes.
- 18,152 Family Carers in Ireland are themselves older people.
- Any effort to identify strategies and supports needed to ensure older people can live healthy, fulfilling lives must include the needs of Family Carers.

The Carers Association and Care Alliance Ireland offer our support to the Department and are confident that the views presented in this submission will be used to inform and guide the development of the National Positive Ageing Strategy. We will be happy to provide the Department with any other additional information that may be required.

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