



Submission to the
Draft Mental Health Services Plan 2009 – 2013

December 2008

www.youthcoaliton.net

The Youth Coalition of the ACT acknowledges the Ngunnawal people as the traditional owners and continuing custodians of the lands of the ACT and we pay our respects to the Elders, their families and ancestors.

We acknowledge that the effects of the forced removal of Indigenous children from their families as well as past racist policies and actions continues today.

We acknowledge that Aboriginal and Torres Strait Islander peoples hold distinctive rights as the original people of modern day Australia, including the right to a distinct status and culture, self-determination and land.

We celebrate Indigenous cultures and the invaluable contribution to they make to our community.

Submission to the *Draft Mental Health Services Plan 2009 – 2013*

ACT Health, Canberra

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December 2008

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Thank you to the Youth Coalition team for their support.

The Youth Coalition is the peak youth affairs body in the Australian Capital Territory and responsible for representing the interests of people aged between 12 and 25 years of age, and those who work with them.

The Youth Coalition is represented on many ACT Government Advisory structures and provides advice to the ACT Government on youth issues as well as providing information to youth services about policy and program matters.

We actively promote the well-being and aspirations of young people in the ACT with particular respect to their social, political, cultural, spiritual, economic and educational development.

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Introduction

The Youth Coalition of the ACT is the peak youth affairs body in the Australian Capital Territory. We are responsible for representing and promoting the interests and wellbeing of people aged between 12 and 25 years and those who work with them.

The Youth Coalition is a strong youth mental health advocate in the ACT and is represented on several high-level advisory groups dealing with mental health and hosting several projects dealing with mental health including in the areas of carers, homelessness, and alcohol and other drugs and mental health comorbidity.

In addition, the Youth Coalition has consulted with its members on the *Draft Mental Health Services Plan 2009 – 2013* and has discussed the contents with other key stakeholders including the ACT Council on Social Services, Mental Health Community Coalition, Comorbidity Strategic Working Group and the ACT AOD Sector Project.

The Youth Coalition commends Mental Health ACT for providing the *Draft Mental Health Services Plan 2009 – 2013* for public consultation, for recognising the developmental approach to young people and for the adoption of the four - stage model for mental health service delivery.

The Youth Coalition notes the challenges that this will entail, and congratulates Mental Health ACT on its commitment to innovation in mental health service delivery. However, the Youth Coalition would like to provide feedback in four areas:

1. Structure of the Services Plan;
2. Implementation and Evaluation of the Plan;
3. The Four-Stage Model; and,
4. Population Sub-Groups.

In this regard, this submission constitutes the Youth Coalition's response to the Services Plan.

Recommendations

Below is a summary of the recommendations made throughout this submission.

Recommendation 1

That Mental Health ACT modify the Services Plan to clarify its purpose as a plan for the delivery of mental health services in the ACT.

Recommendation 2

That 1. A clear statement of purpose be incorporated into the Services Plan; and, 2. That the Services Plan be rewritten in a way that is compatible with this purpose.

Recommendation 3

That the 2020 vision be a separate document or be included in one discreet part of the Services Plan.

Recommendation 4

That the Services Plan clearly state that it is a strategic document that provides principles, objectives and direction for the delivery of mental health services in the ACT up to 2013.

Recommendation 5

That each objective and direction in the Services Plan indicate the date by which it is to be achieved.

Recommendation 6

That a comprehensive service map be included in the next revision of the Services Plan.

Recommendation 7

That the Services Plan be reconciled against the ACT Mental Health Strategy and Action Plan 2003-2008.

Recommendation 8

That the Services Plan should have clear strategies on how an early intervention and prevention focus will be implemented in the ACT.

Recommendation 9

That the actions and strategies in Section 5 of the Services Plan should be rewritten to clearly describe strategies and define targets and actions against clear timelines.

Recommendation 10

That the issues in Table 1 be addressed by Mental Health ACT.

Recommendation 11

That a 'monitoring and evaluation framework' be defined in the Services Plan.

Recommendation 12

That Mental Health ACT should develop a 'Framework for the Implementation and Evaluation of the Four-Stage Model' that includes principles, strategies, targets, and timelines in accordance with Section 3(a) of this submission for the revised Services Plan.

Recommendation 13

That an up-to-date sector map be a key element of the Services Plan.

Recommendation 14

That the interactions between mental health services and particular population sub-groups including (but not limited to):

1. Young people involved with Quamby and Bimberi Youth Justice Centre;
 2. Young people involved with Community Youth Justice;
 3. Young people involved with the care and protection and out-of-home care systems;
 4. Young carers;
 5. Young people experiencing comorbid alcohol and other drug and mental health issues;
- and,
6. Young people experiencing homelessness,
- be considered and addressed in the Services Plan.

Recommendation 15

That there be a new revision of the Services Plan.

1) Structure of the Services Plan

A services plan should differ from a strategy or policy position paper and should clearly set out how mental health will be operationalised in the ACT. The Draft Mental Health Services Plan 2008 – 2013 (the ‘Services Plan’) provides a list of questions, of which question two asks:

‘Did you find the plan easy to understand?’

The Youth Coalition submits that the following six issues make the Services Plan difficult to understand.

i) Mental Health Services Plan or ACT Mental Health Plan?

It is not clear whether the Services Plan is a ‘Mental Health ACT Services Plan’ or a ‘mental health services plan for the ACT’. The Services Plan notes that it is:

‘...a strategic document that gives broad direction for the future development of public mental health services in the ACT,’

and parts one and two of the Services Plan set a policy context for this purpose. However, parts three to five seem to be a plan for how Mental Health ACT will interact with particular programs and organisations operating in the ACT.

The Youth Coalition submits that this lack of clarity undermines the Services Plan and the Youth Coalition therefore recommends:

Recommendation 1

That Mental Health ACT modify the Services Plan to clarify its purpose as a plan for the delivery of mental health services in the ACT.

ii) Purpose

It is also not clear whether the Services Plan is a ‘services plan’ or a ‘strategic policy document’. The Youth Coalition acknowledges that this is a strategic document and notes that it is possible to have a *strategic* services plan. In fact, ACT Health’s *Children and Young People’s Justice Health Plan 2007 – 2010* (the ‘Justice Health Plan’) is a good example of how a plan can be a strategic services plan.

That plan is broken down into ten parts that deal with context, purpose, demography, the service model, staffing and infrastructure, specific populations, information management, evaluation frameworks, timelines, and relationships to other bodies and policy documents. In this regard, the Justice Health Plan identifies the issues, defines the model, details the principles for its operation, develops principles for implementation and evaluation, sets up timelines and puts itself within a broader service delivery context. Participants in the Youth Coalition’s consultation did not feel that the Services Plan achieved these objectives clearly, a position with which the Youth Coalition agrees.

In this regard, the Services Plan is broken down into five sections, of which only the fourth and fifth sections deal with services. In addition, issues that are identified in the policy context are not addressed in sections four and five and the actions in section five seem to only suggest strategic direction for Mental Health ACT. It is difficult to comment on the substantive gaps in the document without clarity on whether it is a services plan or strategic policy or vision document.

Therefore the Youth Coalition recommends:

Recommendation 2

That 1. A clear statement of purpose be incorporated into the Services Plan; and, 2. That the Services Plan be rewritten in a way that is compatible with this purpose.

iii) Timelines

The Services Plan attempts to both define a vision for 2020, while proposing to be a plan to 2013. While a vision and a plan can be properly integrated into one document, the Services Plan does not do this clearly and concisely.

Thus, the statement on page two of the letter in the Services Plan notes:

'The Mental Health Services plan covers the period 2008 – 2013 but conveys a vision for how mental health services will be delivered in the ACT in 20 years' time.'

In contrast, the statement in the introduction at 1.1 notes:

'The purpose of the plan is to articulate the vision and strategic directions for the development of the mental health sector in ACT to the year 2020, and to outline a way forward to achieving this.'

The statements of purpose are inconsistent and foreshadow the lack of clarity demonstrated in the rest of the document. For example, 5.1 notes that:

'the summary of strategic directions detailed below brings together the series of program development initiatives and strategies for reinforcement, extension, and transformation of the service system identified throughout the plan.'

However the initiatives and strategies 'identified throughout the plan' have targets of both 2013 and 2020. Thus, it is hard to ascertain whether the summary that follows is a summary of strategic actions up to 2013 or 2020.

Further, while the Services Plan outlines actions, initiatives and strategies within a 2020 context, it rarely mentions 2013 as a date of use. Thus, the date 2013 is mentioned once in the body of the document (in the statement of purpose), whereas the date 2020 is mentioned six times, including in the heading of two sub-sections of the document. This raises the question of what is the purpose of the 2013 date?

The Youth Coalition recommends:

Recommendation 3

That the 2020 vision be a separate document or be included in one discreet part of the Services Plan.

Recommendation 4

That the Services Plan clearly state that it is a strategic document that provides principles, objectives and direction for the delivery of mental health services in the ACT up to 2013.

Recommendation 5

That each objective and direction in the Services Plan indicate the date by which it is to be achieved.

iv) Relationship to other ACT government plans and other organisations

The Services Plan does not usefully describe how it relates to the other plans and organisations in the ACT. Further, it does not canvass the potential policy changes that are likely to result from the

review of the *Mental Health (Treatment and Care) Act 1994*, the review of forensic mental health and the recently completed review of the ACT Child and Adolescent Mental Health Service ('CAMHS'). In addition, it does address how it will engage mental health services that are delivered through Federal government funding, and over which Mental Health ACT has only limited jurisdiction.

Participants in the Youth Coalition's consultations commented that the Services Plan does not contain an accurate map of mental health and related services in the ACT. The report makes no mention of the Office of Children, Youth and Family Services as a key stakeholder, thereby bypassing Care and Protection Services and Turnaround, and does not mention the ACT Policing or the Office of the Public Advocate under relevant government services on page 20. Similarly, there are errors on page 19, including that the University of Canberra health and counselling service is not open to the general population, and headspace ACT (a youth mental health service based at the University of Canberra) isn't mentioned.

These discrepancies and the lack of links with the other ACT and Federal plans undermines the probity of the Services Plan.

Therefore the Youth Coalition recommends:

Recommendation 6

That a comprehensive service map be included in the next revision of the Services Plan.

v) Relationship to the ACT Mental Health Strategy and Action Plan 2003 – 2008

There is no mention of the *ACT Mental Health Strategy and Action Plan 2003 - 2008* in the Services Plan. The *ACT Mental Health Strategy and Action Plan 2003- 2008* is the predecessor to the Services Plan and has actions within it that should be reconciled with the Services Plan. This would ensure accountability and continuity and therefore the Youth Coalition recommends:

Recommendation 7

That the Services Plan be reconciled against the ACT Mental Health Strategy and Action Plan 2003-2008.

vi) Early Intervention and Prevention

The Services Plan does not demonstrate the emphasis on early intervention and prevention that it proclaims in its statement of purpose in 1.1. In this regard, participants in the Youth Coalition's consultations commented that there was no significant movement away from the emphasis on acute mental health service delivery that underpinned the *ACT Mental Health Strategy and Action Plan 2003- 2008*. The Youth Coalition agrees. While it is commonly acknowledged that providing support early provides the best outcomes for people experiencing mental dysfunction and suffering from mental illness, neither the implementation principles listed in section four or the strategies outlined in section five effectively explain how this focus on early intervention will be implemented.

The Youth Coalition recommends:

Recommendation 8

That the Services Plan should have clear strategies on how an early intervention and prevention focus will be implemented in the ACT.

2) Implementation and Evaluation of the Plan

i) Section 5 Actions

The objectives and strategies in '5. Mental Health Services Network Strategic Directions' are unclear and incomplete. For example, objective one in '5.2.3 Programs and Strategies for Innovation in the Mental Health Services System' is:

'[a]pply research & innovation in service design & evidence based design and encourage teaching in the tertiary education sector.'

This is difficult to understand and undermines the value of the Services Plan.

Similarly, in '5.2.2. Programs and Strategies to Extend the Mental Health Services System', the single strategy listed under the objective: 'extend capacity in the community sector' is:

'[i]mplement strategies for extension of the sector in alignment with the four-stream model.'

The Services Plan as a self-defined *strategic* services plan should describe what these strategies are, defining the targets, actions and timelines that need to met and the strategy discussed above is an example of a range of strategies included in section five of the Services Plan that are vague and provide little direction for readers.

Thus the Youth Coalition recommends:

Recommendation 9

That the actions and strategies in Section 5 of the Services Plan should be rewritten to clearly describe strategies and define targets and actions against clear timelines.

a) Substantive Comments

There are several substantive issues that the Youth Coalition and participants in its consultations have regarding section five, and these are tabularised below:

Page	Objective at Issue	Comments
35	Develop organisational capacity in the community sector	The 'services outcomes evaluation framework' proposed as a part of this objective is noted to only apply to the community mental health sector (as defined in the Plan). Participants noted to the framework should apply to government services and agencies.
35	Align services to the development stages model	It is unclear what: 'Develop children/family and youth specific mental health community services and linkages to existing community services in alignment with the clinical service streams' means. Further, it does not consider how existing services will need to change and what strategies need to be implemented to make this happen.
36	Develop a workforce strategy [for the ACT mental health sector]	This objective should mandate consultation on and consideration of wage parity and community sector viability.
37	Establish an access and information	The phrase: 'and access to care for those who require it' should be removed from the strategy. If it remains, then the Services Plan needs to describe strategies for how this will be operationalised,

	service	and how it will relate to existing services (such as Citizen's Advice Bureau and Health First).
38	Extend Services for Youth	The only strategy under this section is to set up a step up, step down service. Centacare has already been contracted to run this service and it has been operational since February 2008. Further, there is no mention of the community youth sector as a key stakeholder in mental health service provision in the ACT.
41	Support consumer led and directed services.	This objective needs to be split into two objectives: 1. Enhancing the involvement of consumers and carers; and, 2. Supporting consumer led and directed services. It should also be linked to the existing 'Consumer Participation and Carer Participation Across Mental Health ACT - A Framework for Action'.

Therefore the Youth Coalition recommends:

Recommendation 10

That the issues in Table 1 of this submission be resolved and incorporated into the revised draft of the Services Plan.

ii) Implementation and Evaluation Strategies and Framework

Section 5.3 of the Services Plan states: 'the implementation process will commence with the development of a detailed implementation plan that cascades from [the Services Plan] and combined strategies for Mental Health ACT and those for the community mental health sector' noting that an monitoring and evaluation framework will be designed as part of the implementation process.

The Services Plan sets out the framework for service delivery in the next five years and whilst developing an implementation plan is a legitimate action, it is not legitimate for the monitoring and evaluation framework to be deferred to a later stage of the process. In fact, since the implementation plan will be dependant on the Services Plan, it is appropriate that the monitoring and evaluation framework be defined in the Services Plan. Therefore the Youth Coalition recommends:

Recommendation 11

That a 'monitoring and evaluation framework' be defined in the Services Plan.

3) The Four-Stage Model

The Youth Coalition congratulates Mental Health ACT for adopting the four-stage model for mental health service delivery. However, it notes that adapting to the four-stage model will entail significant structural change in the ACT mental health sector. One of the key tasks of the Services Plan should be to explain how this change will be undertaken and it is not sufficient that the Services Plan describe in one paragraph and one objective how this change will occur. Instead, the Youth Coalition submits that the Services Plan define a framework for the implementation of the four-stage model including a schedule of key stakeholders that would be involved in the process. This will provide direction to the readers of the Services Plan and makes the Services Plan accessible.

i) A Framework for Implementation

The changes from the implementation of the four-stage model will be structural, and its impact will be felt across mental health and other services. A major concern for mental health and youth services in the ACT is how the transition to the four-stage model will take place, including concerns about its structure and the types of changes that are likely to be required. The Services Plan needs to describe a framework for implementation of the four-stage model and this framework needs to define principles, strategies, targets and timelines.

Under principles, the Services Plan should at least address the following seven issues:

1. The conditions pursuant to which consultation will take place;
2. How partnerships will be defined, particularly with services over which Mental Health ACT has no or limited jurisdiction;
3. The relevance of continuity of service provision;
4. The relevance of a coherent structure;
5. The relevance of up skilling and professional development;
6. The relationship between the four-stage model and the 2020 vision for mental health service provision in the ACT; and,
7. How stakeholders will be identified and involved.

The Services Plan should set out strategies that operationalise these principles, and in particular these strategies should address how existing services will be brought within the new system, and how the transition to Child, Youth and Adult based services will be implemented. These strategies should be tied to targets, which are then put on a timeline. The Youth Coalition submits that by doing this, the Services Plan provides clarity of purpose and allows services to put into place those policies that will be required at each stage of the transition.

Therefore the Youth Coalition recommends:

Recommendation 12

That Mental Health ACT should develop a 'Framework for the Implementation and Evaluation of the Four-Stage Model' that includes principles, strategies, targets, and timelines in accordance with Section 3(a) of this submission for the revised Services Plan.

ii) Key Stakeholders

In the process of developing the 'Framework for the Implementation and Evaluation of the Four-Stage Model', key stakeholders should be identified and mapped. As the Services Plan was written over a period of two years, some of the information contained within it is out of date, and in particular the list of services identified is out of date. Thus the step-up step-down program is listed as an action that will be taken under the Services Plan when in fact Centacare has been running its STEPS program since 18 February 2008. The Youth Coalition submits that an up-to-date sector map that includes youth services is integral to proper planning and implementation and therefore recommends:

Recommendation 13

That an up-to-date sector map be a key element of the Services Plan.

The Youth Coalition produces the 'Big Red Book: A handbook and directory for people who work with young people in the ACT' biannually and would be happy to provide assistance to Mental Health ACT in a service mapping process.

4) Population Sub-groups

Participants at the Youth Coalition's consultations noted that there were several population sub-groups that should be given greater consideration in the Services Plan. These are:

1. Young people involved with Quamby and Bimberi Youth Justice Centre;
2. Young people involved with Community Youth Justice;
3. Young people involved with the care and protection and out-of-home care systems;
4. Young carers;
5. Young people experiencing comorbid alcohol and other drug and mental health issues; and
6. Young people experiencing homelessness.

There is no indication of how this plan will interact with the *Children and Young People's Justice Health Services Plan 2007 -2010*. That plan states that young people leaving Bimberi will have a case plan and further that Bimberi will build links with community based mental health services to ensure continuity of care for young people leaving Bimberi. Further, CAMHS is tasked with providing support (where possible) to young people at the Bimberi Youth Justice Centre. The changes to mental health services will mean a change to how community mental health services interact with Bimberi and this needs to be addressed in the Services Plan.

Young people experiencing comorbid alcohol and other drug and mental health issues are also not effectively addressed in the Services Plan. There is a lack of detail in the Services Plan about dual diagnosis (comorbidity), and this lack of detail reflects the fact that no youth or AOD services were consulted during the formulation of the plan. This lack of consultation with youth service providers is reflected in the lack of consideration of the service needs of young people experiencing homelessness, young carers and young people involved in the care and protection and out-of-home care systems, and their related services.

Greater detail needs to be provided in the Services Plan on how these key population sub-groups will be serviced.

Recommendation 14

That the interactions between mental health services and particular population sub-groups including (but not limited to):

1. Young people involved with Quamby and Bimberi Youth Justice Centre;
 2. Young people involved with Community Youth Justice;
 3. Young people involved with the care and protection and out-of-home care systems;
 4. Young carers;
 5. Young people experiencing comorbid alcohol and other drug and mental health issues; and,
 6. Young people experiencing homelessness,
- be considered and addressed in the Services Plan.

Conclusions

The Youth Coalition notes the importance of the Services Plan to mental health service delivery in the ACT and appreciates the opportunity to put a submission on behalf of young people and the services who work with them in the ACT. The Youth Coalition looks forward to involvement in the next phase of the review of the Services Plan and is happy to provide support to Mental Health ACT as requested.

The Youth Coalition recognises the exciting changes that the Services Plan aims to facilitate and puts this submission to Mental Health ACT in order to ensure that the Services Plan is both clear and effective.

Therefore the Youth Coalition recommends:

Recommendation 15

That there be a new revision of the Services Plan.