



WANADA Submission on the Western Australian Mental Health, Alcohol and Other Drug Services 2015-2025 – Draft Plan Update 2018

9 April 2019

The Western Australian Network of Alcohol and other Drug Agencies (WANADA) welcomes the opportunity to provide a response to the Draft Plan Update 2018.

WANADA notes that the mid-term review of the Mental Health, Alcohol and other Drug Services Plan 2015 – 2025 (the Plan) is scheduled to commence in less than 12 months. This submission is a response to the Draft Plan Update 2018 and is a start to the conversation regarding the mid-term review process.

WANADA would welcome the opportunity to meet with the Mental Health Commission (MHC) and discuss this submission.

1. Plan Update 2018 - Service Modelling and Actions

It is recognised that, for alcohol and other drug services, the Plan Update 2018 is a reapplication of the National Drug and Alcohol Service Planning (DASP) tool using ‘current evidence regarding population, prevalence and epidemiology in Western Australia’.

The original Plan applied the DASP tool while taking into consideration the Western Australian context, as significantly informed by extensive sector and consumer consultation.

While there have clearly been population, prevalence and epidemiological changes since 2015, there has also been significant change within the alcohol and other drug service delivery environment, impacted by system-wide reforms and local community need and expectations.

The MHC has informed WANADA that, as much as possible, the underlying ‘assumptions’ applied to the original Plan have been maintained. WANADA is concerned that the Plan Update 2018 based on population, prevalence and epidemiology for service types in isolation to the service delivery environment is insufficient. This approach will not provide a robust guide to inform sector investment priority between now and the finalisation of the mid-term review. WANADA is concerned that, until the mid-term review is completed, the central planning document designed to inform all funding bodies, services and communities will be out of synchronisation.

Service Modelling

The updated alcohol and other drug demand modelling has resulted in a number of changes to the 2020 and 2025 service needs. These changes are supported by high level commentary on both: the data sets that influenced the modelling outputs; and the modelling process at Appendix 3.

- WANADA notes that prevention and forensic services modelling was not updated in the Draft Plan Update 2018, due to the absence of improved methodologies.

- WANADA is not in a position to comment on the MHC's implementation of the DASP tool that informs the Plan Update 2018.

Strategic changes

WANADA notes that a number of strategic developments have been listed within the Plan Update 2018. WANADA is concerned that the discussion on the changing strategic environment may confuse stakeholders, given the Plan Update 2018 does not account for the impact these changes may have on service planning and service delivery to meet community need (and yet will be considered as part of the mid-term review).

Changes in metrics

The Draft Plan Update 2018 service matrix includes the following significant changes:

- the inclusion of modelling for the East Metro Health Service; and
- changes to how certain services are represented (i.e. AOD Post Residential Rehabilitation being measured in beds, rather than hours).

These amendments inhibits transparency, as data cannot be readily compared between the original 2015 Plan and the Plan Update 2018. Where there have been changes that have fundamentally altered how service data is represented, WANADA requests the inclusion of additional explanatory content. This content should enable easy comparison with the original 2015 modelling, so that changes in the quanta of service mix can be readily understood.

Regional data

The Plan Update 2018 remodelling has resulting in significant changes to service demand projections in the regions. The Plan Update 2018, however, does not provide sufficient information to support stakeholders' understanding of the drivers for change, and how these have specifically altered the projected levels of service demand.

It is of concern that the projected level of services identified as needed have dropped significantly, and in the following case has dropped to less than what is currently provided.

The 2025 Community Bed-Based Services (AOD Residential Rehabilitation) projected service need in the Kimberley has dropped from 44 beds (in the Plan) to 28 (in the Plan Update 2018). The services provided are currently significantly funded by the Commonwealth Government. While the Plan (and Plan Update 2018) is funder neutral, it would be devastating if funding was withdrawn from these services based on remodelling without service delivery considerations taken into account. One consideration, that undoubtedly the MHC is aware of, is that Aboriginal people in particular from throughout the State access these services because of the unique service models that they offer.

The above example highlights to WANADA that the assumptions informing the Plan may not have been adequately carried forward. Releasing the Plan Update 2018 may present significant risk to the sustainability of needed services.

Impact on actions

WANADA applauds the significant progress against the actions in the Plan: primarily achieved through MHC resources; and particularly given the constrained fiscal environment. WANADA welcomes the listing of activities that are completed, in progress, or pending. We note that some actions, while in progress, are ongoing in nature. It would be desirable if "ongoing" is included as an action achievement to better reflect needed commitments into the future.

Timing and achievability of service investment

WANADA is concerned about the achievability of the 2020 aspirational figures, particularly given the proximity of the State Budget for 2019/20. For example, harm reduction services will require significant investment to meet projected levels of demand (approximately 2.7% of needed services are currently funded).

In circumstances where funding for service types has failed to meet projected milestones, it is essential that there is an explanation for delaying investment or making in-roads to meeting identified need. Given the Plan is soon to enter its final five year phase, this clarity is essential to support informed investment and activity by all commissioning and service stakeholders.

Recommendations to inform the Plan Update 2018

To provide a consistent and transparent guide to inform investment in the Western Australian alcohol and other drug service sector, WANADA recommends:

- the Draft Plan Update 2018 is not released;
- the mid-term review commences immediately, informed by an evaluation of the population modelling that reflects contemporary, local service practice wisdom and the current strategic environment;
- summaries for each region are incorporated, to support improved transparency and stakeholder awareness; and
- adequate explanation to describe the prioritisation of all service types, in particular harm reduction, to ensure achievability while maintaining efficiencies of the service system.

2. Preparing for the Mid-Term (2020) Review

Consultation and Steering Group

In development for the Plan, a steering group of service delivery representatives was established to ensure the DASP modelling was reflective of Western Australia's unique context.

Noting the significant changes to the optimal 2025 service mix, it is essential that service 'practice wisdom' is incorporated into the modelling process to support a more nuanced determination of regional and population group needs, as well as strategic analysis.

The staging of any service expansion was of particular concern in the modelling of the Plan to: minimise bottlenecks where pathways across service types are needed; and to ensure efficiencies of any investment.

WANADA recommends the specialist steering group is immediately reconvened to assess the re-modelling applied to date, and to inform the planning and consultation process for the mid-term review. A co-designed approach is essential.

Strategic Planning

WANADA notes that not all national strategies and additional State developments are listed within the Plan Update 2018. There needs to be a more comprehensive inclusion in the mid-term review, including how these reforms are connected to the Plan and any shared governance and monitoring structures.

The following documents are absent from the Plan Update 2018 despite being relevant:

- Draft National Alcohol Strategy

- National Fetal Alcohol Spectrum Disorder Action Strategic Action Plan 2018-2028
- National Aboriginal Torres Strait Islander Peoples Drug Strategy 2014-2019
- National Alcohol and other Drug Workforce Development Strategy 2015-2018 (being considered for extension)
- National Tobacco Strategy 2012-2018
- National Blood Borne Viruses and Sexually Transmissible Infections Strategies 2018-2022
- National Welfare reform changes that have the potential to impact on service capacity
- National Plan to Reduce Violence against Women and their Children 2010-2022
- Kimberley Alcohol and other Drug Services Review
- Premier's Priorities
- Inquest into the deaths of thirteen children and young persons in the Kimberley
- Decision of Director of Liquor Licencing, Pilbara Inquiry

About WANADA

WANADA is the peak body for the alcohol and other drug education, prevention, treatment and support sector in Western Australia. WANADA is an independent, membership-driven not-for-profit association.

WANADA is driven by the passion and hard work of its member services, which include community alcohol and other drug counselling; therapeutic communities; residential rehabilitation; intoxication management; harm reduction programs; peer based; prevention; and community development services.

Alcohol and other drugs, including tobacco, are a health and social issue that impacts the whole community. The alcohol and other drug sector provides specialist services to meet the diverse needs of people in Western Australia. WANADA aspires to drive across-sector solutions that focus on a whole of community approach to addressing health and wellbeing issues associated with the use of alcohol and other drugs.