



Alcohol, Tobacco & other
Drugs Council Tas Inc.

Submission to the
Tasmanian State Government

One Health System

White Paper:

Exposure Draft

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The Alcohol, Tobacco and other Drugs Council

The Alcohol, Tobacco and other Drugs Council of Tasmania (ATDC) is the peak body representing the interests of community sector organisations (CSOs) that provide services to people with substance misuse issues in Tasmania. The ATDC is a membership based, independent, not-for-profit and incorporated organisation.

The ATDC is the key body supporting the sector to secure adequate systemic support and funding for the delivery of evidence based alcohol, tobacco and other drug (ATOD) initiatives. We support the sector through training and sector capacity building, as well as undertaking policy and development projects with, and on behalf of, the sector.

We represent a broad range of service providers and individuals working in prevention, promotion, early intervention, treatment, case management, research and harm reduction.

We play a vital role in assisting the Tasmanian Government to achieve its aims of preventing and reducing harms associated with the use of alcohol, tobacco and other drugs in the Tasmanian community.

By working with all levels of government and the community the ATDC seeks to promote health and wellbeing of all Tasmanians through a reduction of the harms caused by substance use. Our priorities are set by the membership and Board and focus on the prevention of the uptake of harmful alcohol or drug use, the provision of effective treatment for alcohol or drug misuse and the long term promotion of health and relapse prevention.

A broad and regionally dispersed membership base ensures the ATDC maintains a strategically relevant position within the overall understanding of what services are provided, what services are needed and how best to achieve the goal of reducing the negative impacts on the Tasmanian community from alcohol and drug use.

Our Vision

A Tasmania without drug or alcohol related harm or discrimination.

Our Mission

To provide independent leadership and advocacy; strengthen partnerships through inclusion, and support consumer participation in the promotion of holistic alcohol, tobacco and other drug (ATOD) services for all Tasmanians.

Our Goals

Goal 1: To provide effective leadership and representation for the alcohol, tobacco and other drugs sector.

Goal 2: To build sustainability of the ATDC and the alcohol, tobacco and other drugs sector.

Goal 3: To maximise consumer engagement in service planning and delivery.



Introduction

The Alcohol, Tobacco and other Drugs Council welcomes the opportunity to comment upon the Tasmanian Government's *White Paper – Exposure Draft: Delivering Safe and Sustainable Clinical Services*.

This submission builds upon feedback provided on the *Green Paper* and specifically provides comments against the following topics:

- Role Delineation and Service Profiles
- Service Commissioning
- Primary, Community and Preventative Services
- The Social Determinants of Health
- Corporate and Clinical Governance
- Community, Consumer and Carer Engagement

The ATDC looks forward to the release of the final White Paper and continuing to working closely with the State Government during the development and implementation of the health reform agenda and establishment of the Tasmanian Health Service.

Role Delineation and Service Profiles

The Department is using a draft *Role Delineation Framework* to differentiate and describe services in a variety of areas, including alcohol and drug services. The ATDC provided detailed feedback regarding the *Role Delineation Framework* within its submission about the *Green Paper*. The Framework has been used in the *White Paper Exposure Draft* to describe current and proposed service profile for each of the four major acute public hospitals within Tasmania.

In October 2014 the Department of Health and Human Services released the *Final Report of the Review of Drug Use and Service Responses in North West Tasmania*. That Report made a number of observations and recommendations about alcohol and other drug services within the North West and across Tasmania. Specifically the Review Report recommended increasing access to inpatient withdrawal management services for clients based in the North West and increasing the availability of residential rehabilitation beds for clients based in the North West. Consistent with this the *White Paper Exposure Draft* foreshadows the Government's commitment to increasing resources for alcohol and drug services at the NWRH to address service access issues (page 45). According to the Department's draft *Role Delineation Framework* AOD services at the NWRH will be retained at Level 3.



The *White Paper Exposure Draft* highlights that alcohol and drug services will increase from, no services at present, to Level 4 (in accordance with the Department's draft *Role Delineation Framework*) at the Mersey Community Hospital (page 49). The Exposure Draft goes on to highlight that the establishment of mental health services will enable on-site, colocated alcohol and drug services to be provided. It is a known fact that not everyone who has an AOD substance misuse issue has a mental health problem and not everyone with a mental illness has AOD issues. Despite this, some people do experience co-existing mental illness and substance misuse issues. Whilst the ATDC is a proponent of close and collaborative working relationships between and across services and sectors, and particularly between AOD and mental health services, the ATDC is concerned about the potential colocation and/or apparent amalgamation of AOD and mental health services eluded to within the Mersey Hospital service profile.

Further the ATDC is concerned that it may be the Government's intention to establish AOD residential rehabilitation services at the Mersey Community Hospital campus. The ATDC is extremely concerned about this possibility and believes that residential rehabilitation services are inconsistent with the service provision profile of the government sector.

Service Commissioning

The *White Paper Exposure Draft* states that the "creation of the THOs on 1 July 2012 resulted in a clear distinction between DHHS, the purchaser of health services and system manager and the THOs as service providers." (page 63) Whilst this may have been theoretically desirable it is not strictly the case for the alcohol, tobacco and other drugs sector. In June 2013 when Statewide and Mental Health Services transferred to the Tasmanian Health Organisations (THO), the Alcohol and Drug Service (ADS) State Office also transferred to the THO-South. At that time the service agreements for the community funded alcohol and drug program also transferred to the THO-South.

The ATDC strongly believes that this issue should be resolved during the creation of the Tasmanian Health Service so that that policy direction and purchasing functions for the ATOD sector are clearly returned to the Department within the Mental Health/Alcohol and Drug Directorate.

Primary, Community and Preventative Services

The ATDC is pleased to see that the Government has incorporated feedback from the *Green Paper* into the *White Paper Exposure Draft*, regarding the expectations that Tasmanians have of the health system. The ATDC looks forward to the final White Paper providing more comprehensive detail about how:

- linkages between the acute, primary and community sectors will be strengthened?
- a focus on preventative health will be achieved?
- the new preventative health policy, *A Healthy Tasmania*, will be implemented and what resources will be attached to it?
- health literacy will be improved for Tasmanians?



The Social Determinants of Health

The *White Paper Exposure Draft* acknowledges that there is a strong focus on the acute hospital system at this time. The ATDC believes that it is essential that the State Government recognises the value and importance of other components of the health and community services system as well as the myriad of other services that impact upon individual and community health and well-being outcomes.

The social determinants of health (SDoH) are the conditions in which people are born, grow, live, work, play and age. The SDoH are sometimes referred to as ‘the causes of the causes’ because they are the underlying reasons why people experience poor health.

The health outcomes of people who use alcohol, tobacco and other drugs are always compounded by other social determinants in their lives. What this means for the alcohol, tobacco and other drug sector is that the people who are most severely affected by the harmful use of alcohol, tobacco and other drugs are also those who are most likely to concurrently experience other severe forms of social disadvantage.

The ATDC is particularly interested in the way in which the reformed Tasmanian Health Service will interact with services and agencies outside of the health portfolio to focus on the prevention of illness and on maximising health and well-being.

Corporate and Clinical Governance

The State Government recently created a key AOD governance body, the AOD Treatment Expert Advisory Group, to maximise community sector engagement in planning and priority setting. The Advisory Group reports to the Alcohol and Drug Planning Advisory Group which consists entirely of senior public sector representatives. Additionally the State Government’s Inter Agency Working Group on Drugs brings together key State Government agency representatives together with the Local Government Association of Tasmania and the ATDC to consider key strategic and policy issues for Tasmania.

The ATDC believes that consultation should occur with these existing governance arrangements during the design/redesign, planning and implementation of alcohol and other drug services within the Tasmanian Health Service.

Community, Consumer and Carer Engagement

The ATDC believes that robust and inclusive community and consumer engagement mechanisms are essential to the ongoing governance of Tasmania’s health system. Consumer and carer participation needs to be recognised as a fundamental aspect of health service planning and provision. Whilst Section 3.3 of the *White Paper Exposure Draft* describes the Health Council of Tasmania it does not provide full membership details.



It is essential that stakeholder engagement arrangements actively enable the voices of specific health consumers to be heard and for their views to be incorporated into decision making processes. The ATDC encourages the State Government to consider the ways in which specific groups who are often marginalised, such as people who use drugs, people with mental illness and their carers, people with disabilities and those with chronic and/or relapsing health conditions are enabled to influence the health services that they receive.

The Tasmanian Health Service needs to embed consumer, community and carer engagement at its core by addressing key arrangements such as:

- organisational policies and procedures about consumer and carer engagement
- reimbursement and remuneration arrangements for consumers and carers
- mentoring and support for consumers and carers.

