Australian Network of State and Territory Alcohol and Other Drug Peak Bodies

Submission to Parliamentary Joint Committee on Law Enforcement Inquiry into Crystal Methamphetamine

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About the Australian Network of State and Territory Alcohol and Other Drug Peak Bodies

The Network of Australian State and Territory Alcohol and Other Drug Peak Bodies (the Network of Peaks) comprise all state and territory peak bodies for the alcohol and other drug service sector.

The Network of Peaks represent:

- primarily non-government organisations funded to provide alcohol and other drug services to the community
- all specialist alcohol and other drug treatment types (counselling, withdrawal, residential and non-residential rehabilitation, opiate replacement therapy) and harm reduction services

The Network of Peaks' members are optimally positioned to support the sustainability and quality of the alcohol and other drug service sector across all jurisdictions. This is achieved through:

- supporting continuous quality improvement
- promoting of evidence based approaches to treatment and capacity building
- the identification and sharing of innovative models of practice
- working with research and policy makers to facilitate the translation of research and policy at the service level.

Partnerships exist with the three national research centres (NDARC, NDRI and NCETA), as well as collaborations with other specialist local research centres, with the goal of better supporting translational research activities, as well as to inform research priorities that better support the treatment sector to access and implement evidence based practice as it evolves at the service, jurisdictional and national levels.

Each of the peaks are well placed to promote and support cross-sectoral innovations through partnership models and the provision of workforce and sector capacity building initiatives. Network of Peaks' members are also well placed to connect with other sources of innovation such as, universities, industries, and policy makers. This unique position enables peak bodies to strategically understand how these innovations can be translated, value-add or build capacity and quality across the sector.

Capacity building and workforce development initiatives promoted by the peaks are based on collaboration with consumers, carers and drug user groups (where they exist), as well as member needs analyses and collaboration with research and the mental and allied health and welfare sectors.

The Network of Peaks' members have also informed the development of National and State and Territory policy and clinical guidelines. An example of this is the National Comorbidity Guidelines where most peaks were involved in their initial development, supporting application, and more recently in their review.

Submission Overview

The Network of Peaks welcomes the opportunity to provide a submission into the Parliamentary Joint Committee on Law Enforcement Inquiry into Crystal Methamphetamine (the Inquiry).

The Network of Peaks supports the re-initiation of the Inquiry. It is timely to consider the recommendations, strategies and initiatives from the Final Report of the National Ice Taskforce 2015 (Final Taskforce Report), the Australian Government Response, and the Council of Australian Governments' National Ice Action Strategy 2015 (National Action Strategy),

The Network of Peaks welcomed the release of the Final Taskforce Report, Australian Government Response, and the National Action Strategy. However, the Network of Peaks believes that there are gaps that, if not incorporated, will limit the outcomes of any initiative.

To deliver meaningful outcomes that address the complex needs and expectations of the community, the Network of Peaks considers that any approach must include:

- a balanced allocation of resources across the three pillars of harm, demand and supply reduction
- sector and consumer co-design on all initiatives, to ensure efficient systems are adopted and potential inadvertent consequences are avoided
- a transparent governance structure underpinned by a current national alcohol and other drug strategy, that reflects concerns raised
- a service commissioning process co-designed with the alcohol and other drug service sector, so as to leverage sector expertise in addressing complex community needs
- a multi-jurisdictional approach to address stigma and discrimination, so as to improve access to cross-sector treatment and support
- monitoring and evaluation

Strategic Direction

The overarching approach of harm minimisation, which has guided the National Drug Strategy since its inception in 1985 encompasses the three pillars of demand, harm and supply reduction.

The Network of Peaks believes that there is a need for a greater emphasis on demand and harm reduction in the delivery of alcohol and other drug strategies to create balanced proactive solutions to the problems caused by substances such as methamphetamine.

An analysis by Ritter, McLeod and Shanahan of 2009-10 expenditure by Australian governments revealed approximately $1.7 billion or 0.8% of all government expenditure was spent on illicit drug policy. The majority of this funding was attached to actions with a supply reduction focus[1]:

[1] Ritter, A., McLeod, R., & Shanahan, M. (2013). Monograph No. 24: Government drug policy expenditure in Australia – 2009/10. DPMP Monograph Series. Sydney: National Drug and Alcohol Research Centre.

Policy Domain	2009/10
Prevention such as prevent or delay the commencement of drug use in young people	9.2 per cent
Treatment such as counselling and pharmacotherapy maintenance	21.3 per cent
Harm Reduction such as the needle syringe program	2.1 per cent
Law Enforcement such as police detection and arrest in relation to drug crimes and policing the borders of Australia for illegal importation of drugs and their precursors	66.0 per cent
Other (research funding and policy administration)	1.4 per cent

The Network of Peaks is concerned that current strategies and initiatives to address alcohol and other drug issues, and even more so issues related to methamphetamine use, emphasise a law and order focus. Whilst law enforcement is a critical part of a supply reduction, there needs to be greater emphasis placed on demand and harm reduction, specifically prevention and treatment. A balanced and effective approach is required to reduce the health and social impacts of drug use on individuals, families and communities.

Final Report of the National Ice Taskforce 2015

The Network of Peaks is generally supportive of the Final Taskforce Report and its recommendations.

To maximise the efficacy of the Report's recommendations, the Network of Peaks considers the following important issues should be considered as a priority:

- Consumer and sector co-design on all initiatives
- Balanced funding and initiatives across the three pillars of harm, demand and supply reduction
- Identification of methods to implement the recommendations that ensure complex and varied community needs are met, and barriers to service access are reduced.

Responses to Recommendations

Recommendations: 1-13; 15; 22; 23; 31-34; 35(d); and 38 are for broad cross-sector initiatives that require collaboration with the specialist alcohol and other drug service sector and consumers. Under these circumstances the Network of Peaks support these recommendations. Collaboration will maximise meaningful outcomes.

The National Drug Strategy remains in draft form. The revised Strategy needs to reflect these areas as priority considerations.

Recommendations: 24-30; 35(a-c); and 36-37 relate to law enforcement.

In the Foreword of the Final Taskforce Report, Mr Ken Lay APM stated "Ice use is not a problem we can solve overnight, and not something we can simply arrest our way out of."[2] The Network of Peaks supports this assertion, and does not support resource allocations that further preferences supply reduction over demand and harm reduction.

The Network of Peaks believes there must be further consideration of an appropriate model to deliver a national hotline as outlined in **Recommendation 14**.

The majority of states and territories currently operate phone lines that provide support, counselling and brief intervention as well as localised information for referrals and treatment matching. Establishing a national hotline risks duplicating existing support services, and may not be an ideal method to deliver specific, localised information and referrals.

The Network of Peaks would support the Australian Government investigating the option of a national "hotline" that would redirect callers to their local jurisdiction's alcohol and other drug phone line – particularly for national support promotion purposes.

In regards to **Recommendation 16**, the Network of Peaks believes individuals with diagnosed 'alcohol and other drug misuse disorder' must have access to appropriate specialist alcohol and other drug treatment and support. Alcohol and other drug issues typically co-occur with other complex issues, and the alcohol and other drug issues cannot be dealt with in isolation. The alcohol and other drug services are best placed to ensure the complexity of issues is both identified and addressed to maximise the sustainability of outcomes.

[2] National Ice Taskforce, Final Report of the National Ice Taskforce. Commonwealth of Australia, 2015. P. ii.

The perceived or real discrimination experienced by individuals and families impacted by alcohol and other drug use issues often results in reduced access to the range of health and social treatment and support needed. Specialist alcohol and other drug services are integral to ensure effective systems navigation.

There is a clear role for the alcohol and other drug service sector in building the capacity of other sector services', including GPs, to enhance brief intervention and appropriate referrals.

The Network of Peaks does not support the development and implementation of a new national quality framework outlined in **Recommendation 17**.

The majority of organisations providing alcohol and other drug services are certified under a recognised accreditation standard, typically a management systems standard and/or industry specific standard. The choice of standard(s) used by an organisation is informed by multiple factors including government contract stipulations, the size of the organisation, and the organisation's service scope and focus. For example some organisations are required to meet multiple standards due to their diverse cross-sector funding and focus.

The Network of Peaks recommends that existing accredited standards should be supported, and agencies retain the flexibility to adopt the standards that best meet the needs of the organisation's continuous quality improvement.

The Network of Peaks supports **Recommendation 18**. Further investment in alcohol and other drug specialist treatment services is necessary, as service demand far exceeds available supply. Every year across Australia between 200,000 and 500,000 people are unable to access the treatment they seek.[3]

How further investment in specialist treatment services is commissioned is a key concern of the Network of Peaks. To ensure community needs are addressed and outcomes maximised, it is important that there is guaranteed continuity of existing Commonwealth funded services and a clear and efficient commissioning process is developed in consultation with the alcohol and other drug service sector.

In response to **Recommendation 19**, the Network of Peaks support improved service planning to ensure locations of highest need are addressed. For this to be effective the alcohol and other drug service sector must be consulted.

The Network of Peaks also supports a cost-benefit evaluation process being implemented as part of service planning, to ensure community needs are being met in a cost effective manner and long term outcomes delivered. The Network of Peaks, however, note that additional resources will need to be allocated to support these processes.

The Network of Peaks strongly supports the longer funding periods outlined in **Recommendation 20**.

Longer funding periods would provide much needed stability to the current service delivery environment. In addition, increasing funding periods will: reduce service disruption; improve

[3]Ritter, Alison et al., *New Horizons: The review of alcohol and other drug treatment services in Australia.* National Drug and Alcohol Research Centre, 2014, p. 13

client care; enable long term planning; and support improvement and innovation. The Network of Peaks considers that longer funding periods must be complemented by improved commissioning and accountability processes.

In response to **Recommendation 21**, the Network of Peaks notes that Improved Services Initiative/Substance Misuse Service Delivery Grant Fund currently supports the alcohol and other drug service sector to strengthen collaboration and sectoral intersections.

Capacity building is an ongoing proposition that requires resources and is the core business for alcohol and other drug state and territory peak bodies. The alcohol and other drug service Dual Diagnosis Capability Assessment Toolkit is an effective means for measuring capability. The mental health equivalent tool would be a valuable addition to support strengthened collaboration and intersection across the two sectors.

Report Gaps

The Network of Peaks considers the Final Taskforce Report to be broad and largely comprehensive in its identification and consideration of factors to address methamphetamine use in Australia. However, the Network of Peaks believes there are three particular gaps in the Final Taskforce Report recommendations that require emphasis and action:

- **Stigma and Discrimination** remains a key barrier to cross-sector service access and sustainable outcomes. It is well documented that individuals and family members impacted by alcohol and other drug use experience considerable levels of stigma.[4,5] The World Health Organisation states that illicit drug dependence is the most stigmatised health condition.[6] While stigma and discrimination is noted regularly throughout the Final Taskforce Report, it is not addressed in any recommendation. The Network of Peaks believes that a cross-jurisdiction approach is required to address Stigma and Discrimination.

- **Consumer Involvement** is important to effective planning, development and implementation of policy and initiatives. Meaningfully including consumers in the design of initiatives will ensure that initiatives are appropriately targeted and adverse outcomes can be minimised.

- **Harm Reduction** initiatives are not included in the Final Taskforce Report recommendations. This is not consistent with the three pillars approach of the National Drug Strategy, and does not recognise the benefits of harm reduction strategies in reducing social costs. The Network of Peaks recommends that harm reduction initiatives are included as a matter of priority.

[4]Adlaf EM, Hamilton HA, Wu F, Noh, S. Adolescent stigma towards drug addiction: Effects of age and drug use behaviour. Addictive Behaviors. 2009; 34(4): 360–4.

[5]Corrigan PW, Kuwabara SA, O'Shaughnessy J. The public stigma of mental illness and drug addiction: Findings from a stratified random sample. Journal of Social Work. 2009; 9(2):139–47.

[6]Kelly JF, Westerhoff, CM. Does it matter how we refer to individuals with substance-related conditions? A randomized study of two commonly used terms. International Journal of Drug Policy. 2010; 21(3): 202–207.

Australian Government Response to the Final Report of the National Ice Action Taskforce

The Network of Peaks supports the Australian Government increasing its focus on alcohol and other drugs, and methamphetamine issues.

The Network of Peaks supports all actions outlined in the Australian Government's Response, however the complexity of implementing some of these actions must be further considered and accounted for. All governance and accountability processes must also be transparent, so that the performance and outcomes of all actions can be monitored and evaluated.

Service Commissioning

The announced $241.5 million funding injection for the commissioning of services is welcomed by the Network of Peaks. It is noted, however, that this approximate 5 per cent increase in Commonwealth funding will not address the significant current and increasing demand for alcohol and other drug treatment and support services.

The new drug treatment funding is being commissioned through the Primary Health Networks. While still in its early stages, the alcohol and other drug service sector has identified a significant degree of variability across the Primary Health Networks' approach to the allocation of the new funding. While some commissioning processes have commenced around the country, the funding has yet to result in additional services or episodes of care, with the first of these due to commence in some jurisdictions in January 2017.

Difficulties arise from:

- maintaining nationally consistent processes with 31 commissioning systems that are required to address complex and often unique local needs
- the addition of a further layer of bureaucracy
- expectations of prescribed cross-sector collaborations
- further short term funding contracts that offer limited sector and community security for best results

The Network of Peaks recommends an independent external evaluation of the Primary Health Networks' commissioning of drug treatment funding. This evaluation must consider options for a collaborative planning process that includes collaboration with the alcohol and other drug service sector.

Broadening the Response

The Network of Peaks considers the following issues are not sufficiently addressed in the Australian Government Response:

Many recommendations from the Report are not covered in the Government's response. Gaps in the Report previously identified by the Network of Peaks also require a response to ensure effective and sustainable outcomes.

Council of Australian Governments National Ice Action Strategy 2015

The Network of Peaks supports a Council of Australian Government (COAG) focus on alcohol and other drug issues. Coordinating policies and initiatives across national, state and territory jurisdictions is important to identify and leverage synergies, avoid duplication, and clarify jurisdictional responsibilities.

The Network of Peaks notes that the National Ice Action Strategy will be integrated with the National Drug Strategy. After seven iterations of a national strategy over four decades, Australia is in a position to use its extensive experience to inform the development of a robust and forward looking strategy.

The next National Drug Strategy must outline an integrated and effective purpose for government, communities and services.

To achieve this, the next iteration of the National Drug Strategy must continue to build on the harm minimisation approach and maintain the three pillars of harm reduction, demand reduction and supply reduction pillars. To be effective, these pillars must be:

- balanced and equitably resourced
- supported by initiatives that are grounded in the current evidence base
- informed (supported) by appropriate data and include clear outcome measures
- managed by a formalised and transparent governance structure that engages the alcohol and other drug services sector.

The draft National Drug Strategy 2016-2025 was released for consultation in 2015. However, the Network of Peaks considers the draft document to be insufficient in addressing the above points. The Network of Peaks believes the amendment and finalisation of the National Drug Strategy must be progressed as a priority, to provide policy certainty and deliver clarity regarding the governance and accountability frameworks.

Effective and clear governance and accountability structures are of significant importance in delivering multi-jurisdictional policies and initiatives. The Network of Peaks seeks clarity regarding the establishment of the governance framework to support both the National Ice Action Strategy and the National Drug Strategy and associated strategies (for example Alcohol; Aboriginal and Torres Strait Islander; Workforce Development).

The establishment of a Ministerial Forum as part of the National Ice Action Strategy provides much needed recognition of the importance of alcohol and other drug issues nation-wide and the need for coordination. However, it is not clear what progress has been made in establishing the Ministerial Forum, its scope, and the broader governance and accountability framework. All these mechanisms are required for public awareness and accountability regarding jurisdictional activities and whether these are meeting community needs and delivering meaningful outcomes.

The Network of Peaks broadly supports the following sections in the National Ice Action Strategy:

- Families and communities
- Prevention
- Research and data

To deliver meaningful outcomes, the Network of Peaks considers it of great importance that the implementation of all initiatives outlined in the National Ice Action Strategy is done in consultation with the alcohol and other drug service sector. This will also assist in identifying and avoiding potential adverse outcomes, for example where activities may impact upon treatment service demand.

The Network of Peaks provides minimal comment on the law enforcement-related initiatives outlined in the National Ice Action Strategy. The Network of Peaks recommends that governments' approaches to alcohol and other drugs should be balanced across the three pillars of harm, demand and supply reduction. The Network of Peaks does not support resource allocations that preference supply reduction over demand and harm reduction.

The Network of Peaks supports the following treatment and workforce initiatives outlined in the National Ice Action Strategy:

- Increased investment in the alcohol and other drug service sector, including for Indigenous-specific alcohol and other drug services
- Counselling Online programmes
- Additions to the Medicare Benefits Schedule
- Renewal and dissemination of a national suite of evidence-based guidelines to assist frontline workers to respond to ice in their workplace
- Renewal and dissemination of National Comorbidity Guidelines

The establishment of a new national treatment framework is supported in principle. The Network of Peaks considers this framework must be developed in close consultation with the alcohol and other drug service sector and should:

- reflect jurisdictional differences and delineate government and non-government service roles
- support streamlined through care, including sector and cross-sector navigation
- reduce uncertainty and red tape.

The Network of Peaks supports in principle increasing the links that exist between Primary Health Networks and health care providers and community services. Continuity of care is important for long term outcomes, however for this to be achieved it is important that the alcohol and other drug service sector is closely involved and recognised as a specialist service area.

Expanding training to promote the use of the Alcohol, Smoking and Substance Involvement Screening Test is supported in principle by the Peak Network. This will have through care and referral implications for treatment services, and as such capacity of treatment services must be enhanced as a priority.

The Network of Peaks reserves comment on the intent to enhance the delivery of early intervention and post-treatment care commissioned through the Primary Health Network until there is agreed clarity on what this looks like, the impact on treatment and support services, and the identification of where the funding for this is coming from. The Network of Peaks believes funding to support the initiative must be distinct from the identified treatment funding in the Government Response, and requires consultation with the specialist alcohol and other drug service sector.

The Network of Peaks does not support the implementation of a pilot quality framework as outlined in the National Ice Action Strategy (as detailed above).

Future Consultation

The Network of Peaks would welcome further opportunities to discuss or expand upon this submission with the Parliamentary Joint Committee.

A number of Network of Peaks' members will also lodge separate submissions that provide state and territory jurisdiction specific information, including any additional state and territory specific developments relating to Methamphetamine.

If you would like to discuss further information specific to particular jurisdictions, please contact:

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