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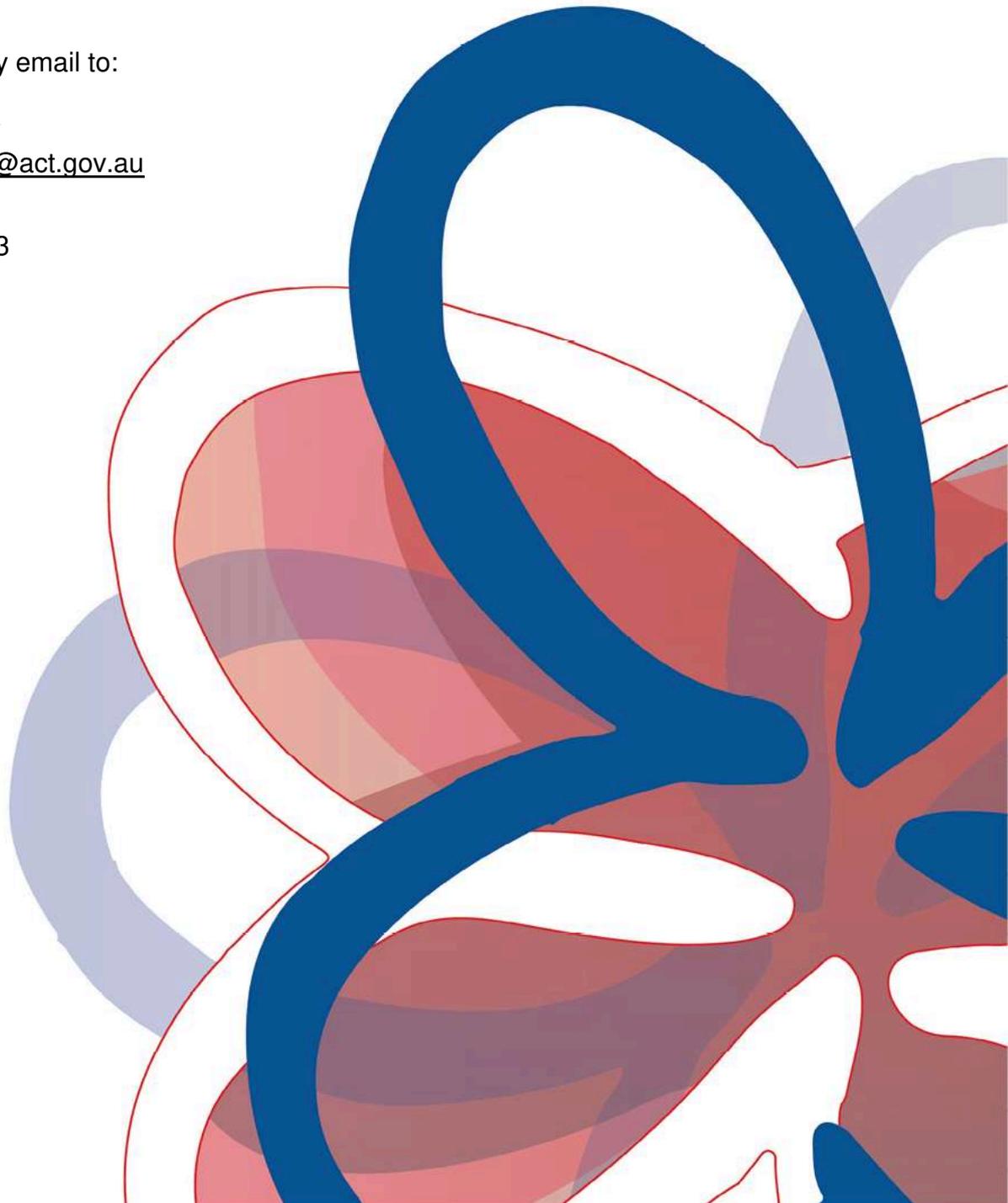
Submission:

**Canberra Health Services Operational Procedure – Supported
Accommodation: Eligibility and Referral to MHJHADS Managed Housing in
the ACT.**

Submitted by email to:

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Submission: Canberra Health Services Operational Procedure – Supported Accommodation: Eligibility and Referral to MHJHADS Managed Housing in the ACT.

This submission has been prepared by the ACT Mental Health Consumer Network (the Network) in response to the invitation from Canberra Health Services (CHS).

The Network is a consumer-led peak organisation representing the interests of mental health consumers in the ACT in policy and decision-making forums. The Network is committed to social justice and the inclusion of people with experience of mental illness. Run by consumers for consumers, our aim is to advocate for services and supports for mental health consumers which better enable them to live fuller, healthier and more valued lives in the community.

A consumer forum was held, and additional feedback was sought via email in relation to the CHS Operational Procedure – Supported Accommodation: Eligibility and Referral to MHJHADS Managed Housing in the ACT documents. Written and verbal feedback was received consumers. This submission incorporates both the written feedback and verbal feedback received.

General comments.

The Network welcomes this opportunity to contribute to the CHS Operational Procedure – Supported Accommodation: Eligibility and Referral to MHJHADS Managed Housing in the ACT (Accommodation procedure) documents. The Supported Accommodation: Eligibility and Referral to MHJHADS Managed Housing in the ACT procedure document should ideally be written in plain language and should include illustrations such as flow-charts and diagrams to accommodate various literacy levels and communication styles.

Consumers welcomed the provision of supported housing accommodation for people with high support needs. It is agreed by participants of this review that housing stability is essential for the ongoing effective management and recovery of chronic, high impact mental health conditions. Consumers also noted that the need for stable housing options for vulnerable Canberrans living with a mental health condition is of special importance given the ongoing crises in housing affordability, cost of living, and rental room availability currently being experienced. Consumers expressed a strong interest in seeing the number of available supported accommodation houses expanded in the coming years.

Consumers approve of the Accommodation procedure's focus on providing supported accommodation to mental health consumers that require high-level support. Nonetheless, consumers stated that the eligibility criteria should reflect how comorbidities, regardless if they are of a physical and/or psychological nature can exacerbate each other, recognising that comorbidities can be compounding in nature. For instance, a person living with a high impact mental health condition and type one diabetes may experience intense emotional states during high or low blood sugar episodes. At the same time, their mental health condition may make the important self-management of their blood glucose levels difficult to maintain. In this case, the comorbidity of conditions places the individual at a much higher risk of injury due to how their conditions interact with one another. Consumers therefore recommended that both the eligibility criteria and referral process should broaden the terminology to specify that existing comorbidities should be taken into consideration by both the referring clinical team and the Mental Health Link team.

Consumers had the following questions regarding the Mental Health Link Team (MHLT), primarily with respect to the distinct lack of information about this body, either within the Accommodation procedure or in the public domain. While the provision of such information may exceed the terms of the Accommodation procedure, given the role that the Mental Health Link Team plays in the referral procedure:

1. What is the MHLT?
2. What are the terms of the MHLT?
3. Where is the MHLT situated within the MHJHADS governance structure?
4. Who and what professionals are included on the MHLT?
5. What other functions within MHJADS does the MHLT fulfill?
6. Does the MHLT have any annual reporting responsibilities?

Due to the responsibility granted to the MHLT by the Accommodation procedure, consumers agreed that it is important that the referred individual and/or their guardian or nominated support persons are provided with information about the MHLT, including a point of contact who can assist them with any questions or concerns about the referral process.

Consumers expressed concern regarding how the overflow of approved referrals will be managed in the likely circumstance that MHJHADS supported accommodation has no vacancies. If there is to be a waitlist, the Accommodation procedure should specify how consumers on the wait list are assessed for approval (such as a triage

or an order of approval system) and that this should be communicated to them. Consumers would also like to see further information on what form of appeals procedures are available for those who are assessed as unsuitable for supported accommodation as well as referral to other appropriate services.

Consumers expressed concerns about the Accommodation procedure's statement that the referral process will be culturally sensitive, given that the procedure does not outline any substantive details or practical steps to be taken to ensure this outcome. Consumers proposed that the Accommodation procedure should state explicitly the practical measures it will implement to ensure that cultural sensitivity is applied.

Consumers stated that people referred to the MHTL for placement in MHJHADS supported accommodation need to be adequately supported throughout the process to ensure that the best outcome for them in their circumstances is achieved and their individual rights upheld. Consumers suggested that as part of the referral process applicants (and/or their nominated person or guardian) be provided with appropriate information for accessing advocacy services and channels for filing complaints.

Although beyond the scope of the Accommodation procedure, the issue of protecting the rights of individuals being considered for supported accommodation was a major point of discussion for consumers. In particular, consumers were concerned that the restrictions of NDIS arrangements in MHJHADS managed housing could infringe on individual rights and result in people receiving inadequate care and support. For example, consumers noted that the condition that "the residents all have to choose the same [NDIS] Support Provider" presents a significant issue for anyone moving into a house with existing tenants insofar as it obliges them to accept the pre-existing service provider arrangements. Consumers highlighted that this bears the risk of disrupting a person's continuity of service, their recovery process, and may also void their right to choose a service provider best suited to accommodate and support their needs. This is also contrary to the NDIS notion of choice and control. Though consumers understood that structural constraints outside of CHS's jurisdiction are the source of such specifications and strictures, they nevertheless expressed concern that this aspect of the procedure could impact on a tenant's right to access care that best suits their needs.

Recommendations: CHS Operational Procedure – Supported Accommodation: Eligibility and Referral to MHJHADS Managed Housing in the ACT.

Recommendation 1:

The eligibility criteria and referral procedure should explicitly state that comorbidities which directly compound and exacerbate mental health conditions will be taken into consideration by the referring clinical team as well as the Mental Health Link team.

Recommendation 2:

The Accommodation procedure should include the provision of additional supports for people (and/or their guardian/nominated person) referred by clinical teams for potential placement in MHJHADS managed housing. These supports should include the following:

1. Information regarding the referral process (who the MHLT is, when the advisory panel will be convened, the waitlist if placement is approved, etc.)
2. Information regarding advocacy support services that can assist the person throughout the referral process and, if approved, moving into the accommodations.
3. The information and details of a point of contact within MHJHADS who can address any questions or concerns from a referred person and/or their guardian/nominated person.

Recommendation 3:

The Accommodation procedure should specify how the waitlist for placement in MHJHADS managed housing will be maintained. Length of time on the waitlist should also be clearly communicated

Recommendation 4:

CHS should create an information page that outlines the basic features, responsibilities, and reporting requirements of the MHLT.

Conclusion

These recommendations are based on consumer feedback provided to enhance the policy and procedure documents.