



ACT  
Mental Health  
Consumer Network

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**Submission: Canberra Health Services Procedure -  
Dhulwa Mental Health Unit – Visitors to Dhulwa  
under the *Mental Health (Secure Facilities) Act  
2016 (ACT)* and  
Prohibited items under the *Mental Health  
(Secure Facilities) Act 2016 (ACT)*  
and Restricted Items in Dhulwa**

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## **Submission: Canberra Health Services Procedure - Dhulwa Mental Health Unit – Visitors to Dhulwa under the Mental Health (Secure Facilities) Act 2016 (ACT) and Prohibited items under the Mental Health (Secure Facilities) Act 2016 (ACT) and Restricted Items in Dhulwa**

This submission has been prepared by the ACT Mental Health Consumer Network (the Network) in response to the invitation from Sarah Dark, Acting Executive Support Officer, Mental Health, Justice Health, Alcohol and Drugs Division, Canberra Health Services.

### **Acknowledgment of Country**

We wish to acknowledge the Ngunnawal people as traditional custodians of the land upon which we sit and recognise any other people or families with connection to the lands of the ACT and region. We wish to acknowledge and respect their continuing culture and the contribution they make to the life of this city and this region. We would also like to acknowledge and welcome other Aboriginal and Torres Strait Islander people who may be reading this submission, and we recognise the ongoing contributions of all Indigenous peoples to ACT society and Australia more broadly.

### **The ACT Mental Health Consumer Network**

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.

Verbal feedback regarding the *Canberra Health Services Procedures: Dhulwa Mental Health Unit – Visitors to Dhulwa under the Mental Health (Secure Facilities) Act 2016 (ACT)* (the procedure) and *Dhulwa Mental Health Unit – Prohibited items under the Mental Health (Secure Facilities) Act 2016 (ACT) and Restricted Items in Dhulwa* (the procedure) was received during a Policy Reference Group meeting and this submission incorporates the feedback received.

## **General comments**

The Network welcomes this opportunity to contribute to the CHS Procedure - Dhulwa – Visitors to Dhulwa under the Mental Health (Secure Facilities) Act 2016 (ACT) and the CHS Procedure - Dhulwa– Prohibited items under the Mental Health (Secure Facilities) Act 2016 (ACT) and Restricted Items in Dhulwa.

Given the tight turn around on these procedures, the Network has submitted it's recommendations for both procedures in this one submission.

## **Recommendations: CHS Procedure – Dhulwa – Visitors to Dhulwa under the Mental Health (Secure Facilities) Act 2016 (ACT)**

*Recommendation 1: staff numbers need to be sufficient to provide support*

Consumers noted that Section 1 of the procedure state the following:

- a) contact by consumers with family, friends and others is important to promote successful recovery; and
- b) it is a legislative requirement that adequate opportunities are provided for consumers in Dhulwa to contact family, friends and others; and
- c) visits should be allowed unless there is a lawful and compelling reason to do otherwise.

However, consumers also noted that there needs to be sufficient staff available to provide support, Section 2.1, and expressed concern that staffing numbers could be used to refuse visitation. Consumers recommend that the document include that staff numbers will be available to provide support, with staff called in from other areas to assist with visitation as required.

*Recommendation 2: booking process to include everything a visitor needs to know to safely visit*

Consumers noted that Section 2.1 Visiting bookings advises that all visits to Dhulwa must be booked in advance. The procedure, in Section 2.2 then lists the various prohibited and Restricted Items and advises that a copy of the list will be signposted at Dhulwa entry and available in the visitor handbook or a list can be obtained from reception. Section 2.3 provides a list of dress standards which you must meet or be refused entry.

Consumers recommend that ALL the information a visitor may need to know to visit Dhulwa safely should be provided at the time of booking via email, if available, or posted. This should include, at a minimum, the dress standards, behaviour standards, the list of prohibited and restricted items and the application process to

bring a restricted item into Dhulwa (see CHS Procedure - Dhulwa Mental Health Unit – Prohibited items under the Mental Health (Secure Facilities) Act 2016 (ACT) and Restricted Items in Dhulwa).

*Recommendation 3: consideration of other items under Dress Standards*

Consumers questioned where the list of items in Section 2.3 Dress standards, p. 4, came from, noting that some of the items, such as bare midriffs, seemed a bit odd. In addition, consumers noted that while neckties, scarves and lanyards are prohibited, assumed to be as they are a choking hazard, there is no mention of religious attire such as head scarves or prayer beads/rosaries as well as chain based jewellery.

As identified in Recommendation 2, providing the dress standards at the time of booking via email would remove the embarrassment of having to 'cover up' or not being able to visit at all, and the distress of the consumer who is now unable to have the visitor they were looking forward to.

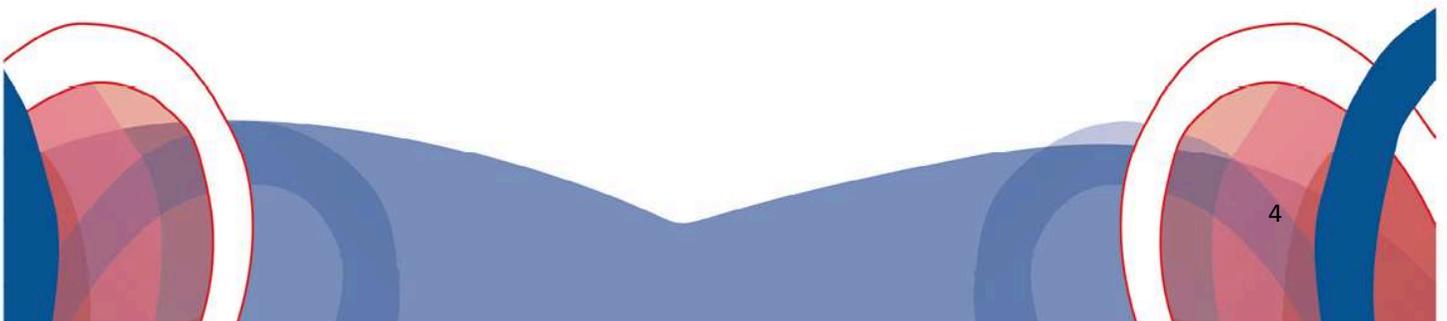
*Recommendation 4: create two lists – one covering behaviour standards and one covering conditions that apply for a visit*

Consumers questioned where the list of behaviour standards came from. Consumers recommended that there be two lists – one covering the expected behaviour standards and the other one covering conditions that apply for a visit.

For example, consumers felt that the condition to not pass items between a visitor and consumer was a condition of visitation but the condition of no profanity (including swearing) or requiring all rubbish is to be placed in the bin at the end of the visit were more behaviour standards. The first is a risk that needs to be managed for the safety of everyone in Dhulwa, the second and third are preferred ways of behaving.

*Recommendation 5: include all reasons why a visit could be cancelled under the one heading*

Section 4.1 covers reasons why a visit could be cancelled and Section 4.3 also covers reasons why a visit could be cancelled as well as refused or postponed. Consumers recommend including ALL the reasons a visit may be cancelled under the same heading.



## **Recommendations: CHS Procedure – Dhulwa – Prohibited items under the Mental Health (Secure Facilities) Act 2016 (ACT) and Restricted Items in Dhulwa**

*Recommendation 1: explain what restricted items are and have consistency in the presentation of Section 1 and Section 2.*

Consumers recommend that under Section 2, p. 3, restricted items be explained in the same way that prohibited items are explained in Section 1.2, p. 3.

In addition, consumer recommend that the way information is presented in Section 1 and Section 2 be consistent to facilitate understanding of these important aspects of the procedure.

*Recommendation 2: include the application process to bring a restricted item in the booking process*

Consumers recommend that the process to apply to bring a restricted item into Dhulwa, Section 3.1, p. 4, be provided as part of the booking process, refer *Canberra Health Services Procedure - Dhulwa Mental Health Unit – Visitors to Dhulwa under the Mental Health (Secure Facilities) Act 2016 (ACT)* and be a part of the consumers/visitors welcome pack.

*Recommendation 3: consistency between sections and what decisions are reviewable*

Consumers were confused as to the consistency in actions outlined in the procedure for when a previously approved restricted item is deemed no longer safe and is removed from the consumer and the actions for when an unapproved prohibited or restricted item is found. Consumers draw your attention to the following issues they identified:

- what happens to a restricted item when it is removed from a consumer? Does it go with the consumers personal property in the same way a seized, unapproved prohibited item does as outlined in Section 5.1, p. 5? If it doesn't then the item needs to be removed from their *Clothing, Property and Valuables Form*, Section 4.1, p 5.
- is the decision to no longer allow a previously approved restricted item reviewable in the same way that the decision to seize an unapproved item is reviewable as outlined in Section 5.1, p. 5? Consumers recommend that there should be some type of reviewable process.

*Recommendation 4: change reference to person to accredited person*

Consumers were concerned that the following use of persons, Section 6.1, p. 6, would cause confusion: *'If another person become aware a person attempting...'* as *person* is not defined in the procedure and could be anyone including visitors. Consumers recommend that it be changed to *'accredited person'*, which is defined, and the sentence edited to *'If another accredited person becomes aware a person...'*

In relation to this section, consumers recommend that the list of people that must be immediately informed be checked to ensure it includes the people that accredited persons need to contact.

*Recommendation 5: make a clear statement as to what staff should do if a person has entered Dhulwa with prohibited or restricted item*

While the second paragraph in *Section 6.2*, p. 6, provides staff with the option to call a *Code Black*, if a person has entered Dhulwa with a prohibited or restricted item, the same paragraph goes on to state the downsides to this and all the alternatives that should be used.

Consumers were concerned that this would cause confusion as to what action should be taken in a time pressured and possibly unsafe situation. Consumers were also concerned that some staff might second guess themselves while others might be concerned that punitive action could be taken against them for calling a *Code Black*, preventing them from doing so.

Consumers recommend that a flow chart or dot points be used to advise EXACTLY what staff should do when this situation arises.

*Recommendation 6: clearly state what 'returned to owner' means*

Consumers recommend that further information be included in the third paragraph, *Section 7.2*, p. 7, which states that *'A seized item must be returned to it's owner not later than 6 months after it was seized...'*. Consumers were not sure whether this meant to their property or to their persons which are two very different things, and refer you to Recommendation 3 of this submission regarding consistency.

*Recommendation 7: clearly state whether tablets are prohibited or restricted*

Consumers noted that tablets are in both the prohibited items restricted items list. They recommend including a statement that it is the wireless component that is prohibited.

*Recommendation 8: have alternatives for people to carry their babies/young children*

Consumers noted that prams were a prohibited item, and recommended that alternatives be available for visitors to carry their babies/young children if they are unable to do so, such as a mum recovering from a birth by Caesarean.

*Recommendation 9: description of items OR inclusion of more specific items*

Consumers noted that many items similar to those included in the Prohibited and Restricted items list were not included. If the identification of property/clothing is required, then ALL items that have the same impact need to be included. For example, Neck wear (ties, scarves or lanyards) are included, consumers presumed due to choking/strangulation hazard, but rosaries or thick chains were not.

*Recommendation 10: similar items with the same rating to be included next to each other*

In addition, consumer recommend the prohibited and restricted lists be sorted so that similar products are next to each other for ease of reference. For example, the restricted list has USB Sticks etc in line 8 but laptop computers etc are at line 15 (they could be lines 14 and 15) and Kitchen tools and utensils are at line 18, Glass and ceramic items, including crockery are at 22 and Metal cutlery, tins etc are at 23 (they could be lines 21, 22, 23).

