



Commissioner for Children and Young People
Western Australia

All enquiries

Telephone: (08) 6213 2224
Email: Katherine.browne@ccyp.wa.gov.au
Our reference: 21/1596

Bianca Fish
A/Senior Policy Officer
Community Support Services Management
Mental Health Commission

Email to: Bianca.fish@mhc.wa.gov.au

Dear Bianca,

RE: Feedback on the draft Youth Mental Health and Alcohol and Other Drug Homelessness Model of Service

As the Commissioner for Children and Young People WA, I have a statutory responsibility to monitor the wellbeing of children and young people under 18 years in WA, and to advocate on their behalf. Both myself and my predecessors have had a distinct interest in the mental health and wellbeing of children and young people in WA, and have undertaken a range of inquiries, reviews and reports into the state of the current system, and the reforms required to improve child and youth mental health outcomes.

I appreciate the opportunity to provide feedback on your draft Model of Service (the draft Model) for the Youth Mental Health and Alcohol and Other Drug Homelessness Service, and have provided some broad feedback on the draft Model below.

National Principles for Child Safe Organisations

The Royal Commission into Institutional Responses to Child Sexual Abuse recommended in 2017 that all organisations in child related work¹ (government, non-government and commercial) meet ten Child Safe Standards, which includes organisations providing accommodation and residential services for children, and health services.

The draft Model of Service proposes to provide a service for young people aged 16 – 25, and given it will accommodate young people under the age of 18, and the possible vulnerability of the young people accessing the service, it is vital that these Standards are embedded into the planning, delivery and evaluation of the Service. All organisations providing a service for children and young people under 18 must take responsibility to protect children and young people from harm and abuse, and to implement strategies to manage and identify risks that compromise their safety and wellbeing. This includes organisations creating conditions that minimise the risk of harm occurring, increase the likelihood of harm being discovered, and which respond to disclosures or allegations of harm.

The Child Safe Standards are reflected in the National Principles for Child Safe Organisations, and outline how organisations can promote child safety and wellbeing in their organisations, families and communities, and protect children and young people from harm. The ten Principles cover the following areas:

- Organisational leadership, governance and culture
- Ensuring young people are aware of their rights, participate in decisions and are taken seriously
- Involving families and communities
- Upholding equity and respecting diverse needs
- Ensuring staff are suitable and supported to reflect safety and wellbeing in their practice
- Child-focused complaints mechanisms to respond to complaints and concerns
- Training and education for staff, to ensure they have the appropriate knowledge, skills and awareness to keep children and young people safe
- Physical and online environments promote safety and minimise risk of harm
- Agencies engage in continuous improvement and review of their child safe approaches
- Policies and procedures which articulate child safe approaches.¹

My office have developed a range of resources to support organisations to develop their child safe approaches, including the *National Principles for Child Safe Organisations WA: Guidelines* and *National Principles for Child Safe Organisations WA: Self-assessment and review tool*, available at <https://www.ccyp.wa.gov.au/our-work/child-safe-organisations-wa/>

Participation of young people

The draft Model makes reference to the participation of young people in terms of assisting young people in their recovery planning (Page 5) and in service development and improvement (Page 9).

However further details should be included to outline the expectations that service providers have clear processes in place to hear the voices and views of young people in service development and improvement, and the range of ways that young people will be involved and participate in decision making within the organisation. This includes participation of individual planning for their care, as well as their ability to participate and have their voices heard about the design, delivery and evaluation of the service. Further detail should also be provided about how young people have been, or will be, involved in regards to the development and implementation of the Model of Service.

It is also critical that service evaluation and service level outcomes are measured and tracked by hearing directly from young people about their experiences, and collecting self-reported data.

Service accessibility

The draft Model does provide a brief comment on service accessibility for young people from particular cohorts or backgrounds (page 5), however this could be expanded

¹ Commissioner for Children and Young People 2019, *National Principles for Child Safe Organisations WA: Guidelines*, Commissioner for Children and Young People WA, Perth.

further to include accessing for young people with other complex needs, for example those with a trauma background.

Further detail could also be provided about how this should be implemented. This might include, for example, accessibility by having a staffing profile reflective of the diversity of young people accessing the service, for example, having staff who identify as Aboriginal, or diverse cultural backgrounds, as well as those representing other diverse communities (such as LGBTQI+ communities). Consideration should also be given to including the inclusion of peer support workers under the Model, given the benefits of this approach for young people.

There is also a need for the Model to be flexible in terms of the eligibility requirements for young people, and ensure that it does not place any restrictive or inappropriate requirements on young people. Young people participating in consultation with this office have previously discussed restrictive eligibility requirements which have been difficult for them to meet, including requirements for young people to be enrolled in a day program (e.g. education) or revoking a placement where they have been absent from the placement for a period (e.g. due to hospitalisation).

Cross agency collaboration and coordination

The section on Collaborative relationships and partnerships (Page 8) does discuss the need to develop and maintain strong and effective relationships with other service providers. The Model would be strengthened by including further information about the role that the service could play in terms of case coordination, given that young people may be engaged with a range of other services, and may benefit greatly from this kind of support. There could also be further detail about other collaborations across either government or non-government agencies, including disability, child protection, justice services.

Summary

I appreciate the opportunity to provide feedback on the draft Model of Service, and the opportunity this service presents in supporting young people. If you would like any further information, please contact Katherine Browne, Manager Policy, on Katherine.browne@ccyp.wa.gov.au or 6213 2297. Katherine will be commencing maternity leave on the 26 March, and after this time, it will be best to contact Natalie Hall, Director Policy, Monitoring and Research at Natalie.hall@ccyp.wa.gov.au

Yours sincerely



COLIN PETTIT

Commissioner for Children and Young People WA

3 March 2021
