



Commissioner for Children and Young People
Western Australia

All enquiries

Telephone: (08) 6213 2223
Email: lucy.ledger@ccyp.wa.gov.au
Our reference: 21/06623

Ms Robyn Kruk AO
Independent Taskforce Chair
Ministerial Taskforce into Public Mental Health Services
for Children and Adolescents aged 0-18 years in Western Australia

E-mail: CATaskforce@mhc.wa.gov.au

Dear Ms Kruk

**Re: Feedback on Emerging Directions - The Crucial Issues for Change paper
(Emerging Directions Paper)**

I appreciate the opportunity to provide feedback on the Emerging Directions Paper released by the Ministerial Taskforce into Public Mental Health Services for Infants, Children and Adolescents aged 0-18 years in Western Australia (Taskforce). I have provided some feedback in this letter which pertains broadly to the need for a holistic approach to children and young people's mental health and wellbeing, and to how they must be provided meaningful opportunities to engage in service planning and design.

As the Commissioner for Children and Young People Western Australia (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. The Key Insights contained in the Taskforce's Emerging Directions Paper reflect many of the issues identified by myself and my predecessors since 2011 across a range of inquiries, reviews and reports into the state of the current system, as well as the reforms required to improve child and youth mental health outcomes.

As testament to the long-standing concern of this office, it was pleasing to note that the Emerging Directions Paper quotes on page 12 the 2011 *Report of the Inquiry into the mental health and wellbeing of children and young people in Western Australia*.ⁱ I would appreciate this report being attributed to this office when quoted in the Taskforce's final report.

My 2020 *Position Paper on Mental Health*,ⁱⁱ builds on the research and advocacy efforts of my predecessors and outlines the current issues impacting child and youth mental health service provision which include:

- Consistent underfunding and under prioritising of mental health services for children and young people.
- Limitations in planning, coordination and investment in services to address their needs.
- Gaps in the range of services available for children and young people.
- Service capacity issues, such as waitlists for services.
- A lack of evaluation of the outcomes and experiences of children and young people with mental health issues.

A holistic approach

Children and young people have the right to have access to and receive appropriate mental health services across their life stages and across the continuum of universal, targeted and specialised services.

The final report developed by the Taskforce should consider the full range and continuum of services that children and young people may require, including; universal programs for all children and young people that strengthen social and emotional skills and promote positive mental health; evidence-based screening processes in the early years to support earlier identification of those at risk of developing mental health concerns; targeted strategies for children and young people and families who are vulnerable or at risk of developing mental health concerns; early intervention strategies for those who are experiencing the onset of poor mental health; as well as appropriate community support, treatment and acute services for those who are experiencing poor mental health.

I note that the Emerging Directions Paper is largely focused on the last of the above-mentioned elements – i.e. predominantly specialised services within the state funded mental health service system for children and young people already experiencing poor mental health. Whilst I strongly support reform of this service system and also understand that there are constraints on the scope of the Taskforce, I am concerned that this narrowed focus could restrict the capacity of the Taskforce’s work to ameliorate the issues impacting children and young people’s mental health more broadly.

I have previously advocatedⁱⁱⁱ that to improve mental health outcomes, a social determinants approach is needed, recognising and addressing other factors which impact and influence mental health and overall wellbeing, including socioeconomic position (education and material wealth), early life experiences, social exclusion and social capital, employment and work and access to housing. Such an approach is consistent with current WA mental health and health policy including the WA Mental Health, Alcohol and Other Drug Services Plan 2015–2025 and the WA Youth Health Policy 2018–2023.

I also continue to advocate for a whole-of-government Child Wellbeing Strategy^{iv} that should be implemented to set long-term targets to improve wellbeing outcomes for children and young people and span individual agency responsibilities to address social determinants and wellbeing experiences. These agencies would include but are not limited to, broader health services, child protection, disability, housing, justice, education and training and employment sectors. I welcome that Emerging Direction Seven acknowledges that a whole of government approach to addressing the social determinants of mental health could improve children’s mental health outcomes and I urge the Taskforce to emphasise the need for a WA Child Wellbeing Strategy in its final report.

I encourage the Taskforce to consider my 2020 *Progress update for agencies on the recommendations from the 2015 Our Children Can’t Wait report* (Progress Update)^v which reflects on universal, targeted and specialised services, and on service systems beyond the mental health system. While the Progress Update was supplied to the Ministerial Taskforce in March 2021, for ease of reference, I have attached to this letter a table that identifies the intersection of aspects of the Progress Update and the Taskforce’s Emerging Directions Paper in order to assist the Taskforce to draw upon it to reinforce some of the Emerging Directions and to expand others to consider broader sites for mental health intervention.

I also encourage the Taskforce to consider my 2020 *Supporting student wellbeing in WA schools: Discussion paper* (Discussion Paper).^{vi} This Discussion Paper explores the Education system as a site for universal and targeted mental health and wellbeing initiatives as well as an avenue for supporting children and young people's access to the mental health service system. The Discussion Paper includes a summary of information gathered in 2019^{vii} from school principals and education staff in over 170 schools about the wellbeing issues facing their students. Amongst many other insights, they identified that school engagement with external service providers, including CAMHS, is dependent on relationships with individual providers, and the availability and capacity of services within the local area.

The Discussion Paper also draws on data and information collected through my *Speaking Out Survey 2019 (SOS19)*^{viii} which involved almost 5,000 year 4 to year 12 WA children and young people. A range of findings related to their wellbeing and mental health are based on their responses and include:

- Substantial proportions of Year 7 to 12 students reported poor life satisfaction (14%), low self-esteem (32%), the feeling they can't cope with life's challenges (11%) and high levels of stress.
- 60 per cent of students in Years 9 to 12 reported they had felt sad, blue or depressed for two or more weeks in a row in the last 12 months.
- Many female children and young people experience a decline in their mental health during the transition from primary school into high school in comparison with their male peers.

The Speaking Out Survey has been repeated in 2021 (SOS21) with more than 16,000 students participating across WA and a summary report is forthcoming. I have invited the Taskforce, via Nous, to reach out to my Research and Data team to explore how this data source could further strengthen the Key Insights in the Emerging Directions Paper.

Additionally, I welcome the Taskforce's recent decision to convene an Expert Advisory Group sub-meeting regarding the needs of children and young people at the interface of education and mental health services and am pleased to advise that the two managers of my office's Research and Data and Policy teams will be participating. It is inevitable that a school aged child requiring mental health services will most likely be engaged in the education system. Hence it is my view that the education system must be considered a key site for mental health initiatives and robust links be forged between the mental health and education systems. I therefore urge the Taskforce to more strongly elevate the profile of this linkage in its final report and support bridging the two systems.

Engagement of Children and Young People

Within SOS21 a number of free-text response areas were included for children and young people wishing to provide more comment on their selected responses. Systematic analysis of these qualitative responses has not yet been completed, however a sample of different young people's views about the mental health service system across WA is provided below.

Young people reflected on the need for a range of diverse, timely and affordable community-based support options:

- *"Kids help line needs government funding it's understaffed."*
- *"Yeah, it's just so expensive to go to therapy and it's hard to talk about to parents."*
- *"There are limited options in small towns so if a professional doesn't suit your needs it's hard to find one that does."*
- *"The process in remote places is very slow and it can often be harmful for this that need urgent help. Many doctors etc often also don't take children seriously and it can do more harm than good seeking help."*

- *"It was hard, they wouldn't let me into headspace because you had to be 12 and at the time I was 11."*
- *"I recently went and had a headspace assessment appointment and the waitlist is 9 weeks. Some of the things I seek help with I need coping ways sooner rather than later, 9 weeks is also there shortest wait period."*
- *"I have a friend who is struggling with depression/self harm, she has actively sought help but her parents have told her she is not allowed to get a therapist because she is "overreacting". Because of this we are organising for us to walk to the local headspace building after school while her parents think she is somewhere else. I am absolutely disgusted by what we must do to get her some help. Nearly all of my queer friends have been suicidal."*

Young people also reflected on the mental health system as being crisis driven:

- *"They only took it seriously when my life was at risk and I had to go to the emergency room."*
- *"[...] people can still be in crisis and suicidal or need mental health help without that [self-harm] they should create systems that help kids and promote services to help kids before it gets that bad [...]."*
- *"The mental health system is not all that great. My doctor was trying to get me into a mental health facility because I was at high risk and the wait list for each place was over a month and I'm still waiting to be accepted - when I had an eating disorder it wasn't taken seriously until I was underweight and having health problems [...]."*
- *"[...] headspace, SARC and psychiatrists have an extremely long waits and can be from 1-5 months before you get seen. Teenagers and people needing help deteriorate as they wait for help and parents are left feeling hopeless."*
- *"I got admitted to hospital after attempting suicide and let out same day with no house to go to."*

Some young people reflected on their experiences with CAMHS:

- *"I believe there should be another government thingy like cahms for people who need help but not enough for cahms. A few weeks ago i got turned away from cahms and i was struggling but cahms has too much on their plate [...]."*
- *"I was supposed to receive a call from CAMHs and never got one. For a community advocating mental health, I feel like an inconvenience and a prop in a business. Nobody genuinely cares [...]."*
- *"I was seeing CAMH but my appointments weren't frequent enough and me case worker wasn't reliable."*

Regarding the voice of children and young people, I note that Emerging Direction Nine (Strengthening Planning and Leadership) acknowledges that service planning should be supported by those with lived experience. However, I urge the Taskforce to explicitly include the principle of engaging children and young people in planning and design of services that impact them – the above sample of their views about their experiences with mental health services demonstrates they have much to contribute.

In line with Article 12 of the UN Convention on the Rights of the Child, one of my core statutory functions is to promote the participation of children and young people in the making of decisions that affect their lives. To give effect to this right, my office has produced a range of resources that directly speak to how organisations and policy makers can engage children and young people, and which could be drawn upon in the final report.

These include:

- *Participation Guidelines: Ensuring children and young people's voices are heard* (2021)^x
- *Child Impact Assessment Guidelines: Considering children and young people in decision making* (2020)^x
- *Engaging with Aboriginal Children and Young People Toolkit* (2018).^{xi}

I have also strongly advocated for policy makers to ensure that services and programs targeting Aboriginal communities are Aboriginal-led and tailored to local needs. In 2018 I convened a forum of 72 Aboriginal and Torres Strait Islander leaders in WA which discussed creating Aboriginal-led solutions to improve the wellbeing of Aboriginal children and young people.

Amongst other key recommendations, forum participants identified the importance of transferring power and responsibility to Aboriginal people and communities to lead the solutions to improve the wellbeing of Aboriginal children, young people and families, as well as properly resourcing Aboriginal community controlled organisations to deliver services and build community capacity.^{xii} I encourage the Taskforce to consider these recommendations in their next steps for progressing Emerging Directions Three and Five regarding services for Aboriginal children and young people, including those in remote communities.

Summary

I appreciate the opportunity to provide feedback on the Emerging Direction Paper, and the work of the Taskforce to address the significant concerns about access to mental health supports for WA children and young people. If you would like any further information, please contact Lucy Ledger, Manager Policy via lucy.ledger@ccyp.wa.gov.au or 6213 2223.

Yours sincerely



COLIN PETTIT

Commissioner for Children and Young People WA

29 September 2021

Attachments:

Attachment One: Relationship between Emerging Directions and recommendations of the Commissioner's 2015 *Our Children Can't Wait* report

Attachment One: Relationship between Emerging Directions and recommendations of the Commissioner's 2015 *Our Children Can't Wait* report

Emerging Directions	Relevant recommendations of the Commissioner's 2015 <i>Our Children Can't Wait</i> report	
	2015 Recommendation	2020 Progress Update status
<p>Emerging Directions regarding integrated and community-oriented services:</p> <p>Emerging Direction 2: Transform community-based services to ensure children, families and carers are supported in their own communities; when, where and how they need it</p> <p>Emerging Direction 6: Integrate mental health services so that all children, families and carers are supported to access services that holistically meet their needs</p> <p>Emerging Direction 7: Utilise multi-sector partnerships with other national, state and non-government services to better support children, families and carers</p>	<p>Recommendation 4: The number of Child and Parent Centres be increased to support more children aged 0 to eight years and their families statewide, and services be expanded to include mental health early intervention and treatment programs.</p> <p>Recommendation 5: The WA and Australian Governments work collaboratively to improve planning and increase resources for mental health promotion, prevention and early intervention services for children and young people, to ensure children and young people across WA have access to the full continuum of services and programs they require.</p> <p>Recommendation 6: A detailed assessment be undertaken by government of the availability and effectiveness of existing parenting programs and services in WA and a model of service delivery be developed to support more equitable access to quality parenting advice and support, especially for parents at risk, tailored to children and young people's key life stages and transition points. This needs to include both universal and targeted support, be culturally appropriate, and across all ages.</p> <p>Recommendation 7: Schools be resourced to provide whole-of-school approaches that have been demonstrated to be effective in promoting resilience and supporting social and emotional learning.</p> <p>Recommendation 8: A model of integrated services be piloted in primary and secondary schools, to provide better access to mental health and wellbeing supports and services for children and young people and their families.</p>	<p>Limited Progress Evident</p> <p>Limited Progress Evident</p> <p>Some progress evident</p> <p>Recommendations progressed through the Commissioner's 2020 <i>Supporting student wellbeing in WA schools: Discussion paper</i></p>

Emerging Directions	Relevant recommendations of the Commissioner's 2015 <i>Our Children Can't Wait</i> report	
	2015 Recommendation	2020 Progress Update status
<p>Emerging Direction 3: Design and implement flexible services that deliver the best outcomes for rural, regional and remote communities, including Aboriginal communities</p> <p>Emerging Direction 5: Ensure that all services are culturally-responsive and inclusive for all children, families and carers, and their communities</p>	<p>Recommendation 11: More innovative and flexible models of service delivery and support be adopted in regional areas, including wider and better use of technology, local workforce development and funding that takes into account the costs of regional service delivery.</p> <p>Recommendation 12: More culturally appropriate mental health programs and services be provided for Aboriginal children and young people and their families, to be achieved by initiatives such as employing more Aboriginal staff, cultural competency training and the development and implementation of tailored programs and services. This must include the full continuum of services, from programs supporting wellbeing, addressing trauma and loss and building resilience, through to early intervention and treatment services, tailored to recognise the importance of culture and healing and to address the impact of intergenerational trauma, particularly for younger ages.</p>	<p>Some progress evident</p> <p>Some progress evident</p>
<p>Emerging Direction 4: Improve and extend services for children with specific, complex and co-occurring needs across all communities</p>	<p>Recommendation 9: Government agencies to report on the Rapid Response Framework in their annual report to demonstrate how they have prioritised access to services or programs to meet the health, mental health, disability, educational, housing and other needs for children and young people in care and for care leavers up to 25 years of age.</p> <p>Recommendation 10: The development of a specialised children in care program and dedicated youth forensic mental health service, as outlined under the Western Australian Mental Health, Alcohol and Other Drug Services Plan 2015–2025, be undertaken as a high priority.</p>	<p>No progress evident</p> <p>Limited progress evident</p>

Emerging Directions	Relevant recommendations of the Commissioner's 2015 <i>Our Children Can't Wait</i> report	
	2015 Recommendation	2020 Progress Update status
<p>Emerging Directions regarding data and outcome measurement:</p> <p>Emerging Direction 9: Strengthen the planning, infrastructure, leadership, governance and accountability to achieve sustainable and ongoing improvement</p> <p>Emerging Direction 10: Establish dedicated structures for research, learning and innovation that translate to improved outcomes</p>	<p>Recommendation 2: The Mental Health Commission report annually on the progress on implementation of the Western Australian Mental Health, Alcohol and Other Drug Services Plan 2015–2025 and key outcomes for children and young people aged 0 to 18 years in regional and metropolitan areas.</p> <p>* The Commissioner's 2020 <i>Mental Health Position Paper</i> identifies data, evidence and oversight gaps and how they could be addressed.</p>	<p>Limited progress evident</p> <p>*The Progress Update report documents the difficulty of obtaining relevant data from the Mental Health Commission to determine progress.</p>

Endnotes

ⁱ Commissioner for Children and Young People 2011, *Report of the Inquiry into the mental health and wellbeing of children and young people in Western Australia*, Commissioner for Children and Young People WA, Perth. Available at: <https://www.ccyp.wa.gov.au/media/1452/report-mental-health-inquiry-april-2011.pdf>

ⁱⁱ Commissioner for Children and Young People 2020, *Position Paper: Mental health*, Commissioner for Children and Young People WA, Perth. Available at: <https://www.ccyp.wa.gov.au/media/4329/position-paper-mental-health-may-2020.pdf>

ⁱⁱⁱ Ibid

^{iv} Ibid; Commissioner for Children and Young People WA 2020, *Child poverty: A call to action*, Commissioner for Children and Young People WA, Perth. Available at: <https://www.ccyp.wa.gov.au/media/4367/child-poverty-a-call-to-action-july-2020.pdf>

^v Commissioner for Children and Young People 2020, *Progress update on the recommendations from the 2015 Our Children Can't Wait report*, Commissioner for Children and Young People, Perth. Available at: <https://www.ccyp.wa.gov.au/media/4369/progress-update-to-agencies-on-the-recommendations-from-the-2015-our-children-can-t-wait-report-september-2020.pdf>

^{vi} Commissioner for Children and Young People 2020, *Supporting student wellbeing in WA schools: Discussion paper*, Commissioner for Children and Young People, Perth. Available at: <https://www.ccyp.wa.gov.au/media/4434/supporting-student-wellbeing-in-wa-schools-discussion-paper-october-2020.pdf>

^{vii} Commissioner for Children and Young People 2020, *School survey on findings on student wellbeing*, Commissioner for Children and Young People, Perth. Available at: <https://www.ccyp.wa.gov.au/media/4433/school-survey-findings-on-student-wellbeing-october-2020.pdf>

^{viii} Commissioner for Children and Young People 2020, *Speaking Out Survey 2019: The views of WA children and young people on their wellbeing - a summary report*, Commissioner for Children and Young People WA, Perth. Available at: <https://www.ccyp.wa.gov.au/our-work/projects/speaking-out-survey/>

^{ix} Commissioner for Children and Young People WA 2021, *Participation Guidelines: Ensuring children and young people's voices are heard*, Commissioner for Children and Young People WA, Perth. Available at: <https://www.ccyp.wa.gov.au/media/4602/ccyp-participation-guidelines-2021-web4.pdf>

^x Commissioner for Children and Young People WA 2020, *Child Impact Assessment Guidelines: Considering children and young people in decision-making*, Commissioner for Children and Young People WA, Perth. Available at: <https://www.ccyp.wa.gov.au/media/4338/ccyp-child-impact-assessment-g-web-enabled-file-june-2020.pdf>

^{xi} Commissioner for Children and Young People WA 2018, *Engaging with Aboriginal Children and Young People Toolkit*, Commissioner for Children and Young People WA: Perth. Available at: <https://www.ccyp.wa.gov.au/media/2919/engaging-with-aboriginal-children-and-young-people-toolkit-complete.pdf>

^{xii} Commissioner for Children and Young People 2018, *Supporting Aboriginal-Led Solutions*, Commissioner for Children and Young People WA, Perth. Available at: <https://www.ccyp.wa.gov.au/media/3635/supporting-aboriginal-led-solutions-aboriginal-forum-23-august-2018.pdf>