



Submission to the *ACT Mental Health and Wellbeing Framework 2015 - 2025*

February 2015

www.youthcoalition.net

The Youth Coalition of the ACT acknowledges the Ngunnawal people as the traditional owners and continuing custodians of the lands of the ACT and we pay our respects to the Elders, families and ancestors.

We acknowledge that the effect of forced removal of Indigenous children from their families as well as past racist policies and actions continues today.

We acknowledge that the Indigenous people hold distinctive rights as the original people of modern day Australia including the right to a distinct status and culture, self-determination and land. The Youth Coalition of the ACT celebrates Indigenous cultures and the invaluable contribution they make to our community.

Submission to the *ACT Mental Health and Wellbeing Framework 2015 - 2025*
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February 2015

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Thank you to the Youth Coalition staff team for their support.

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1. Introduction

Section 1 of this submission provides contextual information about the Youth Coalition of the ACT, mental health and young people in the ACT, the process for developing and the format of this submission, and introductory comments regarding the *ACT Mental Health and Wellbeing Framework 2015 – 2025* (the draft Framework).

1.1 Youth Coalition of the ACT

The Youth Coalition is the peak youth affairs body in the ACT. Comprised of 100 members, programs, and individuals the Youth Coalition is responsible for representing and promoting the interests and wellbeing of young people aged 12 – 25 years and those who work with them.

The Youth Coalition is represented on many ACT Government advisory structures and provides advice to the ACT Government on youth issues, along with providing information to youth services about policy and program matters.

A key role of the Youth Coalition is the development and analysis of ACT social policy and program decisions for young people and youth services. The Youth Coalition facilitates the development of strong linkages and promotes collaboration between the community, government and private sectors to achieve better outcomes for young people in the ACT.

1.2 Mental Health and Young People in the ACT

Mental health issues are likely to be significant in many young people's lives with 25% experiencing a mental health issue in any given year.¹ There are approximately 78,000 young people in the ACT meaning almost 20,000 young Canberrans are likely to experience mental ill health at some point in any given year.²

Young people, youth workers, and services in the ACT consistently report that mental health is one of the top issues for young people in the ACT. In the 2012 *Rate Canberra* survey conducted by the Youth Coalition, "mental health and wellbeing" was found to be one of the top five issues most selected as important to respondents. "Stress", "body image" and "feeling sad or anxious" also rated in the top 5 current issues and concerns for young people aged 12 – 25 in the ACT.³

In Mission Australia's 2014 national survey of 15 to 19 year olds, 'coping with stress' (63.1%), 'body image' (37.5%), 'depression' (26.8%) and 'suicide' (16.0%) were identified as four of the top five issues that young people in the ACT were 'extremely concerned' or 'very concerned' about.⁴

¹ Australian Bureau of Statistics, 2009, *Australian Social Trends: Mental Health*, Australian Government, Canberra.

² Australian Bureau of Statistics, 2013, *Population by Age and Sex, Regions of Australia*.

³ Youth Coalition of the ACT, 2012, *Rate Canberra 2012: Findings from the Survey of Young People aged 12-25 in the ACT*, Canberra.

⁴ Mission Australia, 2014, *Youth Survey 2014*.

1.3 Process for Developing and Format of this Submission

The Youth Coalition has reviewed the draft for the *ACT Mental Health and Wellbeing Framework 2015 – 2025* and welcomes the opportunity to contribute to its development. We commend ACT Health for its commitment to community consultation to inform further development of this document.

This submission is based on:

- Consultations held with young people in Canberra between October 2014 and February 2015;
- The policy positions outlined in the Youth Coalition Policy Platform;
- Previous Youth Coalition submissions to the ACT Government;
- One-on-one consultations with member services and organisations; and,
- Current and topical research on youth affairs.

This submission has been divided into 5 sections, which include the following:

1. Introduction (this section)
2. Summary of recommendations
3. What young people say about mental health
4. Response to the draft Framework
5. Conclusion

This submission represents an opportunity for the Youth Coalition and stakeholders to identify and advise ACT Government of emerging issues, areas in need of additional resources and collaboratively develop social policy in the ACT.

2. Summary of Recommendations

Section 2 provides a summary of the recommendations this submission. It is vital that these recommendations be referred to in the context of the broader submission.

The Youth Coalition's recommendations for the ACT Mental Health and Wellbeing Framework are:

Recommendation 1

Underpinned by a plan for implementation and demonstrates that the ACT Government, and the ACT community more broadly, is taking actions to address the issues of mental health and wellbeing in the Territory.

Recommendation 2

Include the *Human Services Blueprint* and the *Out of Home Care Strategy 2015 – 2020* in the list of Commonwealth and ACT Government policies in the *Policy context* section.

Recommendation 3

Define a young person as between 12 and 25 years of age.

Recommendation 4

Include a section on addressing the social determinants of health alongside the explanation of risk and protective factors.

Recommendation 5

Include data showing trends over time against each of the indicators outlined under each objective.

Recommendation 6

Include a short section under each objective analysing the data provided to clearly explain where the Territory is presently.

Recommendation 7

Include under social and economic health objective a measure of:

- child abuse and neglect;
- discrimination; and,
- youth unemployment.

Recommendation 8

Include under the physical health objective a measure of tobacco use.

Recommendation 9

Include under the gatekeeper awareness objective a measure of:

- the number of teachers who have participated in mental health awareness / training sessions;
- the number of mental health awareness / training sessions delivered by mental health training providers in the ACT, including OzHelp;
- the number of allied sector workers, particularly youth workers, as well as clergy, recreation staff, police and coaches who have participated in mental health awareness / training sessions; and,
- the confidence of allied sector workers, particularly youth workers, as well as clergy, recreation staff, police, coaches, teachers and other gatekeeper groups in identifying and referring mental health issues.

Recommendation 10

Include community-based mental health professionals in the measures of mental health training under the training and support objective .

Recommendation 11

Include under the early interventions objective a measure of:

- the number of people experiencing mild to moderate mental ill health accessing support from mental health service; and,
- the average length of time people are waiting to receive support from mental health services.

Recommendation 12

Include under the intervene early in episode objective a measure of the number of people with a history of mental ill health with a relapse prevention plan.

Recommendation 13

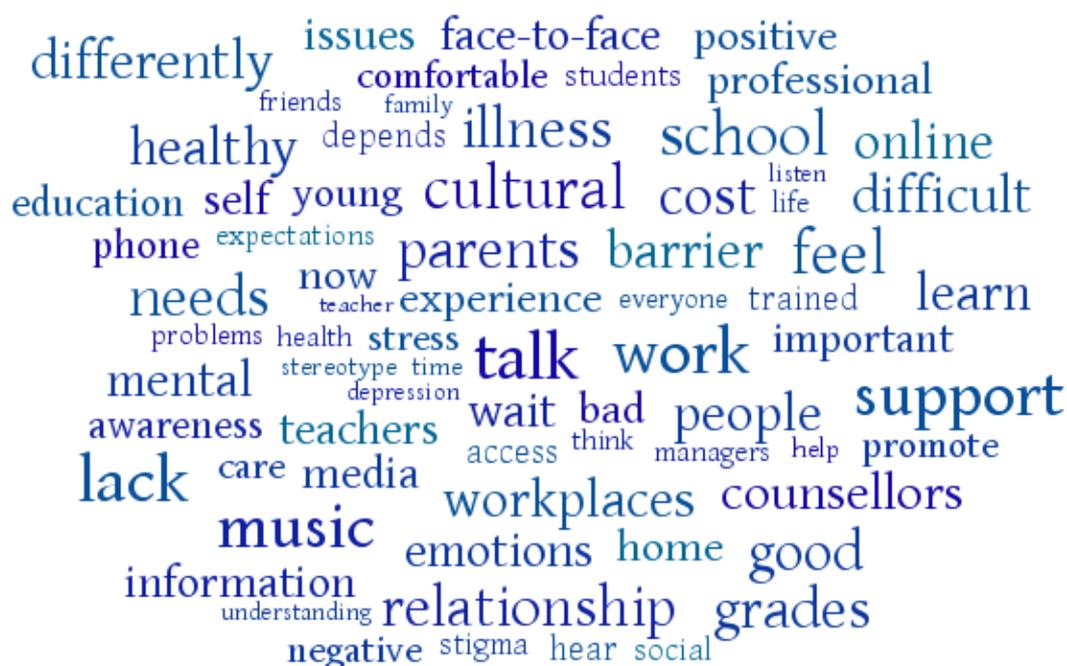
Include under the groups at increased risk objective:

- young people, aged 12-25, as a group that have a higher risk of mental ill health; and,
- a measure of the number of people accessing mental health services disaggregated by at-risk population groups.

3. What Young People Say About Mental Health

In developing this submission, the Youth Coalition has drawn upon the perspectives that young people in Canberra shared as part of the Youth Coalition's series of mental health consultations held between October 2014 and February 2015.

The focus-group consultations sought further information about what aspects of mental health are important to young people, what young people know about seeking help in the ACT, and how young people wish to access support and information around mental health. Section 3 of this submission outlines the key themes found through these consultations.



3.1 Mixed Understanding of Mental Health and Mental Illness

Young people are often familiar with the term mental health, however, the extent to which young people have the knowledge and skills necessary to support their own or others' mental health and wellbeing varies. Young people's understanding of mental health is informed by a mix of education and lived experience. Participants identified that messaging about mental health can come from school, friends and family, the media, social media, and music.

When discussing mental health, young people identified that it was useful to draw a parallel to physical health. We are taught from an early age that there are things we can do to keep ourselves physically fit and healthy, including information about diet and exercise. The participants identified that similar messaging about mental health and wellbeing (as something that affects us all, and an area of wellness that we can take positive steps to influence) resonated with them.

As is the case with the broader community, there was some confusion and misinformation about the relationship between mental health and mental illness. Some young people see mental health and mental illness as synonymous. The Youth Coalition supports the understanding of mental health and mental illness as a

twin continuum in the draft Framework. We believe that this understanding provides a clear and simple articulation of the way mental health and mental illness are related but still separate.

3.2 Stigma

The young people identified that there is still significant stigma surrounding mental health and mental illness, and that the term mental health is often associated with poor mental health and illness. Young people identified that while friends can be helpful to talk to about mental health, they sometimes fear disclosing to friends in case they are seen as weak or attention seeking. Young people also identified that the stigma associated with mental health may make it difficult to disclose in the workplace.

Young people acknowledged that as a community we are talking more about mental health, which helps us move in the right direction of greater understanding and acknowledgement of mental health and wellbeing. Participants identified that continued education in schools, particularly at younger year levels, may help reduce stigma amongst young people. Peer support and peer education were also seen as positive steps to reduce stigma.

3.3 Mental Health As A Community-wide Concern

When asked about who needs to know about mental health, there was strong feedback from young people that everyone needs to care about mental health as it is a community-wide issue that affects us all.

Young people also identified key groups that ought to develop skills and knowledge regarding mental health. In particular, young people raised teachers, employers, parents and friends, and first responders as playing a key role in supporting them to be mentally healthy.

A common theme through the consultations was that it is never too early to be educated about mental health and wellbeing, and that discussions about mental health can occur at any age as long as it is targeted to the age and maturity of the individual.

3.4 Help Seeking

Young people want help to be accessible when they seek it, and the help should be delivered in a manner that suits the individual. Young people acknowledged that long wait lists or having a negative experience can act as a barrier to getting help and seeking help in the future.

When the participants were asked how they would support a friend to get help or seek help themselves, there were many answers across different support types – including face-to-face, phone, online, and peer support. For example, some participants identified that online support was too removed and others found the concept of face-to-face support intimidating. What was clear was that our support system needs multiple modes of delivery that allow young people to access information and support in a way that resonates with different types of people. Young people also outlined that services need to understand young people's mental health, need to be responsive, and young person-friendly.

4. Response to the Draft Framework

Section 4 of this submission outlines the Youth Coalition's response to the draft Framework.

4.1 Focus on Action

Section 4.1 of this submission highlights that young people want to see the ACT Government taking actions on the issues that are important to them, including mental health.

4.1.1 *Young people want to see action, not just words.*

Mental health is one of the top concerns for young people in our community. The Youth Coalition welcomes the development of the draft Framework and acknowledges its potential to reinvigorate service providers, decision makers, and agencies in addressing issues of mental health in the ACT.

In 2014 the Youth Coalition held consultations with both young people and youth sector workers to help inform our submission to the ACT Commitment to Children and Young People. The one stand out consistency in the feedback that both young people and youth sector workers gave was the importance of committing to actions not just words.

***'Be direct and get on with solving a problem, more plans don't do anything without execution.'*⁵**

The Youth Coalition draws focus to the more difficult work that begins at the launch of the Framework and the challenges in setting a strategic direction that is measurable and for which all Government agencies, and the non-government sector will be held accountable.

Recommendation 1

Underpinned by a plan for implementation and demonstrates that the ACT Government, and the ACT community more broadly, is taking actions to address the issues of mental health and wellbeing in the Territory.

⁵ Youth Coalition interviews with young people, 2014.

4.2 Policy Context

Section 4.2 of this submission outlines the Youth Coalition's response to the *Policy context* section of the draft Framework.

4.2.1 *Inclusion of additional Territory policies relevant to mental health and suicide prevention.*

The Youth Coalition supports the draft Framework in aligning with both Commonwealth and other Territory policies relevant to mental health and suicide prevention.

In addition to the policies already specified in the draft Framework, the Youth Coalition encourages the ACT Government to also consider aligning with the following ACT Government strategies:

- Human Services Blueprint
- Out of Home Care Strategy 2015 – 2020

Recommendation 2

Include the *Human Services Blueprint* and the *Out of Home Care Strategy 2015 – 2020* in the list of Commonwealth and ACT Government policies in the *Policy context* section.

4.3 Areas for Action

Section 4.3 of this submission outlines the Youth Coalition's response to the *Areas for Action* section of the draft Framework.

4.3.1 *Inclusion of young people aged 12 – 25 as a key target group*

The Youth Coalition welcomes the inclusion of young people as a key target group of the draft Framework. However, the Youth Coalition notes that the draft Framework's definition for young people, defined as aged 15 – 24, is not in line with the ACT Government's definition of a young person. In the *ACT Young People's Plan 2009 – 2014*, the ACT Government defines a young person as between 12 and 25 years of age. The *ACT Mental Health Services Plan 2009 – 2014* outlines a Four Life Stages model for mental health service delivery, which highlights young people aged 12 – 25 as a distinct target group in the delivery of mental health services.

Mental health is a significant issue for young people, with one in four experiencing mental ill health in any given year.⁶ Research has also shown that approximately 75% of mental health issues emerge by the age of 25 and more than one fifth of young Australians (21.2%) meet the criteria for probable serious mental illness.^{7 8} Further to this, only 31% of young women and 13% of young men experiencing

⁶ Australian Bureau of Statistics, 2009, *Australian Social Trends: Mental Health*, Australian Government, Canberra.

⁷ headspace National Youth Mental Health Foundation, 2011, *Position Paper: Young People's Mental Health*.

⁸ Ivancic, L., Perrens, Fildes, Perry & Christensen, 2014, *Youth Mental Health Report*, Mission Australia and Black Dog Institute.

mental health issues access support services,⁹ making young people the least likely to access services compared to all other age groups and highlighting the need for increased promotion, prevention and early intervention.¹⁰

While the Youth Coalition recognises that much of the available data relating to young people and suicide focuses on the 15 – 24 age group, we understand this is because many jurisdictions do not collect data on the 12 – 14 age group, not because suicide is not considered to be an issue for this group of young people. Given the focus on early intervention outlined in the draft Framework, it would seem that the 12 – 14 age bracket would be a key sub-group in the delivery of suicide prevention strategies.

Recommendation 3

Define a young person as between 12 and 25 years of age.

4.4 Social Determinants of Health

Section 4.4 of this submission outlines the Youth Coalition's recommendations relating to the inclusion of the social determinants of health in the draft Framework.

4.4.1 Inclusion of the social determinants of health as key to addressing the health and wellbeing of the ACT community

The Youth Coalition welcomes the inclusion of the social determinants of health in the rationale for combining the previously separate policies addressing suicide prevention and mental health promotion, prevention and early intervention. However, we note that there is no further exploration of the social determinants of health in the draft Framework.

The social determinants of health are the conditions in which people are born; grow up; live; work; and age, which are in turn shaped by political, social, and economic factors.¹¹ People's experiences of health and wellbeing are influenced by a variety of factors including education, employment, transport, income, social status, housing, geography, environment, access to food, access to health care, individual behaviours and lifestyle factors.¹²

The Youth Coalition recognises the importance of addressing the social determinants of health in promoting and supporting the mental health and wellbeing of our community. Social factors can have a significant impact on the mental health of populations, as well as physical health. Persistent social and economic pressures mean that certain groups have a higher risk of mental ill health.¹³ The Youth Coalition welcomes the inclusion of key target groups in the *Areas for Actions* section of the draft Framework.

⁹ Rickwood, D.J., Deane, & Wilson, 2007, "When and how do young people seek professional help for mental health problems?" in *Medical Journal of Australia*, 187(7): p. S35–39.

¹⁰ Australian Bureau of Statistics, 2009, *Australian Social Trends: Mental Health*, Australian Government, Canberra.

¹¹ World Health Organisation, 2008, *Social Determinants of Health: Key Concepts*, online at http://www.who.int/social_determinants/thecommission/finalreport/key_concepts/en/, accessed 20 October 2014

¹² South Australian Council of Social Services, 2008, *The Social Determinants of Health: SACOSS Information Paper*.

¹³ World Health Organisation, 2014, *Mental health: Strengthening our response*, online at <http://www.who.int/mediacentre/factsheets/fs220/en/>, accessed 23 October 2014.

Research shows that mental illness is more prevalent among low socio-economic groups and is associated with a number of social, economic and political conditions, including insecure housing, limited education, recent unemployment, child abuse or neglect, poor neighbourhood conditions,¹⁴ rapid social change, stressful work conditions, gender discrimination, social exclusion, unhealthy lifestyle, risks of violence, physical ill-health and human rights violations.¹⁵

Recommendation 4

Include a section on addressing the social determinants of health alongside the explanation of risk and protective factors.

4.5 Ten Objectives

Section 4.5 of this submission outlines the Youth Coalition's response to seven of the ten objectives outlined in the *Ten Objectives* section of the draft Framework.

4.5.1 *Inclusion of data showing trends over time and further analysis of the current context in the ACT*

The Youth Coalition welcomes the inclusion of data showing where the Territory is presently in relation to indicators identified under each of the ten objectives. However, we note that only point-in-time data is provided and there is no further analysis on what the data means for the Territory.

Data showing trends over time can help to paint a clearer picture of the current context and to identify the indicators in which the ACT has seen improvements and those in which the ACT has been declining. Further analysis of the data will assist government directorates and community sector organisations to align their efforts to meet the Framework's objectives and work in a targeted way to address the mental health and wellbeing of the ACT community.

Recommendation 5

Include data showing trends over time against each of the indicators outlined under each objective.

Recommendation 6

Include a short section under each objective analysing the data provided to clearly explain where the Territory is presently.

4.5.2 *Objective: Enhance the social and economic health of the Territory to promote mental health and wellbeing.*

The Youth Coalition welcomes the inclusion of the "social and economic health" objective of the draft Framework. We believe social and economic health is key to the promotion of mental health and wellbeing.

¹⁴ Fisher & Baum, 2010, *The social determinants of mental health: implications for research and health promotion*.

¹⁵ World Health Organisation, 2014, *Mental health: Strengthening our response*, online at <http://www.who.int/mediacentre/factsheets/fs220/en/>, accessed 23 October 2014.

The Youth Coalition acknowledges that the indicators included under the social and economic health objective are suitable, however, we note there are additional measures that could also be included.

In addition to the indicators already listed in the draft Framework, research shows that child abuse or neglect¹⁶ and gender discrimination¹⁷ are also social conditions that are associated with mental illness. The inclusion of measures of child abuse or neglect and discrimination will better articulate the current state of social health in the Territory.

The Youth Coalition supports the inclusion of the indicator relating to unemployment. Unemployment has been linked with poor health outcomes, particularly when it comes to stress and its impact on physical and mental health and wellbeing.¹⁸ Youth unemployment is of particular concern. In the ACT, youth unemployment is more than double the total unemployment rate (3.8%).¹⁹ It has risen by 13% in the last two years, reaching 10.8% in the year to February 2014 and is predicted to rise to 12.4% by 2016.²⁰

Recommendation 7

Include under social and economic health objective a measure of:

- child abuse and neglect;
- discrimination; and,
- youth unemployment.

4.5.3 Objective: Enhance the physical health of the Territory to promote mental health and wellbeing.

The Youth Coalition supports the inclusion of the "physical health" objective of the draft Framework.

The Youth Coalition acknowledges that the indicators included under the physical health objective are suitable, however, we note there is an additional measure that could also be included.

Research shows that smoking rates among people with a mental illness are higher than the general population. In Australia, it is estimated that 32% of people with a mental illness smoke cigarettes. For people with psychotic conditions such as schizophrenia, the rate increases to between 60% and 73%.²¹

Recommendation 8

Include under the physical health objective a measure of tobacco use.

¹⁶ Fisher & Baum, 2010, *The social determinants of mental health: implications for research and health promotion*.

¹⁷ World Health Organisation, 2014, *Mental health: Strengthening our response*, online at <http://www.who.int/mediacentre/factsheets/fs220/en/>, accessed 23 October 2014

¹⁸ Australian Institute of Health & Welfare, 2013, *What works? A review of actions addressing the social and economic determinants of Indigenous health*.

¹⁹ Australian Bureau of Statistics, 2014, *Labour Force*, Australia.

²⁰ Brotherhood of St Laurence, 2014, *Youth Unemployment Monitor: March edition*, <http://createsend.com/t/r-C00FBEEAD9543CDB2540EF23F30FEDED>, accessed June 2014.

²¹ Department of Health, 2013, *Mental Illness and Quitting*, Australian Government, online at <http://www.quitnow.gov.au/internet/quitnow/publishing.nsf/Content/mental-health-and-quitting>, accessed February 2015.

4.5.4 *Objective: Increase gatekeeper awareness of the need for early detection and availability of treatment in promoting optimal mental health.*

The Youth Coalition supports the inclusion of the "gatekeeper awareness" objective of the draft Framework.

The Youth Coalition acknowledges that the measures under the gatekeeper awareness objective are suitable, however we note there are additional measures that could also be included.

The Youth Coalition welcomes the focus of providing mental health training to non-clinical staff, in particular, the inclusion of teachers as a key gatekeeper group. Schools are recognised as a first to know agency regarding many aspects of young people's lives and teaching staff require ongoing professional development to identify, understand and refer mental health issues that may arise. This includes provision of information about local services that are available for referrals. Teachers need to be trained with the appropriate knowledge and skills to understand bullying and mental health issues.

The Youth Coalition supports measuring the number of mental health awareness / training sessions delivered by OzHelp, however we believe that this measure could be expanded upon to provide a clearer indication of gatekeeper awareness in the ACT.

While OzHelp is a valued mental health training provider in the ACT, the Youth Coalition suggests that the draft Framework should also measure the number of sessions delivered by other mental health training providers in the Territory. Further, as the draft Framework identifies clergy, recreation staff, police, coaches and teachers as key gatekeeper groups, the Youth Coalition suggests that the draft Framework also measures the number of people in those identified professions who have participated in mental health training.

The Youth Coalition recognises the value of measuring outputs, such as the number of training sessions delivered, however we also suggest that the draft Framework include some more outcomes-focussed measures. The confidence of gatekeepers to identify and refer mental health issues is what will make the most impact under this objective.

Recommendation 9

Include under the gatekeeper awareness objective a measure of:

- the number of teachers who have participated in mental health awareness / training sessions;
- the number of mental health awareness / training sessions delivered by mental health training providers in the ACT, including OzHelp;
- the number of allied sector workers, particularly youth workers, as well as clergy, recreation staff, police and coaches who have participated in mental health awareness / training sessions; and,
- the confidence of allied sector workers, particularly youth workers, as well as clergy, recreation staff, police, coaches, teachers and other gatekeeper groups in identifying and referring mental health issues.

4.5.5 *Objective: Increase training and support for those working in mental health and emergency services.*

The Youth Coalition supports the inclusion of the "training and support" objective of the draft Framework. The Youth Coalition strongly supports training and professional development for professionals in mental health and emergency services. As there are a number of community-based mental health professionals in the ACT, the Youth Coalition suggests that the measures under this objective extend to those mental health professionals based in community organisations.

Recommendation 10

Include community-based mental health professionals in the measures of mental health training under the training and support objective .

4.5.6 *Objective: Enhance early interventions to people showing initial signs of mental ill health.*

The Youth Coalition welcomes the inclusion of the "early interventions" objective. The Youth Coalition strongly supports early intervention as key to addressing the mental health and wellbeing of our community. We are increasingly concerned about the gaps in service for young people experiencing mild to moderate mental ill health. Workers often express their frustration with the limited options for young people who are seeking help.

*'We are concerned about the lack of available services for young people experiencing moderate mentally ill health, particularly the lack of therapeutic options and case management / support.'*²²

Community services are also reporting an increase in demand for therapeutic options for young people, and, as a result of the limited services and resources, waitlists for some services are increasing. For example, in October 2014 headspace Canberra had approximately 70 young people waiting to see a private practitioner (psychologist / social worker). These young people had been assessed as suitable for headspace's service, and most were offered an equivalent external service. However, due to cost, accessibility and availability many have no option but to wait up to 6-8 weeks for an appointment.

The Youth Coalition suggests including additional measures under this objective to examine the effectiveness of early intervention activities in the ACT. The Youth Coalition suggests measuring the number of people experiencing mild to moderate mental ill health accessing support from mental health services, as well as the average length of time people are waiting for service.

Recommendation 11

Include under the early interventions objective a measure of:

- the number of people experiencing mild to moderate mental ill health accessing support from mental health service; and,
- the average length of time people are waiting to receive support from mental health services.

²² Youth Coalition of the ACT, 2014, *ACT Budget 2015-16 Sector Survey*

4.5.7 *Objective: Intervene early in episode for people experiencing mental ill health.*

The Youth Coalition supports the inclusion of the "intervene early in episode" objective.

The Youth Coalition suggests including additional indicators under this objective to determine whether people experiencing mental ill health are receiving intervention early in an episode of illness, whether that is when a person is showing the early warning signs or has recently relapsed. The draft Framework outlines the importance of developing relapse prevention plans for people with a history of mental ill health, however the Youth Coalition notes that the draft indicators under this objective do not include a measure of the uptake of relapse prevention plans.

Recommendation 12

Include under the intervene early in episode objective a measure of the number of people with a history of mental ill health with a relapse prevention plan.

4.5.8 *Objective: Enhance services to groups within the community at increased risk of developing mental ill health.*

The Youth Coalition welcomes the inclusion of the "groups at increased risk" objective.

The Youth Coalition strongly supports targeted service delivery to groups within the community at increased risk of developing mental ill health. The research is clear that mental illness is more prevalent among certain population groups. For young people mental health is a significant issue, with one in four experiencing mental ill health in any given year.²³ While young people were identified as a key target group in the *Areas for Action* section of the draft Framework, the Youth Coalition notes the absence of young people in the rationale for this objective.

The Youth Coalition recognises that measuring spending will provide an indication of the level of service provision in the ACT, however we also suggest including additional indicators that will provide a more comprehensive understanding of the service use of the identified at-risk groups. The Youth Coalition suggests including measures of the number of people accessing mental health services disaggregated by at-risk population groups.

Recommendation 13

Include under the groups at increased risk objective:

- young people, aged 12-25, as a group that have a higher risk of mental ill health; and,
- a measure of the number of people accessing mental health services disaggregated by at-risk population groups.

²³ Australian Bureau of Statistics, 2009, *Australian Social Trends: Mental Health*, Australian Government, Canberra.

5. Conclusion

The Youth Coalition would like to thank the ACT Government for providing the opportunity to contribute to the development of the *ACT Mental Health and Wellbeing Framework 2015 – 2025*. We commend the commitment by the ACT Government to developing a Framework based upon community consultation and key stakeholder feedback.

The Youth Coalition welcomes the focus on the social determinants of health and promotion, prevention and early intervention in the draft Framework. This submission identifies many opportunities by which the ACT Government can build upon the existing strengths of the draft Framework. In particular, the Youth Coalition calls for the further development of the Framework to be more action-focussed, to define young people as aged 12 – 25, and to include comprehensive indicators under each objective that show trends over time.