

Attachment A: Letter to ACT Health regarding the request to reconvene the governance group prior to, and as part of, finalising the ACT Drug Strategy Action Plan



Dr Paul Kelly
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cc: Non-government members of the ACT ATOD Strategy Evaluation Group (ACT Council of Social Services, Canberra Alliance for Harm Minimisation and Advocacy, Families and Friends for Drug Law Reform, Health Care Consumers Association, Hepatitis ACT, Mental Health Community Coalition, Pharmacy Guild ACT Branch, Youth Coalition of the ACT)

cc: ACT ATOD Strategy Evaluation Group Secretariat (AODpolicy@act.gov.au;
Kathy.dennis@act.gov.au)

Request to convene the governance group prior to, and as part of, finalising the ACT Drug Strategy Action Plan

Dear Dr Kelly

Thank you for recently disseminating a Draft ACT Drug Strategy Action Plan for comment and for extending the submission deadline to 30 March 2017.

ATODA is working with stakeholders to make a full submission, however following multiple consultations to date, believes it is important to make an early submission specifically with regards to the matter of when the new governance group for the ACT Drug Strategy Action Plan will first be convened.

ATODA's consultations have included participation from the ATOD sector, allied services, peak organisations and consumer organisations. Stakeholders have been very interested in the draft plan and have expressed the importance of an appropriate whole-of –government and -community governance mechanism for the ACT Drug Strategy Action Plan - similar in function and membership to that which was convened under previous ACT Alcohol Tobacco and Other Drug strategies.

ATODA notes that the draft ACT Drug Strategy Action Plan proposes that the new governance group is convened only after the plan has been finalised. We are concerned that this proposal contradicts the highly effective practice of the ACT ATOD Strategy Evaluation Group, which has - for over a decade - been actively involved in the monitoring, evaluation, and, especially, the development of new and existing strategies. Stakeholders are concerned that the draft Action Plan currently focuses on advising about the *implementation* of the Plan, rather than contributing to its development.

As you can see, we have included the NGO members of the ACT ATOD Strategy Evaluation Group in this correspondence. As far as ATODA is aware, this group remains a current

governance group and as a member of that group ATODA has not been informed otherwise by ACT Health.

We request that ACT Health convene the new ACT Drug Strategy Action Plan governance group prior to the action plan being finalised, and seek its advice on the contents of the Strategy Action Plan, its implementation modalities, and its governance.

This approach is consistent with that which ACT Health took at the end of 2017 with regards reconvening the Opioid Treatment Advisory Committee and then subsequently adopting the National Guidelines for Medication-Assisted Treatment of Opioid Dependence and the development of the local procedures documentation.

As expressed to in the draft Strategy Action Plan; the actions that compose a response to drug use and harms are complex and require inter-governmental and whole-of-community engagement and responses. ATODA maintains the belief that good policy-making must involve a broader array of stakeholders; and in turn, that increases the need for consultation, trust and negotiation, rather than top down decision-making. This approach is consistent with *The Social Compact: A relationship framework between the ACT Government and community sector*. ATODA believes that principles of good governance and decision-making should be apparent through all components of drug policy and strategy making, starting with issue identification, through to policy analysis, consultation, decision making, implementation and all the way to evaluation (Althaus, Bridgman, & Davis 2018, *The Australian Policy Handbook*, 6th edn).

Importantly, the ACT Government has a strong legacy of good quality drug policy governance (attached to strategies) from which to draw; and many of the stakeholders, including ATODA, who have participated in structures that informed the drafting of a number of the previous strategies are available and ready to recommence engagement in drug policy governance in the ACT.

Kindest regards,



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23 March 2018