



Mr Gordon Ramsay  
Chair, Targeted Assistance Expert Panel  
Chief Minister and Cabinet Directorate - ACT Government  
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## **Submission to the ACT Targeted Assistance Strategy**

Dear Mr Ramsay and the Expert Panel,

The Alcohol Tobacco and Other Drug Association ACT (ATODA) is the peak body representing the non-government and government alcohol, tobacco and other drug (ATOD) sector in the ACT. ATODA is an evidence informed organisation that is committed to the principles of public health, human rights and social justice.

ATODA seeks to promote health through the prevention and reduction of the harms associated with ATOD including supporting reduced costs for treatment and support.

We would like to thank the ACT Government and the Expert Panel for the opportunity to comment on the proposed Targeted Assistance Strategy and commend you for your work and commitment in this area. ATODA broadly supports the measures put forward in the Strategy and supports ACTCOSS' submission.

However, we are concerned that the goals of the strategy may need to extend to some vulnerable priority populations, such as people who use drugs and may access ATOD services, and believe they warrant greater attention and action in the strategy. As you are aware, drug use and poverty are often interlinked and impact beyond the individual experiencing ATOD problems. Further drug use and crime are not causally related but both result from other factors such as poverty, sexual and physical abuse, and lack of educational and employment opportunities.<sup>1</sup>

As part of the Strategy, ATODA strongly encourages the ACT Government to consider reforming the ACT's infringement schemes into a single streamlined system. ATODA believes that any proposed reforms to the parking and traffic infringement schemes should be extended to cover all infringements and fines, including infringements made for ATOD-related behaviours, such as smoking, drinking alcohol, or possession of illicit drugs, as well as extending the reforms to include the following:

1. Installment plans for all fines and infringements, including those which are ATOD-related;
2. Options for community service, education or treatment as payment;
3. Options to waive fines for certain members of the community;
4. Matching fine amounts with the capacity of individuals to pay;
5. Adequately supporting Police;

6. Adequately supporting the Courts;
7. Promoting access to appropriate health and social services; and,
8. Trialling evidence-based responses to ATOD-related and low-level offending.

ATODA supports the Street Law report *The Downward Spiral: How a fine can cause homelessness in the ACT*,<sup>2</sup> and the ACT Council of Social Service (ACTCOSS) decade long advocacy for reforms to infringements system.<sup>3</sup>

For further information please see attached ATODA's paper *ACT Infringement Schemes Reform: Implementing effective and appropriate responses to offending by disadvantaged people including alcohol, tobacco and other drug (ATOD) related offending*.

ATODA recommends the ACT Government consider how financial burdens can be minimised for people requiring health treatments by advocating for the expansion of medicines included on the Pharmaceutical Benefits Scheme (PBS) such as pharmacotherapies and hepatitis C treatments.

ATODA recommends the establishment of a Counting the Kids Brokerage Fund,<sup>4,5</sup> the aim of which would be to provide direct assistance to children whose parents are undergoing treatment for ATOD use. The funds could be directed towards resources and opportunities the children would not otherwise have access to. The Victorian based program, which was open to the ACT, has now ceased leaving a significant gap addressing the economic impact on children of their parents' drug use.

Further considerations regarding the Strategy are outlined in the attached submission. Attached for your reference is also ATODA's submission to the ACT Budget 2012-2013 consultation. Please don't hesitate to contact ATODA if you would like further information, to discuss any ideas presented or would like support in this area.

Sincerely,



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## ATODA Submission to the ACT Targeted Assistance Strategy

### Priority populations

The Alcohol Tobacco and Other Drug Association ACT (ATODA) believes that goals of the strategy may need to extend to some vulnerable priority populations, such as people who use drugs and may access alcohol, tobacco and other drug (ATOD) services, and believe they warrant greater attention and action in the Strategy. Specific priority populations that could be reflected within the Strategy include:

- Aboriginal and Torres Strait Islander people;
- People in custodial settings including the AMC;
- People who are unemployed or unable to work;
- People with disabilities associated with ATOD (such as alcohol acquired brain injury and foetal alcohol syndrome);
- Peoples experiencing ATOD issues or accessing ATOD services (and their families); and
- Women and women with children.

### Responses to Expert Panel questions

#### 1. **What are the problems that the community faces in targeting social assistance, and what is the evidence for these problems?**

##### Defining and identifying disadvantage

It is necessary to recognise that difficulties with day-to-day expenses come from three areas:

- Capacity of individuals to pay;
- Goods and services the individual or family needs / requires; and,
- Capacity of individuals to manage their day to day expenses.

Consequently, it will be necessary to ensure that appropriate measures of all three domains are considered when determining who should be eligible for targeted assistance. This includes not only income and or disposable income, but also the specific needs of individuals and families (including improving capacities to manage expenses etc).

It is essential that ATOD problems be recognised in legislation and policy as a characteristic that entitles individuals and families to concessions and assistance that are entitled to all persons with a disability (and do not act as an exclusion to accessing support).

##### Targeting the right sort of assistance to the right people at the right level (individual, family, neighborhood)

ATODA recognise the range of concessions and assistance programs that are available to individuals and families in the ACT. However, it is essential that these concessions and services are appropriately targeted and efficiently distributed. It will be necessary for the Strategy to determine whether assistance is provided to

individuals, families or communities; and what the expected impact of these would be.

In particular, ATODA believes that it is necessary to recognise the important roles families play in supporting people experiencing ATOD problems. Effectively supporting the families of people affected by ATOD should be considered one area in which the Strategy could play a substantial role in addressing ATOD problems and poverty.

An example of how these high needs families could be identified and engaged is through the Counting the Kids Brokerage Fund, the aim of which was to provide direct assistance to children whose parents are undergoing treatment for ATOD use. The funds were directed towards resources and opportunities the children would not otherwise have access to. The program was evaluated and found to have been successful including helping to broaden the focus on the needs of the family and heightened awareness of the economic impact on children of their parents' drug use.<sup>67</sup>

ATODA strongly encourages the ACT Government to consider establishing a similar fund in the ACT.

#### [Ensuring that assistance is integrated](#)

Piece-meal responses to disadvantage may address specific issues for individuals and families, but their impact may be degraded by the lack of integrated companion measures. One feasible option is to ensure that individuals and families eligible for concessions or assistance have the opportunity to have a case plan developed, which will identify areas of need so that appropriate assessment and referral can be made.

#### [Ensuring that individuals and families make use of targeted social assistance that is provided to them](#)

Simply providing access to concessions and targeted assistance does not ensure individuals and families will take advantage of such assistance. It is important to identify individuals and families who are eligible for social assistance but who are not taking advantage of this assistance and identify opportunities for them to engage with available supports.

## **2. What is working in the way the government delivers targeted assistance, and how could existing initiatives be modified or improved?**

ATODA acknowledges the range of targeted assistance currently in place and believes the following initiatives could be strengthened:

- The ACT Government has a strong commitment to carers in policy and programs. The ACT Carers Charter acknowledges a broad definition of people that can be carers, and this includes due to substance use or ATOD issues.<sup>8</sup> It is important to ensure that the carer services and assistance programs funded by the ACT Government include substance use / ATOD in their scope.

- Emergency relief programs are essential in supporting people in crisis and whose incomes are insufficient to meet their expenses. ATODA recommends that this program is expanded to include additional ATOD services as target outlets for accessing hard to reach populations, such as availability through the needle and syringe programs and the Opioid Treatment Service.
- The Working with Vulnerable People Background Checking System is now legislated in the ACT. People on low incomes and without concession cards would greatly benefit if there was a process to have fees for these checks waived.
- Expand the current subsidies available for people from low socio-economic backgrounds and community sector workers to access nicotine replacement therapies. In the *2008 National Aboriginal and Torres Strait Islander Social Survey*, 20% of Aboriginal and Torres Strait ACT residents reported running out of money for living expenses and 36% were smokers.<sup>9</sup> We refer you to the study currently being undertaken by the National Drug and Alcohol Research Centre - *Reducing smoking in socioeconomically disadvantaged groups: a trial of a financial counselling intervention with Nicotine Replacement Therapy*<sup>10</sup> and the findings from the ACT Workplace Tobacco Management Project.<sup>11</sup>

### **3. What can the Government, business and the community do to provide better assistance to Canberra households whose income is just above the level which is eligible for Government concessions?**

Opportunities exist to provide better assistance to low-income individuals and families experiencing ATOD problems through education and employment initiatives. For many people experiencing ATOD problems, employment services can provide skills and training, but fail to ensure appropriate employment is available upon completion. There is an opportunity for government, service providers, and businesses to work collaboratively to ensure that opportunities for employment are made available to individuals who need them.

### **4. What are the three most important things that could be done? Why do you believe they will work?**

ATODA believes that the three most important things that could be done to reduce poverty and promote economic and social independence, particularly for people affected by ATOD issues, are:

1. Reducing health costs by:
  - Increasing the number of place that distribute subsidised opioid maintenance therapies;<sup>12</sup>
  - Providing full subsidies for pharmacotherapies, such as methadone, including requiring no fees for dispensing the medications;<sup>13</sup>
  - Providing free immunisations to people who inject drugs and who may access ATOD services;<sup>14</sup> and
  - Establishing a Counting the Kids Brokerage Fund to meet the financial needs of children whose parents are accessing ATOD treatment and support.<sup>15</sup>

- Expand the current subsidies available for people from low socio-economic backgrounds and community sector workers to access nicotine replacement therapies.<sup>16</sup>

2. Reducing people's contact with the criminal justice system, including recidivism, by:

- Reforming and streamlining the entire ACT infringements system, including those related to ATOD, to include payment through installment plans, opportunities to access treatment as payment for fines, and waiving fines in particular cases;<sup>17,18</sup>
- Providing concession and income scaled fees for the proposed new alcohol ignition interlock program in the ACT;<sup>19</sup> and
- Increasing funding for ATOD treatment and support services.<sup>20</sup>

3. Reducing homelessness by:

- Maintaining a public housing policy rather than moving towards a welfare housing policy;
- Increasing the Housing ACT priority list; and,
- Diversifying and increasing the public housing stock.

## 5. **What do you believe are the medium and long term solutions to increasing the effectiveness of targeted government assistance?**

- In the long-term, it is essential that ATOD problems be recognised in legislation and policy as a characteristic that entitles individuals and families to concessions and assistance that are entitled to all persons with a disability.
- For the ACT Government to provide leadership and engage in national advocacy, through forums such as the Inter-Governmental Committee on Drugs and the needs-based Ministerial Council on Drugs, to address health and social inequities through advocating for the inclusion of key medicines on the Pharmaceutical Benefits Scheme (PBS) such as pharmacotherapy and hepatitis C treatments.

ATODA stands ready to support the ACT Government to develop and implement strategies to better support and reduce the economic impacts of ATOD issues on individuals and families in our community.

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### References

<sup>1</sup> Loxley, W. & Adams, K. (2009). *Women, drug use and crime: findings from the Drug Use Monitoring in Australia program*. Australian Institute of Criminology. Available online at: <http://www.aic.gov.au/documents/A/F/4/%7BAF425925-9725-4BC7-96B7-61ED6EE5338C%7Drpp99.pdf>

<sup>2</sup> Street Law (2011). *The Downward Spiral: How a fine can cause homelessness in the ACT*. Welfare Rights and Legal Centre: Canberra. Available online at: [streetlaw.org.au/files/view/?id=34](http://streetlaw.org.au/files/view/?id=34) &

<sup>3</sup> ACT Council of Social Service (2001) *Budget Submission*. [www.actcoss.org.au](http://www.actcoss.org.au)

<sup>4</sup> Australian Centre for Child Protection. 2008. *Evaluation of the Counting the Kids Brokerage Fund*. <http://www.odyssey.org.au/images/files/brochures/Publications/ctk%20brokerage%20fund%20final%20report%202008.pdf>

<sup>5</sup> Contole J, O'Neill C, Mitchell G & Absler D (nd) *Counting the Kids Final Evaluation Report*. Odyssey House Victoria.

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<http://www.odyssey.org.au/images/files/brochures/Publications/counting%20the%20kids%20evaluation.pdf>

<sup>6</sup> Australian Centre for Child Protection. 2008. *Evaluation of the Counting the Kids Brokerage Fund*. <http://www.odyssey.org.au/images/files/brochures/Publications/ctk%20brokerage%20fund%20final%20report%202008.pdf>

<sup>7</sup> Contole J, O'Neill C, Mitchell G & Absler D (nd) *Counting the Kids Final Evaluation Report*. Odyssey House Victoria. <http://www.odyssey.org.au/images/files/brochures/Publications/counting%20the%20kids%20evaluation.pdf>

<sup>8</sup> Community Services Directorate, ACT Government. *ACT Carers Charter*. Available online at: [http://www.dhcs.act.gov.au/\\_\\_data/assets/pdf\\_file/0014/263102/ACT\\_Carers\\_Charter\\_Fact\\_sheet.pdf](http://www.dhcs.act.gov.au/__data/assets/pdf_file/0014/263102/ACT_Carers_Charter_Fact_sheet.pdf)

<sup>9</sup> *ibid*.

<sup>10</sup> National Drug and Alcohol Research Centre (2012) Centrelines. Sydney. Available online at: <http://ndarc.med.unsw.edu.au/sites/ndarc.cms.med.unsw.edu.au/files/ndarc/resources/CentreLines32.pdf>

<sup>11</sup> Information about the project, including template resources and evaluation reports are available via contacting ATODA or visiting [www.atoda.org.au](http://www.atoda.org.au)

<sup>12</sup> Ritter, A. & Chalmers, J. (2009). *Polygon: the many sides to the Australian opioid pharmacotherapy maintenance system*. Australian National Council on Drugs. Available online at: <http://www.ancd.org.au/publications-and-reports/research-papers.html>

<sup>13</sup> Chalmers, J. Ritter, A. Heffernan, M. & McDonnell, G. (2009). *Modelling pharmacotherapy maintenance in Australia: exploring affordability, availability, accessibility and quality using system dynamics*. Australian National Council on Drugs. Available online at: <http://www.ancd.org.au/publications-and-reports/research-papers.html>

<sup>14</sup> Alcohol Tobacco and Other Drug Association ACT. (2012). *Submission to the Draft ACT Immunisation Strategy 2012 – 2016*. Copies can be obtained by contacting ATODA.

<sup>15</sup> Australian Centre for Child Protection. 2008. *Evaluation of the Counting the Kids Brokerage Fund*. <http://www.odyssey.org.au/images/files/brochures/Publications/ctk%20brokerage%20fund%20final%20report%202008.pdf>

<sup>16</sup> National Drug and Alcohol Research Centre (2012) Centrelines. Sydney. Available online at: <http://ndarc.med.unsw.edu.au/sites/ndarc.cms.med.unsw.edu.au/files/ndarc/resources/CentreLines32.pdf>

<sup>17</sup> Street Law (2011). *The Downward Spiral: How a fine can cause homelessness in the ACT*. Welfare Rights and Legal Centre: Canberra. Available online at: [streetlaw.org.au/files/view/?id=34](http://streetlaw.org.au/files/view/?id=34) &

<sup>18</sup> Alcohol Tobacco and Other Drug Association ACT (2012) *ACT Infringement Schemes Reform: Implementing effective and appropriate responses to offending by disadvantaged people including alcohol, tobacco and other drug (ATOD) related offending*. Canberra.

<sup>19</sup> Alcohol Tobacco and Other Drug Association ACT (2012) *Improving road safety in the ACT by implementing: a comprehensive, collaborative and evidence-based alcohol ignition interlock program*. Canberra.

<sup>20</sup> See for example: Wundersitz, J. (2007). Criminal justice responses to drug and drug-related offending: are they working? *Technical and Background Paper*. Canberra, Australian Institute of Criminology.