

ADCA Response to the *National Drug Strategy 2010-2015* Consultation Draft

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ABN: 39 008 455 525

Introduction

The Ministerial Council on Drug Strategy has released a draft of the *National Drug Strategy 2010-2015* (NDS) for consultation with stakeholders and the community.

The Alcohol and other Drugs Council of Australia (ADCA) is the national peak, non-government organisation (NGO) representing the interests of alcohol and other drugs (AOD) sector, providing a single voice for people working to reduce the harm caused by alcohol and other drugs.

ADCA works collaboratively with the government, non-government, business and community sectors to promote evidence-based, socially just approaches aimed at preventing or reducing the health, economic, and social harm caused by alcohol and other drugs to individuals, families, communities, and the nation.

Background

The draft NDS has been developed following a period of initial consultation involving:

1. the release of a consultation paper in December 2009
2. a public submission process which closed at the end of February 2010, and
3. roundtables with stakeholders in April 2010.

A Forum, convened by the Department of Health and Ageing (DoHA), was held in Canberra on 2 December 2010 to provide stakeholders with an opportunity to discuss the draft NDS.

ADCA, representing the AOD NGO sector, has been an active contributor to this process, having made a comprehensive and detailed submission on the NDS Consultation Paper in March 2010, and participating in the roundtable consultations in April, and the latest Forum.

Aim

As the peak body for the AODNGO sector, ADCA is pleased to reaffirm the position it has put previously in its original submission and at the 2 December 2010 Forum on several key strategic issues that are either not addressed, or are insufficiently covered in the latest draft NDS.

Consideration of the issues

ADCA's views were expressed in the comprehensive ADCA Issues Paper on the 2010-15 National Drug Strategy Consultation Paper in March 2010. That submission responded to the 13 key NDS consultation questions, raised 10 key issues from the AOD sector, and addressed each of the 15 Siggins Miller Evaluation Recommendations.

ADCA is pleased to note that much of the substance behind ADCA's views has in fact translated into the overarching NDS. A range of issues raised at the forum are supported by ADCA and are understood will be incorporated into the redrafted document.

There are however, three crucial matters previously identified by ADCA upon which the draft Consultation Paper remains silent. There was some consideration of these matters at the Forum on 2 December 2010, but they are now set out here for ease of reference:

1. The overarching framework and synchronising strategies.

Like many other bodies ADCA believes that the broad, high-level framework needs to better reflect the overall priorities to be accorded. In particular the emphasis placed by the Federal Government on excessive alcohol consumption (acknowledged in the draft as a priority in 2010-2015) needs greater prominence, and, accordingly, the title for the NDS needs to reflect the alcohol priority.

ADCA recommends that the title be the *National Drug and Alcohol Strategy 2010-2015* (NDAS). Corresponding editorial changes will be required throughout the document.

Furthermore, ADCA believes the acknowledged priority to excessive alcohol consumption as an issue is not reflected in the directly related Sub-strategy, the National Alcohol Strategy, listed in the draft consultation paper as expiring in 2011. It is vital that this existing stand alone strategy be updated and integrated within the NDAS. ADCA also believes that the voice of consumers must not be overlooked in forming the NDAS, and that a separate Sub-strategy should be developed.

Other Sub-strategies may need to be similarly updated to take account of developments with several having already expired. For example, the National Drug Strategy Aboriginal and Torres Strait Islander Peoples Complementary Action Plan 2003–2009 is now approaching two years out of date and, like the issue of excessive alcohol consumption, needs to be updated and similarly integrated within the NDAS.

It is also vital that there be closer alignment, integration and better explanation of all the Sub-strategies. As previously raised by Siggins Miller Evaluation Recommendation (SMER) 11 – and supported by ADCA – there is insufficient explanation of the Sub-strategies within the document.

2. Governance and representation of the NGO AOD sector.

In discussions with Department of Health and Ageing (DoHA) on 3 December 2010 it was clearly confirmed that ADCA is the national peak and the voice for the AOD NGO sector.

This is in line with the statement on 28 December 2009 by the Minister for Health and Ageing, the Hon Nicola Roxon MP, that specifically mentioned funding having been approved for ADCA:

“...to support the work of the Alcohol and other Drugs Council of Australia in representing the non-government organisations in the alcohol and other drugs sector.”

With respect to the Australian National Council on Drugs (ANCD), it is the principal independent advisory body to Government on drug and alcohol issues.

Against this background, ADCA strongly believes that the Ministerial Council on Drug Strategy (MCDS) and the Intergovernmental Committee on Drugs (IGCD) would benefit from expanding the membership base with ADCA representing the AOD NGO sector.

This is consistent with SMER 9 that has ADCA representing the AOD NGO sector and given formal representation on government consultative bodies. The draft Consultation Paper states only that representatives of “relevant” agencies, intergovernmental councils, and/ or NGOs will be invited to help form policy advice.

Specific reference to ADCA’s role in this regard is seen as advantageous. This would ensure that the AOD NGO, as well as the consumer voice was able to be addressed through an effective mechanism, thereby giving confidence and trust in the new NDAS.

3. Contribution of the Not-for-profit sector.

ADCA believes that the NDAS needs to consider the administrative burden faced by AOD NGO service delivery organisations as increasing proportions of staff time are being devoted to fulfilling funding reporting demands rather than client treatment. SMER 5.2 called for increasing capacity across State and Territory, non-government, and private sectors for more collaborative needs-based planning, funding allocation, performance monitoring, and review processes.

The draft Consultative Paper makes no references to this recommendation and does not address ADCA’s concerns regarding funding/ governance arrangements for the AOD NGO sector. In this regard, a Productivity Commission Research Report *Contribution of the Not-for-Profit Sector* (February 2010) quoted ADCA (in relation to competitive tendering) that:

“...processes should be substantially reduced so that service providers can solely focus on delivering their services efficiently and effectively, and grants should be given to service providers based on a qualitative assessment of their service provision.”

The draft Consultative Paper does not mention SMER 4, or ADCA’s concern to ensure that there is perspective from consumer groups brought to the policy formulation process.

Conclusion

ADCA has thoroughly reviewed the draft consultation paper from an NGO perspective having regard to its previous submission and the Siggins Miller Evaluation Recommendations.

Following consultation with strategic stakeholders across the AOD NGO sector, ADCA strongly recommends that the three crucial matters raised be now considered as being highly relevant for incorporation into the NDAS.

ADCA’s responses to the issues raised in the Consultation Paper demonstrate the significant degree of commitment and priority accorded by it to the NDAS, a commitment ADCA would be keen to convert into formal participation on behalf of the AOD NGO sector.

Bibliography

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