

9 December 2016



Submitted by email to National.Mental.Health.Plan@health.gov.au

To whom it may concern

Thank you for the opportunity to provide comment on the draft National Mental Health Plan (“draft Plan”). I am writing to you on behalf of the NSW Disability Network Forum (DNF) which comprises non-government, non-provider peak representative, advocacy and information groups whose primary aim is to promote the interests of people with disability. A list of DNF members is appended to this letter.

The DNF is concerned that there is no mention of people with intellectual disability in the draft Plan. People with intellectual disability who experience mental health issues are particularly vulnerable due to the challenges they face in accessing appropriate mental health care.

The vulnerability of this cohort has been recognised by other levels and Government, and in whole-of-Government strategies. In NSW, the Mental Health Commission’s Strategic Plan for Mental Health 2014-2024 includes a specific focus on intellectual disability and mental health.¹ At the Commonwealth level, the National Disability Strategy 2010-2020 specifically calls for universal health initiatives (including in mental health) to address the needs of people with disability.²

The DNF endorses the position statement of its member, the NSW Council of Intellectual Disability, in relation to the draft Plan. In doing so, we support their recommendations to:

1. **Identify intellectual disability as a specific focus area**, modeled on the NSW Mental Health Commission’s Strategic Plan.
2. **Include a focus on the research** in relation to poor mental health of people with intellectual disability.
3. **Include “people with intellectual disability” in the list of groups whose specific needs should be considered in an overarching sense when implementing the National Mental Health Plan.**
4. **Include specific measures related to the needs of identified equity groups to ensure concrete progress is made.** Specific measures should be added to the following sections in the Mental Health Plan:
 - Priority area 1: integrated regional planning and service delivery
 - Priority area 7: safety and quality in mental health care
 - Monitoring and reporting on reform progress

The DNF endorses the following specific measures put forward NSW Council of Intellectual Disability:

¹ Mental Health Commission of NSW (2014) [Living Well: A Strategic Plan for Mental Health in NSW 2014-2024](#), section 7.4.

² Council of Australian Governments (2010) [National Disability Strategy 2010-2020](#) “Health and Wellbeing”, Strategic Direction 1.

In relation to Priority Area 2 (Coordinated treatment and supports for people with severe and complex mental illnesses), the draft Plan should:

- Acknowledge that people with intellectual disability often have complex mental illnesses due to difficulties with communication and diagnosis and the interplay between the mental illness, the intellectual disability and the person's social circumstances.
- Include people with intellectual disability who also have a mental illness in the discussion about the interplay between the roles of mental health services and the NDIS. Currently, the draft Plan's focus on the NDIS does not address the issues arising for people who have a primary intellectual disability but also a mental disorder. The focus is concentrated on people who have a primary psychosocial disability.

In relation to Priority Area 5 (Physical health of people living with mental health issues), the draft Plan should:

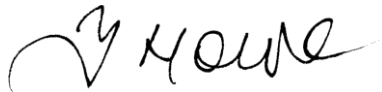
- Include a focus on working with the NDIS on physical health issues for people with mental illnesses. Improved health and well-being is one of the key outcome measures being used by the NDIS in its draft Outcomes framework.³

In relation to Priority Area 6 (Stigma and discrimination reduction), the draft Plan should:

- Include a specific focus on discrimination against people with intellectual disability in the mental health workforce. For people with intellectual disability, their mental health needs notoriously go untreated on the assumption that the behavior resulting from the mental health problem in fact flows from the intellectual disability.

If you have any questions about the points raised above, please email Carolyn Hodge (NCOSS Policy Lead, Disability) at carolyn@ncoss.org.au

Yours sincerely



Tracy Howe
Chief Executive Officer, NCOSS
on behalf of the Disability Network Forum

³ National Disability Insurance Agency (2015) [Outcomes Framework Pilot Study](#).

NSW Disability Network Forum Member Organisations:

- Association of Blind Citizens of NSW
- Being Mental Health and Wellbeing Consumer Advisory Group
- Deaf Australia NSW
- Deaf Society of NSW
- DeafBlind Association NSW
- Deafness Council (NSW)
- First Peoples Disability Network
- Information on Disability and Education Awareness Services Self Advocacy Sydney (IDEAS) NSW
- Institute for Family Advocacy
- Intellectual Disability Rights Service
- Multicultural Disability Advocacy Association of NSW
- NSW Council for Intellectual Disability
- NSW Council of Social Service (NCOSS)
- NSW Disability Advocacy Network
- People with Disability Australia
- Physical Disability Council of NSW
- Positive Life NSW
- Side By Side Advocacy Incorporated
- Synapse (Brain Injury Association NSW)