

Submission in response to
the 'Tasmanian Drug Strategy (TDS) 2022-27'
Consultation Draft



July 2022

Introduction

“Young people cited underaged smoking, drinking and drug use as a barrier to maintaining good health and report that it’s often peer pressure that leads to early engagement with alcohol, tobacco and other illicit drugs. They feel these substances are easy to access in most communities.”¹

The Youth Network of Tasmania (YNOT) welcomes the opportunity to respond to the Department of Health, ‘Tasmanian Drug Strategy (TDS) 2022-27’ Consultation Draft.

YNOT is the peak body for young people aged 12-25 years and the non-government youth sector in Tasmania. YNOT works to ensure policies affecting young people in Tasmania are relevant, equitable and effective, and that young people can share their views on issues important to them. Our purpose is to drive positive change with young people and the youth sector in Tasmania.

Our response to the draft TDS has largely been informed by the views of young Tasmanians based on previous YNOT consultations where alcohol, tobacco and other drugs (ATOD) was discussed.

Overall, YNOT supports the aims, principles and strategic objectives articulated for the proposed TDS. We are pleased to see the inclusion of children and young people as a priority population group and support intervening early to prevent drug related harm. We also strongly endorse grounding the TDS in a strong evidence base.

We acknowledge that the TDS is intended to be a high level, whole of government strategic framework. However, we believe greater community consultation is required to achieve the stated overarching strategic objectives, and to ensure the development of effective policies and programs to reduce drug related harm in our communities. YNOT is concerned that meaningful consultation and engagement with young Tasmanians has been overlooked in the development of the TDS. The absence of targeted alcohol and illicit drug initiatives for young people is also alarming, as is the lack of alignment with other government reform agendas relevant to young people. Furthermore, the TDS currently contains several strategies and frameworks that have lapsed and/or are not adequately resourced to affect meaningful change.

After careful consideration, YNOT cannot endorse the proposed TDS 2022-27 in its current form. Whilst there are some aspects of the TDS that we fully support, we believe it requires further refinement and development to affect meaningful change and improve outcomes for young Tasmanians.

Key Principles

Whilst supportive of the key principles, we recommend they be extended to include a commitment to upholding human rights and adopting strength-based approaches when working with people affected by alcohol, tobacco and other drug (ATOD) use.

¹ Child and Youth Wellbeing Team 2021, *Tasmania’s Child and Youth Wellbeing Strategy Consultation Report*, The Tasmanian Government, Tasmania.

Engagement of young people in the development of the TDS

YNOT strongly advocates for young people's active and meaningful involvement in informing the proposed TDS, particularly when identifying and prioritising key activities relevant to them. Young people we have spoken with said that they would like to see more effort made to consider the views of young people, and that they want to be involved in co-designing policy, programs and initiatives that impact them.

[Young people] want to be included early in planning and decision making, not as an afterthought, and they want their diversity of views and ideas considered. And they want to see action taken to implement their ideas.²

This not only applies to young people with lived experience but also those without. We fully endorse a commitment to engaging with people with lived experience, their families and carers, and other people directly affected by ATOD use. These individuals will have valuable insights on strategies that may lead to long term positive change for others.

However, consultation also needs to occur more broadly with young people who do not have lived experience, particularly when developing and planning prevention and early intervention strategies intended for all young people, such as drug education in schools.

YNOT recommends that the proposed TDS be strengthened to clearly articulate a commitment to youth engagement and participation in the development, implementation and evaluation of the TDS. This aligns with the Government's commitment to the *Tasmania Statement*, specifically in working across government and with communities to address social and economic factors that influence health and wellbeing and involving Tasmanians in decisions. Initiatives also need to be well planned and adequately resourced.

A whole of Government approach

YNOT recommends greater alignment of the TDS with government reform processes relevant to young people - for example, child and adolescent mental health, youth justice and youth homelessness. The links between alcohol and other drug use with mental health issues, offending behaviours, educational disengagement, homelessness and disadvantage should not be overlooked. Better integration with other non-AOD specialist services such as prison services, children and youth services, homelessness services and education has been identified as a reform goal in the Reform Agenda for the Alcohol and Other Drugs Sector AOD in Tasmania (AOD Reform Agenda). A cross-government systemic response could be articulated as a key principle in the TDS.

We also recommend that the entire section relating to the Tasmanian strategic policy context be reviewed and updated. The proposed TDS currently contains several strategies and frameworks that have lapsed and/or are not adequately resourced to affect meaningful change – for example, the Youth at Risk Strategy 2017. YNOT supports the alignment of the TDS with the National Drug Strategy 2017-2026.

² Child and Youth Wellbeing Team 2021, *Tasmania's Child and Youth Wellbeing Strategy Consultation Report*, The Tasmanian Government, Tasmania.

Prevention and Early Intervention

YNOT supports a focus on intervening early to reduce alcohol and other drug related harm amongst young people. We are pleased to see support for Tasmanian schools to access and use developmentally appropriate, evidence-informed drug education in schools. However, drug education has been demonstrated to be most effective when it reflects the needs and attitudes of young people, is relevant to their life, is interactive in nature, and addresses prevention, harm minimisation and help seeking³. A commitment to ensuring young people inform drug education in schools, relevant to their local context, should be reflected in activity 1.4.

Young people have told us that they value drug education in Tasmanian schools and have shared valuable insight into the type of content that would be beneficial and relevant to them.

“...young people would like to have education in schools about alcohol and other drugs but feel that the message should not be as simple as “don’t do drugs.” They described a harm minimisation approach where they can learn about the effects of drugs, the health risks associated with them, how to be safe using drugs and where to get help for addiction so that they can make informed choices.”⁴

Furthermore, activity 1.4 includes reference to ‘...information about alternatives to the use of medication’ with respect to drug education in Tasmanian schools. It is not clear what this means and why this was prioritised. Further clarification is required to avoid ambiguity.

YNOT welcomes initiatives designed to prevent and minimise tobacco use amongst young people but notes that the Smoke Free Young People Strategy 2019-21 outlined in activity 3.1 has lapsed. The recently released Tasmanian Tobacco Control Plan 2022-26 contains specific action to prevent the uptake of smoking by young people and may be more relevant in achieving desired outcomes.

Targeted Interventions

Evidence suggests that more than 80% of Tasmanians over the age of 14 years drink alcohol and more than one in six Tasmanians use illicit substances.⁵ Young people we have spoken to have identified the need for a range of youth specific ATOD treatment and support services available in the community to reduce drug related harm.

“Young people acknowledged that adolescence was when many people experiment with alcohol and other drugs, they want to see targeted youth support in their communities to help young people who misuse substances.”⁶

³ Allen & Clarke Policy and Regulatory Specialists Ltd 2003, *Effective Drug Education for young people: An overview of the literature and analysis*, Ministry of Youth Development, Wellington, NZ.

⁴ Child and Youth Wellbeing Team 2021, *Tasmania’s Child and Youth Wellbeing Strategy Consultation Report*, The Tasmanian Government, Tasmania.

⁵ Australian Institute of Health and Welfare 2020, *National Drug Strategy Household Survey 2019—Tasmania*, The Australian Government, Bruce, ACT.

⁶ Child and Youth Wellbeing Team 2021, *Tasmania’s Child and Youth Wellbeing Strategy Consultation Report*, The Tasmanian Government, Tasmania.

The absence of initiatives to respond to alcohol and illicit drug use for young people is concerning. We note that activity 6.1 refers to supporting the implementation of the AOD Reform Agenda. The AOD Reform Agenda articulates a ten-year vision and is ambitious. However, it is not clear which actions in the AOD Reform Agenda will be prioritised and why the entire AOD Reform Agenda has been referenced in one Action Area of the TDS. It appears that reform directions are applicable to all action areas in the TDS and should be mentioned throughout the TDS accordingly.

YNOT believes it will be important to prioritise actions from the AOD Reform Agenda in the TDS to ensure greater alignment, clarity and accountability. Targeted strategies to reduce harms associated with alcohol consumption and illicit drug use with respect to young people need to be identified and clearly articulated.

In Summary

Overall, YNOT endorses key aspects of the proposed TDS 2022-27 including;

- The national policy context underpinning the TDS.
- The aim, principles and strategic objectives.
- The inclusion of young people as a priority population.
- Early intervention to reduce drug related harm; and
- Grounding the TDS in a strong, contemporary evidence base.

YNOT is committed to ensuring that the views of young people are heard on issues that affect them, and we are concerned at the lack of consultation and engagement with young people in the development of the proposed TDS. YNOT believes the TDS requires further development to successfully achieve the overarching strategic objectives, aim and ultimately the vision of this Strategy. We particularly recommend that;

- A commitment to upholding human rights and adopting strength-based approaches is reflected in the principals.
- Youth consultation mechanisms are strengthened, clearly articulated and embedded at every stage of TDS development, implementation and evaluation.
- Investment is made to adequately resource and support the implementation of the TDS.
- That greater effort is made to align the TDS with government reform processes relevant to young people.
- Efforts are made to review and update the Tasmanian Strategic Policy context in the TDS.
- Drug education models in Tasmanian schools be strengthened and drug education programs be prioritised.
- Targeted initiatives to respond to alcohol and illicit drug use for young people are identified and included in the TDS.
- Actions outlined in the AOD Reform Agenda are prioritised in the TDS.