



Combined submission by Platform Trust and Community Housing Aotearoa

Mental Health and Wellbeing Commission Bill

11 December 2019



Introduction

Platform Trust (Platform) (www.platform.org.nz) is an intermediary organisation. We support a network of community organisations that provide support to people whose lives are directly impacted by mental health and addictions, their whānau and the communities where they live. Our role is to give voice to the hundreds of community sector organisations that have a significant role in the day to day delivery of mental health, addiction, disability and social support.

Community Housing Aotearoa (CHA) is the peak body for New Zealand’s community housing sector. Our 90 provider members house approximately 25,000 people nationally across 13,000 homes. Our 19 partner members include developers, consultants and local councils. More information is available at www.communityhousing.org.nz.

A membership list of Platform and CHA can be found in Appendix 1.

Platform and CHA acknowledge and support the submission of Changing Minds. We especially want to highlight the survey with 247 responses that helped shape their submission.

Key Recommendations

A summary of our key recommendations from this submission:

- 1) We endorse the creation of the Mental Health and Wellbeing Commission as an Independent Crown entity.
- 2) The Mental Health and Wellbeing Commission needs to be broader than the health system.
- 3) The Mental Health and Wellbeing Commission should use a wide range of intermediary organisations which are separate, but work with the Commission to perform its functions.
- 4) The Mental Health and Wellbeing Commission needs legitimacy. This will be gained through public confidence, the use of evidence-based strategy and having the ability to hold other entities accountable.

Previous recommendations

Platform submitted on the health and disability system review and the mental health inquiry. We wish to highlight several key recommendations from these submissions as they are relevant to this submission:

Mental Health Inquiry:	Health and disability review:
1. Generate cross-party commitment to setting a long-term vision for the future;	1. Ensure that equity is the main driver for any investment decisions;

<p>2. Establish independent commissioning for evidence-driven action; and</p> <p>3. Invest in the capacity and capability of the community sector.</p>	<p>2. Facilitate a close partnership between the health system and the social service system to help promote the mental health and wellbeing of the population;</p> <p>3. Re-establish the independent commissioning of health services;</p> <p>4. Direct the health system to more actively engage with local communities to foster health promotion, illness prevention and early intervention activities;</p> <p>5. Build the workforce capacity and capability of the health system to eliminate health inequities and to promote good health and wellbeing outcomes.</p>
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CHA support and endorse the recommendations made by Platform in their submissions.

A mandate larger than the Health System

Platform and CHA endorse the re-establishment of the Mental Health and Wellbeing Commission and believe it is a step forward in the mental health and addiction transformation that *He Ara Oranga*¹ called for. As outlined in s10 of the bill, the objective of re-establishing the commission is:

*“to contribute to better and more equitable mental health and wellbeing outcomes for people in New Zealand”*²

Addressing inequities will require solutions that are multifaceted, and outside the traditional idea of health. The current mental health and addictions system will not be able to solve this in isolation. The Mental Health and Wellbeing commission will therefore need to have overview of the activities of all government departments and entities that have mental health and wellbeing in their brief. For example: Corrections, HUD, MSD, Work and Income New Zealand, Oranga Tamariki, Ministry of Health, DHBs and ACC.

It is also crucial that the Commission is given the mandate to address and hold cross-government agencies to account on making the necessary structural changes in the mental health and addictions system which create and exacerbate inequities. For example, the inequities between government and non-government contracting processes and payments, and in staff FTE rates.

¹ <https://mentalhealth.inquiry.govt.nz/assets/Summary-reports/He-Ara-Oranga.pdf>

² <http://legislation.govt.nz/bill/government/2019/0188/latest/LMS281163.html#LMS281185>

We acknowledge the bill's recognition of a wider view of the Mental Health and Wellbeing system to include social factors, as stated under s8 of the bill:

“(a) have knowledge, understanding, and experience of—

(i) te ao Māori (Māori world view), tikanga Māori (Māori protocol and culture), and whānau-centred approaches to wellbeing; and

(ii) the cultural, economic, educational, spiritual, societal, and other factors that affect people's mental health and wellbeing”

These social factors need to underpin everything if the mental health and addiction system is to be effective and efficient. Overwhelming local and international and public health evidence identifies the need to improve social and economic inequities as the starting point of addressing mental health and addictions across a society.

The Mental Health and Wellbeing Commission will therefore need to take a wider view of what wellbeing is, and what can be done to enhance it. Wellbeing is more than the absence of disease; it is the ability for people to thrive. This will require the Commission to have the mandate to be able to work with, and hold to account, partners outside of the traditional mental health and addictions sector.

Intermediary Organisations

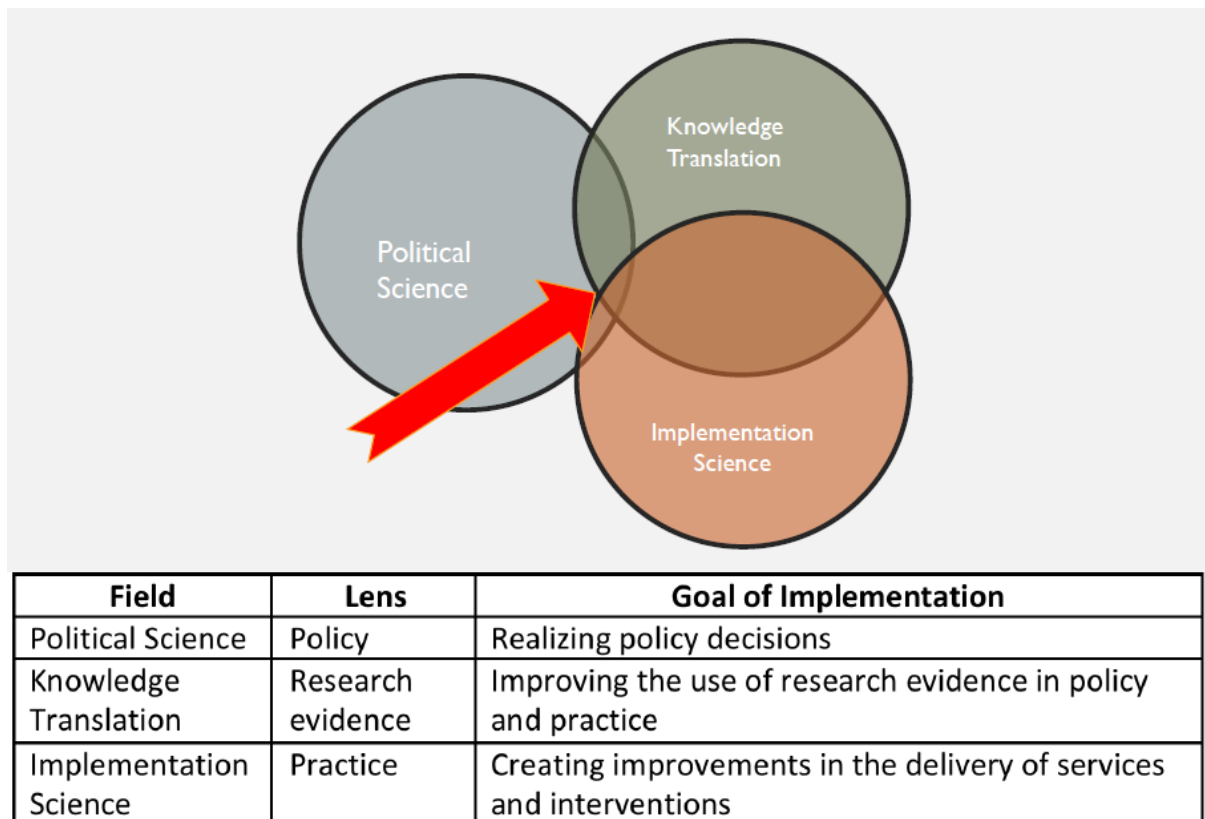
It is not possible for one entity (i.e. the Mental Health and Wellbeing Commission) to undertake all the functions required to transform the mental health and addictions system and complete the recommendations in *He Ara Oranga*³. Therefore, to achieve these, the use of intermediary organisations will be required.

Intermediary organisations work in-between existing system structures in order to facilitate communication or to achieve a particular goal. Intermediary organisations interface with a diverse array of organisations including service providers, service users, policy makers, other intermediaries, professional associations and government agencies⁴. An intermediary's role is to work in the space between policy, research evidence and practice (as outlined in figure 1).

³ <https://mentalhealth.inquiry.govt.nz/assets/Summary-reports/He-Ara-Oranga.pdf>

⁴ https://www.lattice.co.nz/documents/joining_the_dots.pdf

Figure 1. The role of intermediary organisations



Ref: Bullock & Lavis (2019)⁵

It is not feasible for the Mental Health and Wellbeing Commission to facilitate a national co-designed service transformation process, or provide backbone support for national, regional and local implementation on its own. It is therefore critical that alongside the establishment of the Commission, these essential and crucial functions are identified, and suitable intermediary organisations contracted to work separately, but alongside the Commission.

Legitimacy

Platform and CHA endorse the Government's decision for the Mental Health and Wellbeing Commission to be established as an Independent Crown Entity. For the Commission to be able to correctly identify problems and enact meaningful changes, it needs to be legitimate and have powers to enforce. Legitimacy will come from:

⁵ Bullock, H.L., & Lavis, J.N. (2019). Understanding the supports needed for policy implementation: a comparative analysis of the placement of intermediaries across three mental health systems. *Health Research Policy and Systems*

- 1) Public confidence,
- 2) Using evidence-based strategies, and
- 3) Being able to hold the government and appropriate ministries to account.

Public Confidence

For the community to have confidence in the Commission, leadership must reflect the diversity of New Zealand. People working with the Commission should have a broad understanding of the impact of mental health and addictions in our communities. Platform, CHA and Wise believe that focus must be placed on the groups most affected (people with lived experience, Māori, Pasifika, youth, refugees, migrants, people with disabilities, Te Hunga Takatāpui & Rainbow Communities). For this to be possible, we recommend a larger board, of at least five members, to ensure the diversity of expertise.

Public confidence in the Commission also requires transparency of the commission itself, and the work it does. It needs to authentically engage with the public and provide clear information about what is being done to improve mental health and wellbeing. This will require the development of clear measurable objectives that are reported on regularly. Objectives will need to consider the mental health and addictions sector, as well as the wider social systems (health, disabilities, housing, employment, welfare, education, and justice). As recommended in *He Ara Oranga*¹, the Commission should make regular reports on the status of the mental health and addictions sector, and the status of the mental health and wellbeing of New Zealanders more broadly, that are digestible for the public.

The Mental Health and Wellbeing Commission should be long-term. For example, Canada has recently renewed their mental health commission for another 10 years⁶. These longer contract terms make it easier to recruit and retain the highly skilled staff necessary and is a measurable outcome of the Government's goal to ensure mental health and wellbeing is a priority.

Evidence Based Strategy is used

As recommended in Platform's submission to the mental health inquiry, the Commission needs to be able to create and implement evidence-based strategy. To do this, the Commission should have the legislative mandate to be able to monitor the wider problem, rather than looking at the mental health and addiction system in isolation. This mandate will allow the Mental Health and Wellbeing Commission to identify information gaps that link mental health and addiction to the social

⁶ Comments on establishing a NZ Mental health & Wellbeing Commission in New Zealand

inequities, and will also support the development of New Zealand based evidence. As stated earlier, addressing the social determinants is vital if mental health and wellbeing in our society is to improve.

People working in the Commission must have the research expertise and knowledge to enable this work. To this end, it is also crucial that research expertise is identified as part of the competencies of the Board.

The Commission could also investigate the development of a mechanism that would support and promote the rapid uptake of evidence informed practice across the country, potentially something like reports produced by the Productivity Commission.

Accountability

The success of the Commission will depend on its ability to hold government ministries and those administering mental health and addictions services to account. Platform and CHA support the Commission’s ability to make recommendations. However, it is important to clarify who the Commission can make recommendations to, and what power these recommendations hold.

Accountability is critical. This will be a challenge and something that will need to be worked through. It will be important to consider the power and influences, and how these will impact on the Commission’s ability to hold organisations to account. It needs to have the teeth to be an independent watchdog, to monitor progress, to make corrections and to implement innovative strategies, as well as the right leadership to maintain the sector’s trust and form lasting relationships.

Commission Types

Rosen et al. (2010), outlined two types of mental health commissions used throughout the world. The table below summarises their findings. We support the current bill which suggests the creation of a Type 2 Mental Health and Wellbeing Commission.

Commission	Type 1	Type 2
Mandate	Narrow	Wide
Focus	Individual service user. Predominately risk management agenda; complaints ombudsman or umpire re adverse occurrences.	System-wide. Positive agenda; stakeholder encouragement, programmatic system reform and improvement.

	Medico-legal review of quality and duty of for involuntary patients. Inspectorial, inquisitorial, or regulatory.	Proactive consultation with all stakeholders.
Auspice	Mental Health Act or Own Act	Specific own Act and/or enabling legislation
Report to Examples	Health Minister or attorney general (predominately type 1, but with some elements of type 2).	Prime Minister, First Minister, health Minister, parliament, all of government (predominately type 2)
Jurisdictions	<ul style="list-style-type: none"> • Republic of Ireland • Northern Ireland • Scotland • Victoria, Australia 	<ul style="list-style-type: none"> • New Zealand (Former) • Canada • Western Australia

Source:⁷

⁷ Adapted from Rosen, A., Goldbloom, D., & McGeorge, P. (2010). Mental Health Commissions: Making the critical difference to the development and reform of mental health services. *Current Opinion in Psychiatry*, 23(6), 593-603.

Appendix 1

Community Housing Aotearoa Membership

Ngāti Tamaoho Trust	Compass Housing Services NZ Ltd	Latimer Community Housing Trust	Spencer Henshaw Ltd
Homeco Ltd	Compassion Housing Ltd	Level Consults Limited	Stepping Stone Trust
CNSST Foundation	Coromandel Independent Living Trust	Lifewise and Airedale Property Trust	Tauranga City Council
Sustain & Enable	CRESA	LinkPeople	Tauranga Community Housing Trust
Te Runanga o Kirikiriroa	De Paul House	Manawatu Community Housing Trust	Tāmaki Housing Association (THA)
Rauawaawa Kaumatua Charitable Trust	Downtown Community Ministry Inc	Manawatu Community Trust	Te Hau Ora o Ngapuhi
Hamilton City Council	Dunedin City Council	Mangatawa Papamoia Blocks Inc.	Te Kainga Oranga Trust
Habitat for Humanity (Dunedin) Ltd	Dwell Housing Trust	Marlborough Sustainable Housing Trust	Te Runanga o Ngati Awa
MyKiwiHouse Limited	EasyBuild House Packs	Mercy Villas	Te Runanganui o Ngati Porou
Abbeyfield NZ Inc	Emerge Aotearoa	Metro Performance Glass	Te Runanga o Toa Rangatira Inc Society
Accessible Properties New Zealand Ltd	Family Violence Intervention and Prevention Services	Mike Greer Homes NZ Ltd	Te Runanga o Whaingaroa
Aegis Projects	Gemelli Consulting	Modcom Portable Buildings Ltd	Te Taiwhenua o Heretaunga
Alcohol & Drug Community Support Trust	Habitat for Humanity (Central North Island) Ltd	Monte Cecilia Housing Trust	Te Tomika Trust
ATAMU Housing Trust (AHT)	Habitat for Humanity (Christchurch) Ltd	Napier City Council	Te Tumu Kāinga (Te Tumu Paeroa)
Auckland City Mission Housing Ltd	Habitat for Humanity (Tauranga) Limited	Navigator Limited	Tenants Protection Association Chch Inc
Auckland Community Housing Provider Network	Habitat for Humanity Greater Auckland Ltd	Nelson Tasman Housing Trust	The ASH Foundation
Auckland Community Housing Trust	Habitat for Humanity Invercargill	New Zealand Coalition to End Homelessness	The Porirua Whānau Centre Trust
Bays Community Housing Trust	Habitat for Humanity Nelson Ltd	New Zealand Council of Christian Social Services	The Property Group

Beacon Pathway	Habitat for Humanity New Zealand	Nga Hau E Wha National Marae	The Salvation Army
Bishop's Action Foundation	Habitat for Humanity Northland	Nga Maunga Whakahii o Kaipara Development Trust	Trust House Limited
Boffa Miskell Limited	Haumaruru Housing	Ngati Kahungunu ki Poneke Community Services Inc	Upper Hutt Housing Trust
Buildtech	Homes for People	Ngā Pōtiki a Tamapahore Trust	Homai te Whaiora VisionWest Community Trust
Chintaro (MDB Consulting)	Homes of Choice Limited	Ngāti Whātua Ōrākei	Waiheke Hope Centre
Chow Hill Architects Ltd	Horizon Housing Company	Ōtautahi Community Housing Trust	Waiohiki Community Charitable Trust
Christchurch Methodist Mission	Hornsby & Co.	Paekākāriki Housing Trust	Wellington City Mission
Cobham Street Trust	Housing Foundation	Papakāinga Solutions	Wellington Night Shelter Trust
Comcare Trust	Housing Plus Charitable Foundation	Penina Health Trust	Wesley Community Action
Community Housing Aotearoa	Aspire Community Trust	Poyner Houselifting Limited	Whakaatu Whanaunga Trust
Community Housing Trust	Island Child Charitable Trust	Queenstown Lakes Community Housing Trust	Whangarei Accessible Housing Trust
Community Living	Kāhui Tū Kaha (formerly Affinity Services)	Raukawa ki te Tonga AHC Ltd	Whatever It Takes Trust Inc.
Community of Refuge Trust	Kennerley Consulting Ltd	Regenerative	Zero Profit Initiative

Platform Charitable Trust Membership

Able Charitable Trust	He Waka Tapu	Odyssey House	Te Kotuku Ki Te Rangi
Arahura Charitable Trust	Hinemoa Lodge	Odyssey House Trust Christchurch	Te Rūnanga o Kirikiriroa Trust Inc
Arataki Ministries Ltd	Kāhui Tū Kaha	Otago Mental Health Support Trust	Te Waka Whaiora Trust
Balance Aotearoa	King Street Artworks	Pablos Art Studios Inc	Te Whare Mahana Trust
Beth-Shean Trust	Kites Trust	Pact	Thames, Coromandel Hauraki Social Services Collective c/o Whitianga Community Services Trust

Braemore Lodge	Koputai Lodge Trust	Pathways	The Higher Ground Drug Rehabilitation Trust
Changing Minds Comcare Trust	Le Va LifeWise	Penina Trust Problem Gambling Foundation	The Salvation Army Toi Ora Live Art Trust
Connect - Supporting Recovery	LinkPeople	Progress to Health	Tui Ora
Corstorphine Baptist Community Trust	Mana o te Tangata	Pukeko Blue Ltd	Turning Point Trust
Creative Arts Trust - Artsenta	MASH Trust	Purapura Whetu Trust	Vaka Tautua
Dalcam Healthcare Group	Mental Health Education and Resource Centre	Refugee Trauma Recovery	Vincent's Art workshop Inc
Dayspring Trust	Mental Health Foundation of New Zealand	Rubicon Charitable Trust	Waiheke Island Supported Homes Trust
Delamore Support Services Ltd	Mental Health NZ	St Marks Residential AOD Centre	WALSHtrust
Depression Support Network	MHAPS (Mental Health Advocacy and Peer Support Trust)	Stand Children's Services Tū Māia Whānau	Whatever It Takes Trust Inc
EMERGE Aotearoa Ltd	Mind and Body Consultants Ltd	Step Ahead Trust	Wild Bamboo
Equip Framework	MIX Mothers Helpers	Stepping Out Hauraki Stepping Stone Trust	Wise Group Work Opportunities Trust
Gateway Housing Trust	New Zealand Needle Exchange Programme	Supporting Families in Mental Illness NZ Inc	Workwise Employment Ltd
Goodwood Park Healthcare Group Ltd	Oasis Network	Te Ara Korowai	Youth Horizons