

# Submission

**To** Preventive Health SA

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**Topic** Draft South Australian Alcohol and Other Drug  
Strategy 2024-2030 Consultation

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## Contact

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## Acknowledgement of Country

Uniting Communities respects the enduring spiritual relationship First Nations people have with land and sea and the importance of this relationship to the wellbeing of First Nations people, including their languages and customs.

By seeking reconciliation and working in partnership with Aboriginal communities, Uniting Communities will move towards healing, justice, self-determination, and empowerment for Aboriginal people.

## About Uniting Communities

We are an inclusive not-for-profit organisation working alongside more than 80,000 South Australians each year and have been creating positive change for South Australian communities for more than 120 years. We utilise this expertise to advocate for systemic change across diverse social justice issues to shape public and social policy that delivers better outcomes for marginalised communities.

We support those in need to find the courage to move forward through enriching their lives and uniting the communities in which they live. By tackling the deep-seated challenges that affect people's lives, we are working to create systemic change and brighter futures for all South Australians. We provide support services across a range of different areas including legal services, aged care, family and domestic violence counselling, alcohol and other drugs, disability, homelessness, mental health, and child protection.

We have a long history of supporting people who want to change their use of alcohol and/or other drugs (AOD) and have been providing AOD support services for over 120 years. We currently provide a number of services that respond to the needs of people seeking alcohol and other drug associated assistance including;

### **New ROADS**

Our New ROADS program supports clients, over the age of 18, on the path to recovery from alcohol and other drug (AOD) use. New ROADS provides a range of support options including counselling, home detox, day programs and rehabilitation in shared houses (residential program). The residential service operates within a stepped care model, ranging from lower to higher intensity supports depending on the clients' needs.

### **Aboriginal Community Connect**

Aboriginal Community Connect is a 'one-stop' service for Aboriginal and Torres Strait Islander peoples seeking support with their drug and alcohol use, isolation, poverty and other social issues. Our service works with individuals and families with a cultural and community wellbeing focus and our services are available in north-western Adelaide, Murray Mallee, Riverland and Limestone Coast.

### **Streetlink Youth Health Service**

Streetlink is a service aimed to support young people (and their families) aged between 10 and 25 with health support and counselling about alcohol and other drugs.

## Submission to Preventive Health SA's consultation on the DRAFT South Australian Alcohol and Other Drug Strategy 2024-2030

We welcome the opportunity to provide feedback on Preventive Health SA's draft South Australian Alcohol and Other Drug (AOD) Strategy 2024-2030.

### Our key recommendations:

- Uniting Communities fully supports the recommendations and comments outlined in the submission prepared by SANDAS.
- We acknowledge SANDAS as the AOD Peak Body and thank them for their ongoing commitment to enhancing community wellbeing and reducing the harms associated with alcohol and drug use
- It is acknowledged that since the original consultations for this draft strategy occurred, new and emerging issues have evolved, including the 200% increase of alcohol consumption for women and the significant number of emerging drugs of concern coming into the drug market.
- As a result of these identified emerging issues, we recommend that the draft Strategy is amended to reflect appropriate responses to address these concerns.
- Following the review and examination of written submissions to this consultation, genuine additional consultations and workshops with key stakeholders (including NGO AOD service providers) are undertaken to ensure that the Final Strategy reflects the views and expertise of the AOD sector.
- NGO AOD providers and people with lived and living experience are included and invited to participate in the whole-of-government AOD Strategy Steering Group that is co-chaired by Preventive Health SA and SA Police.
- Resources are proportionately allocated to the AOD sector, similar to recent state and federal government investments that aimed to address domestic, family and sexual violence and mental health.
- Best practice models of substance use care for young people are reviewed, adapted and outlined in the Strategy, to better meet the needs of young people, as outlined in the recent [article](#)<sup>1</sup> written by Moensted, M. et. al. 2024, published in Drug and Alcohol Review.
- The Strategy outlines how safe and secure housing solutions for those completing residential AOD rehabilitation services are prioritised, and that clients are provided with appropriate solutions by the South Australian Housing Trust and Community Housing Providers.

### Additional comments

#### Alternatives to punitive measures

The SANDAS Submission outlined:

“The Strategy was developed before the release of the 2023 United Nations System Chief Executives Board for Coordination (CEB), chaired by the Secretary-General which opens the door for re-regulation, stating “alternatives to punitive measures for personal consumption should be considered. Prevention,

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<sup>1</sup> Moensted ML, Little S, Haber P, Day C. Time to reconsider the best practice models of substance use care for young people. Drug Alcohol Rev. 2024;43(4):817–22. <https://doi.org/10.1111/dar.13837>

treatment, harm reduction, rehabilitation and other measures were [are] required to help to secure individual rights to health and avoid incarceration”. These are to be prioritised over justice and carceral responses to drug use.”

Uniting Communities is fully supportive of introducing approaches that will reduce punitive measures through the criminal justice system. Our experience is that the South Australian Police Drug Diversion Program produces limited outcomes and engagement, and that more effective outcomes could be achieved through a strategic and considered decriminalisation of certain classes of drugs that are currently considered to be illicit. Such a program of decriminalisation would need to be accompanied by specific measures to assist those seeking to address their drug use on a voluntary basis.

We believe the Final SA AOD Strategy should clearly outline a pathway for deregulation (decriminalisation) of drug use in South Australia through a process of community discussion and proposed measures. Additional forms of harm minimisation measures such as pill testing should also be considered as they are being introduced in other jurisdictions around Australia and the globe.

### **Availability of Support Services**

The SANDAS submission highlighted:

“The Strategy is silent as to demand, either current or emergent demand for AOD interventions. It is difficult to assess the merits of the Strategy without understanding how it will respond to emerging needs of the community for treatment. This in the context of a significant reduction in treatment availability in South Australia over the period between 2013 and 2021/22 as noted by the AIHW in their most recent report. Fewer clients are using [able to access] AOD services in 2021–22 than 2013–14, after adjusting for population growth (434 clients per 100,000 population compared with 624 per 100,000, respectively).”

As it stands, the Draft Strategy does not specifically address how this increase in demand will be appropriately resourced. We call for this to be clearly outlined in the Strategy to ensure that access to residential or community-based support is available for those seeking support to address their use of AOD.

### **Health Promotion, Prevention and Education**

Priority Action 1.3 of the Strategy outlines that a priority action is to implement evidence-based school alcohol and other drug prevention education programs that incorporate protective factors. Currently this is not well resourced and is severely lacking in South Australia. We believe that NGO providers are already delivering successful programs and education within the school system and that these programs should be adequately resourced to expand this work.

### **Conclusion**

We are thankful for the opportunity to provide feedback to Preventive Health SA's consultation on the DRAFT South Australian Alcohol and Other Drug Strategy 2024-2030. We look forward to continuing our work with Preventive Health SA to progress this strategy and to meaningfully engage in any future consultations.