



# **Submission to the Department of Social Services Consultation on Foundational Supports**

**November 2024**

## Mental Health Victoria

Mental Health Victoria (MHV) is the peak body for mental health and wellbeing in Victoria. Our vision is a high-quality mental health and wellbeing system which embeds consumer and carer choice and agency into its design. MHV's Associates include specialist mental health and wellbeing service providers, consumer peaks, carer peaks, community health services, hospitals, professional associations, and allied community service and health providers.

This submission has been prepared following consultation over recent months with our Associates, including through a discussion forum and our Psychosocial Supports Network. MHV has also sought the advice of our Lived and Living Experience Advisory Group (LLEAG).

## Overview

MHV welcomes the opportunity to make a submission to the Department of Social Services (DSS) consultation process as governments consider how to best design a cohesive and integrated system of Foundational Supports – both General and Targeted – following the *Independent Review into the National Disability Insurance Scheme*<sup>1</sup> (NDIS) (NDIS Review).

It is critical that through this process, all governments meaningfully consider the perspectives and expertise of the mental health sector, consumers and carers, specifically those living with psychosocial disability and/or requiring psychosocial supports. The availability and accessibility of psychosocial supports are a human rights matter. It is the view of MHV and its Associates that coordinated investment in these services is essential to empowering a consumer to live independently and safely in the community. However, we are concerned that the value of these supports are not being recognised in this consultation process.

The *Analysis of unmet need for psychosocial supports outside the NDIS*<sup>2</sup> (Unmet Needs Analysis) revealed that 493,600 people with severe or moderate mental illness are missing out on psychosocial support. With changes to NDIS eligibility following the Review, this number is set to rise, making it critical for this consultation process to consider how to embed psychosocial supports in the design of a new system of Foundational Supports.

MHV is concerned that the DSS and Social Deck consultation approach to date, and the decision to separate policy discussions regarding General and Targeted Foundational Supports, will lead to a further fragmented system. Recommendation 7.5 of the NDIS Review specifically states that *“All Australian governments should prioritise supports for people with psychosocial disability as part of general foundational supports”*. However, through the discussion papers and online forums, attendees have consistently been advised that psychosocial supports will be considered in the future, as part of Targeted Foundational Supports. While we understand the appeal of separating these policy discussions, it presents a high risk of further fragmentation and will lead to further gaps.

MHV Associates have separately written to you with specific requests to better include people living with psychosocial disability and service providers, including to host a dedicated consultation session regarding psychosocial supports. MHV supports this request and recommends it be considered as a priority before the consultation period ends.

MHV provides this submission so that some psychosocial supports considerations can be incorporated at this stage of the Foundational Supports consultation. However, we implore the government and the Social Deck to consider how it can further engage with this cohort so that you can make meaningful recommendations and advice about how to design a genuinely integrated, Foundational Supports system.

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<sup>1</sup> [Working together to deliver the NDIS. NDIS Review: Final Report](#)

<sup>2</sup> [Final Report: Analysis of unmet need for psychosocial supports outside of the National Disability Insurance Scheme](#)

## Responses to Questions in the DSS Consultation Paper

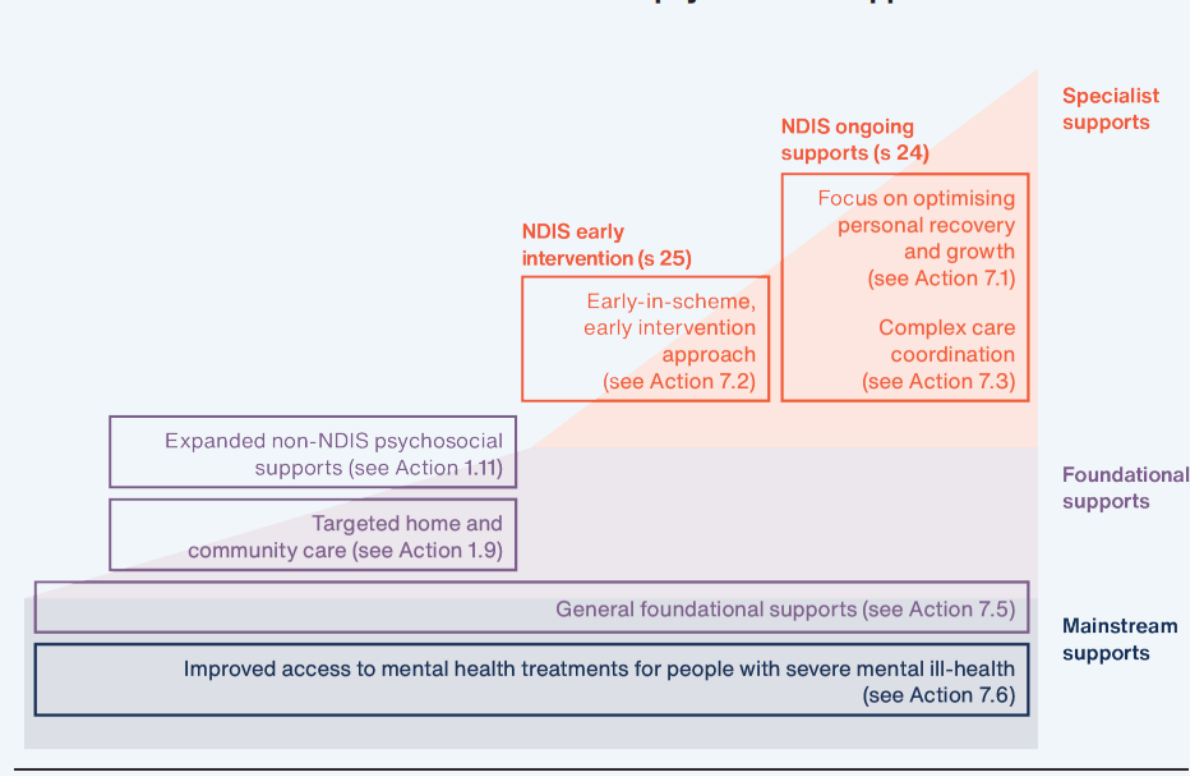
### Is the broad focus and scope of information, advice and capacity building supports aligned to what you would expect? Are there any gaps?

MHV and our Associates note that the broad focus and scope is currently misaligned, and a major gap is related to psychosocial supports. There needs to be consideration and focus given to psychosocial supports, through active engagement of people with lived and living experience of psychosocial disabilities, and organisations that work within the space, at each stage of the consultation and reform, to be able to address this gap.

In support of the inherent need to progress discussions about psychosocial supports within the context of General Foundational Supports, MHV draws your attention to the NDIS Review. The Panel's Vision in the NDIS Review included a continuum of mental health and psychosocial support which saw psychosocial supports integrated within Mainstream supports, Foundational Supports and Specialist Supports.

Figure 7

#### Overview of the continuum of mental health and psychosocial support



Extracted from page 134 of NDIS Review Final Report

Further, in the NDIS Review's recommendations, Action 7.5 specifically articulated the need to prioritise supports for people with psychosocial disability as part of General Supports. It listed the need for information and capacity building initiatives, as well as priority areas for investment including mutual peer support; recovery colleges; family psychosocial education.

***“Action 7.5: All Australian governments should prioritise supports for people with psychosocial disability as part of general foundational supports.*”**

*This should fund a range of initiatives providing information, individual and family capacity-building. Priority areas for investment include mutual peer support; recovery colleges where people can learn about mental health; and family psychosocial*

*education to assist families in their roles of supporting people with severe mental ill-health. In addition, as a targeted foundational support, governments should commit to increasing supply of psychosocial supports outside the NDIS.”*

MHV also notes that the reform focus on navigators and information and linkages does not address the difficulties people face due to issues with the current system. For example, MHV has heard from Associates that their services designed to support people with mild to moderate needs, are receiving increased rates of severe, persistent, and complex presentations as people cannot find other services. This, alongside the staggering statistics in the Unmet Needs Analysis highlight the need for more fit-for-purpose programs and services to be commissioned and designed. We also know that the lack of available services mean that people often end up on long waitlists to access support. This further reinforces that while information, advice and capacity building supports are important, the lack of available services and the significant unmet need is a gap that needs to be addressed as a priority.

In terms of building or investing in specific supports, MHV endorses the information included in the *Advice to governments on evidence-informed and good practice psychosocial services*<sup>3</sup> prepared by Mental Health Australia and the National Consumer and Carers Forum. This advice outlines psychosocial service principles, service models, and discrete psychosocial services which are particularly relevant for your consideration of potential reforms.

**Are there critical or immediate sector capacity challenges or opportunities that should be considered as part of initial reforms? How would you propose these challenges or opportunities be addressed?**

As noted before, the Unmet Needs Analysis demonstrates that there is a significant cohort of Australians whose needs are not currently being met, even before changes to the NDIS's eligibility for people with psychosocial disability. This is a significant gap that needs to be addressed, and it is important that the multiple disability and mental health reform processes underway across all jurisdictions are coordinated and considered if we want the result to be an integrated system where no one falls through the cracks. It is important to progress conversations systematically to minimise overlaps and ensure integration between General Foundational Supports, Targeted Foundational Supports, and the NDIS' new Psychosocial Early Intervention Pathway.

A significant sector capacity challenge relates to the transitional support for people who may transition out of the NDIS system following amendments. This cohort of people will need urgent and appropriate referral and transition supports to ensure that they do not fall through the cracks and maintain access to some type of support. However, existing psychosocial programs outside the NDIS are not currently set up to replace support services provided by NDIS. Scaling of these programs, as well as guaranteed funding beyond 30 June 2025, needs to be addressed as a key challenge to the sector's capacity to support individuals and their families and carers.

MHV also notes that the sector's experience is that the commissioning of new psychosocial programs and services in Victoria have not kept up with shifting mental health consumer needs. This highlights the importance of active engagement of people with lived and living experience of psychosocial disabilities and organisations that work in this space to better understand the gaps.

<sup>3</sup> [Advice to governments on evidence-informed and good practice psychosocial services | Mental Health Australia](#)

## **What could help support innovation, quality and best practice in the delivery of these supports?**

It is clear that a more integrated system of care between mental health and disability services is best practice and would enhance the quality of care a consumer receives. Therefore, it would seem logical to progress different reform conversations in parallel with one another and with appropriate coordination between processes. However, this is not the current experience.

At present, consideration of General and Targeted Foundational Supports is occurring separately from one another, likewise negotiations about responses to the Unmet Needs Analysis are distinct from these discussions. There is a strong need for better coordination between reform processes and funding negotiations happening at the Commonwealth and state level. In Victoria, the sector is seeking to engage with both mental health reform and disability reform processes which do not appear to be progressing in a coordinated manner making it difficult to realise an integrated system of care.

Further to this, there are opportunities for innovation through better coordination and collaboration across sectors including health, education, employment. There are a cohort of consumers who are sent from one service to another due to capacity issues or their complex needs, but often never getting the benefits of integrated, human-centred care. Our social services systems need a no wrong door policy and better integration of services to more appropriately support consumers.

## **What would need to be considered to avoid market gaps in the availability of supports including in lower population and regional and remote areas?**

MHV notes that there needs to be an urgent investment into supporting foundational and psychosocial workforces to improve retention with psychological support, secure employment opportunities, and resourcing to meet increasing need for services. Any service gap and/or workforce issue outlined in this submission is only heightened in regional areas, and we know that on top of that, there are additional unique delivery experiences, for example related to workforce and housing shortages.

### **Further Information**

MHV is continuing to engage with our Associates on this important topic and would be happy to meet with DSS or the Social Deck to provide further information.

MHV has an Associate Psychosocial Supports Network and has recently issued an Open Letter to the Victorian Government and published key themes from a discussion forum on this topic. Information is available online: <https://www.mhvic.org.au/our-work/networks>.

If you have any questions about this submission, you can contact:

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