



Government of **Western Australia**  
**WA Country Health Service**

Your Ref : 121141  
Our Ref : ED-CO-18-28959  
Enquiries to : Dr. Emma Crampin

Mental Health Advocacy Service  
Unit 6/18 Harvest Terrace (Cnr. Hay Street)  
WEST PERTH WA 6005

Dear Ms Colvin

**Non-compliance with sections 186 to 188 of the Mental Health Act 2014  
(Treatment, support and discharge plans inquiry)**

Thank you for your letter of 19 March 2018, and the accompanying report titled 'Treatment, Support & Discharge Plans (TSDP) Inquiry' (March to September 2017).

WACHS welcomes the report and recommendations and is keen to work with the Mental Health Advocacy Service (MHAS) to ensure compliance with this important aspect of the Mental Health Act 2014 (MHA 2014) across all its sites. We regret that we were not able to demonstrate full compliance in your inquiry.

We were pleased to note that a shift towards compliance was seen in all but one region, and note the initiatives described in Bunbury and Broome, as well as high degree of compliance in Kalgoorlie. We are grateful for your focus both on examples of good practice, and on identifying some of the impediments to compliance experienced by rural services.

You note in your report that the continual turn-over of staff mainly in regional areas has contributed to the issue of complying with the MHA 2014 and certainly this is an ongoing issue in regional WA, with locum doctors and psychiatrists covering for short periods of time, meaning that maintaining awareness and education across the workforce is challenging.

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Actions to date:

- We have ensured that the report is available to all our regions, and have received feedback from regions where there were specific issues identified.
- Following our own internal audit process (undertaken in March 2018), the WACHS Mental Health Safety and Quality sub-committee had already identified consumer involvement in care planning (including Treatment Support and Discharge Planning for those subject to the MHA) as a key quality improvement priority for 2018-2019.
- We concur with your comments about the ambiguities around the specific forms to be used, and the issues around PSOLIS. Moving forward, we plan to focus on the development of standardized templates to support clinicians to develop plans with the consumer, in a more uniformly recovery focused way. Some work is underway, for example:
  - Since your enquiry the South West has developed a standardized template for their treatment, support and discharge plans, and management plans, in a consumer friendly format, supported by the Consumer Advisory Group.
  - The Kimberley has developed a 'My Wellness Plan' template which is used with their Aboriginal consumers.

WACHS Mental Health will continue to build on the work underway, recognizing that a degree of culture change may also be required in some areas. We would be pleased to involve the MHAS further in this process as it evolves.

- WACHS undertakes 6 monthly clinical documentation audits (most recently in March 2018), to monitor compliance with the Mental Health Act 2014, Chief Psychiatrist's Standards, Stokes Recommendations and Policy. It includes questions re evidence of consumer and carer/family involvement in development of management plans. The current audit tool does not specifically identify the Mental Health Status of the consumer; however the audit questions will be reviewed prior to the next cycle in September 2018 and this may be amended.
- WACHS will write to all salaried Psychiatrists reminding them of their responsibilities with respect to completing TSDP.
- In regard to Mental Health Act training, the Mental Health Commission currently holds the records of individuals who have completed the online Clinician's e-Learning Package (CELP) training. WACHS Mental Health Central Office is in the process of uploading Mental Health Act specific training requirements into the WACHS online Learning Management System, which will allow Regional Managers to monitor compliance.

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We acknowledge the ongoing challenges and are committed to compliance with Sections 186 and 188 of the MHA 2014, and to ensuring that consumers are involved every step of the way through their patient journey in our service,

If you have any further queries please do not hesitate to contact Paula Chatfield, Executive Director Mental Health, on (08) 9223 8523. No doubt this topic will also be discussed at your routine meetings with Paula over the coming months.

Yours sincerely



Shane Matthews  
**A/CHIEF EXECUTIVE**

14 May 2018