



Submission to the Department of Employment Affairs and Social Protection on its review of the Implementation of the National Action Plan for Social Inclusion 2007- 2017

January 2019



St Patrick's Mental Health Services (SPMHS) is Ireland's largest independent, not-for-profit mental health service provider. St Patrick's Mental Health Services' vision is for a society where all citizens are given the opportunity to live mentally healthy lives. SPMHS works to provide the highest quality mental healthcare, to promote mental wellbeing and mental health awareness, and to advocate for the rights of those experiencing mental health difficulties. SPMHS achieves this through a human rights-based approach, through the enhancement of evidence-based knowledge and by striving to be at the cutting edge of new initiatives and advances in the field.

SPMHS is committed to furthering the development of the competencies of those choosing to work in mental health and of the organisations providing mental healthcare services, and to enhancing partnership with service users. Our strategic plan for 2018-2022 – 'Changing Minds. Changing Lives', is firmly rooted in these principles and commitments¹.

SPMHS welcomes the opportunity to contribute to the Department of Employment Affairs and Social Protection's consultation review of the implementation of the National Action Plan for Social Inclusion 2007-2016 and the Updated Plan 2015-2017 (NAPinclusion 2007-2017). This submission will focus on aspects of the Action Plan that are particularly pertinent to mental health.



Human Rights Based Approach

SPMHS welcomes the State's ratification of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) in 2018. We wish to highlight Article 19 as especially significant to informing the approach to dealing with social inclusion as a rights-based issue, and of particular significance for people with disabilities, including mental health difficulties – "States Parties to the present Convention recognize the equal right of all persons with disabilities to live in the community, with choices equal to others, and shall take effective and appropriate measures to facilitate full enjoyment by persons with disabilities of this right and their full inclusion and participation in the community"².

With the adoption of the 2030 Agenda for Sustainable Development³, alongside, among others, the UN CRPD⁴ and the Convention on the Rights of the Child⁵, Ireland has an obligation to protect and fulfil the right of everyone to the enjoyment of the highest attainable standards of physical and mental health⁶. The significance of the 2030 Agenda for Sustainable Development has been highlighted in the updated plan 2015-2017; SPMHS would highlight that within the Sustainable Development Goals, improving population mental health has been explicitly addressed for the first time in this context, reflecting increasing recognition of mental health as a rights issue internationally.

The recent OECD report, *Health at a Glance*⁷, states that Ireland has one of the highest rates of mental illness in Europe. Mental health difficulties impact upon every level of Irish society. Poverty, disempowerment, social exclusion, isolation and socioeconomic disadvantage are both a cause and a consequence of poor mental health, with long-term implications on morbidity, mortality and societal wellbeing⁸.

SPMHS encourages future iterations of the NAPinclusion to mainstream "the right to mental health into health, poverty-reduction and development strategies and interventions, and explicitly include it in general and priority health policies and plans"⁹. Prioritising equal access to rights-based mental health services, including the provision of geographically and financially accessible services on the basis of non-discrimination, will ensure that everyone will have access to basic healthcare services, including good mental healthcare services.

It is essential that the rights of people with long-term mental health difficulties accessing services are protected as regards the 'relevance and comprehensiveness of the monitoring and governance structures underpinning' the Plan. With respect to this, SPMHS highlights the need for community residences to be brought under the oversight of the Mental Health Commission (MHC) as they are not currently subject to regulation under the Mental Health Act. The 2017 MHC annual report notes that the residents of these services are "a very vulnerable population of people, and the emerging patterns from the inspections is that they are a forgotten group of people who are living their lives in less than satisfactory conditions"¹⁰.



Comprehensive Services

SPMHS supports the assertion within the Plan that – “Access to quality health services is a prerequisite for participation in the social and economic life of society”¹¹, and welcomes the steps taken by NAPinclusion 2007-2017 to support the implementation of reforms outlined in A Vision for Change¹² in order to develop comprehensive mental health services. However, despite an allocation of €160 million between 2012 and 2016 to the development of community-based mental health services and supports, progress on recruitment is slow, with less than a 7% increase in staff between 2012 and the beginning of 2016¹³. Public support for increased investment in mental health services has recently been evidenced within a Mental Health Reform report, which also found that 84% of those surveyed identified “that too little focus was placed on mental health – the highest of the six health problems measured”¹⁴. The allocation of €84 million in the 2019 Budget to mental health services, including €55 million to new services and the expansion of services, is welcomed. However, it’s important to note that in terms of percentage resource allocation of the total health budget, mental health funding remains below the recommendation of the Sláintecare report ¹⁵ for a 10% allocation of the overall health budget to mental health services.

Ensuring adequate funding for the provision of financially and geographically accessible mental health services and supports is a vital step towards meeting the mental healthcare needs of the most vulnerable members of Irish society and supporting social inclusion efforts.

Children’s right to enjoy the highest attainable standard of mental health

SPMHS fully supports the focus within the Plan’s high-level goals on “ensuring children reach their true potential”¹⁶. The European Network of Ombudspersons for Children’s (ENOC) position statement on ‘Child Mental Health in Europe’¹⁷ states that “protecting and enhancing children’s mental health is not only a key component of promoting their rights, including their best interests, but also has immense advantages. It gives children the best opportunity to live a happy, fulfilled life. It enables them to make the most of their childhoods and of growing up to be productive and happy adults”¹⁸.

Enhancing children’s mental health and wellbeing helps to break the cycle of poverty and exclusion that results from chronic untreated mental health difficulties. In line with the recommendations of the above cited report, SPMHS recommends that the NAPinclusion review consider the following:

- Promote and support child-centred, mentally healthy and inclusive schools. Such schools create an optimum environment for promoting child wellbeing, where difficulties can be identified and responded to early.
- Ensure the provision of age-appropriate services and supports to those young people who require secondary and tertiary mental health care.



- Ensure that those programmes responding to childhood adversity recognise children as rights holders, respect their evolving capacities and empower children and families to improve their mental health and wellbeing.

Greater public understanding and awareness of mental health, less mental health stigma and discrimination from childhood to later life

While mental health awareness and understanding has increased in the period 2007-2017, stigma remains a barrier to mental health recovery¹⁹. Early intervention is key to better recovery outcomes and when a person is stigmatized about their mental health difficulties, a delay in accessing treatment often results. It is imperative that there is a comprehensive national approach to breaking the cycle of harm caused by mental health stigma. SPMHS recommends that a comprehensive national stigma reduction programme needs to be introduced and sustained. Such a programme should include initiatives targeted at children and young people and build on the work of existing national stigma reduction efforts, which will support overall social inclusion efforts.

Greater responsiveness to the mental health needs of diverse groups in society

SPMHS agrees with the stated principle within the Plan that “working to improve the health status of all, and particularly vulnerable groups such as people with disabilities including those with mental illness, drug users, the homeless and Travellers, is an essential element of social inclusion”.²⁰

Travelling Community

The mental health needs of the travelling community in particular, has been highlighted in the final report of the Joint Oireachtas Committee on the Future of Mental Health Care (2018) which noted the “exponentially high levels of mental ill health among the Travelling Community where suicide was the cause of 11% of all Traveller deaths”²¹.

Persons experiencing homelessness

SPMHS recognises the changes in the social landscape in the period 2007-2017, and the increase in individuals presenting as homeless. According to Focus Ireland, in November 2018, 9,968 individuals were homeless in Ireland, 3,811 of whom were children. Research suggests that up to 71 percent of individuals experiencing homelessness have a formal mental health diagnosis²². Factors such as stigma, the psychological impact of being homeless, as well as high levels of exposure to adversity and traumatic events such as abuse, violence and substance abuse experienced by those in the homelessness system^{23,24,25} mean that the current and future need for mental health support for these individuals is unprecedented.



With the adoption of the UNCRPD, Ireland is required to provide housing, community services and facilities on an equal basis to persons with disabilities. SPMHS encourages the urgent provision of social housing alongside an increase in targeted mental health support to those currently accessing homeless services.

Older Adults

The number of people over the age of 65 in Ireland is set to almost treble by 2046²⁶. Maintaining social connections and involvement in community life has been identified as a protective factor for mental health in later life, thus considering barriers to participation is essential to this end and to support wellbeing in later life more generally²⁷. For example, the importance of accessible public transport for older adults and how this can benefit health has been highlighted within research.²⁸ For older people living in rural areas, improving transport accessibility and availability would be a practical action to facilitate social, civic and cultural participation and subsequently support wellbeing.

Increased access to services to support self-determination and independence will support older people to live in dignity and independence in their own homes and communities for as long as possible. Older adults with mental health concerns are less likely to be offered psychosocial interventions or to be targeted by awareness-raising and anti-stigma campaigns on social media or online, notwithstanding the efforts of the Plan to address this via e-inclusion initiatives. The provision of financially, geographically, age-appropriate services on the basis of non-discrimination and the provision of targeted information to reduce stigma is therefore a recommendation of SPMHS.

Summary of Recommendations

- Prioritise equal access to rights-based mental health services and recognise the significance of the UNCRPD to inform the approach to social inclusion
- Bring community residences under the oversight of the Mental Health Commission (MHC) inspection process
- Ensure adequate funding for the provision of financially and geographically accessible comprehensive mental health services and supports
- Introduce a comprehensive stigma reduction programme, including initiatives targeted at children and young people
- Promote and support child-centred, mentally healthy and inclusive schools
- Ensure the provision of age-appropriate, rights-based services and supports to young people



- Ensure the accessibility and availability of flexible social housing and targeted mental health support to those currently accessing homeless services
- Prioritise the provision of targeted services to older adults that support self-determination and independence

END

Ruth Cleary, Assistant Psychologist, SPMHS
Elaine Donnelly, Social Worker, SPMHS
Louise O'Leary, Advocacy Manager, SPMHS



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