Submission to:

WA Mental Health and Alcohol and other Drug Strategy Discussion Paper

Students for Sensible Drug Policy Australia

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WA Mental Health and Alcohol and other Drug Strategy Discussion Paper
Students for Sensible Drug Policy (SSDP) Australia

This paper reflects SSDP Australia's submission to the WA Mental Health Commission's 'Have Your Say' portal for the Mental Health and Alcohol and Other Drug Strategy Discussion Paper.

Our submission focuses on the discussion paper's sixth focus area, *"Reducing the harms associated with alcohol and other drug use for individuals and communities"*.

SSDP Australia is Australia's only national youth- and student-led community organisation that empowers and represents young people to bring change to drug policy. Young people are the most likely age group to use illicit drugs, yet the least likely to be involved in decision-making about drug-related policies and programs. We represent a grassroots network of students, young people, and their allies working towards meaningful drug policy reform grounded in evidence, compassion, and human rights. Our network is made up of young people and students involved with our national organisation, and our affiliated clubs formed at university campuses around Australia, including at the Edith Cowan University and the University of Western Australia. We belong to an international network of young people and students working towards health and human rights-based drug policies, and have continued involvement on an international level with the Australian Civil Society Committee on United Nations Drug Policy, the UNODC, and the Commission of Narcotic Drugs.

Can you provide specific examples of any harm reduction initiatives that are likely to have a significant impact over the next five years?

Promoting the health and well-being of young people requires creating environments that empower them to make informed decisions about alcohol and other drugs while ensuring access to support services when needed. Western Australia has a strong foundation in harm reduction through initiatives such as needle and syringe programs and naloxone distribution, and in lived and living experience service provision through organisations such as Peer Based Harm Reduction WA . However, there remains a significant gap in harm reduction services tailored specifically to young people.

While most young people in Western Australia use drugs infrequently and without experiencing dependence, they are particularly vulnerable due to the unpredictable nature of the unregulated illicit drug market. Increasing accessibility and variability of drugs, coupled with the absence of drug checking services, create a risky environment for young Western Australians. For example, the United Nations Office on Drugs and Crime recently found that Australia has one of the highest rates of MDMA use globally, and it is also one of the most dangerous places to consume it.[1]

[1] United Nations Office of Drugs and Crime (UNODC) (2019) *World Drug Report 2019*, Vienna.

In Western Australia, where cocaine, MDMA, and psychedelics are among the five most consumed illicit drugs,[2] illicit drug-related hospitalisations spike during festival seasons, which highlights the need for effective, acute, on-site responses at music festivals and events where young people are most likely to use drugs.[3]

Currently, on-site services at such events typically include ambulances, medical staff, security personnel, police, and occasionally, volunteer groups like Red Frogs. While these resources are valuable, they are often not perceived as approachable or attractive by young people. Many avoid seeking help after consuming alcohol or other drugs due to fears of judgment, stigma, or potential legal consequences, including criminal records. These not only represent missed opportunities to save lives and prevent injury, overdose, and other acute and long-term drug-related harm, but also to have health conversations with a population group that rarely seeks information regarding their drug use from health professionals. Students for Sensible Drug Policy WA strongly believes that adequately funded peer-led harm reduction at music events is absolutely critical to saving lives in Western Australia.

What do peer-led harm reduction services do at events?

Peer-led harm reduction at events looks substantially different across Australia. DanceWize (VIC) and DanceWize NSW have established programs in their respective states, with DanceWize NSW now partially funded to provide service delivery at a multitude of 'subject' events in NSW.[3] A number of funded and unfunded services operate across Australia, some of which are mobilised by event organisers, particularly for doofs and unregulated events, such as the Blazing Swans Rangers (WA). Some peer-led harm reduction services include: All Good Project (NT), ConsciousNest (QLD), Hi-Ground (QLD), In-tune (North QLD), and ACON Rovers (NSW).

With adequate funding, peer-led harm reduction services can operate supervised care spaces to provide peer support, care, and monitoring for mental health and drugs, and brief intervention. They can also assist with providing support for patrons who have experienced traumatic events at the festival, such as sexual assault or harassment, drink spiking, assault, and many other distressing, impactful events.[4] Peer-led harm reduction services can also distribute harm reduction resources and messaging, and provide education. Medical teams work closely and collaboratively with peer-led harm reduction services, utilising them as an intermediary, with lower acuity presentations being de-escalated to the supervised care space and high acuity being escalated as these occur.

Peer-led harm reduction services can also provide roving teams (rovers) who monitor crowds to identify patrons who may require support, distribute harm reduction resources (including water, condoms, earplugs), and advise people of their supervised care and education spaces. Rovers provide support across the duration of the event, including during ingress and egress, and also report on trends and behaviours in the crowd and coordinate

[2] Australian Institute of Health and Welfare (AIHW) 2024, *State and Territory summaries of alcohol, tobacco, e-cigarette and other drug use*, viewed 2 December 2024.

[3] WA Parliament (2019). Final Report of the Select Committee into Alternate Approaches to Reducing Illicit Drug Use and its Effects on the Community - Help, Not Handcuffs: Evidence-Based Approaches To Reducing Harm From Illicit Drug Use.

[4] Grahame H (2019) Inquest into the death of six patrons of NSW music festivals. State Coroner's Court of New South Wales.

with security and medical to support patron welfare.[5,6]

Additionally, in the absence of sensible policy, including drug checking and wider drug legislation, many patrons turn to peer-led harm reduction services for advice about the contents of their drugs, interpreting reagent test results, and to share their test results or experiences on drugs with the service in the hope that the information can be passed on to as many people as possible. Peer-led harm reduction services therefore facilitate community care by providing safe avenues for obtaining and sharing information that can be critical for saving lives and promoting community wellbeing. This anecdotal information is also passed on to other key stakeholders, which has a massive, positive impact on coordinated service delivery. Given that police sometimes are not forthcoming about the trends of their drug detections, the combination of anecdotal information and care presentations from both peer-led harm reduction services and medical services is crucial for developing tailored messaging and preparedness of all stakeholders on-site.

The value of lived experience

Peers "play an important role in creating safe, welcoming and non-judgemental services that successfully engage people".[7,8,9] Lived and living experience "lends legitimacy to [harm reduction] messaging,"[10] and peer-led harm reduction services have a proven track record because they have direct experience and, as a result, are listened to seriously by other peers."[11]

In the 2019 NSW Coroner's *Inquest into the death of six patrons of NSW music festivals*, further evidence was provided of the value of people with lived experience delivering harm reduction services:

> *Peer support encourages young people to learn from other young people who attend the same events, like the same music and wear the same clothes. Dr Monica Barratt and others emphasised the importance of organisations like DanceWize in her oral evidence,stating that peer support workers can be seen as"allies" to drug users. The Fosters a trusting relationship that makes young people more receptive to listening to their messages and changing their behaviors. The court heard evidence that the involvement of young people in conveying drug safety and harm minimisation messaging and services to other young people is extremely valuable, with peer-based education leading to a higher level of engagement among young people.*[12]

[5] Erica Franklin (2019) '18 July 2019 T870.27-28', Inquest into the death of six patrons of NSW music festivals. State Coroner's Court of New South Wales.

[6] DanceWize NSW (n.d.) 'Promoter'.

[7] Alcohol and Drug Foundation (2021) The power of lived experience – a quick guide for alcohol and drug services.

[8] *See also* Meumann N & Allen J (2018) *Peer Workforce Modelsin Alcohol and Other Drug Treatment.* Fairy Meadow: Coordinaire: South Eastern NSW Primary Health Network.

[9] *See also* Chapman J, Roche AM, Kostadinov V, Duraisingam V & Hodge S (2020) Lived experience: Characteristics of workers in alcohol and other drug nongovernment organizations. *Contemporary Drug Problems* 47(1): 63-77.

[10] Erica Franklin (2019) '18 July 2019 T866.25-34', *Inquest into the death ofsix patrons of NSW music festivals.* State Coroner's Court of New South Wales.

[11] Stuart Munckton (n.d.) User rights and peer-led harm reduction. Community Legal Centres NSW.

[12] Grahame H (2019) Inquest into the death of six patrons of NSW music festivals. State Coroner's Court of New South Wales.

[12] Grahame H (2019) Inquest into the death of six patrons of NSW music festivals. State Coroner's Court of New South Wales.

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Further contributions of peer-led harm reduction services

Peer-led harm reduction services at events provide outreach that makes seeking help accessible for communities that may not otherwise access a healthcare or specialist service for drug information and support. The recent evaluation of the CanTEST drug checking service in the ACT found that the majority of service users (70%) 'reported never previously accessing a healthcare worker for information or advice.'[13] Festivals and music events present as a strategic opportunity to provide intervention to the largest demographic of people who use drugs (20-30 years old).[14] Therefore, these settings provide an opportunity for intervention both at the likely point of consumption, and to be delivered in a culturally relevant setting.

Evidence from formal evaluations and research studies has outlined the positive impacts of harm reduction services at events. A community-based study conducted with Hoviakotilo ry, a grassroots harm reduction service operating at festivals in Finland, outlined the benefits of people with lived and living experiences delivering harm reduction services.[15] Service users highlighted the "social, emotional and spiritual support" provided by peer-led services, as well as being met with "empathetic non-judgemental approaches", and the "proximity, informality and expertise by the peers who come from the same culture." The study offers further evidence for the value of peers-led services, brilliantly summarised in the following quote:

> *"every respondent highlighted the importance of having personal, lived experiences of substance use, psychedelic culture, or trip sitting. The interviewees mentioned these experiences"give reasonsto understand clients", helping in the process of providing support and helping a person through a difficultsituation, and also helping to understand the thought processes and internal experiencesthe clients may go through. This experience wasseen to provide the volunteers with a calmer attitude, perspective and more toolsto provide support."*

An evaluation of Take Kare Safe Space, a 'safe space' program implemented in Sydney City nightlife districts, further identified the "benefits of providing early, proactive, non-judgmental interventions and de-escalating conflict".[16] Moreover, harm reduction services complement existing medical services at events, and have been shown to improve the efficiency and effectiveness of emergency services and other key stakeholders.[17,18]

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[13] Olsen A, Baillie G, Bruno R, McDonald D, Hammoud M & Peacock A (2023) CanTEST Health and Drug Checking Service Program Evaluation: Final Report. Australian National University: Canberra, ACT.

[14] Lancaster C, Ritter A & Matthew-Simmons F (2013) Young people's opinions on alcohol and other drugs issues. National Drug and Alcohol Research Centre, University of New South Wales.

[15] Kranz M (2020) Harm reduction at music festivals: How peer organisations support the wellbeing of partygoers. [Bachelor's Thesis]. Helsinki Metropolia University of Applied Sciences.

[16] Wadds P, Doran CM, Shakeshaft A & Tran DA (2023) "It's like a safety net for when things go wrong": key stakeholder and program user perspectives on a peer-led safe space program in Sydney, Australia. *Harm Reduction Journal 20*(1): 1-11.

[17] Wadds P, Doran CM, Shakeshaft A & Tran DA (2023) "It's like a safety net for when things go wrong": key stakeholder and program user perspectives on a peer-led safe space program in Sydney, Australia. *Harm Reduction Journal 20*(1): 1-11.

[18] Munn MB, Lund A, Golby R & Turris SA (2016) Observed benefits to on-site medical services during an annual 5-day electronic dance music event with harm reduction services. *Prehospital and Disaster Medicine 31*(2): 228-234.

Funding and support

(1) **All Australian state and territory governments** should provide **appropriate funding and support for peer-led harm reduction** education and support services at festivals and events.[19,20]

Educating festival-goers and young people about the signs of drug intoxication and toxicity is crucial for early identification and better outcomes.[21] Expanding organisations like DanceWize and enhanced support for 'rovers' in the music festival context are imperative to amplify education and support.

We recommend that state and territory governments consider developing relevant guidelines and legislation to support music festival safety while not restricting or removing youth leisure spaces. We suggest that the legislation and policy introduced in NSW for regulating music festivals serves as an example but not exemplar of the ways the governments can facilitate safer nightlife.

For example, in accordance with the *NSW Music Festival Guidelines(2019)*, DanceWize NSW currently engage in practices that reduce harms at festivals that sit outside of their direct scope. These practices are outlined in the Guidelines as responsibilities of festival prompters. They include:

- water provision (e.g., tubs, water, and staminade),
- prevention of noise related harms (e.g., free earplugs),
- designing accessible and inclusive music festivals (advocating for gender identity in records of care, inclusion of neurodivergent sensory items in supervised care space, diverse sexualities and genders training),
- prevention and management of sexual assault (specialised training in sexual assault and drinking spiking response),
- sexual health promotion (chemsex and sexual health training, sexual health consumables), and
- pre- during- and post-event harm reduction messaging.

(1.1) **Funding for existing peer-led harm reduction services** for events should be **increased** to promote the health and wellbeing of communities and increase access to education and support.[22]

(1.2) Peer-led harm reduction services should be **legislated** for **all events** that are **large scale** and/or are anticipated to **involve increased risks** to patron wellbeing.

SSDP Australia acknowledges that an expectation for all event organisers to ensure that peer-led harm reduction services are on-site is likely to place undue strain on

[19] Students for Sensible Drug Policy Australia (SSDP Australia) (2023) Submission to 'Australia's illicit drug problem: Challenges and opportunities for law enforcement'.
[20] Students for Sensible Drug Policy Australia (2020) Submission in support of the proposed amendments to the Poisons Standard (Medicines) to reschedule MDMA and Psilocybin.
[21] Coronial Inquest.
[22] Students for Sensible Drug Policy Australia (SSDP Australia) (2023) Submission to 'Australia's illicit drug problem: Challenges and opportunities for law enforcement'.

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organisers and existing service providers. For effective policy and service delivery change, it is crucial that these services receive appropriate funding that is scaled to match any legislative change across states and territories. It is also critical for the live music industry that event organisers are not constrained by legislation in their ability to hold financially-viable events.

Conditions of a festival or event which may increase risks for patron wellbeing include but are not limited to high temperatures and isolated locations. Effective, integrated service delivery on-site is critical to promoting patron welfare and both proactively addressing and responding to avoidable harms.

Additional funding and support should be provided for event organisers and existing harm reduction service providers to consult on best practice harm reduction and/or have a presence at other events where required.

(1.3) Peer-led harm reduction services should be **adequately funded to coordinate and operate at events** which are located in **rural, regional, and remote areas**, as well as events that **operate over long hours, nights, weekends, and over multiple days**.

(1.4) For states and territories with a lower number of local festivals and events, **governments** should consider **providing funding** to **support inter-state collaboration,** such as mentorship, training, resourcing, and support offered by existing service providers.

(1.5) Peer-led harm reduction services should be **adequately funded** to **engage culturally and linguistically diverse (CALD) communities, people who are neurodivergent, people with disabilities, and Aboriginal and Torres Strait Islander peoples**.

(1.6) Peer-led harm reduction services should be **adequately funded** to **respond to sexual assault and harassment**, and **mental health crises or challenges**.

(2) **People with lived and living experience** should be **centred** in **all harm reduction services,** and wherever possible, **peer-led services should be prioritised in funding**.

In absence of a peer-led service feasibly operating in a state or territory, governments should consider how adequate funding could support available service providers to consult with peers to improve practice and inform training.

SSDP Australia firmly believes that people with lived and living experience should be elevated to lead harm reduction services and provide meaningful, accessible, and trustworthy services.

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Law enforcement & security

(3) **Law enforcement and security** should **support event-based harm reduction programs.**[23]

(4) **Law enforcement and security** should **consult peer-led harm reduction services** to **develop guidelines and procedures** on engaging with patrons **using harm reduction frameworks**.

(5) **Law enforcement and security** should **receive peer-led briefings and trainings** on **harm reduction services** and on working within **harm reduction frameworks**.

(6) **Law enforcement and security** should **maintain reasonable distance from harm reduction services** operating at events and in nightlife to **promote service access.**[24,25]

> (6.1) **Law enforcement should not be located** at the entry of or enter harm reduction and medical services unless formally requested, and **should remain at least 10 metres away**.
>
> The requirement for law enforcement to maintain reasonable distance from harm reduction services should be written into relevant legislation and policy.
>
> SSDP Australia strongly advocates that **police should not be positioned in large groups** near harm reduction and medical services, regardless of their distance from services. Large groups of police function to intimidate patrons and prevent them from accessing services.

(7) **Law enforcement and security should not**, as a matter of course, **evict patrons** from events **without appropriate assessment and support from** an available harm reduction service.[26]

> (7.1) **Law enforcement and security should not**, as a matter of course, **evict patrons who have accessed a harm reduction service**.
>
> Law enforcement and security have a duty of care for patrons and should refer anyone who may be at risk of harm to available harm reduction services. No service user should feel threatened by the risk of eviction, or be evicted from an event due to their use of an on-site service.

(8) **Law enforcement** should **provide harm reduction and medical services** with **up-to-date information** regarding searches, seizures, charges, and emerging drug trends.

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[23] Students for Sensible Drug Policy Australia (SSDP Australia) (2023) Submission to 'Australia's illicit drug problem: Challenges and opportunities for law enforcement'.

[24] Students for Sensible Drug Policy Australia (SSDP Australia) (2023) Submission to 'Australia's illicit drug problem: Challenges and opportunities for law enforcement'.

[25] Students for Sensible Drug Policy Australia (2022) Submission to 'Exploring liquor licensing reform options'. Liquor & Gaming NSW.

[26] Students for Sensible Drug Policy Australia (SSDP Australia) (2023) Submission to 'Australia's illicit drug problem: Challenges and opportunities for law enforcement'.

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Information-sharing between on-site stakeholders is critical to ensuring effective service delivery and proactive responses to emerging issues of concern.

Operations & stakeholders

(9) Peer-led harm reduction **supervised care spaces** should be **adjacent to medical services** and deliver best practice **integrated referral models of care**.

(10) **Harm reduction** at festivals and events should be **adequately resourced by event organisers**, including **consultation with peer-led harm reduction services** in the planning of operations, and the **inclusion** of harm reduction service providers in pre-event, on-site, and post-event meetings and de-briefs.

(11) **Event organisers** should **actively advertise harm reduction services** before, during, and after events, including in **pre-event and post-event messaging**, and through **on-site maps and sufficient signage**.

(12) Peer-led harm reduction services should be **permitted to display harm reduction information**, including educational signs and posters, **inside and outside of their spaces** to facilitate service engagement.

Displaying harm reduction information in the external, public-facing areas of services, can substantially improve the likelihood that patrons will seek education and support. These informational materials promote open conversations with patrons and help to alleviate the stigma and 'taboo' surrounding drug harm reduction conversations and drug use. For example, displays of poly-drug combinations and their dangers (e.g., the Tripsit Drug Combinations chart) are the top conversation starter for DanceWize VIC and NSW at events.

(13) **Event organisers** should employ **best practice harm reduction** during **ingress/egress and within event spaces**, including environmental design.

Event organisers should ensure that there is adequate shade, water, ease of patron movement, signage, and adequate cooling and ventilation.

> (13.1) **All state and territory governments** should commit to exploring **integrated harm reduction services** that **support patron wellbeing** upon **exiting licensed areas** and after **event cessation**.
>
> In 2023, we have seen three festival deaths in NSW, all of which have occurred after the event has closed. Security teams are tasked with clearing the event space, while peer-led harm reduction is tasked with handing out water where it is available. This is a time of the night when harm reduction and medical services are no longer able to take more patrons into their care. A 'post-event' space, or any service tasked with providing supervision or medical assistance is not a provision accounted for.

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Testing

(14) **Peer-led harm reduction services and on-site medical** at events should be **adequately funded and supported** to **provide test strips** and **self-administered urine kits** to patrons who are concerned about **drink spiking**.[27]

(15) **Peer-led harm reduction services** should be **adequately funded and supported** to **provide harm reduction education and reagent testing kits**.[28]

Reagent testing kits, and more advanced and reliable forms of drug checking, enable people to make informed choices around drugs and employ practices to look after their health and wellbeing when using drugs. In absence of sanctioned drug checking services, existing service providers should be supported to share legal testing equipment with patrons.

> (15.1) **Peer-led harm reduction services** should be supported to **provide reagent testing kits and testing strips** both **on-site and outside of events**, to people concerned about the contents and/or purity of their substances.

Naloxone and NSPs

(16) **Peer-led harm reduction services** should be **adequately funded and supported** to operate as an **on-site needle and syringe program** (NSP).

Needle and syringe programs provide sterile and unused equipment to promote safer forms of drug consumption and reduce associated health risks.

> (16.1) **Peer-led harm reduction service**s should be supported to provide **safe disposal of equipment**.

(17) **Peer-led harm reduction services and on-site medical** at events should be **appropriately funded** to **carry naloxone on-site** and should **undergo nationally recognised training in administering naloxone** to respond to an opioid overdose.

Licensed areas

(18) A **supervised care space** operated by peer-led harm reduction services **should be considered a harm reduction area**, where intoxicated patrons may rest and receive required care without licensees or agents of licensees being at risk of penalty.[29]

Licensed areas in nightlife spaces, festivals, and events, are governed by legislation around alcohol consumption and intoxication. Across Australia, responsible service of alcohol laws require that intoxication patrons are evicted from licensed areas, or else licensees are at risk

[27] Students for Sensible Drug Policy Australia (2022) Submission to 'Exploring liquor licensing reform options'. Liquor & Gaming NSW.
[28] Sage C (2015) Harm Reduction and Drug Checking; A wrap-around service for festivals. Case Study: Shambhala Music Festival/ANKORS Drug Checking Harm Reduction Service data.
[29] Students for Sensible Drug Policy Australia (2022) Submission to 'Exploring liquor licensing reform options'. Liquor & Gaming NSW.

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of penalty.

Supervised care spaces run by peer-led harm reduction services provide spaces for intoxicated patrons to receive support. As these spaces are located within festivals and events, it is critical that legislation around licensed areas and intoxication be updated to enable these services to effectively support patrons (e.g., by designating that a peer-led harm reduction service is outside of a licensed area, or a 'harm reduction area'). This outdated legislation also presents challenges for intoxicated patrons once they leave a supervised care space. As stated in our policy asks 7 and 7.1, intoxicated patrons leaving a supervised care space should not be evicted without appropriate assessment and support from a harm reduction service.

(19) A **patron** should have a **reasonable excuse** for **remaining within or reentering the vicinity of a licensed area** if a **health professional has advised** that there is a **reasonable fear for their safety** if they do not remain in, or re-enter the vicinity of the area.[30]

Yours sincerely,



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[30] Students for Sensible Drug Policy Australia (2022) Submission to 'Exploring liquor licensing reform options'. Liquor & Gaming NSW.