Dear Ms Parter

I write to make a submission on the Discussion Paper, *Towards an Aboriginal Health Plan for NSW*. In addition to considering the Discussion Paper, I have also noted the Aboriginal Health Report Card included for information.

I note that Aboriginal children make up a high proportion of the Aboriginal population (37% of Aboriginal people are aged less than 15 years compared with 19% of the NSW population). I consider the health and well-being of Aboriginal children and young people to be an issue of vital importance. The current disparities in health status between Aboriginal and non-Aboriginal children and young people are of particular concern and I would be keen to see a clear focus on addressing this inequality in any new *Aboriginal Health Plan for NSW*.

My comments, in the main, relate to the need to more fully articulate links between activity and measures addressing social determinants of health and the proposed high level strategies focusing on primary health reform. It is understood that the new Plan's focus on broad health system reform emerged as an important issue in consultations. However, it would be helpful for the new *Aboriginal Health Plan* to explain more fully the rationale for the focus on broad health system effectiveness and reform rather than the social determinants of health, preventive and environmental health.

The Discussion Paper notes that social determinants of health are omitted from the Plan as they will be addressed via a newly established Ministerial Taskforce on Aboriginal Affairs. The Report Card document includes data on life expectancy, child mortality and hospitalisation rates and targets and measures for determinants of health such as smoking, including in pregnancy, overweight and obesity and alcohol consumption. The Aboriginal Health Report Card document cross references the *Aboriginal Health Plan* currently under development. However, the Plan itself does not cross reference the Report Card or articulate how the two are linked.
In addition to further explanation of the role of the Ministerial Taskforce, I would suggest that there be explicit articulation between the Plan’s proposed high level accountability framework and the Report Card as it would be desirable for a high level plan for Aboriginal health for the state to make reference to the social determinants that have a direct impact on health. The Commission is of the view that activity to improve Aboriginal health should identify and seek to address key health issues for Aboriginal children such as the high mortality rate of children aged under 5 years and high levels of hospitalisation for respiratory and infectious diseases, injury and skin conditions. Social determinants of health such as poor nutrition due to lack of access to healthy food and smoking and alcohol intake during pregnancy have a significant impact on infant health, including low birth-weight.

The Aboriginal Health Report Card notes that Aboriginal health monitoring sits within a policy context that includes the NSW State Plan 2021 (which has targets to reduce rates of smoking among Aboriginal pregnant women by 2% per year and halve the gap between Aboriginal and non-Aboriginal infant mortality rates by 2018) and the Aboriginal Health Plan Discussion Paper notes close alignment between the Plan and NSW 2021. However, it is not clear in the Discussion Paper how existing measures and targets in NSW 2021 and the Aboriginal Health Report Card will be encapsulated in development of new measures under the new Aboriginal Health Plan.

In regard to the vision and goal for Aboriginal health identified in the Discussion Paper, it is considered that these require further explanation. For example, does the vision ‘health equality for Aboriginal people in NSW’ refer to equality of access, outcomes or both? Similarly, the goal of providing ‘culturally safe and optimal health services for Aboriginal people in NSW’, would benefit from some additional explanation about what these terms mean. These further clarifications will also link to what performance measures and targets are set in place.

In regard to Strategic Direction 1- Integrated Planning and Funding for Aboriginal Health in NSW, primary healthcare is identified as the core focus. The importance of primary health care is not disputed. However, given the influence of lifestyle factors such as smoking, binge drinking and overweight/obesity on Aboriginal health outcomes and the importance of environmental health, preventive and environmental health initiatives should also receive significant attention, including within the primary health care context.

I appreciate the opportunity to provide input on the Discussion Paper, Towards an Aboriginal Health Plan for NSW, and trust that the comments provided are of assistance. For further communications on this matter the contact person is Mr Gregor Macfie on 9286 7243 or Gregor.Macfie@kids.nsw.gov.au.

Yours sincerely

Megan Mitchell
Commissioner
29 June 2012