

27 February 2020

Mr Gavin Matthews  
First Assistant Secretary  
Indigenous Health Division  
Commonwealth Department of Health

Via email to: [health.implementation.plan@health.gov.au](mailto:health.implementation.plan@health.gov.au)

Dear Mr Matthews,

**Re: Implementation Plan Consultation Paper**

The Australian Healthcare and Hospitals Association (AHHA) welcomes the opportunity to respond to the Implementation Plan Consultation Paper.

AHHA is Australia's national peak body for public hospitals and healthcare providers. Our membership includes state health departments, Local Hospital Networks (LHNs), public hospitals, community health services, Primary Health Networks (PHNs), primary healthcare providers, aged care providers, universities, individual health professionals and academics. As such, we are uniquely placed to be an independent, national voice for universal high-quality healthcare to benefit the whole community.

AHHA congratulates the Department on the decision to incorporate the *My Life My Lead* outcomes into the revised Implementation Plan. The consistent themes that emerged from that consultation were:

- Culture is central to Aboriginal and Torres Strait Islander wellbeing and needs to be embraced and embedded across a range of Aboriginal and Torres Strait Islander and mainstream services—both as a protector and enabler of health and wellbeing.
- Racism within health and other systems must be addressed to remove barriers to better outcomes in health, education and employment.
- The impacts of trauma across generations of Aboriginal and Torres Strait Islander people must be acknowledged and addressed.
- Governments need to support long-term, coordinated, placed-based approaches that honour community priorities and embed participation.

The Implementation Plan Framework provided embraces a strengths-based approach with a vision of Aboriginal and Torres Strait Islander people enjoying long and healthy lives with culture at the centre of this framework. These themes are consequently embedded within the proposed Implementation Plan Structure.

The vision of the *National Aboriginal and Torres Strait Islander Health Plan 2013-2023* (The Plan) that 'the Australian health system is free of racism and inequality and all Aboriginal and Torres Strait Islander people have access to health services that are effective, high quality, appropriate and affordable' is enunciated within the Overarching Policy document. However, AHHA is concerned that this direct language from The Plan regarding racism has been diminished within the Implementation Plan Consultation Paper. This would

appear to be inconsistent with the *My Life My Lead* theme of racism within health and other systems needing to be addressed to remove barriers to better outcomes in health, education and employment. As you will be aware racism was a consistent element emerging within the many Closing the Gap refresh consultations held around Australia during 2018.

Taking action to ameliorate racism within healthcare settings is a key objective for AHHA in enabling all Australians to have equitable access to healthcare of the highest standard when and where they need it. AHHA is currently working with the South Australian Health Performance Council to develop a measurement tool for the SA health system <https://www.hpcsa.com.au/reports/institutional-racism>.

This builds upon work that we supported in Queensland where Queensland Health partnered with QAIHC and the Queensland Human Rights Commission [https://www.ghrc.qld.gov.au/\\_data/assets/pdf\\_file/0004/19759/2018.12.04-MEDIA-RELEASE-Matrix-report.pdf](https://www.ghrc.qld.gov.au/_data/assets/pdf_file/0004/19759/2018.12.04-MEDIA-RELEASE-Matrix-report.pdf). Recently AHHA congratulated the Queensland Government on the introduction of the Health Legislation Amendment Bill 2019 which will require Queensland Hospital and Health Boards to have a strategy for achieving health equity for Aboriginal people and Torres Strait Islander people as well as requiring each Hospital and Health Board to have one or more Aboriginal persons and/or Torres Strait Islander persons as members.

Racism, either interpersonal or institutional, continues to contribute to lower levels of access to, and poorer outcomes from, health services by Aboriginal and Torres Strait Islander people. The vision of The Plan of a health system free of racism demands a coherent implementation plan. Whilst this could be interpreted from the consultation documents provided there is a distinct lack of emphasis that does not align with the current efforts already underway in some jurisdictions or the clearly expressed focus of Aboriginal and Torres Strait Islander people.

AHHA values the opportunity to contribute our feedback to the Implementation Plan Working Group.

Yours sincerely,



Alison Verhoeven  
Chief Executive  
Australian Healthcare and Hospitals Association