

19 June 2020

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### ***National Injury Strategy 2020-30 - Consultation Draft***

I am writing to express serious concerns held by the Federation of Ethnic Communities' Councils of Australia (FECCA) in relation to the consultation draft of this Strategy. We appreciate the opportunity to provide you with feedback as part of this consultation.

FECCA is the peak, national multicultural body representing Australians from culturally and linguistically diverse (CALD) backgrounds. FECCA's role is to advocate and promote issues on behalf of its constituency to government, business, and the broader community. FECCA strives to ensure that the needs and aspirations of Australians from diverse cultural and linguistic backgrounds are given proper recognition in public policy.

Our primary concern is that the draft Strategy is largely silent on addressing the potentially increased vulnerability to injury of some people from CALD backgrounds, particularly as a result of language barriers and poorer health literacy. There is a risk, for example, that injury awareness and prevention initiatives may not be delivered in a culturally appropriate way or are unavailable in languages other than English.

Demographic data alone indicates that consideration should be given to including CALD issues more explicitly in the Strategy. The most recent Census showed that in 2016, nearly half (49%) of Australians had either been born overseas (first generation Australian) or had one or both parents born overseas (second generation Australian). Over 300 separately identified languages were spoken at home in 2016. 21% of Australians spoke a language other than English at home, and of those 17% reported speaking English not well or not at all.

This serious omission in the draft Strategy is all the more surprising, given that various strategies emanating from the Department of Health are explicitly responsive to and inclusive of CALD issues. These include strategies relating to aged care, disability, immunisation, preventive health, HIV/AIDS and blood borne viruses, and sexually transmissible infections to name a few.

FECCA proposes that the following factors may have contributed to the deficiencies in the current draft.

#### **Governance**

The Strategy development team led by the George Institute does not appear to include any members with obvious or recognised experience in multicultural health, health promotion or engaging with CALD communities. There is a similar gap in membership of the Expert Advisory Group. FECCA notes and applauds significant representation on Aboriginal and Torres Strait Islanders but regrets the missed opportunity to provide a CALD perspective in the Strategy.

Federation of Ethnic Communities' Councils of Australia

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### **Data**

There is a paucity of data relating to CALD issues in both the Strategy and in the published literature review. This may be because even the core indicators of cultural and language diversity within the ABS Standards for Statistics on Cultural and Language Diversity (1999) appear to be not reported in various injury data sets. FECCA has asked for clarification of this issue from the Injury Studies team at the Flinders Health and Medical Research Institute.

Without these data it would be difficult to establish injury impacts on CALD people who represent a significant proportion of the Australian population and to assess whether it would be appropriate to make this group a priority population for the strategy.

### **Literature Review**

The published literature review is deficient in that it contains only a few references to CALD issues and most of these are from now out-dated national aged care strategies.

This deficiency could be due to a failure to include CALD or other related terms as search criteria. Even a cursory Google search including 'CALD', 'diversity', 'multicultural' reveals a wealth of relevant academic and research publications on topics as varied as drowning, rock fishing, heatwaves, and a need for safety product instruction manuals to include more graphical explanation rather than relying on English language alone.

### **Roundtable Consultations and Report**

It appears from the 2019 Report on roundtables held in Sydney and Melbourne that FECCA was the only participant with the capacity to present a CALD perspective.

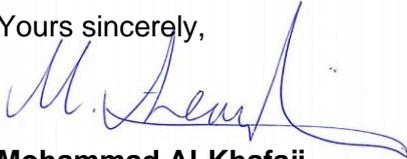
The report records that numerous suggestions were made regarding the need for the Strategy to be responsive to and inclusive of CALD communities. In discussion on the principles to be adopted 22% of the Sydney participants and 26% of the Melbourne participants supported the need to recognise and respond to the unique needs of diverse populations. Other suggestions included: the need to address racism and injustice; implementation of community led, culturally responsive and strengths-based programs; the need for interventions to be culturally sensitive and understanding; and a focus on non-English speaking people for injury prevention and for CALD communities to be a priority.

It is clear that these suggestions have, to a significant extent, not been adequately reflected in the current draft Strategy. It is also disappointing that the roundtable report only records participants' views but, unlike many quality consultation reports, does not contain a section which conveys and explains the writing team's acceptance or rejection of those participant views.

In conclusion, FECCA suggests that the consultation draft of the Strategy is deficient in failing to acknowledge CALD issues. Furthermore, publication by the Department of Health of the Strategy in its current form may not be consistent with the Australian Government Multicultural Access and Equity Policy.

FECCA has the capacity to contribute formally to further work on the Strategy and bring the required CALD perspective through its State, Territory and Regional members and its extensive multicultural partner network, and we would be glad to assist further.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'M. Al-Khafaji', written over a light blue grid background.

**Mohammad Al-Khafaji**  
FECCA Chief Executive Officer