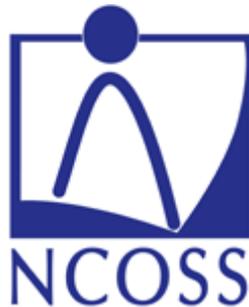


Submission to NSW Health on the draft NSW Rural Health Plan



June 2014

Council of Social Service of NSW (NCOSS)

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About NCOSS

The Council of Social Service of NSW (NCOSS) is a peak body for the not-for-profit community sector in New South Wales. NCOSS provides independent and informed policy advice, and plays a key coordination and leadership role for the sector. We work on behalf of disadvantaged people and communities towards achieving social justice in NSW.

NCOSS' health priorities

NCOSS' objective in the health portfolio is to reduce inequities for disadvantaged people and improve population health outcomes. We believe that health policy and systems need to be based on principles that recognise health as a human right, the social determinants of health, and the importance of strengthening the role of the community and consumers in the development and delivery of health services.

NCOSS health priorities are primary and community-based health, oral health, mental health, health transport, and aids and equipment for people with disabilities. Our funding recommendations to the NSW Government on these issues are outlined in our [2013-14 Pre-Budget Submission](#). We also advocate on health system reform, consumer and community engagement and health equity issues.

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Summary of recommendations

NCOSS recommends:

- Social determinants initiatives include a focus on education and the early years, along with housing, transport and social cohesion.
- Additional initiatives for prevention and health promotion in relation to illicit drug use are included in line with harm minimisation principles, such as the Needle and Syringe Program.
- Mental health initiatives reflect a recovery focus and orientation as a core principle underpinning the provision of mental health services.
- Additional mental health initiatives are included to acknowledge and address the co-existing relationship between substance abuse and mental health.
- Mental health initiatives (third bullet) - the word 'patient' is replaced with 'consumer' in line with NSW mental health policy and good practice.
- Additional initiatives to improve access to health transport are included to:
 - Review the delivery of non-emergency health transport in NSW, including community transport providers.
 - Implement a reform plan for non-emergency health transport that delivers a coordinated system at the Local Health District level and a consistent approach for responding to people in need of transport assistance. This plan should address the role of community transport in addition to Non-Emergency Patient Transport services.
 - Increase investment to community transport providers to meet the growing need for non-emergency health transport services.
- Under initiatives to Support the patient journey:
 - The third initiative is amended to provide assistance for patients transitioning both to and from regional/metropolitan care.
 - An additional initiative is included to improve referrals to community-based health and non-government services for patients being discharged from health facilities.
 - An additional initiative is added to increase funding for aids and equipment, as outlined in the NCOSS Pre-Budget Submission 2014-15
- Initiative to invest in regional and rural hospital infrastructure is expanded to include other health infrastructure to continue and support the delivery of health services.
- Rural Health Plan recognises the diversity of rural communities, and includes initiatives to address the specific needs of diverse populations and people living in rural communities.
- The term 'consumer' is used in the Plan rather than 'patients'.

Introduction

The Council of Social Service of NSW (NCOSS) welcomes the opportunity to provide feedback to NSW Ministry of Health on the draft *NSW Rural Health Plan*.

NCOSS broadly supports the draft Plan. We believe the proposed directions and initiatives reflect the priority health equity issues affecting people living rural and remote communities, and strategies to address them. We provide the following comments in response to the consultation questions.

1. Does the Draft Plan address the key health challenges facing rural, regional and remote communities in NSW?

Direction 1: Healthy Rural Communities

NCOSS commends the draft Plan's focus on healthy communities and its commitment to strengthen health promotion, prevention and primary care. We believe the focus on Aboriginal health, mental health, and child and maternal health appropriately reflects the major areas of health inequities. We also strongly welcome the commitment to work in partnership with other organisations to address the social determinants in order to improve the health and well-being of rural communities.

Direction 2: Improved Rural Patient Experience

NCOSS applauds the draft Plan's recognition of the need to improve access and continuity of health services in rural communities. In particular, non-emergency health transport and aids and equipment continue to be critically under-resourced to meet demand across NSW. We note that effective care coordination requires consideration of the availability of community care and support services at the time of referral and discharge, as well as transport and accommodation (second last paragraph, p16).

Directions 3: Integrated Rural Health Services

NCOSS supports the prioritisation of workforce, infrastructure and e-Health strategies to improve rural health services in partnership with local services and the community.

2. Will the initiatives in the Draft Plan help achieve the proposed key Directions and Strategies?

Direction 1: Healthy Rural Communities

Initiative: "Addressing the social determinants of health"

NCOSS welcomes the activities to address the social determinants, and recommends the critical role of education and early childhood learning in improving outcomes for children, particularly those from disadvantaged families, are included as a focus.

Recommendation:

- Social determinants initiatives include a focus on education and the early years, along with housing, transport and social cohesion.

- Additional initiatives for prevention and health promotion in relation to illicit drug use are included in line with harm minimisation principles, such as the Needle and Syringe Program.

Initiative: “Improving rural mental health”

Recommendation:

- Mental health initiatives reflect a recovery focus and orientation as a core principle underpinning the provision of mental health services.
- Additional mental health initiatives are included to acknowledge and address the co-existing relationship between substance abuse and mental health.
- Mental health initiatives (third bullet) - the word ‘patient’ is replaced with ‘consumer’ in line with NSW mental health policy and good practice.

Direction 2: Improved Rural Patient Experience

Initiative: “Improve access to health transport”

While NCOSS welcomes the recognition of the need to improve access to health transport, we believe the initiatives could be strengthened to address under-funding and lack of coordination.

Recommendations:

The following initiatives to improve access to health transport are included:

- Review the delivery of non-emergency health transport in NSW, including community transport providers.
- Implement a reform plan for non-emergency health transport that delivers a coordinated system at the Local Health District level and a consistent approach for responding to people in need of transport assistance. This plan should address the role of community transport in addition to Non-Emergency Patient Transport services.
- Increase investment to community transport providers to meet the growing need for non-emergency health transport services.

Initiative: “Support the patient journey”

Recommendations:

- The third initiative is amended to provide assistance for patients transitioning both to and from regional/metropolitan care.
- Additional initiative is included to improve referrals to community-based health and non-government services for patients being discharged from health facilities.
- Additional initiative is added to increase funding for aids and equipment, as outlined in the NCOSS Pre-Budget Submission 2014-15

Strategy 2: Infrastructure

We recommend the initiative to invest in ‘regional and rural hospital infrastructure’ is broadened beyond hospitals to include other existing community-based health services, such as dental clinics and community health centres. We note the following initiative to develop new regional health care hubs, but believe that existing community facilities also require appropriate investment so these can continue to operate efficiently and effectively.

Recommendation:

- Initiative to invest in regional and rural hospital infrastructure is expanded to include other health infrastructure to continue and support the delivery of health services.

3. Other feedback

Recognising diversity

NCOSS recommends the Rural Health Plan recognises the diversity of rural communities, and addresses the specific needs of diverse groups living in rural and remote areas, including refugee and humanitarian entrants, culturally and linguistically diverse people, and people with different sexual or gender orientations.

Significant numbers of refugee and humanitarian entrants initially settle in rural and regional areas of NSW. Locations such as Newcastle, Goulburn, Wollongong, Coffs Harbour, Albury, Lismore, Goulburn, Armidale, Tamworth and Wagga Wagga, have often been the first destination for newly arrived refugees. There are also pockets of secondary settlement in areas such as Orange and Young.

The NSW Refugee Health Plan identifies rural and regional refugee settlers as a priority group, see pg 17: NSW Health Department (2011) NSW Refugee Health Plan 2011-2016, NSW Health Department, Sydney:

http://www0.health.nsw.gov.au/policies/pd/2011/pdf/PD2011_014.pdf

Other relevant policies include:

- NSW Health and Equity Statement: In All Fairness (2004)
- Community Relations Commission and Principles of Multiculturalism Act (2000)
- Multicultural Planning Framework- Community Relations Commission (2009)

Recommendation:

- Rural Health Plan recognises the diversity of rural communities, and includes initiatives to address the specific needs of diverse populations and people living in rural communities.

Language

We suggest the plan refers to ‘consumers’ rather than ‘patients’, as for example *Direction2: Improved Rural Patient Experience*. The term ‘patients’ confers a bio-medical relationship with a focus on illness and treatment, rather than reflecting the broader engagement a person may have across the spectrum of health services.

Recommendation:

- The term ‘consumers’ is used in the Plan rather than ‘patients’.

Conclusion

NCOSS thanks the NSW Ministry of Health for the opportunity to provide input into the development of the NSW Rural Health Plan. For inquiries or further information please contact Ms Solange Frost, Senior Policy Officer (Health) on 02 9211 2599 ext. 130 or solange@ncoss.org.au