

Access and Equity

Inquiry into the responsiveness of Australian Government services to Australia's culturally and linguistically diverse population

Discussion paper response template

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Summary/Overview of your views

Mental Health in Multicultural Australia (MHiMA) is of the view that there is clear evidence that the culturally and linguistically diverse (CALD) population faces many barriers in accessing and receiving equitable Australian Government and other related services. MHiMA welcomes the current Inquiry to review the responsiveness of Australian Government services to Australia's CALD population and is of the view that there can be improvements particularly with regards to:

- Providing greater clarity on the concepts of 'access' and 'equity' to all stakeholders;
- Increasing the level of authority for the strategy;
- Increasing the level of oversight and governance of agencies through mandatory reporting of compliance with performance indicators;
- Ensuring the Access and Equity strategy is aligned with the Social Inclusion Agenda and improve integration;

- Improving the transmission of access and equity obligations to contracted service providers and tighten the monitoring and management of these obligations;
- Developing more specific and measurable performance standards with mandatory reporting of compliance with these standards;
- Publishing the Access and Equity Report annually with the aim of the Report being to provide a clear picture of the current level of compliance with the Framework;
- Ensuring that Reports focus on all aspects of access and equity and continue to incorporate the findings from the community consultations undertaken by FECCA.

Concepts of 'access' and 'equity'

1. Is there a clear understanding of what the concepts 'access' and 'equity' mean in delivering services to people from culturally and linguistically diverse backgrounds?

Response:

It is important to consider understanding of these terms by the general community including people from CALD backgrounds, and service providers. The terms are complex and there may not be a clear shared understanding of what they mean. There would be little understanding of these terms by community members who have low English proficiency.

Examples of common misunderstandings about access and equity from a community member point of view may include:

- how entitlement to particular services is determined (who can use the service);
- how government services interconnect with each other and other private or NGO services;
- Concern with how personal information may be distributed may deter access;
- Lack of awareness that particular services exist, what they offer and how they can be accessed.

Examples of common misunderstandings by services may include:

- A belief that access and equity obligations are met by merely stating that the service has processes in place to not actively discriminate against any individual;

- A belief that equity means offering everyone the same service and not taking into consideration the special needs of a CALD person such as the need for an interpreter, allocation of extra time and therefore costs involved in the provision of services to the CALD population.

There is often little understanding of the actions required for the provision of culturally responsive services to people from CALD backgrounds. Culturally responsive services may require significant modification of approaches such as providing more community outreach or developing alternative models of service delivery.

There is evidence that while people from CALD backgrounds may access services, there is an equity issue in that the quality of the service they receive is of a lower quality as contextual issues related to culture and language are not taken into consideration. This results in poorer outcomes and then affects access as CALD people drop out of services as they are not seen to be effective. This in turn negatively affects the help seeking behaviour of the various CALD communities.

2. [Is there a need to communicate the meaning of access and equity better to government agencies and/or the community? How would that be best done?](#)

Response:

Yes there is a need to better communicate the meaning of these terms. At the community level this requires:

- educating the CALD community about access and equity policies in easily understandable English and community languages, using a variety of media;
- communicating messages about access and equity in culturally meaningful terms. For example, simply informing groups about the availability of mental health services will have limited value if the members of that group do not conceive personal and social problems as “mental health issues”;
- providing culturally and linguistically responsive support, advocacy and information services to help people from CALD backgrounds learn about their rights, service obligations, and related issues including privacy, confidentiality and mental health acts so that they can ultimately become empowered to advocate for themselves and family members

At the level of government agencies:

- funding agreements need to clearly articulate the meaning of access and equity, and clearly stipulate the access and equity obligations of funded government agencies which should be incorporated into reporting requirements;
- The relationship between access & equity and other policies, frameworks and legislation needs to be clearly explained.

Authority for access and equity

3. Is the level of authority for the access and equity strategy (i.e. endorsement by the Australian Government) adequate?

Response:

- No. MHiMA is of the view that the level of authority for the access and equity strategy needs to be strengthened considerably.

4. Should stronger authority for access and equity be considered? What mechanisms would be most feasible?

Response:

Yes, because without an obligation to act and report on the Access and Equity Framework it is unlikely that services will give sufficient attention at the organisational level. As indicated previously, evidence of the implementation of access and equity strategies need to be demonstrated through mandatory reporting and performance indicators in funding agreements.

Access and Equity Strategy and Framework

5. How should government departments and agencies best ensure that their policies, programs and services are accessible and equitable to clients from culturally and linguistically diverse backgrounds?

Response:

Government departments and agencies should be aware of the

cultural and linguistic characteristics of their population and utilise this information in policy planning and implementation. Departments and agencies need to have a mechanism for community engagement and the best way to ensure that their policies, programs and services are accessible and equitable is to ask the community. CALD representation on advisory or reference committees will also provide such a mechanism.

Other mechanisms that can ensure that access and equity is part of strategic direction may include:

- Internal access & equity diversity committee with attention to leadership and staff inclusion;
- A CALD consumer and carer participation strategy;
- Community representatives participation at all levels of the organisation
- Attention to ways complaints and quality feedback mechanisms work and how appropriate they are for CALD service users, especially those with greater disadvantage

Organisations can put practical measures in place to track service use patterns, and implement changes that that will facilitate an individuals' ability to successfully enter, navigate, and exit needed services and supports. Departments and agencies can increase service utilisation by disadvantaged groups by:

- Considering times and locations that are convenient to the community. For example, women who are obliged by their family to have a male present at interviews may be unable to attend services in working hours. The need to rely on public transport and travel a long distance may render some services unavailable;
- Ensuring that that materials are available in languages used by the community;
- Providing reminder calls, or transportation to services

We note again that some of these measures require additional resource allocation at the organisational level.

6. What support do agencies need from DIAC in implementing access and equity?

Response:

As administrator of the Access and Equity Policy it is the responsibility of DIAC to ensure that agencies are supported in their implementation of the Policy. It is important that agencies can expect consistency in regard to access and equity across the various services. Some other examples of support may include:

- Guidelines on what is expected in regard to access and equity;
- Advice on how to put the framework into practice;
- Access to affordable and professional interpreting services and multilingual resources;
- Readily accessible information on cultural demographics.

7. Is the current Access and Equity Strategy and Framework appropriate to guide access and equity implementation by departments and agencies?

Response:

It may be an appropriate guide, however if the concepts are poorly understood, then this needs attention. In relation to cultural responsiveness, services need guidance on how to implement and track the impact of these kinds of organisational initiatives.

8. Is there a need for clearer performance standards for agencies?

Response:

Yes.

9. Should access and equity put more focus on core services such as employment, health, welfare and education instead of the full suite of policy and services provided by the Australian Government?

Response:

It is important to retain a whole of government focus on access and equity which can be complimented by specific attention to important foundation services such as health, welfare and education, though impact in these areas is dependent on a whole of society/government commitment to recognize the needs of a culturally diverse society. Any strong themes which emerge from the FECCA community consultations may provide an indication of specific areas of need, as will an analysis of the mandatory reporting of government agencies on their implementation of the Access and Equity Framework.

Alignment with other Government policies

10. How does the Access and Equity Strategy align with the Government's Social Inclusion Agenda? Does it need to be better integrated? How?

Response:

Clearly the two do need to be integrated. It would be a good time to explore how the two could be better integrated as part of the current Inquiry.

11. What opportunities are there to align the Access and Equity Strategy with other government strategies?

Response:

The Access and Equity Strategy should be aligned with all government strategies. In regard to mental health there are opportunities to align with key mental health policies, standards and reforms such as the Ten Year Road Map for Mental Health Reform (DoHA), as well as through various accreditation mechanisms such as the ACHS, EQuIP and other community sector accreditation processes.

Service Delivery, Contracts and Contract Management

12. How well are access and equity obligations transmitted to contracted service providers?

Response:

It is MHiMA's view that these obligations are not transmitted to contracted service providers very well. If they are transmitted, they are often not enforced through agreements and performance indicators.

13. Are access and equity obligations in contracts effectively monitored and managed by departments and agencies?

Response:

No.

Standards/performance measures

14. Are clearer and more measurable performance standards required to measure government agencies' performance in providing accessible and equitable services? If so, should they be uniform across the government or more tailored to individual agencies?

Response:

Yes. They would need to be tailored to service needs and negotiated with services since access and equity can have many meanings depending on the context and nature of the service in question.

15. What standards should agencies meet to effectively implement the Government's Access and Equity Strategy?

Response:

Standards need to be developed from the Strategy. Agencies need to demonstrate that they have incorporated key components of the Strategy into their policies and plans and should be able to demonstrate implementation of these through reporting against the standards.

16. Does the current Access and Equity Framework provide adequate standards for measuring performance?

Response:

Agencies need to be provided with clearly defined standards to report against. The standards need to be contained in a separate section or as a stand-alone document and developed in such a way that performance indicators can be drawn from them.

17. Is the current 'self-reporting' adequate or should there be some independence in the assessment of departments' and agencies' performance? How?

Response:

Ideally external assessment of performance would help ensure compliance. However it may be a large undertaking to have external assessments for all departments and agencies. Self-reporting is fine as long as performance indicators are clearly articulated and agencies are required to submit documentation to demonstrate compliance.

18. Should all agencies report against specific measures? (for example, against ethnicity data for planning and service usage; resource and expenditure on interpreting and translating; increasing cultural competence etc.)

Response:

Yes.

Access and Equity Report

19. Is reporting on government access and equity initiatives necessary?

Response:

Yes. Without some form of reporting it is unlikely services/agencies will focus on the issues or think through the implications.

20. If reporting is considered necessary, what should be the form of reporting and reporting frequency?

Response:

Reporting should focus on specific measures and performance indicators. Such reporting should be mandatory and incorporated into funding agreements reporting requirements. Such reporting should be annual.

21. What should be the purpose of access and equity reporting? (to showcase best practice? measure agency performance in delivering access and equity to clients? improve government services? communicate government achievements within government / to community?)

Response:

Ultimately, such reporting is to ensure that the health and equity initiatives are actually being implemented and adhered to. However, such reporting can also showcase best practice to provide a solid foundation on which services can plan, to promote social/organisational change to meet changing demographic challenges and needs.

22. How could better performance reporting be achieved?

Response:

As stated in a number of responses already provided, reporting should be mandatory and be integrated into other reporting requirements attached to funding agreements, etc.

Focus of access and equity reporting

23. Should the Access and Equity Report have an annual theme? What implications, if any, would this have for the reporting?

Response:

No, this may give a message that certain aspects of access and equity are more important than others. All aspects of the access and equity strategy are important. If very strong themes emerge from the FECCA community consultations and these are supported by the reporting of performance indicators by the various government agencies and services then possibly these could be focussed on in the following Report.

24. Should examples from each department or agency be included in the report or should the report include only good practice examples? If the latter, what should be done with the excluded input?

Response:

The Report would get very long if examples from each and every department and agency were utilised. Good practice examples could provide a benchmark for other agencies to strive towards so that in future reports good practice examples from these agencies may be used.

25. How should the input of FECCA be presented in the report? How should the report respond to this input?

Response:

The outcomes of the annual community consultations undertaken by FECCA should be presented in the report by order of priority of themes. The strongest themes that emerge do need to be responded to in the report as these will indicate either positive areas or negative areas which need to be rectified.

Location of Access and Equity Policy and Reporting Responsibility

26. Is DIAC the appropriate agency to administer the Access and Equity Policy and Strategy and coordinate the Access and Equity Report? Is any agency better placed to do these tasks?

Response:

Given that access and equity is a whole-of-government strategy MHiMA suggests that the best placed agency to administer the Policy and Strategy would be the Department of the Prime Minister and Cabinet. There should also be an exploration of the option of devolving the responsibility for collection and analysis of reporting by government agencies and services to other relevant departments.

Do you have any other comments?

Mental Health in Multicultural Australia (MHiMA) is supportive of this inquiry into the responsiveness of Australian Government services to Australia's CALD population. We welcome further involvement in this process and in any subsequent activities arising from the Inquiry that relate to mental health.