

5 July 2024

## Preventive Health SA Bill 2024

As South Australia's largest cancer charity, with a key cancer prevention focus, Cancer Council SA welcomes the opportunity to provide comment on the Preventive Health SA Bill 2024.

Since the establishment of Wellbeing SA in 2020 and through our decades of collaboration with Drug and Alcohol Services SA, our organisation has had an extremely productive relationship with SA Health and its agencies. We look forward to an equally productive relationship with Preventive Health SA. Cancer Council SA welcomes the certainty that this legislation brings with an ongoing focus on prevention in South Australia.

### Consultation questions:

*1. The draft Bill has been designed to ensure prevention is an important and permanent part of the infrastructure of the health system in South Australia, embedding preventive health policy, action and resourcing for long term and sustainable outcomes. How likely is it that the wording in the draft Bill will enable this?*

Cancer Council SA believes the wording of the Bill provides certainty for investment in prevention in South Australia. We particularly welcome the inclusion of 3 (d) that preventive health policy, action and resourcing will be embedded in the legislative framework governing the State's health care system and administration.

Cancer Council SA would like to see preventive health policy embedded across all other Government Departments in the future including the Department for Education to protect young people and embed healthy lifestyle behaviours into adulthood. A previous framework *Health in all Policies* demonstrated the premise that the determinants of health often sit across other Government departments.

#### *a. Are there specific areas of the draft Bill that require clarification or strengthening?*

Many Government funded and supported prevention strategies, programs and campaigns are limited by short time frames and contracts. This can limit their impact and especially reduces the ability of non-government bodies to improve health equity. Cancer Council SA recommends strengthening sections with the addition of long-term to both 7(1)(a) and 7(1)(b) to read:

- To undertake, commission, support, monitor and evaluate **long term** programs or services designed to-, and
- To make grants or commission **long term** strategies designed to prevent or reduce non-communicable health conditions and improve health equity in partnership with government and non-government bodies;

There are also several points Cancer Council SA would like clarification on.

The draft Bill references the functions of the Chief Executive to include the commissioning and leading public education initiatives in 7(1)(d). We seek clarification as to whether this will include public education campaigns and, if so, will Preventive Health SA be staffed with adequate communications and marketing staff to lead these campaigns and initiatives.

Additionally, will Preventive Health SA have the independence to commission campaigns without the intervention of other Government Departments or authorities? Cancer Council SA believes that an independent Preventive Health SA requires the capacity to commission initiatives and campaigns unencumbered by departmental influence. We believe that there is a risk that prevention messaging may be lost if it is forced to compete with other Government campaign funding priorities.

***b. Are there aspects missing from the draft Bill that should be considered for inclusion?***

There are no aspects missing from the draft Bill. However, Cancer Council SA would like to recognise two key areas are missing from the key prevention functions listed in the background of the Consultation Discussion Paper. Cancer Council SA believes that national population-based cancer screening programs and skin cancer prevention are key priority areas that require inclusion in any list of functions for Preventive Health SA. These priority areas are vital to Cancer Council SA's work to reduce the rate and impact of cancer for all South Australians. Cancer Council SA and Preventive Health have a Skin Cancer Prevention Partnership - Framework for Action 2023-28 setting out the priorities for SA which was launched by Minister Picton in November 2023.

***2. Do you have any comments about:***

***a. The Objects?***

Cancer Council SA welcomes the four objects contained in the draft Bill. As outlined above, we particularly welcome the inclusion of health equity as one of the objects. We would like to see that this specific focus on equity will lead to concrete action to reduce the inequality in outcomes for priority populations in our community. In the past, goals of achieving health equity in our community have not been matched with adequate support, funding and research. Cancer Council SA hopes the inclusion of equity in the goals will lead to effective action to reduce the disparities in outcomes for priority populations.

*b. Functions of the Chief Executive for Preventive Health SA?*

Cancer Council SA welcomes consultation and collaboration with non-government bodies, which we believe is important when developing the strategic plan for preventive health in South Australia.

*c. The Preventive Health SA Council?*

Cancer Council SA recognises the breadth of experience or expertise required from Council members which are contained in the draft Bill and the broad range of skills the Council will have. We look forward to the independence of the Council and Chief Executive being maintained in perpetuity.

*3. The draft Bill seeks to strengthen collaborative action across government and non-government agencies on prevention. Do you think the wording in the draft Bill will enable this? What, if anything, could be considered to strengthen this approach?*

Cancer Council SA strongly supports the strengthening of collaboration with non-government agencies contained in the draft Bill. Section 7(1)(b).

*4. Which aspects, if any, of the draft Bill align or support current or future prevention activities or initiatives which your agency is involved in planning or delivering?*

Alignment of longer-term strategy, project planning and investment will allow Cancer Council SA and Preventive Health SA to have the more impact on cancer control in South Australia.

Cancer Council SA have current and future planned strategies and programs with Preventive Health SA. These includes programs addressing the areas of skin cancer prevention, cancer screening, tobacco and vape use, workplace programs, alcohol and obesity prevention and food systems/insecurity. We look forward to delivering on the actions within the next SA Cancer Plan in collaboration with Preventive Health SA and support sustainable prevention action through the functions of the Bragg Comprehensive Cancer Centre.

***5. Which aspects, if any, of the draft Bill will enable and encourage your agency to support preventive health action and positive health and wellbeing outcomes?***

Several key functions of the Chief Executive will enable Cancer Council SA to continue our work preventing cancer in South Australia. Specifically, the majority of Chief Executive's functions outlined in section 7 will enable collaborations that will reduce the rate and impact of cancer for all South Australians. These include:

- (a) to undertake, commission, support, monitor and evaluate programs or services designed to—
  - (i) improve physical and mental health and wellbeing; or
  - (ii) improve health equity; and
- (b) to make grants or commission strategies designed to prevent or reduce non-communicable health conditions and improve health equity in partnership with government and non-government bodies; and
- (c) to develop partnerships and collaborate with other agencies, and be the primary source of advice to the Minister and government, in relation to preventive health policies and action; and
- (d) to commission and lead public education initiatives that are effective in increasing community knowledge and awareness of health risks and modifying behaviour to promote health and wellbeing and prevent ill health; and
- (f) to collect, monitor and support the sharing of population level health and wellbeing data and analyses to inform evidence-based practice in preventive health and wellbeing; and
- (g) to undertake, commission or support research in areas of preventive health and wellbeing; and
- (h) to support innovation in preventive health action and the understanding and interpretation of data relating to preventive health to promote evidence-based preventive health action; and
- (j) to develop and publish reports and make independent public statements designed to raise awareness and promote action on preventive health priorities.

Cancer Council SA welcomes the investment in programs and services and strongly endorses the collection, monitoring and sharing of population health and wellbeing data to assist our behavioural researchers to support and inform prevention activities and programs.

***6. Do you have any other suggestions or feedback regarding the draft Bill?***

Cancer Council SA welcomes this draft Bill and the consultation which has been undertaken. We look forward to this legislation confirming our collaboration with Government in work that will reduce the rate and impact of cancer for all South Australians into the future.