

7th May 2019

Mr Kim Wood
Principal Commissioner
Queensland Productivity Commission
PO Box 12112 George Street
BRISBANE QLD 4003



Dear Mr Wood,

I am writing in response to the Queensland Productivity Commission's (QPC) Inquiry into Imprisonment and Recidivism. QAIHC is the Peak Body for 28 Aboriginal and Islander Community Controlled Health Organisations (AICCHOs) and has 14 affiliate members across the state. Our members provide culturally appropriate, comprehensive primary health care under a *Model of Care* that includes both mental health, and social and emotional wellbeing. AICCHOs provide community advocacy and undertake work that is outside the scope of mainstream primary health care. Our members deliver services that address social determinants of health including employment, environmental health, and housing. AICCHOs are the first point of contact for Aboriginal and Torres Strait Islander people and it is for this reason that QAIHC should be engaged in the planning, delivery and reviewing of primary health care services before, during and after custodial sentencing.

Given this gross over-representation of Aboriginal and Torres Strait Islander people, referred to as being approximately 31% of the prison population, it is unclear how widely Aboriginal and Torres Strait Islander people, communities and organisations have been consulted in this report. QAIHC would consider it an inherent requirement to ensure that this population has been widely consulted and that the recommendations are informed by their knowledge and experience.

Furthermore, in light of the reported overrepresentation, QAIHC is of the view that the QPC should consider and consult on the specific impact of each recommendation on Aboriginal and Torres Strait Islander people. Of the 18 recommendations, only recommendation number 14 had specific reference to addressing the overrepresentation of this population and draft recommendation 18 referred to working towards closing the gap. The draft report makes it clear that the rate of incarceration is increasing despite the rate of crime decreasing. QAIHC is disappointed that the QPC stopped short of investigating institutional racism within the justice system and how that contributes to over sentencing.

QAIHC is interested to note that draft recommendation 13 stated that the Queensland Government should publish its Youth Justice Action Plan. As a Peak body for the AICCHOs delivering health care to the overrepresented Aboriginal and Torres Strait Islander youth in Queensland, QAIHC should have been a key stakeholder in the development of this Youth Justice Action Plan and is very interested in the actions recommended.

It is QAIHC's primary interest to understand how the AICCHO Model of Care can support a reduction in the Aboriginal and Torres Strait Islander prison population. QAIHC believes early access to support programs through the AICCHOs for family and domestic violence, alcohol and other drugs, mental health and social and emotional wellbeing will be key to diverting people before they come into contact with the legal system. QAIHC is currently conducting a scoping exercise to review health access for Aboriginal and Torres Strait Islander people incarcerated or otherwise detained. QAIHC will have its position finalised by September 2019. In the interim, we look forward to staying engaged in the QPC inquiry and would be happy to provide support at any time.

Yours sincerely,

Neil Willmet
Chief Executive Officer
Queensland Aboriginal and Islander Health Council

