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5 July 2024

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Interim Chief Executive
Preventative Health SA
PreventiveHealthSA.strategy@sa.gov.au

Dear Preventative Health SA,

RE: Draft Preventive Health SA Bill 2024

Thank you for the opportunity to provide feedback on the draft Preventative Health SA Bill 2024.

SA Rainbow Advocacy Alliance (SARAA) is the peak body representing LGBTIQ+ South Australians and the sector that supports us.

We know that LGBTIQ+ South Australians face a range of health disparities because of who we are and who we love. Ongoing discrimination and inequality are core drivers of this disparity.

Our charitable purpose is to eliminate these disparities and promote the health, safety, inclusion and well-being of LGBTIQ+ South Australians.

We are therefore pleased to see the South Australian Government action its commitment to create an independent prevention agency.

SARAA is committed to working with Preventative Health SA to eliminate health disparities for LGBTIQ+ South Australians. We provide the below feedback to strengthen our ability to achieve this shared goal.

About preventative health and LGBTIQ+ people

LGBTIQ+ people are more likely to experience poorer health outcomes in several key areas:

- LGBTIQ+ people are more likely to experience psychological distress and have depression, anxiety or another mental health condition
- LGBTIQ+ are more likely to experience suicidal ideation, self-harm or have attempted suicide in their lifetime
- lesbian and bisexual women and gay men are twice as likely to be diagnosed with cancer
- there is a high prevalence of alcohol and drug use within LGBTIQ+ communities.

Risk factors unique to LGBTIQ+ communities that influence our health outcomes include:

- rejection from family and friends
- discrimination, real and/ or perceived
- mistrust and avoidance of healthcare settings
- experiences with health providers and faith leaders who attempt to change who we are (conversion practices)
- economic and housing insecurity
- politicised healthcare and education.

Protective factors that boost our well-being include:

- peer support and connection with LGBTIQ+ communities
- positive identity-affirming experiences within family, workplace and service settings
- social, medical and legal gender-affirmation for trans and gender-diverse people.

These factors are explored in depth in *Rainbow Realities*, a key report that provides an in-depth analysis of large-scale LGBTQ+ health and wellbeing data in Australia.

It was designed to inform the Commonwealth Government's 10-year LGBTIQ+ Health and Wellbeing Action Plan, anticipated for release within the next 12 months.

Objects

We note that s3(b) sets out the object 'to improve health equity for populations requiring priority consideration in relation to preventive health action, especially First Nations persons'.

We note that 'populations requiring priority consideration' is not defined and assume this is an intentional feature of the legislative framework to allow the agency flexibility to adapt and respond to emerging needs.

We note that LGBTIQ+ people are identified as a priority population in the *National Preventative Health Strategy 2021-2030*.

LGBTIQ+ communities are often not considered or counted in public policy and law reform which serves to invalidate our experiences and systematically erase our communities in the planning of policies, programmes and services.

We therefore recommend Preventative Health SA further define 'priority populations' and specifically include LGBTIQ+ communities. To honour the intention of flexibility, this could occur by way of regulation.

Functions

We note that s7(1)(f) includes the function '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'.

We note that LGBTIQ+ communities are frequently not counted in government data or statistics, limiting the ability of decision-makers to understand and respond to our needs.

We recommend that Preventative Health SA work to embed the [South Australian Government's Data Collection and Gender Guideline](#) in all health and wellbeing datasets across government to build an appropriate evidence base for preventative health initiatives to meet the needs of LGBTIQ+ communities.

Preventative Health SA Council

LGBTIQ+ people are experts in the needs of our own communities and are best placed to use our lived experience to understand and advise on how best to support our peers.

We appreciate that the Council's membership must include people who have experience in 'health equity or health and wellbeing for populations requiring priority consideration in relation to preventive health action' (s12(3)(c)).

As discussed above, we encourage the Council to further define 'populations requiring priority consideration'.

We also encourage consideration of the model adopted in the *Suicide Prevention Act 2021* (SA) that includes a requirement for key populations to be represented on the Council (s9(3)(i)).

Conclusion

Thank you again for the opportunity to provide feedback on this important matter. If you wish to discuss these matters further, please contact Varo, SARAA Board Chair via email chair@saraa.org.au.

We will also make this submission publicly available on our website to ensure our members and supporters are aware of our position.

Kind regards,

Varo they/them

Chair

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