

Injury Matters' proposed updates to the Commissioner's Interpretation Statement: Health Promotion Charities

Injury Matters welcomes the opportunity to comment on the *Commissioner's Health Promotion Charities Interpretation Statement*.

Injury Matters is an independent, not-for-profit organisation and registered charity dedicated to preventing and reducing the impact of injury. Based in WA, with a proud history spanning over 30 years toward advancing our Vision of 'safer people and places' for all.

Given the dynamic and evolving nature of injury, Injury Matters works across a range of current and emerging injury priority areas, delivering community-based injury prevention and recovery support programs to prevent and reduce the impact of injury.

To inform and achieve positive injury outcomes, Injury Matters utilises available evidence and surveillance, applying a multifaceted approach of influencing, empowering and collaborating.

Influencing – individuals, agencies, and decision-makers, that injury prevention and recovery support is a health priority. Advocating for accessible, inclusive interventions.

Empowering – people, communities, professionals, and agencies with information to support informed decision-making and increase awareness of modifiable factors to prevent injury, reduce harm and support recovery.

Collaborating - at a local, national, and international level for effective, accessible, shared solutions to improve injury outcomes for all.

Injury in Australia:

Injury is the leading cause of death in Australians aged 15-44 and in 2020 11,377 Australians died due to injury.¹ Injury hospitalisations have continued to increase over the past decade and now exceed 527,000 per annum.² Injuries are not random nor an inescapable event; they are preventable. With the ongoing burden that injury places on the health system in Australia and the preventable nature through increased knowledge around the mechanisms in which injury occurs, injury prevention should be prioritised within Australia.

The impact of injury on disease:

Injury Prevention and Health Promotion organisations work together, operating across systems to prevent the causes of injury and chronic disease. "Using health promotion for injury prevention and control can help reduce health care costs and improve the quality of life".³

The Australian Institute of Health and Welfare (AIHW) states, the "burden of disease is a measure of the years of healthy life lost from living with or dying from disease and injury".⁴ AIHW also states that a portion of the burden is preventable due to modifiable risk factors, which crossover to contribute to a variety of diseases and injury.⁴

Recent data highlights the prevalence of ongoing problems at three years post-injury in severely injured patients, demonstrating that not only does injury contribute to disability burden and chronic disease more broadly (and this is demonstrated in orthopaedic trauma patients up to 5 years post-injury), but can be considered a chronic disease in and of itself.⁵

Injury prevention can also be an outcome of preventing disease, and an excellent example is reducing the supply and demand for alcohol in our communities.⁶ Trauma resulting from injury predisposes people to increased substance use, with associated risky behaviours. Addressing the modifiable risk factors for injury and chronic disease is vital.⁷

Preventing injury and disease requires a nationally and locally collaborative approach, requiring stakeholder and community engagement to develop, implement and evaluate prevention initiatives to meet the community's needs. Injury prevention organisations need adequate access to resourcing to ensure disease and injury prevention activities are equally able to prevent harm collectively to our communities in Australia.

Please see the following examples illustrating how approaching injury and disease prevention comprehensively will reduce Australia's overall burden of disease.

Alcohol

Alcohol contributes to disease and injury. The AIHW identifies alcohol as a modifiable behavioural risk factor in its recent *Australian Burden of Disease Study, 2018*.⁴ The AIHW says, "Alcohol use contributed to the burden of 30 diseases and injuries including alcohol use disorders, eight types of cancer, chronic liver disease and 12 types of injury — predominantly road traffic injuries and suicide & self-inflicted injuries".⁴ Therefore, it is clear that preventing excessive alcohol consumption in the population reduces non-communicable disease and injury.

The AIHW outlines the top 10 "diseases" linked to alcohol use that include "injury" in this list as:⁴

1. Alcohol use disorders
2. Liver cancer
3. Coronary heart disease
- 4. Road traffic injuries - motor vehicle occupants**
- 5. Poisoning**
6. Breast Cancer
7. Stroke
- 8. Falls**

The National Health Medical Research guidelines for alcohol "are based on comprehensive analyses of the international evidence regarding the lifetime risk of alcohol consumption for acute injury and chronic disease".⁸ Guideline One says, "To reduce the risk of harm from alcohol related disease or injury, healthy men and women should drink no more than ten standard drinks a week and no more than four standard drinks on any one day".⁹

Adverse Childhood Experiences

The AIHW discusses the burden of disease in relation to bullying, child abuse and neglect, and intimate partner violence.⁸ The risk factors are multiple and complex. The Injury Prevention Centre at the Centre for Disease Control and Prevention in the United States of America has Adverse Childhood Experiences (ACE's) listed as a priority. "Exposure to ACE's can change the way the brain develops and functions, contributing to increased risk of chronic diseases, substance use, suicide and other types of injury and violence".¹⁰

Physical Activity and Falls Prevention

The final example of injury and disease prevention is outcomes from preventing falls. Evidence-based physical activity, nutrition, and the prevention of a falls-related injury in older people is a priority in Australia. It is essential that the relationship between chronic disease and falls risk is approached comprehensively. Modifiable behavioural risk factors contribute to falls prevention. Sometimes preventing the fall prevents chronic disease and sometimes preventing chronic disease prevents the fall.⁴ It is important to address individual and population-based behaviours, the physical environment, and access to health services in preventing disease and injury.³

In summary, the benefit of broadening the definition of Health Promotion Charities to include prevention of injury is that preventing injury across the lifespan can prevent chronic disease and vice versa.¹⁰ Preventing the human and economic costs of injury requires a comprehensive public health approach to injury prevention, through an “integrated, health system-wide approach that involve hospitals, medical clinics, established primary health care settings, schools and workplaces, and other community-based service centres” complex causal and other multiple risk factors can be addressed.¹¹ Working with Health Promotion experts “will assist in reducing the health burden of injury and refine existing injury prevention programs and develop new and possibly novel programs to reduce the burden of injury”.¹¹

Health Promotion Charities and injury organisations:

The current definition of an ACNC Health Promotion Charity is limited to the prevention or control of diseases in human beings, therefore excluding injury from its interpretation.

The exclusion of injury from this definition results in the dependence of injury prevention organisations to raise funds predominantly through government grants. Broadening the definition of Health Promotion Charities to include 'prevention of injury' enables greater opportunity to attract funding from philanthropic bodies.

Changes in eligibility to qualify as a Health Promotion Charity would enable injury prevention organisations to have a greater impact on the reduction of injury in Australia, which will result in an overall improvement to the health of all Australians.

Additionally, the revision would significantly support the injury prevention not-for-profit sector by improving the ability to provide competitive remuneration features and benefits that other Health Promotion Charities are able to offer within comparative roles, therefore improving the recruitment and retention of a vital professional and qualified injury prevention workforce.

Recommendations:

Injury Matters supports the need for the following:

1. The Australian Government recognises the prevention of injury as a priority and advance changes in legislation to extend the Health Promotion Charities definition beyond disease, and to include the prevention of injury.

If you would like to discuss any of the proposals or require additional information, please contact Injury Matters' Chief Executive Sandy Lukjanowski, on 6166 7688 or via slukjanowski@injurymatters.org.au.

References:

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