



***TWO WAYS TOGETHER***  
**REGIONAL REPORT**  
Public Report

**New England / North-West  
(Tamworth)**

– November 2006 –



# **TWO WAYS TOGETHER**

## **REGIONAL REPORT**

### **New England/North-West Region (Tamworth)**

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## EXECUTIVE SUMMARY

This report gathers together data<sup>1</sup> about Aboriginal people and the government services provided to them in the New England/North West region of NSW. The report has been developed as part of the regional implementation of *Two Ways Together*.

*Two Ways Together 2003-2012* is the NSW Government's plan to improve outcomes for Aboriginal people and communities. *Two Ways Together* recognises that in order to affect real and sustainable improvements in the wellbeing of Aboriginal people a whole-of-government approach is required. It recognises that effective partnerships with Aboriginal communities must underpin government action if policies and programs are to be relevant to Aboriginal people. In developing sustainable partnerships between Aboriginal people and government it aims to strengthen Aboriginal people's capacity to exercise their inherent rights as the first peoples of Australia.

At a state level, *Two Ways Together* targets seven priority areas to positively improve the lives of Aboriginal people. These areas have been identified as priorities by Aboriginal communities in New South Wales. They are: Justice; Health; Housing and Infrastructure; Education; Culture and Heritage; Economic Development and Families and Young People. Four cross-agency Cluster Groups have been established with responsibility for developing innovative initiatives which meet the needs of Aboriginal people in these priority areas. Each of the Cluster Groups is chaired by a lead agency and includes representation from 60 relevant New South Wales and Australian Government agencies and five Peak Aboriginal Bodies. *Two Ways Together* Action Plans for 2005-2007 are currently being implemented by the Cluster Groups.

At the regional level, Regional Engagement Groups (or REGs) have been established to ensure that government agencies are meeting community needs in the regions. The Regional Reports will be used by the REGs to develop regional action plans to focus regional government activity on locally identified priority issues and areas. In most of the regions, regional action planning will include particular focus on up to three Partnership Communities. REGs are coordinated by the Department of Aboriginal Affairs' Regional Managers. The regional reports have been developed to inform the work of REGs and government agencies in the regions.

A description of the contents and major findings of the report are outlined below.

Chapter 1 outlines the characteristics of the region, noting its geographical location, the local government areas that fall within its borders and its population. This chapter also outlines the Aboriginal cultural and language groups and the Local Aboriginal Land Councils in the New England/North-West. There is a brief overview of the local economy, in which employment of Aboriginal people is most commonly in the health and community services, government administration, retail, education and agricultural sectors.

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<sup>1</sup> All data is from the Australian Bureau of Statistics, *2001 Census*, unless otherwise specified.

Chapter 2 presents a statistical profile of the region, focused on the demographics and population projections. This chapter reveals that the Aboriginal population has a very large cohort of young people, with 58.5% under the age of 25 years. By way of contrast, the older age group is very small, with only 2.9% of the Aboriginal population aged 65 years and over.

In Chapter 3, socio-economic indicators are analysed to determine the areas in which Aboriginal people are particularly disadvantaged in the New England/North-West region. This data reveals that the Aboriginal population in this region has very high levels of disadvantage in a number of areas, particularly in relation to health, income, justice, housing and education. Rates of low birth weight babies, cardiovascular disease, diabetes, alcohol-related hospitalisations and environmental health problems are much higher than the state average for Aboriginal people. Rates of sexual assault, domestic violence and child protection reports are also disturbingly high, while rates of literacy and numeracy within the primary school population and levels of tertiary education in the adult population are much lower than the state averages.

Chapter 4 provides a snapshot of the current environment by summarising the needs identified through assessment of the demographic and socio-economic data and the community's priorities. Chapter 4 concludes by suggesting some areas for further examination at the local and regional planning levels.

**Important note:**

The *Two Ways Together* regional reports have been written based on the ten Regional Coordination Management Group (or RCMG) regions in New South Wales. REGs are constituted as sub-committees of RCMGs, which are coordinated by the NSW Premier's Department.

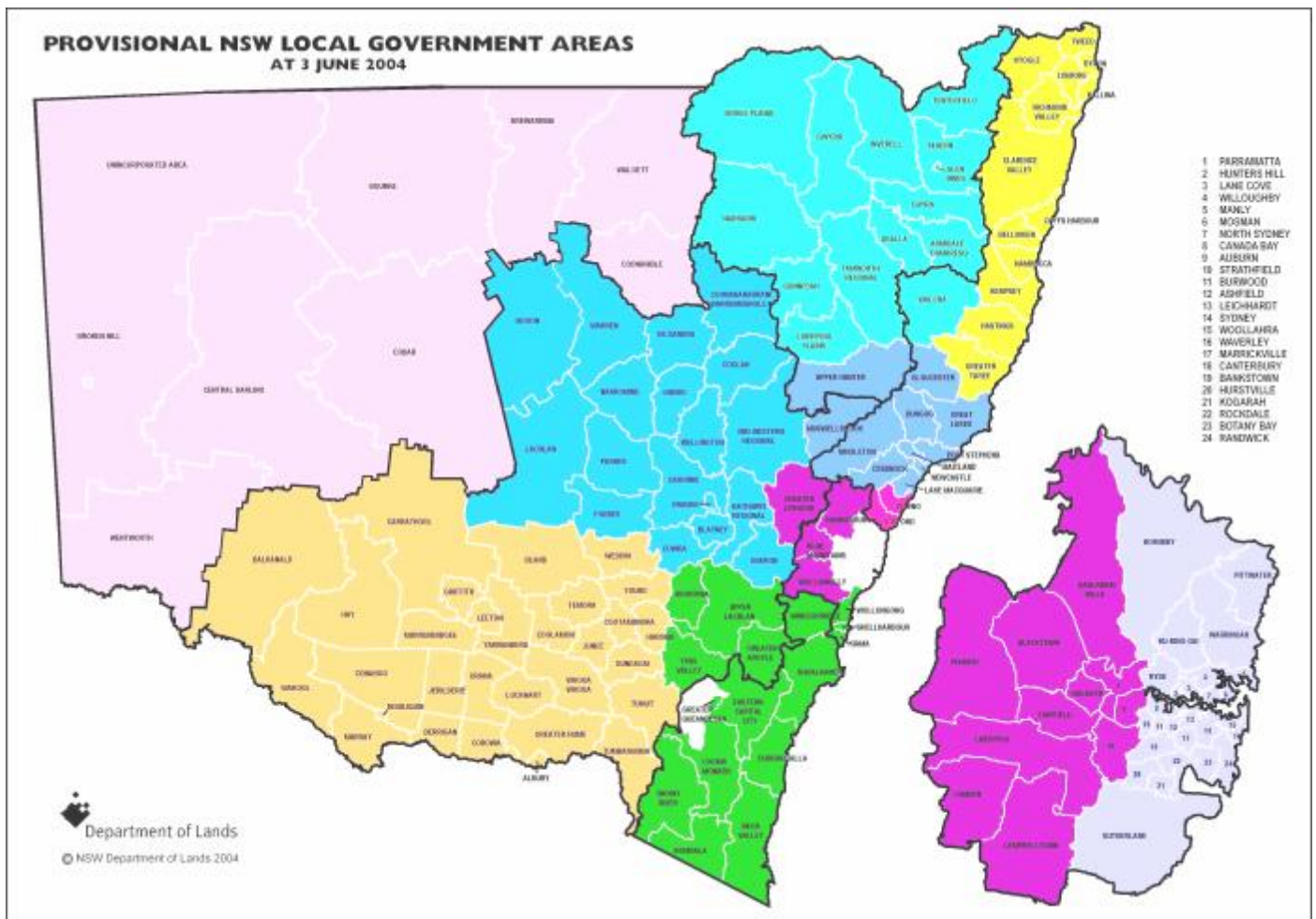
However, much of the data relied upon in this report is collected by ATSI region, and these boundaries are not consistent with the RCMG boundaries. Where this creates possible issues in interpreting the data contained in this report, it is noted. **Figure 1** notes the six ATSI regions, outlined in black, the ten RCMG regions by colour, and the Local Government Areas, outlined in white and by name. The six former ATSI regions are:

- Sydney
- Many Rivers (on the north coast)
- Kamilaroi (including north-west NSW)
- Murdi Paaki (including western NSW)
- Binaal Billa (including mid-west and south-western NSW)
- Queanbeyan (on the south coast).

The ten RCMG regions are:

- Coastal Sydney
- Western/South Western Sydney
- Central Coast
- Hunter
- North Coast
- New England/North West

- Western NSW/Murdi Paaki
- Mid-Western NSW
- Riverina/Murray
- Illawarra/South East.



**Figure 1: Map of RCMG, ATSI and LGA boundaries**

Please note that for the purposes of this report Weddin, Young and Harden have been included in the Riverina Murray region as their statistics are collected with West Wyalong, Temora, Coolamon and Bland. Weddin is situated within the Mid-Western RCMG boundary and Young and Harden are situated within the Illawarra-South East boundary.

Also although the Wentworth LGA is part of the Riverina Murray RCMG boundary, the statistics have been captured with Western NSW as it is expected that the information will be used to assist with the COAG Trial in the Murdi Paaki region, and Wentworth is part of the Trial site.

# 1.0 CHARACTERISTICS OF THE REGION

## 1.1 Geography

The New England/North-West region, shown on the map at **Figure 2**, covers an area of 105,534 square kilometres in the northern inland region of New South Wales. The region reaches from the upper Hunter Valley, north to Tabulam along the Great Dividing Range, west to Mungindi on the Queensland border, and sweeps in an arc south and east to Muswellbrook.



Figure 2: NSW Local Government Areas in New England/North-West Region

It includes towns such as Narrabri, Tamworth, Inverell, Gunnedah, Moree and Armidale, and 14 Local Government Areas (LGAs), as listed below:

- Armidale – Dumaresq
- Glen Innes
- Gunnedah
- Guyra
- Gwydir
- Inverell
- Liverpool Plains
- Moree Plains
- Narrabri
- Severn
- Tamworth Regional
- Tenterfield
- Uralla
- Walcha



## 1.2 Local Planning for Aboriginal Communities

Shires and councils in New South Wales are required to have social plans that make specific mention of local Aboriginal communities and issues of concern to the communities. In practice, some plans are out-of-date, some are still being drafted and some councils are yet to develop social plans.

Social plans vary widely in scope, but many include innovative arrangements. The Armidale-Dumaresq Social Plan for 2004 – 2009 contains a number of initiatives for addressing Aboriginal social needs:

- work with representative agencies/groups (e.g. Northern Tablelands Aboriginal Planning Forum) to facilitate the implementation of a Whole-of-Community Aboriginal Agreement/Plan;
- introduce four-yearly Armidale-Dumaresq Council Aboriginal Issues Action Plans, modelled on the Human Rights and Equal Opportunity Commission model for [Disability] Action Plans, possibly as a sub-plan of the Whole-of-Community Plan mentioned above;
- Council to continue to host and participate in the Community “Gayinyaga” (Let’s Talk) Committee;
- consider an Agency and Community Capacity Building Model arising from a community-accepted model;
- ensure that Council continually re-affirms its commitment to the Reconciliation process through political and policy statements;
- Council resolves to support a National Treaty process with Aboriginal Australians;
- publication of a local resource guide for Aboriginal service delivery in Armidale-Dumaresq, utilising information from relevant agencies; and

- commission a new LGA-wide Aboriginal cultural heritage study to integrate with Council's future social and environmental planning processes.

### **1.3 Aboriginal Cultural Groups**

There are nine discrete Aboriginal communities in the region, located at former missions and reserves:

<ul style="list-style-type: none"> <li>• Boggabilla</li> <li>• Jubullum Village</li> <li>• Mehi Crescent</li> </ul>	<ul style="list-style-type: none"> <li>• Minnon</li> <li>• Mungindi</li> <li>• Narwon Village</li> </ul>	<ul style="list-style-type: none"> <li>• Stanley Village</li> <li>• Toomelah</li> <li>• Walhallow Reserve</li> </ul>
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Culturally significant sites in the region include Boobera Lagoon, near Toomelah, a waterhole considered to be a resting place of the rainbow serpent. Previously under threat from powerboats, water-skiers and camping, Boobera Lagoon has been protected through conservation funding that enabled the construction of an alternative water sports site near Goondiwindi. The campsite was moved to a more appropriate location and Landcare funding has financed revegetation of the site.

Terry Hie Hie, near Moree, is another site of high cultural significance in the New England/North-West region. This traditional gathering place is on a site owned by the LALC. However, the traditional owners have sought to have the surrounding land gazetted as a National Park under Aboriginal ownership. A co-management agreement that does not include transfer of ownership or rental payments has instead been offered by the Government.

More generally, cultural heritage issues include the impact on the integrity of cultural sites through native vegetation clearing and erosion caused by intensive farming. The growth of large scale farming and mining activity by multinational corporations also has the potential to result in loss of access to culturally significant sites.

### **1.4 Land**

The New England/North-West region covers the traditional lands of a number of Aboriginal nations or language groups, the largest of which is the Kamilaroi nation. The Anaiwan, Ngarrabul and the Guyambal also fall within the borders of the New England/North-West region.

The New England/North-West region largely corresponds with the former ATSIC Kamilaroi regional boundaries, with the following Local Aboriginal Land Councils (LALCs) falling within its borders:

<ul style="list-style-type: none"> <li>• Anaiwan</li> <li>• Armidale</li> <li>• Ashford</li> <li>• Glen Innes</li> <li>• Guyra</li> </ul>	<ul style="list-style-type: none"> <li>• Moombahlene</li> <li>• Moree</li> <li>• Mungindi</li> <li>• Narrabri</li> <li>• Nungaroo</li> <li>• Pilliga</li> </ul>	<ul style="list-style-type: none"> <li>• Red Chief</li> <li>• Tamworth</li> <li>• Toomelah</li> <li>• Walhallow</li> <li>• Wanaruah</li> <li>• Wee Waa</li> </ul>
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In addition to individual's private purchases, there are several mechanisms through which Aboriginal people can own or control land in New South Wales. These are the *Native Title Act 1993*, *NSW Aboriginal Land Rights Act 1983*, Indigenous Land Corporation, Management Agreements, non-statutory co-management agreements and Aboriginal Land Use Agreements.

The estimated number of land claims as at 6 December 2005 in the New England/North-West region is 338. Numbers are estimate, based on Local Aboriginal Land Council boundaries, not ATSIC boundaries.

As at 16 June 2006, the estimated amount of land acquired by the Indigenous Land Corporation in the New England/North-West region was 8,430.426 ha.<sup>2</sup> The relevant sites are:

Balo Street, Moree	0.062 ha
Boorabee	1,662.2 ha
Canoon & Rosemont	1,026.76 ha
Coburn	519.576 ha
Edgerton	248.912 ha
Mooki & Bassendean	3,590.92 ha
Trelawney Station	751.302 ha
Wattleridge	630.694 ha

There are no native title determinations, non-statutory co-management agreements or Aboriginal Land Use Agreements in the New England/North-West region.

## 1.5 Regional Economy

The economic bases of the communities in the New England/North-West region are varied. Generally the regional economy has an agricultural focus, with sheep, cattle, cotton and wheat the principal agricultural produce. Other key sectors are retail, government administration and defence, and education.

Although the private sector is the key employer for Aboriginal males in the New England/North-West region (57%), this is a smaller proportion than private sector employment of Aboriginal men in the rest of New South Wales (70%).<sup>3</sup> Some 52% of Aboriginal women in the New England/North-West are employed in the private sector, compared to 65% of Aboriginal women in the rest of the State.

The top industry employers of **men** in 2001 were:

<i>Non-Aboriginal Men</i>	<i>Aboriginal Men</i>
<ul style="list-style-type: none"> <li>• Agriculture (23%)</li> </ul>	<ul style="list-style-type: none"> <li>• Government Administration &amp; Defence (13%)</li> <li>• Health &amp; Community Services (12%)</li> <li>• Retail (11%)</li> <li>• Agriculture (10%)</li> </ul>

**Table 1: Industry employers (male)**

<sup>2</sup> <http://www.ilc.gov.au/site/page.cfm?u=38>

<sup>3</sup> This figure sourced from NSW Labour Economics Office, DEWR.

Agriculture is the key industry of employment for non-Aboriginal men in the region.<sup>4</sup> This sector of the regional economy is significantly less likely to employ Aboriginal men than non-Aboriginal men. Of the total male employment in agriculture, only 1.6% is Aboriginal.

The top three occupations of Aboriginal men were:

- Labourers and related workers (37%);
- Tradespersons and related workers (14%); and
- Intermediate production and transport workers (14%).

For non-Aboriginal men, the most common occupations were:

- Managers and administrators (21%);
- Tradespersons (18%); and
- Labourers (13.7%).

There is more similarity in the employment of Aboriginal and non-Aboriginal women than is the case for the men, as revealed below.

The top industry employers of **women** in 2001 were:

<i>Non-Indigenous Women</i>	<i>Indigenous Women</i>
<ul style="list-style-type: none"> <li>• Retail (21%)</li> <li>• Health &amp; Community Services (15%)</li> <li>• Government Administration &amp; Defence (10%)</li> <li>• Education (9.6%)</li> </ul>	<ul style="list-style-type: none"> <li>• Health &amp; Community Services (23%)</li> <li>• Retail (23%)</li> <li>• Education (11%)</li> </ul>

**Table 2: Industry employers (female)**

Aboriginal women in the region are most commonly:

- Intermediate clerical, sales and service workers (30%)
- Labourers and related workers (15%)
- Professionals (13.6%)

Non-Aboriginal women in the region are most commonly:

- Intermediate clerical, sales and service workers (23.6%);
- Professionals (19%); and
- Elementary clerical, sales and service workers (12.7%).

It is notable that of the occupations identified in this section, a number are in industries with very good prospects (health and community services) or good prospects (education, sales, clerical), according to research by the Department of

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<sup>4</sup> Ibid.

Employment and Workplace Relations.<sup>5</sup> Labouring and agricultural positions are reported to have below average prospects.

### **1.5.1 Where Are the Job Vacancies?**

In March 2006, the DEWR website collation of job vacancies for this region listed 1,549 vacant positions. Of these, over 60% were vacancies for labourers, factory and machine workers. The next highest vacancy rate was in gardening, farming and fishing, where there were 142 vacancies, or 9% of the total vacancies. Accounting, finance and management made up 5% of vacancies.

Computing and IT professionals were not in high demand: there were no advertised vacancies in these professions in this region. Media, the arts and printing were also in low demand, with only two vacant positions, the same figure as for government administration and defence.

### **1.5.2 Community Development and Employment Project (CDEP)**

There were approximately 5,000 CDEP participants in New South Wales in January 2000, according to ATSI data, of which 987, or almost 20%, were in the Kamilaroi region.<sup>6</sup> The proportion of Aboriginal men employed in the CDEP in the New England/North-West region is approximately 23%, which is significantly higher than for the rest of New South Wales (7%). The CDEP is the employer for 15% of Aboriginal women in this region. Again, this is a higher proportion than the average, which is 6% for Aboriginal women in the rest of New South Wales.<sup>7</sup>

Nevertheless, the high unemployment rate for this region suggests that CDEP participation is not resulting in employment for many participants.

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<sup>5</sup> DEWR, *Australian Jobs 2005*, pp. 27 – 30.

<sup>6</sup> This figure cited by NSW Labour Economics Office, DEWR, which notes that ABS figures for CDEP do not provide an accurate figure of CDEP participation.

<sup>7</sup> Ibid.

## 2.0 STATISTICAL PROFILE OF THE REGION

### 2.1 *Demographics*

The Aboriginal population of the New England/North-West region at the 2001 Census was 12,047<sup>8</sup>, representing 7.28% of the total population of the region.<sup>9</sup> This is significantly higher than the New South Wales average of approximately 2%; some 8.9% of the NSW Aboriginal population lives in this region. Between 1996 and 2001 the Aboriginal population had grown by approximately 20%, which was higher than the expected growth rate of around 12%.<sup>10</sup>

There are seven communities in the region with a significant Aboriginal population. These are:

- Armidale
- Glen Innes
- Gunnedah
- Inverell
- Moree
- Tamworth
- Tenterfield

In addition, there are sizeable Aboriginal populations in Manilla/Warialda, Narrabri, Wee Waa/Namoi and Parry/Nundle/Werris Creek.

The Aboriginal population in the New England/North-West region is younger than the non-Aboriginal population, as is the case across New South Wales. Over half (51.4%) of the Aboriginal population in the region is 19 years of age or younger, and approximately 58.5% is younger than 25 years. By comparison, in the non-Aboriginal population, only 34% are younger than 25 years. The gender ratio for both Aboriginal and non-Aboriginal people under 25 is 51:49 (male: female).

Fifty percent of Aboriginal females in the region are 19 years of age or younger; the proportion for males is 52.5%. For non-Aboriginal females, 27.5% are 19 years or younger; 29.3% for non-Aboriginal males.

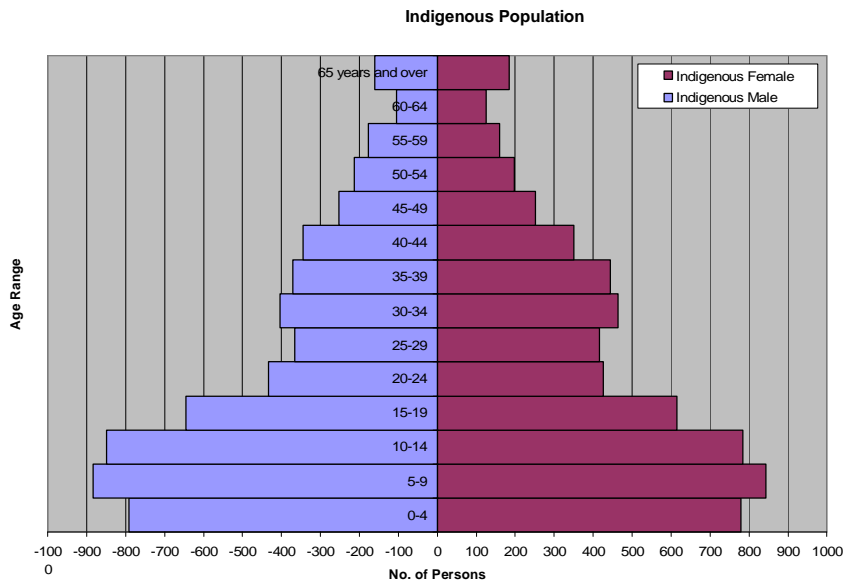
The New England/North-Western region has a very small elderly Aboriginal population, particularly compared to the non-Aboriginal population. Only 2.9% of the Aboriginal population is 65 years and over, while 14.2% of the non-Aboriginal population falls in this age group. The table below represents the age distribution for Aboriginal populations in the New England/North-West region.

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<sup>8</sup> Australian Bureau of Statistics advises that there was an under-reporting of Aboriginality in the 2001 census. Estimates for the population at a regional level are not currently available.

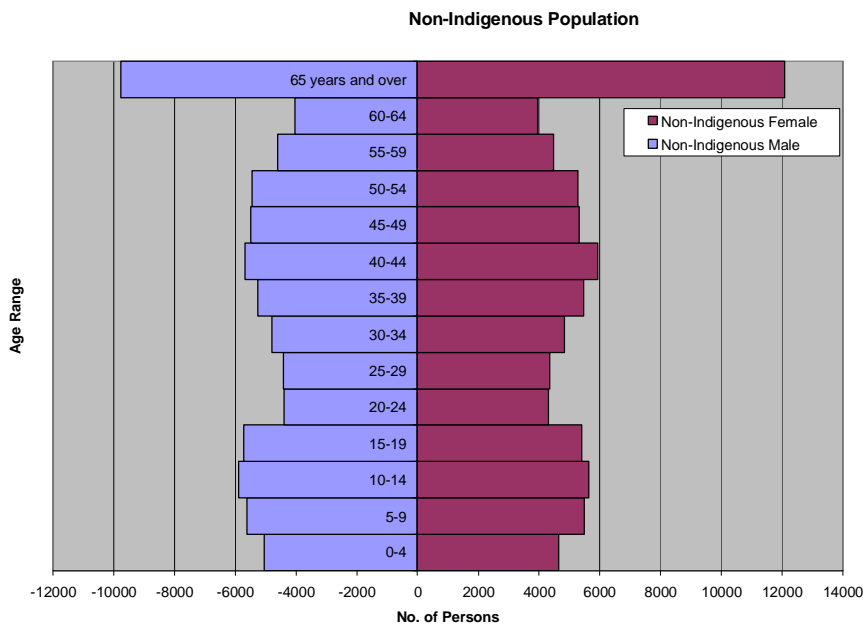
<sup>9</sup> Australian Bureau of Statistics, *2001 Census of Population and Housing*.

<sup>10</sup> *Kamilaroi Regional Statistical Summary*, 2001.



**Table 1: Age Distribution by Aboriginal Population**

By comparison, the following table reveals the markedly different age distribution for non-Aboriginal people in this region.



**Table 2: Age Distribution by Non-Aboriginal Population**

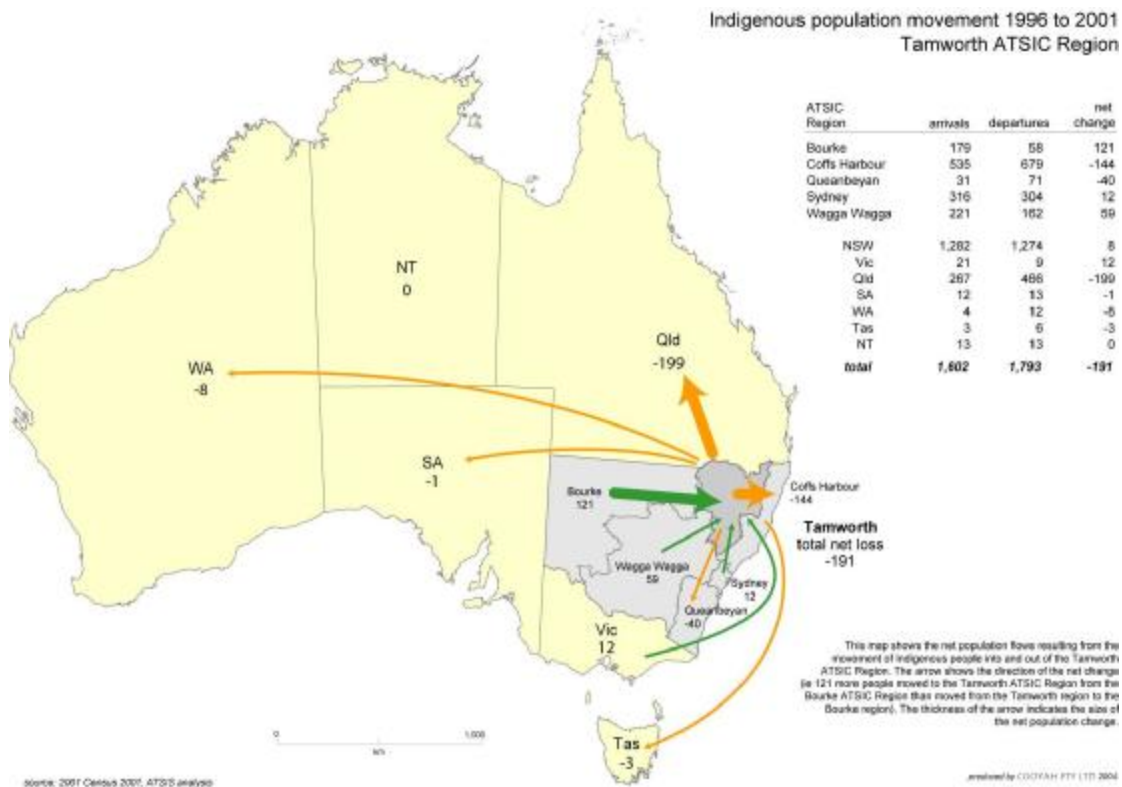
Examined together, the two charts provide a clear visual representation of the different age distribution in the Aboriginal and non-Aboriginal communities, characterised by a much larger proportion of young Aboriginal people.

## 2.2 Population Projections

The Aboriginal population in the New England/North-West region is increasing quite significantly. Australian Bureau of Statistics Experimental Population Projections for 2001-09 for the Kamilaroi ATSI region, which largely corresponds to the New

England/North-West region, suggest a population increase of between 5.6% and 13.6% by 2009.

The following map reveals the inbound and outbound internal Aboriginal migration:



**Figure 3: Aboriginal Population Movement, 1996-2001**

## 3.0 SOCIO-ECONOMIC INDICATORS

The socio-economic indicators collated below demonstrate that Aboriginal people in the New England/North-West region are considerably more disadvantaged when compared with non-Aboriginal people. This trend of Aboriginal disadvantage is apparent across all the indicators for health, economic development, education, housing, justice and family and community wellbeing. A comparison between the regions shows that the trend of Aboriginal disadvantage occurs across the State. Compared to other regions, Aboriginal people in the Tamworth region face greater disadvantage than any region other than Murdi Paaki on nearly all indicators.

Findings relating to the New England/North-West region are listed below according to the *Two Ways Together* priority areas. Comparisons with other ATSI regions are provided as well as figures for Aboriginal New South Wales as a whole.

### 3.1 Health

The health profile of Aboriginal people in the New England/North-West region is generally worse than other areas of the State. In a few respects, the region ranks well compared to other regions of the State, but is well below average with respect to most of the health indicators. For example, the region has a relatively low rate of low birth weight babies and a relatively high rate of antenatal visits by pregnant mothers. While rates of infectious diseases were also comparatively low, rates of skin infections were far higher than the state average for Aboriginal people. With respect to cardiovascular disease, diabetes and alcohol-related problems, the rates in the Aboriginal population in the region are not only increasing, they are significantly higher than the Aboriginal and non-Aboriginal state wide averages.

All of the material in the Health section of this report was sourced from the *Report of the New South Wales Chief Health Officer*, accessed on 31 March 2006, unless otherwise indicated.<sup>11</sup>

#### 3.1.1 Maternal and Child Health

A birth weight of less than 2,500 grams for babies is considered to be low and may be indicative of poor health of the mother, her environment or the lack of available antenatal care. The New England/North-West region had the third lowest proportion of Aboriginal low birth weight babies in New South Wales. The proportion of Aboriginal babies in the New England/North-West region that were born with a low birth weight decreased between 1993 and 1998, but increased between 1999 and 2004. The period between 1993 and 2004 saw a 14% overall increase in the percentage of low birth weight Aboriginal babies in the region, although the total number of babies born remained fairly stable throughout this period.

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<sup>11</sup> NSW Department of Health, Population Health Division, *The health of the people of New South Wales – Report of the Chief Health Officer*, Sydney, at: [http://www.health.nsw.gov.au/public-health/chorep/atsi/atsi\\_anteprocatsi\\_rcmg.htm](http://www.health.nsw.gov.au/public-health/chorep/atsi/atsi_anteprocatsi_rcmg.htm).

Between 1999 and 2001, 11.6% of Aboriginal babies in the region were born with low birth weight, compared to 12.6% of all Aboriginal babies in New South Wales. Between 2002 and 2004, 14.7% of Aboriginal babies in the region were born with low birth weight, compared to 12.7% of all Aboriginal babies in New South Wales. This figure is still more than double that for non-Aboriginal babies in the region, only 6.8% of which were born with low birth weight in the period 2002-04.

The higher rates of Aboriginal babies born with low birth weights is related to a high incidence of Aboriginal mothers smoking in the second half of pregnancy (58% in 2000, compared with 15.3% of non-Aboriginal mothers), and the younger overall age of Aboriginal mothers (smoking rates among younger women are higher than among older women).

Linked to low birth weight is the time of the first antenatal visit by pregnant women. Ideally, this should occur before 20 weeks of pregnancy. Between 2002 and 2004, the New England/North-West region had the third highest figures in New South Wales for visits to antenatal clinics, with 74% of pregnant Aboriginal women consistently having their first antenatal visit before 20 weeks. This figure is around 6% higher than the average for Aboriginal mothers throughout the State (69.3%), but around 15% lower than that of non-Aboriginal mothers throughout the State, 87.3% of whom had their first antenatal visit before 20 weeks of pregnancy. It is also much lower than the average for non-Aboriginal mothers in the region, which is also the fourth highest in the State, at 91.7%. These data suggest that there is an above average awareness of the need for antenatal visits amongst Aboriginal mothers in the New England/North-West region, although the rate could be improved significantly.

Almost 5% of Aboriginal mothers in the New England/North-West region are aged under 18 years of age, compared to 0.5% for non-Aboriginal mothers. Early pregnancy rates, a smoking rate during pregnancy that is four times the rate of other mothers, and drug and alcohol use have contributed to lower Aboriginal birth weights.<sup>12</sup>

### **3.1.2 Cardiovascular Disease**

Between 2002 and 2005, rates of hospital separation<sup>13</sup> for cardiovascular disease amongst Aboriginal people in the New England/North-West region were around 37% higher than the NSW average for Aboriginal people: 4,214 per 100,000, compared to 3,071 per 100,000. The rate is almost double that for the non-Aboriginal population of New South Wales over the same period (2,164 per 100,000), and 80% higher than the rate for the non-Aboriginal population in the New England/North-West region (2,318 per 100,000).

The rate of hospital separations for cardiovascular disease in the region has increased by around 57% between 1993 and 2005, which appears to reflect across-

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<sup>12</sup> NSW Department of Health, *South East Health Population Health Profile*, 2000.

<sup>13</sup> Hospital separation: A formal separation is a discharge, transfer or death of a patient. It refers to the process by which a same day patient or inpatient completes an episode of care. A type change separation occurs when an episode of care ends because the type of care provided to the patient changes.

the-board increases in the incidence of this disease amongst Aboriginal people in New South Wales over the same period.

### **3.1.3 Diabetes**

Diabetes is a major health problem. The rate of diabetes amongst Aboriginal people in the New England/North-West region rose dramatically from 1993-96 (637 per 100,000) to 2002-05 (1,545 per 100,000). The rate in the period from 2002 to 2005 was therefore more than double the rate from 1993 to 1996. It is also more than double the average rate of 746 per 100,000 for the total NSW Aboriginal population in the period from 2002-05, and more than six times the rate for the total NSW non-Aboriginal population (236 per 100,000).

The more than two-fold worsening of the statistics over this period is comparable to the significant overall worsening of the statistics across the total NSW population over the last decade or so. These statistics indicate a major public health crisis in relation to diabetes across the whole population.

### **3.1.4 Infectious Diseases**

Hospital separation rates for pertussis, measles and Haemophilus influenzae meningitis throughout the State amongst Aboriginal people have dropped by 80% over the period from 1993 to 2005, and by 63% in the New England/North-West region.

The rate of hospital separations for these infections amongst Aboriginal people in the New England/North-West region during the period from 2002 to 2005 is lower than the rate for all Aboriginal people in New South Wales, at 3.7 per 100,000, compared to 4.2 per 100,000. It is also slightly lower than the rate of non-Aboriginal people in the region during the same period, which was 3.9 per 100,000, but slightly higher than the rate of non-Aboriginal people throughout the State, which was 3 per 100,000.

Skin infections are related to the later onset of heart and kidney disease. Hospital separation rates for skin infections throughout the State amongst Aboriginal people have increased by 16% over the period from 1993 to 2005.

The rate of hospital separations for skin infections amongst Aboriginal people in the New England/North-West region during the period from 2002 to 2005 is the second highest in the State after Murdi Paaki. At 1,129 per 100,000, the rate is more than four times the rate of non-Aboriginal people in the region and in the State, at 280 per 100,000, and 235 per 100,000, respectively. It is also almost twice the rate of all Aboriginal people in New South Wales (583 per 100,000).

### **3.1.5 Alcohol-related issues**

Hospital separation rates attributed to alcohol throughout the State amongst Aboriginal people have increased by 11% over the period from 1993 to 2005.

The rate of hospital separations attributed to alcohol amongst Aboriginal people in the New England/North-West region during the period from 2002 to 2005 is 15%

higher than the rate for all Aboriginal people in New South Wales, at 2,059 per 100,000, compared to 1,790 per 100,000. However, this is almost four times the rates for non-Aboriginal people in the region and throughout the State during the same period, which were 524 and 537 per 100,000, respectively.

The rate of hospital separations for trauma attributed to alcohol amongst Aboriginal people in the New England/North-West region during the period from 2002 to 2005 is around 32% higher than the rate for all Aboriginal people in New South Wales, at 654 per 100,000, compared to 497 per 100,000. It is around 180% higher than the rate for non-Aboriginal people in the region, and more than three times higher than the rates for non-Aboriginal people throughout the State during the same period, which were 234 and 214 per 100,000, respectively.

The 7% increase in the rate of hospital separations attributed to alcohol and 50% increase in trauma attributed to alcohol amongst Aboriginal people in the region between 1993 and 2005 appears generally consistent with the general upward trend in the statistics for Aboriginal people across the State. These statistics indicate that alcohol-related problems are on the increase in the Aboriginal population.

### **3.2 Housing**

A substantial number of Aboriginal people in New South Wales are assisted with public housing. In 2004-05, 934 Aboriginal households were newly assisted, while there are currently around 8,700 Aboriginal tenants in public housing. Mainstream community housing also houses an additional 600 Aboriginal households.

Aboriginal people in the New England/North-West region are generally disadvantaged in relation to housing, both compared to non-Aboriginal people and to Aboriginal people in other regions.

In 2001, approximately 30% of Aboriginal people in the New England/North-West region owned or were purchasing their homes, compared to 69% of non-Aboriginal people. This was the second lowest rate of all regions and the 39 percentage point gap was among the highest. The Aboriginal home ownership rate increased by 2% from 1996, while the non-Aboriginal rate was unchanged.<sup>14</sup>

In 2002-3, some 2.7% of houses occupied by Aboriginal people reported overcrowding in the New England/North-West region, which was average for the State.<sup>15</sup> For households with Aboriginal occupants, the average household size was 3.4 persons per dwelling (3.5 in 1996) compared to 2.5 for dwellings with no Aboriginal occupants (2.6 previously). There were 269 households in the region that needed an extra two or more bedrooms to meet national occupancy standards (to alleviate overcrowding), with 73 dwellings requiring three or more extra bedrooms (in effect, an extra house).

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<sup>14</sup> ABS, *2001 Census of Population and Housing*.

<sup>15</sup> NSW Department of Housing. Overcrowding is defined according to the CSHA national performance indicator, P3.

Housing stress refers to the proportion of income paid in rent. Just over a third of low income Aboriginal households in the region were paying more than a quarter of their incomes in rent in 2001 and were therefore classified as being in housing affordability stress. Almost 100 households were paying over half their incomes in rent.<sup>16</sup>

### **3.2.1 Environmental Health**

Hospital separations for acute respiratory infection, gastrointestinal infection, rheumatic heart disease, skin infections and tuberculosis are conditions related to environmental health. In particular, they may be related to poor housing factors, such as over-crowding and lack of access to adequate means of sanitation.

Hospital separations for acute respiratory infection amongst Aboriginal people during the period from 1993 to 1996 were 1,611 per 100,000, but had doubled to 3,256 per 100,000 for the period from 2002 to 2005. The New England/North-West figures for the period 2002-05 are more than double the NSW average for Aboriginal people (1,504 per 100,000), and more than three times higher than the rate for non-Aboriginal people in the region over the same period (1,031 per 100,000). They are more than five times higher than the rate for non-Aboriginal people throughout the State, which was 627 per 100,000.

Hospital separations for gastrointestinal infection amongst Aboriginal people during the period from 1993 to 1996 were 160 per 100,000, but had risen to 595 per 100,000 for the period from 2002 to 2005: an almost four-fold increase over twelve years. The New England/North-West figures for the period 2002-05 are more than double the NSW average for Aboriginal people (285 per 100,000), as well as being almost double or more than double the rate for non-Aboriginal people in the region and throughout the State over the same period (301 and 278, respectively per 100,000).

### **3.3 Justice**

This section on justice-related issues for Aboriginal people in the New England/North-West region focuses on hospitalisations for assault, victim rates for crime, imprisonment and detention rates, bail for Aboriginal defendants and juvenile diversions<sup>17</sup> as a proportion of all juvenile offenders.

The data below were sourced from the *Two Ways Together Report on Indicators*, June 2005, unless otherwise indicated, and refer to the New England/North-West (Kamilaroi) ATSI region as a whole.

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<sup>16</sup> Ibid.

<sup>17</sup> Diversion: This is where juvenile persons of interest (POI) have their charges proceeded against by legal processes other than referral to court. Not all crimes have an associated POI and not all POIs have legal proceedings taken against them. The legal processes available to police include referral to court, referral to a youth justice conference, the issue of a caution or warning, or the issue of an infringement notice. There are many factors that can affect the likelihood of POIs being diverted from court by police, including the nature of the offence or the offending history of the individual.

### 3.3.1 Victim Rates

In all regions, the rate of hospitalisation for assault is higher by Aboriginal status compared to the total population. In 2001, the rate of hospitalisations for assault by Aboriginal status in the New England/North-West region was 500 per 100,000 population – which was around the average for Aboriginal people in the State. The New England/North-West region compares unfavourably with all other regions except Murdi Paaki.<sup>18</sup>

In 2002, the rate of assault victimisation in the New England/North-West region was the equal second highest in the State, at just under 6,000 per 100,000. This was approximately three times higher than the average rate for the population as a whole in this region, which was 2,000 per 100,000, one of the largest gaps in all the regions. The average rate for assault victimisation for Aboriginal people state-wide was approximately 4,500.<sup>19</sup>

### 3.3.2 Adults

The rate of Aboriginal adult incarceration in the New England/North-West region in 2003 was almost 800 per 100,000 population, which was lower than the Sydney, Murdi Paaki and Wagga Wagga regions, but higher than the Coffs Harbour and Queanbeyan regions.<sup>20</sup> The gap between Aboriginal imprisonment rates and imprisonment rates for the regional population as a whole was smallest in Queanbeyan, followed by New England/North West.

The rate of Aboriginal adults on remand in 2002 was approximately 170 per 100,000 in the New England/ North-West region, a rate that was lower than the Sydney, Murdi Paaki and Wagga Wagga ATSI regions, but higher than the Coffs Harbour and Queanbeyan regions.<sup>21</sup> As with imprisonment rates, the gap is smallest in Queanbeyan, followed by the New England/North-West region.

With almost 60% of Aboriginal people refused bail in higher court appearances in 2002, the New England/North-West region had the highest proportion of persons refused bail by Aboriginal status. Aboriginal people in the region were almost twice as likely to be refused bail than the regional population as a whole.<sup>22</sup>

### 3.3.3 Juveniles

Some 60% of juveniles were diverted from court in the New England/North-West region in 2002. This was the third highest rate of juveniles diverted from court in New South Wales. The gap between the proportion of juveniles diverted from court by Aboriginal and non-Aboriginal status was smaller than in any other region except for Murdi Paaki. This suggests some success in diverting juvenile offenders in this region.<sup>23</sup>

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<sup>18</sup> Injury Risk Management Research Centre at the University of New South Wales, which sourced the data from the NSW Health Department's Inpatient Statistics Collection.

<sup>19</sup> Bureau of Crime Statistics and Research.

<sup>20</sup> NSW Department of Corrective Services.

<sup>21</sup> Ibid.

<sup>22</sup> NSW Bureau of Crime Statistics and Research.

<sup>23</sup> Ibid.

### **3.4 Economic Development**

This section on the economic status of Aboriginal people in the New England/North-West region focuses on rates of income and employment.

#### **3.4.1 Employment and Unemployment**

The unemployment rate for Aboriginal people in the New England/North-West region is disproportionately high compared to non-Aboriginal people in the region and in New South Wales as a whole, as well as compared to Aboriginal people in other regions.

In 2001, the unemployment rate for Aboriginal males in New England/North-West was about 32%, compared to 8% for non-Aboriginal males in the region. For females, the figures were 27% and 5.4%, respectively.

The total unemployment rate for this region averages out at 30% for Aboriginal people and 8.6% for non-Aboriginal people, the largest gap of all NSW regions. This data compares to an unemployment rate of 23% for Aboriginal people in New South Wales as a whole, and 7% for non-Aboriginal people. Across the New England/North-West region, unemployment is higher in the 15 to 24 year old age group, at 40% for Aboriginal people and 16% for non-Aboriginal people.<sup>24</sup>

#### **3.4.2 Income**

In 2001, the median Aboriginal family income in the New England/North-West region was \$557 per week compared to \$787 for non-Aboriginal families. The median household incomes were \$537 per week for Aboriginal households, and \$642 per week for non-Aboriginal households. The lower incomes are the result of lower employment rates, employment in lower paying occupations and the younger age of the Aboriginal population.

Based on income levels in 2001, some 15% of Aboriginal households in the region had incomes below the poverty line. Housing costs pushed a further 20% of Aboriginal households under the poverty line. As a result, 47% of Aboriginal children in the region were living in poverty in 2001.<sup>25</sup>

### **3.5 Education**

Because of the younger age profile of Aboriginal people in the New England/North-West region, a higher proportion of school participants are Aboriginal. According to the *2001 Census*, approximately 3% of the Aboriginal population attend pre-school (compared to 2% of the non-Aboriginal population in the region), 19% attend primary school (compared to 10%) and 10% attend high school (compared to 8%). These figures are similar for Aboriginal people in New South Wales as a whole.

The data below were sourced from either the *2001 Census*, or from the Department of Education and Training's Planning and Innovation Directorate *Mid-Year Census 2003-2005*, unless otherwise indicated.

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<sup>24</sup> This figure is based on NSW Labour Economics Office, DEWR.

<sup>25</sup> These figures are based on the ATSIK Kamilaroi summary.

Levels of literacy and numeracy in Years 3 and 5 for Aboriginal students in the New England/North-West region in 2005 are in most cases around the state average for Aboriginal students. Aboriginal students in the region are currently performing between ten and seventeen percentage points lower than the state average for all students (Band 2 and above for Year 3, and Band 3 and above for Year 5).

With respect to overall literacy results for Year 3 students in the region, 15% of Aboriginal students were placed in the two highest skill bands, while 23% were placed in the two highest skill bands for numeracy. These compare with 16.5% of all Aboriginal students in the State for Year 3 literacy, and 21.1% of all Aboriginal students in the State for Year 3 numeracy. On the other hand, 37% of all students in the region were placed in the two highest skill bands for literacy, 41.4% in the two highest skill bands for numeracy, and 42.2% and 46.2% respectively, for all students across the State.

With respect to overall literacy results for Year 5 students in the region, 15.4% of Aboriginal students were placed in the two highest skill bands, while 20.9% were placed in the two highest skill bands for numeracy. These compare with 18.4% of all Aboriginal students in the State for Year 5 literacy, and 21.5% of all Aboriginal students in the State for Year 5 numeracy. On the other hand, 40.2% of all students in the region were placed in the two highest skill bands for literacy, 44.1% in the two highest skill bands for numeracy, and 47.4% and 50.7% respectively, for all students across the State.

### **3.5.1 School Retention**

According to NSW Department of Education figures for 2002, the apparent retention rate for Years 7 to 10 Aboriginal students in government schools in the whole of New South Wales was just over 80%. In the New England/North-West (Kamilaroi) ATSC region, the rate was 70%, making it the region with the second lowest rate of Year 10 retention. The gap between Aboriginal and non-Aboriginal was largest in Murdi Paaki, followed by the Queanbeyan and New England/North West ATSC regions.

The state average for Years 7 to 12 retention for Aboriginal students in 2002 was 30%, compared to over 65% of non-Aboriginal students. In the New England/North-West region, the Year 12 retention rate for Aboriginal students was less than 25%. The New England/North-West region had the second lowest rate for Year 12 retention for Aboriginal students. The gap between Aboriginal and non-Aboriginal students, however, was significantly higher in Sydney.

In 2005, the full-time equivalent retention rate across all schools for New England/North-West Aboriginal students in Years 10 to 12 was 43.1%, compared to 66.3% for all students in the region. This was the third highest rate in the State for Aboriginal students in that year. The NSW average for all Aboriginal students was 39.3%, and for all students was 74.2%, indicating that Aboriginal students in the New England/North-West region are remaining in school at a rate around 10% higher than the state average for Aboriginal students.

Nevertheless, these data indicate that New England/North-West schools need to improve their efforts at assisting Aboriginal students in the transition to, and

completion of, senior high school. However, these statistics do not fully capture all of the students who may be enrolled in Year 11 and 12 coursework, such as part-time students, mature-aged students, and repeating students.

### 3.5.2 Educational Attainment

In 2002, some 70% of Aboriginal students in the New England/North-West region attained a Year 10 certificate, compared to slightly over 80% for Aboriginal students state-wide and approximately 95% of non-Aboriginal students state-wide.<sup>26</sup> The New England/North-West had the second lowest level of Year 10 attainment of all regions.

For Year 12 attainment in 2002, the New England/North-West region had the lowest levels of completion in government schools, with less than 50% having completed requirements for a Year 12 certificate as a percentage of the number who commenced Year 11. The state average was almost 70%.<sup>27</sup>

### 3.5.3 Tertiary Education

Aboriginal people in the New England/North-West have relatively low levels of educational qualification. In the New England/North-West (Kamilaroi) ATSI region in 2001, 0.1% of Aboriginal people compared to 1.1% of the total population had a postgraduate degree in 2001, 0.2% compared to 1% had a graduate degree, and 1% compared to 6.1% had a bachelor degree.

The New England/North-West region was the last to second last in New South Wales at all levels of training compared to Aboriginal populations in other regions.

The table below details the proportion of Aboriginal people in the ATSI region of Kamilaroi with various levels of qualifications.<sup>28</sup>

<b>Kamilaroi</b>		
<i>Qualification</i>	<i>Aboriginal persons</i>	<i>All persons</i>
Postgraduate Degree	0.1%	1.1%
Graduate Diploma and Graduate Certificate	0.2%	1.0%
Bachelor Degree	1.0%	6.1%
Advanced Diploma and Diploma	1.8%	4.6%
Certificate	8.7%	16.1%
Not stated	13.2%	11.5%
Not applicable	75.1%	59.5%

**Table 4: Non-school qualification - level of education by Aboriginal status, ATSI regions 2001**

<sup>26</sup> Figures from NSW Department Education and Training, IESIP sOut6.

<sup>27</sup> Figures from NSW Department of Education and Training, IESIP sOut7.

<sup>28</sup> ABS, 2001 Census.

## **3.6 Culture and Heritage**

An Aboriginal Cultural Heritage Advisory Committee was recently established under the *National Parks and Wildlife Act 1974*. The Committee will advise the Minister for the Environment and the Director General of the Department of Environment and Conservation about any matter relating to Aboriginal Cultural Heritage in New South Wales. The Committee will not replace existing local, regional and state-wide consultative processes of the Department of Environment and Conservation or other NSW government agencies. The Committee will provide strategic advice about the development and administration of Aboriginal culture and heritage programs, policies and projects.

### **3.6.1 Environmental and Natural Resource Management**

The broad environmental and natural resource management themes are land (land quality, land use and management), atmosphere (air quality, climate), biodiversity conservation, water (water quality and ecology, water use and allocation) and human settlement (waste, noise, Aboriginal heritage and non-Aboriginal heritage).

According to the Department of Environment and Conservation, there are 2,532 known and recorded sites of Aboriginal cultural and heritage significance listed on the Aboriginal Heritage Information Management System (AHIMS) for the 14 LGAs in the region.

There are eight Aboriginal Places declared within the region:

- 1) Tooloom Falls Aboriginal Place
- 2) Wellington Rock / Woolool Wooloolni Aboriginal Place
- 3) Devils Chimney Aboriginal Place
- 4) Boobera Lagoon Aboriginal Place
- 5) Carrai Waterholes Aboriginal Place
- 6) Northcote Bora Ring Aboriginal Place
- 7) Sugarloaf (Gwydir) & Waratah Trig Aboriginal Place
- 8) Chinaman's Creek Aboriginal Place

There is also one Aboriginal Area declared within the region, i.e., Stonewoman Aboriginal Area, and four Community Conservation Agreements (CCAs):

- 1) Terry Hie Hie CCA
- 2) Deriah CCA
- 3) Pilliga East CCA
- 4) Kelvin CCA.

### **3.6.2 Inland Development**

Increased migration into regional centres such as Armidale, Moree and Tamworth is creating new demands for land and therefore new demands on Aboriginal communities. There are pressures on the regional LALCs to sell land for development purposes, but as in other urbanized parts of the State, developments on non-Aboriginal land are happening so quickly that traditional owners are struggling to protect heritage sites or make land claims over areas of significance to them.

### **3.6.3 Aboriginal Land Claims**

Ownership, control of and access to land increases opportunities for Aboriginal people to practice, promote and protect their culture and heritage and participate in natural resource management, which has both cultural and economic benefits. In addition to an individual's private purchases, there are several mechanisms through which Aboriginal people can own or control land in New South Wales. These are: the *Native Title Act 1993*; *NSW Aboriginal Land Rights Act 1983*; the Indigenous Land Corporation; management agreements; non-statutory co-management agreements and Aboriginal Land Use Agreements.

There has been one native title determination and four Aboriginal Land Use Agreements registered in New South Wales. None of these are in the New England/North-West region.

### **3.7 Families and Young People**

Aboriginal households in the New England/North-West region are predominantly made up of couples with children and single parents. Over 80% of Aboriginal households are families with dependent or non-dependent children. Breaking this down further, over 46% of Aboriginal households are couples with children, and approximately 34% of Aboriginal households are single parent family structures.

For non-Aboriginal households, just under 59% are households with dependent or non-dependent children. Some 44% of the total non-Aboriginal households are couples with children, and 14% are single parent households.

Some 20% of Aboriginal households have no children compared to 41% of non-Aboriginal households.

#### **3.7.1 Violence, Abuse and Neglect**

In 2002, the rate of reported domestic violence victimisation in the New England/North-West region for Aboriginal young people was 8 per 100,000, which was more than double that of the population as a whole in this region. The Tamworth region had the equal second highest victimisation rate for domestic violence for Aboriginal young people in New South Wales and the equal second highest gap between Aboriginal and non-Aboriginal outcomes.

Substantiated child protection reports are reports where assessment determined abuse or neglect issues. In 2001-2002, the rate of substantiated child protection reports for Aboriginal children in the New England/North-West was 26 per 1,000 people. This was the second highest of all regions in New South Wales, and compares to 37 per 1,000 for Aboriginal people state-wide and 16 per 1,000 for the population as a whole state-wide.<sup>29</sup>

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<sup>29</sup> NSW Department of Community Services, *Client Information System Annual Statistical Extracts*, 1999/00 to 2001/02.

## **4.0 CURRENT ENVIRONMENT**

### **4.1 Community Priorities**

Prior to its dissolution by the Australian Government, The Aboriginal and Torres Strait Islanders Commission's (ATSIC's) Kamilaroi Regional Council (KRC) conducted consultations with communities in the Kamilaroi region to determine priorities for services. These were collated into the Regional Plan for 2004-2007. The Kamilaroi region roughly coincides with the boundaries of the New England/North-West region, so that regional plan has been used as the basis for the community priorities identified in this chapter.

According to the ATSIC survey, the top five community priorities are:

- employment
- health
- family violence
- education
- housing

### **4.2 Analysis of Need**

This section is based on an analysis of need identified from the socio-economic and demographic data, as well as those needs identified by Aboriginal communities in the region. There is a reasonable correlation between Aboriginal community priorities and areas of need identified through the data.

An overview of the demographic information detailed previously suggests that, with a high proportion (51.4%) of the Aboriginal population aged 19 years or younger, funding should be directed at early intervention and prevention, early childhood initiatives, pre-school education, sport and recreation, school education and youth programs. Given the large proportion of the population in the region aged under 25 years (58.5%), services and programs should be focusing on vocational training, employment programs, housing and disease prevention programs.

Aboriginal people are disadvantaged compared to non-Aboriginal people on the majority of indicators in most regions of New South Wales, but the degree of disadvantage varies across those indicators. Compared to other regions, Aboriginal people in the New England/North-West region are suffering more disadvantage than any region other than Murdi Paaki on nearly every indicator.

The socio-economic indicators identify the New England/North-West region's Aboriginal population as being more disadvantaged or less disadvantaged (relative to Aboriginal people in other regions) in the following areas:

Less disadvantaged	More disadvantaged
<ul style="list-style-type: none"> <li>• First antenatal visit by pregnant mothers</li> <li>• Adult incarceration &amp; remand rates</li> <li>• Rates of juvenile diversions</li> <li>• Years 10 to 12 retention rates</li> </ul>	<ul style="list-style-type: none"> <li>• Low birth weight babies</li> <li>• Cardiovascular disease</li> <li>• Diabetes</li> <li>• Environmental health</li> <li>• Income</li> <li>• Unemployment</li> <li>• Bail refusals</li> <li>• Sexual assault &amp; domestic violence rates</li> <li>• Child protection reports</li> <li>• Housing</li> <li>• Alcohol use</li> <li>• Years 3 &amp; 5 literacy &amp; numeracy</li> <li>• Tertiary education</li> </ul>

### **4.3 Issues for Consideration**

On the basis of the information set out in this report, it is recommended that the New England/North-West Regional Engagement Group undertake further investigation of the following issues:

1. Although there is a high rate of CDEP participation in the region, unemployment rates continue to be very high, suggesting CDEP training is not leading to stable employment.
2. The increasingly high rates of cardiovascular disease and diabetes in the region suggest a need for more targeted Aboriginal-specific health and prevention programs, and possibly community transport to assist access to services.
3. The increasingly high rates of alcohol-related trauma indicate a chronic need for harm minimisation programs and rehabilitation services.
4. The continuing low rates of literacy and numeracy, as well as school retention, particularly to Year 12, suggest that education initiatives for Aboriginal students in the region require more support.
5. The high rates of assault victimisation, domestic violence involving young people, and sustained child protection reports, suggest a need for specialised programs, as well as shelters and safe houses for those in need.
6. Overcrowding of housing in the region is high, and the available data are likely to involve significant under-reporting.
7. There is a very high proportion of refused applications for bail in the region, indicating the need for greater focus by the relevant agencies, perhaps including funding for bail hostels and cultural awareness training for local magistrates.

In developing appropriate responses to these issues, consideration should be given to advice consistently provided by Aboriginal people in various forums in relation to service delivery.

Transport availability and cost are regularly identified as significant barriers to accessing government services. In particular, Aboriginal people often express a lack of confidence in utilising community buses which are not specifically operated by Aboriginal organisations such as Aboriginal Medical Services. This may be due to lack of familiarity with drivers, a lack of knowledge about what services are on offer, or a perceived lack of flexibility and adaptability with respect to timetables.

This reflects a broader concern identified by Aboriginal people regarding the culturally inappropriate manner in which services are delivered. This manifests itself in a range of ways, including:

- the absence of Aboriginal staff in organisations, particularly at the first point of contact such as reception areas;
- an inability by service providers to communicate effectively with Aboriginal people; and
- overt racism expressed by service providers.

“Cultural understanding” is listed as one of the goals under the *Two Ways Together*. The Department of Education and Training has developed a cultural competence course called the Aboriginal Cultural Education Program. It is suggested that the relevant CEOs prioritise cultural awareness training for public sector employees in key agencies with high levels of contact with Aboriginal people, including NSW Police, and the Departments of Community Services, Corrective Services, Education and Training, Environment and Conservation, Health, Juvenile Justice and Primary Industries.

Agencies are recommended to give careful consideration to these concerns when developing a response to the issues identified in this report.

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