

# Response ID ANON-RDKT-Y494-F

Submitted to **A consultation on a new National Public Health body: 'Public Health Scotland'**

Submitted on **2019-07-08 15:58:54**

## Questions

### 1 Do you have any general comments on this overview of the new arrangements for public health?

#### Give your comments below::

The RCN welcomes the opportunity to respond to the consultation on proposed new arrangements for public health which are designed to ensure the effective delivery of improved health and wellbeing outcomes for the population of Scotland.

Firstly we wish to highlight that the RCN believes that nursing should be at the heart of minimizing the impact of illness, promoting health and helping people to function at home, work, and leisure. Improving public health should be seen as part of all nursing and midwifery roles.

Nursing teams and the care they deliver will be key to achieving a healthier and fairer Scotland where health and wellbeing is improved and health inequalities reduced. We know that having the right support available at the right time can make a big difference to people's overall health and wellbeing. Nursing teams, particularly those in community settings, have a uniquely valuable understanding of the populations and communities they work in and are well placed to understand particular local needs and nuances. Their expertise and knowledge should be reflected in any whole system approach to public health.

Nursing teams work in almost every stage and setting of care, and as such they have an important role across a wide range of public health interventions. Nursing teams can often reach people who may not engage with other services and have a key role in reducing health inequalities. Nurses working in community settings are likely to be among the first professionals to work with people experiencing significant life events including nurses who work in health visiting, family nurse partnerships, and palliative care as well as specialist nurses who work with people experiencing life-changing diagnoses

The vision for the new public health body in ensuring effective delivery of improved health and wellbeing outcomes for the population of Scotland is laudable as is the recognition that as a country we need to address the current challenges – our poor relative overall health status compared with other countries; the significant and persistent health inequalities that exist across Scotland.

The documents highlights that there is a need for our care services to respond to the needs of a changing population with more complex needs, such as more older people; and the particular effects of current key issues such as obesity, mental health problems, alcohol and substance misuse. Is there not a need for our health and social care services to respond to the need of a changing population with more complex needs and perhaps as a country we should not continually describe the rise in the number of older people as a problem.

We support the aim of simplifying the public health landscape at the national level; the need for better, more visible leadership and a stronger voice for the public; the need to prioritise the application of public health intelligence and evidence into policy and practice.

### 2a What are your views on the general governance and accountability arrangements?

#### Give your comments below::

The corporate governance role and key responsibilities of the Board for Public Health Scotland is clearly defined in the consultation document, however the arrangements for shared responsibility with COSLA and Local Government leaders is vague with the joint role of COSLA and Scottish Government in strategic planning and monitoring deliverables potentially leading to conflict and confusion for the new body.

### 2b How can the vision for shared leadership and accountability between national and local government best be realised?

#### Give your comments below::

### 3a What are your views on the arrangements for local strategic planning and delivery of services for the public's health?

#### Give your comments below::

Given Scotland's integrated health and social care landscape, it is appropriate that Scottish Ministers and Local Government are jointly accountable for the delivery of Public Health Scotland's strategic objectives. Likewise, it is right that partnership working sits at the heart of Public Health Scotland.

However further clarity regarding the description of the multiple local partnerships would be welcome as it was not clear of how these multiple partnerships across Scotland would be co-ordinated by the new body, if indeed that was their role.

### 3b How can Public Health Scotland supplement or enhance these arrangements?

#### Give your comments below::

We agree that "it is crucial to avoid duplication, address gaps and tackle problems, particularly when a new development has impact across sectors."

It is important not to over complicate arrangements so that they become too bureaucratic and as such are unable to respond flexibly to changing need or the views of people using and providing services. Public Health Scotland should work to within existing arrangements and aim to bring clarity and cohesion to strategic planning.

### 4 What are your views on the role Public Health Scotland could have to better support communities to participate in decisions that affect their health and wellbeing?

**Give your comments below::**

As well as supporting people using services to participate in decisions that affect their health and wellbeing, Public Health Scotland should also be committed to supporting the multidisciplinary teams who provide care and services to participate in discussions. As part of the wider multidisciplinary health and social care team, nursing teams, particularly those in community settings, have a uniquely valuable understanding of the populations and communities they work in and are well placed to understand particular local needs and nuances. Their expertise and knowledge should be reflected in any whole system approach to public health.

**5a Do you agree that Public Health Scotland should become a community planning partner under Part 2 of the Community Empowerment (Scotland) Act 2015?**

Don't know

**5b Do you agree that Public Health Scotland should become a public service authority under Part 3 of the Community Empowerment (Scotland) Act 2015, who can receive participation requests from community participation bodies?**

Don't know

**5c Do you have any further comments?**

**Give your comments below::**

**6a What are your views on the information governance arrangements?**

**Give your comments below::**

**6b How might the data and intelligence function be strengthened?**

**Give your comments below::**

**7a What suggestions do you have in relation to performance monitoring of the new model for public health in Scotland?**

**Give your comments below::**

The commitment to include the national data and intelligence function within the new body, in order to ensure that all public health activity and performance measurement is brought together in one place, is welcome. Robust, reliable data of public health outcomes are important for ensuring that need is identified and met and that future planning is well planned and resourced however, where possible performance monitoring of the new model should adopt a Once for Scotland approach and should not replicate measures that may already be in place. Any new model should reflect existing standards including the Health and Social Care Standards and should form a feedback loop for those who have submitted data or participated in monitoring activity.

**7b What additional outcomes and performance indicators might be needed?**

**Give your comments below::**

**8 What are your views on the functions to be delivered by Public Health Scotland?**

**Give your comments below::**

The shared services section is not adequately described and appears to indicate that in the future other services which are currently delivered by Boards and or Councils could be centralised. It is not clear what is meant by professional services, for example, is this NHS Board level public Health Departments? More needs to be done to provide clarity on this.

**9a What are your views on the health protection functions to be delivered by Public Health Scotland?**

**Give your comments below::**

The transfer of the current services delivered by Health Protection Scotland to the new body appears sensible.

As Public Health Scotland "will become responsible for the implementation of the relevant health protection programmes and policies, including the provision of expert advice on policy development", it is of vital importance that the new body includes expertise from a multi-disciplinary workforce that includes registered nurses. Nurses and nursing teams play a key role in population health protection and their knowledge and experience should be reflected in the work of the new body.

**9b What more could be done to strengthen the health protection functions?**

**Give your comments below::**

**10 Would new senior executive leadership roles be appropriate for the structure of Public Health Scotland?**

Yes

**If so, what should they be? :**

The RCN believes that there should be an Executive Nurse Director Role within the new body. Nurses are often ideally suited and uniquely placed to respond to public health challenges as they understand the particular risks of individuals but also know the population and the communities they work in. Traditionally public health nurses have been seen as those in specialist community roles such as health visitors, school nurses and occupational health nurses and in some cases

specialist public health practitioners. However, with the challenges outlined and the need to improve the public's health there is an increasing need now for all nurses to become agents of public health and promote health as part of their clinical role.

**11 What other suggestions do you have for the organisational structure for Public Health Scotland to allow it to fulfil its functions as noted in chapter 5?**

Give your comments below::

**12 What are your views on the proposed location for the staff and for the headquarters of Public Health Scotland?**

Give your comments below::

**13 Are the professional areas noted in Chapter 8 appropriate to allow the Board of Public Health Scotland to fulfil its functions?**

Not Answered

Give your comments below: :

See answer to question 10 re the role of nurses in public health and the need for an Executive Nurse Director role.

**14a What are your views on the size and make-up of the Board?**

Give your comments below::

See answer to question 10 re Nursing role

**14b How should this reflect the commitment to shared leadership and accountability to Scottish Ministers and COSLA?**

Give your comments below::

**15 What are your views on the arrangements for data science and innovation?**

Give your comments below::

**16 What are your views on the arrangements in support of the transition process?**

Give your comments below::

It is important that staff effected by the transition proves are represented during the process. Further detail on the involvement of trade unions and staff side representation would be welcome as well details of that measures will be undertaken to ensure that staff are not negatively impacted.

**17a What impact on equalities do you think the proposals outlined in this paper may have on different sectors of the population and the staff of Public Health Scotland?**

Give your comments below::

**17b If applicable, what mitigating action should be taken?**

Give your comments below::

**18 What are your views regarding the impact that the proposals in this paper may have on the important contribution to be made by businesses and the third sector?**

Give your comments below::

## About you

What is your name?

Name:

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

**Organisation:**

Royal College of Nursing Scotland

**The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:**

Publish response only (without name)

**We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?**

Yes

**Evaluation**

**Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)**

**Matrix 1 - How satisfied were you with this consultation?:**

Please enter comments here.:

**Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:**

Please enter comments here.: