



IRISH MEDICAL
ORGANISATION
Ceadchumann Dochtúirí na hÉireann

**IMO Submission to the Department Of Health on
Your Health is Your Wealth
Public Health Policy Framework 2012-2020 – 2nd Consultation**

June 2012

IMO Submission on Your Health is Your Wealth – Health and Wellbeing Framework 2012-2020 – 2nd Consultation

Please find below the response from the Irish Medical Organisation to the 2nd Consultation on Your Health is Your Wealth – Health and Wellbeing Framework 2012-2020.

Options Appraisal

1. Are there other advantages or disadvantages of the models described in the paper which have not been considered?

2. Are there other models of service delivery that should be considered?

A wide range of factors - including poverty, social inequality, social exclusion, employment, income, education, housing conditions, transport access to health care, lifestyle, stress - all impact significantly on an individual's health and wellbeing. Evidence shows that lower socio-economic groups have relatively high mortality rates, higher levels of ill health and fewer resources to adopt healthier lifestyles when compared to better-off sections of society.

In view of the large contribution social determinants make to the health status of the population of Ireland, the IMO recommends

- the establishment of a Minister of Public Health with direct responsibility for overseeing the delivery and implementation of Public Health Policy and to ensure that public policy is health proofed across all Government Departments.
- The Minister for Public Health should have a statutory function in each of the Departments involved and funding within each Department should be ring-fenced for Public Health initiatives
- a national public health executive agency should be established to drive progress and be accountable for implementing policies set by the Minister for Public Health.

The models subgroup has developed five models for the delivery of the public health function however none are directly accountable to a Minister for Public health. Model 2b combines the core functions of Public Health in a National Health and Well-being Agency with linkages to other agencies and accountable directly to the Minister for Health. The IMO recommends the adoption of Model 2b but answerable to a Minister for Public Health who has a statutory function within each Department.

All models should be considered in the context of a future System of Universal Health Insurance.

International Models

3. Are there other models of service delivery from other countries which should be considered?

4. How should a Health in All Policies approach be implemented in Ireland?

Health in all Policies (HiAP) is a policy strategy that targets the key social determinants of health through integrated policy response across relevant policy areas with the ultimate goal of supporting health equity. Experience from other countries which have adopted various approaches to Health in all Policies shows that¹:

1. While some countries have adopted policies to improve the health of socially disadvantaged groups or narrow the gap between different groups, few countries have adopted policies that specifically address the social gradient across whole populations;
2. Nearly all public health policies recognise the importance of other non-health sectors but with differing emphasis on Education, Employment, Environment...
3. Commitment to addressing inequalities in health is required not just at local and regional level but at national level;
4. Data is needed to establish and monitor health inequalities;
5. A targeted approach is necessary with the development of policies and structures to achieve those targets;
6. All countries combine disease specific, group specific and arena specific approaches;
7. Legislation is required to place HiAP and Health Impact Assessments on a statutory footing;
8. Research is needed to build the evidence base for policies and strategies;
9. Support is needed to build capacity at local level.

The IMO recently published a Position Paper on Health Inequalities recommending that the Government adopt a Health in All Policies Approach. Specifically the IMO recommends:

- An explicit statement from Government that health is a basic human right and its protection should be a core aim of Government and the State;
- An explicit statement that the State recognises the crucial importance of prevention and that preventing ill-health through the reduction of health and social inequalities would be a stated priority of Government;
- An immediate review of inequalities and inequities in health to include inequalities in health status, and inequities in access to health care by socio-economic grouping, geographic location, gender and ethnic minority;
- The establishment of an inter-sectoral committee to prioritise the development and implementation of evidence-based initiatives across departments and across sectors that tackle the unequal distribution of wealth and ensure that all children have the opportunity to realise their maximum potential including;
- Economic policies that focus on growth and provide as large a proportion of the population as possible with rewarding, productive and secure employment;
 - Fiscal policies that are progressive;

¹ Hogstedt C, Moberg H, Lundgren B and Backhans M (Eds) Health for all? A critical analysis of public health policies in eight European countries, Swedish National Institute of Public Health 2008

- Social welfare policies that ensure a minimum standard of living for all;
- Family policies to eliminate child poverty
- Education policies that focus on early childhood including:
 - formal statutory preschool access for all children;
 - active collaboration between the Department of Education and the Department of Health to deliver on early educational intervention.
- establishment of a Minister of Public Health with direct responsibility for overseeing the delivery and implementation of Public Health Policy and to ensure that public policy is health proofed across all Government Departments;
- The Minister for Public Health should have a statutory function in each of the [Government](#) Departments involved and funding within each Department should be ring-fenced for Public Health initiatives;
- The Office of the Minister for Public Health should also be responsible for ensuring that Health Impact Assessments are carried out on all new government policies at design, implementation and review stages.
- A national Public Health Executive Agency should be established to ensure that the core functions of public health (Health Protection, Health Intelligence and Public Health), drive progress and are accountable for implementing policies set by the Public Health Minister;
- The contribution, to the overall economic strength and well-being of Ireland, of Public Health interventions and measures should be recognised through priority funding. Secured funding for Public Health is of vital importance, particularly in view of the Government's plans to introduce universal health insurance – a funding mechanism which traditionally caters poorly for Public Health requirements.
- Development of an integrated Public and Community Health workforce plan.

Economics of Prevention

5. In your opinion is this a comprehensive review of the economic benefits of the prevention of ill-health?

6. Have you any further comments on the economic advantages of preventing ill-health and promoting health and well-being?

Improving the health of all our citizens (particularly the poorest and most deprived) will reap long-term dividends by ensuring a healthier population, and more productive workforce, who will have less need for expensive health interventions and socio-economic supports.

Legislation technical consultation

7. Do you agree with the key proposals posed in this document?

8. Are there other considerations in the area of legislation for public health that should be added?

The IMO welcomes proposals for a comprehensive Public Health Act and urges public consultation on the details of the proposed Heads of Bill.

9. Are there strengths and/or weaknesses that haven't already been identified in our description of the Essential Public Health Operations (EPHOs) in Ireland?

- *Introduction to EPHO SWOT analysis*
- *EPHO 1: Surveillance and assessment of the population's health and well being*
- *EPHO 2: Identifying health problems and health hazards in the community*
- *EPHO 3: Preparedness and planning for public health emergencies*
- *EPHO 4: Health protection operations (environmental, occupational, food safety and others)*
- *EPHO 5: Disease prevention*
- *EPHO 6: Health promotion*
- *EPHO 7: Evaluation of quality and effectiveness of personal and community health services*
- *EPHO 8: Assuring a competent public health and personal health care workforce*
- *EPHO 9: Has not been specifically addressed to date. A short document on leadership has been prepared by the working group.*
- *EPHO 10: Health related research*

The IMO are particularly concerned about the short timeframe for this second consultation on the *Your Health is Your Wealth – Health and Wellbeing Framework 2012-2020*. Just three weeks were provided for consultation on questions 1 to 8 and circa 1 week for question 9.

IMO doctors working on the frontline of service provision have an important contribution to make to the development of Public Health Policy in Ireland. However, the IMO feel that one week is too short to examine the strengths and weakness of all the Essential Public Health Operations (EPHOs) in detail and

to provide meaningful commentary. However in relation to EPHO 8 *Assuring a competent public health and personal health care workforce* the IMO would like to repeat:

- The significant role that Public Health and Community Health Doctors make to population health must be recognised and resourced. Public Health and Community Health Doctors have been particularly hard hit by the HSE's moratorium on recruitment. An integrated public health workforce plan should be developed;
- Steps must be taken to ensure that Public Health Medicine and Community Health Medicine are made attractive options to medical students and doctors in training in order to maintain the capacity of the specialty;
- At present there is insufficient training available specific to the needs of Community Health Doctors. The IMO would like to see the establishment of a faculty in this specialty.