

RSPH Response to the Consultation - Strategic Equality Plan 2024 to 2028: proposed principles of approach and objectives

Royal Society for Public Health (RSPH) is an independent health education and campaigning charity, committed to improving and protecting the public's health and wellbeing. We are the world's longest-established public health body with over 6000 members committed to supporting the public's health. Activities include providing qualifications and public health programmes, alongside campaigning on issues to support better health and wellbeing for the public.

Question 1: Do you agree with the Long-term Aim? Please explain your answer, suggesting any amendments.

RSPH welcomes this long-term aim which focuses on strengthening and advancing equality in Wales, with the hope that this strategy can influence similar policy objectives and proposals for the wider UK. The long-term aim aligns with RSPH's vision to tackle inequalities in health which have been exacerbated through Covid-19 and the cost-of-living crisis. This also fits with our ambition to raise awareness of, and reduce the impact that inequalities have on healthy life expectancy. We know that poverty and the cost-of-living crisis have seriously impacted on the health of communities and have led to rising inequalities. In addition, they have added further pressure to our already overworked public health [workforce](#) who are key to supporting our health and wellbeing.

Inequalities in health are the result of structural, systemic, and political processes that prevent people from accessing the fundamental building blocks needed for good health and well-being (e.g., housing, employment, education and skills, healthcare etc). Overall, we feel the Strategic Equality Plan would benefit from a more explicit recognition of the causes and impacts of health inequalities, and potential responses and solutions to reduce them. This also includes a greater recognition of the wider public health workforce who require the resources, investment, skills, and training to continue supporting the nation's health.

Throughout 2024, RSPH has been [engaging](#) specifically with the wider public health workforce (WPHW) - defined as "Any individual who is not a specialist or practitioner in public health but has the opportunity or ability to positively impact health and wellbeing through their work" - to understand how they can be harnessed and supported to grow and deliver public health. Whilst they usually don't do public health day in day out, many embed public health approaches as part of their work.

The WPHW must be further supported and acknowledged, so they can continue to contribute across a range of settings and professions, from urban planning to community outreach work, and from cleaning and hygiene to occupational therapy. In order to reach their potential, they need to have access to training and qualifications, and more formalised routes into doing public health. RSPH will release a report (early 2024) on this engagement which will also provide recommendations to public health leaders and governments.

We would welcome the opportunity to work with the Welsh Government to achieve the aims of this consultation. We are dedicated to improving and protecting the health of people across the United

Kingdom.

Question 2: Do you agree with the proposed National Equality Objectives above? Please explain your answer, suggesting any amendments.

The National Equality Objectives touch on key areas that affect the ability of people in Wales to prosper. In particular, there are two key objectives (1 and 3) broadly mirror our goal of reducing poverty and creating a society where everyone can be aware of and has equitable access to high quality public services.

It is imperative that we acknowledge, recognise, and highlight the work that the public health workforce does in prevention and tackling health inequalities. However, based on evidence relating to the building blocks needed for a healthy life, which are key to reducing health inequalities, RSPH feels that the objectives could benefit from a stronger emphasis on the value of the whole public health community, including the WPHW.

[Poor quality and insecure housing](#) has cut lives short in Wales, with the [risks to health and well-being associated with living in unhealthy homes](#) felt unequally across the population. For example, approximately one in three [excess deaths during winter](#) are linked to either living in cold homes or fuel poverty, with older people, children and babies at particularly high risk. Housing is therefore a key driver of health and [health inequalities](#) – and the differences are [getting larger](#). In addition to supporting the public health workforce it is crucial to have effective public policies which tackle key areas including poor housing, food poverty, climate change and financial insecurity – and which focus on particular communities who experience stark inequalities.

Question 3: Please tell us about any other issues relating to equality and community cohesion in Wales that you feel should be addressed?

We agree with the proposed National Equality Objectives and welcome the continued focus that Welsh Government is placing on addressing the impacts of inequalities on opportunities and outcomes across the life-course. The aims and objectives align with our ambitions for achieving a healthier future by considering the impacts on health of education, employment opportunities, good quality housing and healthy food that is accessible and affordable and an environment that is created to fundamentally support our health and well-being.

However, the objectives could be more explicit about the impact of the listed factors (e.g. poverty, access to public services and employment opportunities) on people's health and well-being. This means that although solutions that target the whole population can be useful in improving the health of the entire nation, there must be more focus on how to support those communities which are most impacted in order to maximise these benefits for people who are most in need of support. For example, people living in the poorest parts of Wales [already die more than six years earlier](#) than those in the least deprived areas, and these communities must be an explicit focus in the objectives.

Achieving the proposed National Equality Objectives, with the aim of also reducing health inequalities, means rethinking the approach to decision-making at the national, regional and local level in policy areas that shape the building blocks for a healthy life, such as employment, education, income, housing and the environment. An overarching priority needs to be around giving everyone the best start in life, ensuring their needs and rights are met from the beginning, whilst recognising that [disadvantage can start before birth and accumulate over their life](#). Life expectancy, healthy life expectancy and their inequality gaps are also important indicators to help measure inequalities.

The effects of [climate change](#) are also expected to increase inequalities due to health impacts from extreme weather events. Therefore, a focus on how climate change will exacerbate inequalities, in addition to the current focus within the plan on ensuring a transition to net zero in the future, is needed. The way these factors contribute to inequalities demonstrates how crucial it is to not lose sight of the need to tackle the underlying causes of health inequalities, such as poor housing and poor access to primary and secondary care services. A planned and coordinated effort is needed if we are to reduce the unfair health gap and protect at-risk population groups.

Question 8: Do you have any further specific points you'd like to raise in relation to the Strategic Equality Plan?

Overall, the Strategic Equality Plan provides a valuable list of different objectives and actions that will help the Welsh Government achieve the aim of the plan and we hope that this approach will be replicated across the UK. A greater emphasis on timely evaluations of initiatives and accountability mechanisms, with clear commitments to review, would also help support the effective implementation of the priorities and objectives outlined in the plan. This would allow the public to understand how the government aims to tackle the impacts on inequalities through a clear strategy with achievable objectives and aims. This will also then encourage further input from organisations (especially those in public health) to ensure that the plan remains relevant. Input from those most affected by inequalities (e.g. lived experience) will also highlight the key areas in which the government should increase its involvement to continue reducing inequality, particularly on areas including housing, employment, climate change.

There should always remain an overarching focus on reducing health inequalities and preventing them from widening further by targeting their root causes and influencing change. One method which may tangibly help to measure accountability and formulate policies which meet the aims and objectives of the Strategic Equality Plan is the use of Health Impact Assessments (HIA). This uses a process that gathers peer-reviewed evidence, grey literature, health intelligence and stakeholder interviews, to identify how policies, plans and proposals may affect health and well-being (both positively and negatively), and how those impacts may differ between different population groups and between different areas (with the potential to create or worsen inequalities).

For example, a [Health Impact Assessment \(HIA\) of climate change](#) conducted by Public Health Wales identified that all of the determinants of health and well-being are impacted by climate change, with the potential to lead to cumulative and long-term impacts on overall population health and inequalities. This means that HIA's can be used at the design and development phase prospectively, or to help understand impacts retrospectively. They should also be participatory involving local communities and stakeholders in decision-making. The findings can be used to revise a policy proposal or to take action to mitigate against any unintended negative impacts. This will certainly encourage all those interested in public health (from communities to public health workers) to consistently engage with the policy making process. They will provide valuable insight into the potential effects of any policies on public health whilst also allowing these stakeholders to regularly support policy formulation with the latest data. This will allow the government to make better choices to mitigate the public health impacts of current and future health disasters, such as the Covid-19 pandemic and climate change.