

Appendix A

Public Health Wales Long Term Strategy 2023 – 2035

Integrated Impact Assessment

1. Purpose and summary

Public Health Wales is required by law to comply with the Public Sector Equality Duty, the Socio-Economic Duty, the Well-being of Future Generations (Wales) Act 2015 and the Welsh Language Standards in developing any strategic plan/ decision. This includes our Long Term Strategy.

An integrated screening assessment (stage 1 of an impact assessment) has been undertaken on our Long Term Strategy and the process of strategy development to assess how the legal duties have been given due regard and the potential impacts of the strategy. This has been a pilot for the development of a new process for Public Health Wales in response to the Socio-Economic Duty, which has replaced the previous Equality and Health Impact Assessment process.

This paper presents the findings of the Integrated Impact Assessment that was undertaken alongside the development of Our Long Term Strategy 2023-2035.

The assessment and findings we are presenting at this stage is not a one-off and will provide a foundation for further consideration of the duties throughout the life of the strategy.

2. Recommendations

The integrated screening assessment has produced the following recommendations which should be considered as Public Health Wales begins to implement the Long Term Strategy:

1. Implementation of all strategic priorities and the design of programmes need to take account of:
 - socio-economic disadvantage - area multiple deprivation is a measure of relative not absolute socio-economic disadvantage. It will be important that due regard is given to other measures or socio-economic inequalities
 - a life course approach – ensuring the needs of different age groups are met
 - impacts on people with protected characteristics
 - different forms of multiple, and overlapping (or intersectional) inequalities
 - impacts on place-based or geographic communities that experience inequalities
2. Further consideration is needed of how the delivery of the Long Term Strategy will take account of the Welsh Government's Anti-Racist and LGBTQ+ Action Plans and the forthcoming NHS Wales Women's Health Plan, including how improvements in data availability and quality are needed to take effective action on health inequalities

3. Governance arrangements for strategy implementation to monitor and evaluate the implementation of these recommendations and ensure that due regard is given to the legal duties
4. Consider how the delivery of the strategy could maximise our contribution to all seven of the national well-being goals
5. Share learning from implementing the integrated screening process for the legal duties, including recommendations to inform the further implementation of the socio-economic and other legal duties

3. Background

Public Health Wales is required by law to comply with the Public Sector Equality Duty, the Socio-Economic Duty, the Well-being of Future Generations (Wales) Act 2015 and the Welsh Language Standards in developing any strategic plan/ decision. This includes our Long Term Strategy.

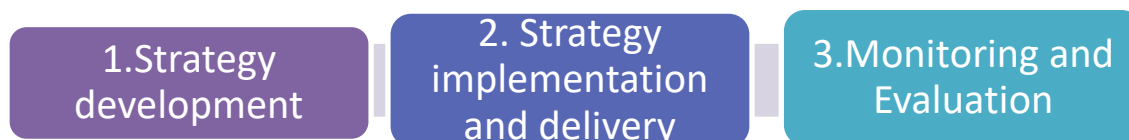
Therefore, it is important that we can evidence how the strategic priorities and objectives have been informed with due regard to these duties to date, what the potential impacts of our intended action are on our duties, and how the proposed areas of delivery and ways of working in implementing the strategy will also meet our legal obligations:

- **Equality Act 2010: The Socio-Economic Duty:** Consider the reduction of inequalities of outcome related to socio-economic disadvantage when taking strategic decisions. This includes corporate objectives,
- **Equality Act 2010: Public Sector Equality Duty** Assess the likely impact of proposed policies and practices on the ability to comply with the general duty and the particular impacts on people with protected characteristics
- **Well-being of Future Generations (Wales) Act 2015:** Public bodies subject to the Duty must carry out sustainable development e.g. demonstrate the five ways of working
- **Welsh Language (Wales) Measure 2011:** states that the Welsh language should not be treated less favourably than English. This Measure gave the Welsh Language Commissioner the power to impose standards on a range of public bodies to ensure that every public services organisation in Wales complies with language duties.

4. Proposed Approach

An approach to meet these duties needs to be integrated throughout all stages of the strategy, including the development (current stage), implementation and delivery, and monitoring and evaluation. This approach will also support Public Health Wales in achieving a cross cutting objective of the Long Term Strategy which is to reduce health inequalities and improve health equity.

The assessment and findings we are presenting at this stage is not a one-off and will provide a foundation for further consideration of the duties throughout the life of the strategy.



5. Strategy Development

An integrated screening assessment (stage 1 of an impact assessment) has been undertaken on our Long Term Strategy and the process of strategy development to assess how the legal duties have been given due regard and the potential impacts of the strategy.

The process has been undertaken by a cross organisational group of staff, with expertise in strategy development, equalities, impact assessment, and sustainable development. It is important to note that this has been a pilot for the development of a new process for Public Health Wales in response to the Socio-Economic Duty, which has replaced the previous Equality and Health Impact Assessment process. It has sought to create an integrated approach to assessing how strategic decisions meet the legal duties and provide an assessment and recommendations to the Board on the likely impact of key decisions on these legal duties.

A significant amount of learning has taken place during this process to apply to the future development of capacity, tools and guidance for implementing the duties, as well as recommendations for resourcing this aspect of essential corporate governance. This will be reported on separately.

The assessment has involved a critical assessment of the process of strategy development, stakeholder engagement and perspectives, and drawn on evidence base utilised to form the priorities and outcomes in the long term strategy. It has used the lens of the legal duties to identify where due regard has been given and where there is scope to improve our consideration of the duties throughout the life of the strategy.

This has enabled the identification of actions and recommendations to strengthen impacts of the strategy and identify areas that may warrant further detailed impact assessment.

6. Description/Assessment

Summary of main findings from the integrated screening assessment

6.1 Equality Act 2010: The Socio-Economic Duty

Evidence and consideration of socio-economic inequalities has been strongly integrated in the development and finalisation of the Long Term Strategy, for example,

via health intelligence on inequalities contained in the Health in Wales report and via stakeholder engagement. The overarching strategy outcome is to narrow the gap in healthy life expectancy between the least and the most deprived populations. Strategic Priority 1 is explicitly focused on addressing socio-economic determinants of health such as fair work, living conditions and poverty.

Strategic Priorities 1 and 2 have objectives that include a specific focus on reducing inequalities arising from socio-economic factors and commit to work to support the following additional system wide outcomes related to socio-economic inequalities:

- reduce the gap in mental well-being between the most affluent and most disadvantaged groups.
- children in poverty

The recent Public Health Wales report on the Cost of Living Crisis identified that many of the groups at higher risk of relative income poverty can overlap and intersect, (i.e. you can be a women and disabled) and meaning that you can experience multiple forms of disadvantage that increase socio-economic inequalities. This intersectional perspective on inequality is currently not directly addressed in the long-term strategy.

6.2 Equality Act 2010: Public Sector Equality Duty

6.2.1 Cross cutting impacts

Availability and quality of health data on specific population groups is identified as a gap and barrier to tackling health inequalities – including those linked to sex, sexual orientation and race.

Language, content, format, design and delivery routes can all impact on equal access to health information and services. For example, increasing digitalisation of services may disadvantage some groups. Consideration of equalities will be needed in strategy implementation to ensure equity of access to information and data.

Several of the enabling approaches in the strategy are identified as supporting Public Health Wales to meet our duty to promote equality through the delivery of the strategy including:

- an overall outcome focused on reducing inequalities in life expectancy based on multiple deprivation
- being equity-focused, in our approach to behaviour change and seeking to reduce inequity through segment-specific intervention design
- digital and data services that are accessible and equal
- an inclusive approach to research, co-designing with communities and capturing equalities information systematically
- a robust approach to public and community engagement to inform and influence our work

Strategic priority 2 highlights the impact of discrimination on mental well-being, action on violence prevention, and a trauma informed approach. These actions are highly relevant to tackling health inequalities in people with the following protected characteristics who are more likely to experience discrimination, harassment or bullying, and violence; LGBTQ+ and those undergoing gender reassignment; people from ethnic minorities; women; people from specific religion/beliefs; people with disabilities. Consideration will be needed as to how to maximise the impact of this priority on these population groups.

6.2.2 Impact on people with protected characteristics and other population groups

Age related groups: A focus on promoting health in the early years has been removed, and a decision was made in consultation with stakeholders to embed a life course approach across the refreshed strategy so that health outcomes across the life course are addressed. This provides an opportunity for a greater focus on the needs of an ageing population, but it will be important to ensure that the early years and First 1000 days programme remain a focus for health improvement.

Sex: There are significant inequalities in health between men and women across different health outcomes. Key areas of the strategy that are relevant to addressing these inequalities include wider determinants, mental wellbeing, healthy behaviours, delivering excellent public health services and access to sustainable health and care. The strategy does not address inequalities linked to sex directly. An NHS Wales Women's Health Plan is currently in development.

Sexual orientation and gender reassignment: The Welsh Government LGBTQ+ Action Plan identifies inequalities in health in relation to; access to and experience of healthcare; smoking and substance misuse; discrimination; and mental wellbeing. Key areas of the strategy that provide an opportunity to address these inequalities include; mental wellbeing, healthy behaviours, delivering excellent public health services and sustainable health and care. The strategy does not address inequalities linked to sexual orientation or gender reassignment directly.

Pregnancy and maternity: The strategy continues a commitment to the First 1000 days programme, which, which aims to address the wider social, economic, and environmental conditions that support parents to give their children the best start in life and to support policy makers in assessing the impact of policy on families.

Disability: people with disabilities are more likely to live in poverty, be unemployed, have a long-term health condition, lower wellbeing and need to access healthcare. They also face barriers to access to services and health improvement information. Key areas of the strategy that that provide an opportunity to address these inequalities include; wider determinants; mental wellbeing, healthy behaviours, delivering excellent public health services and sustainable health and care. The strategy document does not address inequalities linked to disability directly.

Race: The Welsh Government's Anti-Racist Action Plan identifies inequalities in health including mortality from COVID-19; maternity care and mental health; access to and experience of healthcare, socio-economic factors, discrimination and a need to improve population health data that includes ethnicity. We also know rates of smoking are higher in some ethnic groups. Key areas of the strategy that that provide an

opportunity to address these inequalities include; wider determinants; mental wellbeing, healthy behaviours, delivering excellent public health services and sustainable health and care. The strategy document does not address inequalities linked to race or ethnicity directly.

6.2.3 Other groups at higher risk of discrimination or other social or economic disadvantage

The strategy includes clear commitments to address the health needs of vulnerable groups including:

- reducing harm from communicable disease in communities at higher risk
- increasing uptake of screening services in disadvantaged groups
- meeting needs of most vulnerable communities in responding to climate change.
- identifying vulnerable populations, marginalised groups and local health inequalities and advising on commissioning to meet their health care needs apply these principles to healthcare services we directly provide e.g. population screening programmes
- co-creating a trauma-informed Wales, to reduce impact of adverse childhood experiences and other forms of adversity and trauma

6.2.4 Geographical communities

Rural and coastal and other geographical communities have been identified as disproportionately impacted by the “Triple Challenge” arising from COVID-19, Brexit and climate change. Rural communities also experience higher deprivation in relation to access to services, including healthcare. There is no specific reference to the needs of geographic communities in the strategy.

6.3 Well-being of Future Generations (Wales) Act 2015

Consideration and alignment of the strategic priorities to the Well-being of Future Generations Act has been strongly integrated in the development and finalisation of the Long Term Strategy. The priorities and objectives will contribute to multiple well-being goals and align with our partner organisations well-being objectives. However, direct alignment to the goal of *A Wales of Vibrant Culture and Thriving Welsh Language* could be strengthened. There is an opportunity to consider how the delivery of the strategy could maximise our contribution to all seven of the well-being goals.

The overarching outcome ***to increase the healthy life expectancy of adults and narrow the gap in healthy life expectancy between the least and the most deprived*** is one of Wales’ National Well-being Indicators and National Milestones.

The outcomes proposed under each priority area are pulled from national frameworks to ensure our work integrates with wider system ambitions. This includes the Well-

being of Future Generations Act national goals and wellbeing indicators and the Public Health Outcomes Framework.

There is strong evidence that the five ways of working have been embedded throughout the development of the strategy (see cover paper). Building on this approach during strategy implementation could ensure ongoing collaboration with partners to further integrate our objectives, achieve a common understanding and seek to identify and mitigate any negative impact on each other.

6.4 Welsh Language (Wales) Measure 2011

There is evidence that consideration of the Welsh Language Measure has formed part of the strategy development. This includes ongoing opportunities for persons to use the Welsh language and treating the Welsh language no less favourably than English during engagement with staff, stakeholders and the public. This approach should be built upon for strategy implementation.

Aligning the strategy to areas of the Public Health Outcomes Framework will help stakeholders understand the impact which our individual behaviours, public services, programmes and policies are having on health and well-being in Wales as the tools and evidence are available in both Welsh and English. The strategy document does not address inequalities linked to the Welsh Language directly.