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## Response to the general principles of the Well-being of Future Generations Bill

### 1 Introduction

Public Health Wales welcomes the opportunity to contribute to the Environment and Sustainability Committee's inquiry into the general principles of the Well-being of Future Generations (Wales) Bill.

The significance of this Bill for public health in Wales is intrinsically linked with the content and progress of the proposed Public Health Bill, the white paper for which has recently been consulted upon. Public Health Wales submitted a comprehensive response to the Public Health White Paper in June 2014 and a further supplementary response in August 2014, once we had viewed the Well-being of Future Generations (Wales) Bill. The supplementary response prepared in August 2014 is cross-referenced to various points we raise in this consultation response. It is attached in full for information (attachment 1).

Public Health Wales is willing to provide oral evidence to the Committee and for the reasons outlined below and in attachment 1, we believe that it is important for the Committee to have the opportunity of hearing directly from the health sector. We welcome the Commissioner for Sustainable Futures, Peter Davies's intention to increase the engagement with health interests as signalled in the "*The National Conversation-the Wales We Want*" interim report.

In providing this response to the Committee, Public Health Wales has had regard to the accompanying Explanatory Memorandum. In doing so, it is apparent that some things appear to be regarded as implicit in the wording of the Bill. Public Health Wales will state where we feel that reference must be more explicit; it is inappropriate to assume that the reader is interpreting the Bill in the way envisaged.

Public Health Wales has also had regard to the White Paper on Local Government Reform, and the accompanying document *Devolution, Democracy and Delivery-Improving public services for people in Wales*. The Well-being of Future Generations Bill sets out the vision that public services will pursue, whilst the White Paper and accompanying documents set out the direction for the reform of public services to steer them towards achieving that vision.

## **2 Legislating to put sustainability and sustainable development at the heart of government and the wider public sector**

Public Health Wales welcomes the commitment to sustainable development as a central organising principle and the strong message that legislating for sustainable development sends out. There is reciprocity between public health and sustainable development- you cannot have one without the other.

Public Health Wales views the Bill as an opportunity for gaining a wider understanding, and broader application, of the principles of 'prudent healthcare'. NHS Wales is working hard to ensure that 'doing the right thing at the right time' is translated into effective clinical practice which increases capacity, reduces the need for multiple interventions and provides the individual with the best outcome in the timeliest manner. We would further advocate this approach being applied more broadly to the delivery of all public services and in strategic partnerships. Working in a holistic and integrated way will support the drive towards 'prudent healthcare' in Wales. Delivering this agenda will require ambition, consensus and co-ordinated delivery across the system.

## **3 Response to the general principles of the Bill and the need for legislation**

### **3.1 The common aim and sustainable development principle established in the Bill and the public bodies specified.**

Public Health Wales agrees with the sustainable development principle but, as outlined in detail in the attachment 1, the absence of health as a core element of the common aim is of great concern. We recognise that "social, economic and environmental well being" is encompassed within a wide definition of health. However, in the view of Public Health Wales, it is wholly inappropriate to discuss wellbeing in the common aim, in terms that do not explicitly encompass health as a fundamental part of well being.

Public Health Wales recognises that when working with partners and stakeholders, "health" is still sometimes seen as the responsibility of the NHS. Much time and energy has been expended in seeking to gain recognition that health and well being is a much broader concept. The Future Generations Bill provides the opportunity to be explicit about the central role of health and well being in sustainable development.

We find it particularly telling that health and wellbeing serve as key examples in the Explanatory Memorandum. Paragraphs 127-129 highlight health in all policies as an example of the need for integration and in paragraph 130, health is cited as the example for preventative action. "Healthier people" is the opening phrase in discussing the policy intention of the Bill:

"The Welsh Government has set out the difference that it wants to make to the lives of people in Wales *'healthy people living productive lives in a more prosperous and innovative economy, safer and more cohesive communities, with lower levels of poverty and greater equality; a resilient environment with more sustainable use of our natural resources and a society with a vital sense of its own culture and heritage'* (at paragraph 44 of the Memorandum).

Public Health Wales agrees with the bodies identified as public bodies in the Bill but queries why the Welsh Ambulance Service NHS Trust has been omitted from the list.

### **3.2 The approach to improving well-being, including setting of well-being goals, establishment of objectives by public bodies and the duties imposed on public bodies**

Public Health Wales recognises the need for measures and structures to be put in place to encourage and monitor compliance with the proposed legislation. We welcome the recognition that these must be integrated at all levels; that fundamentally the longer term impacts (positive and negative) must be considered as well as the shorter term impacts.

In regard to the specific goals, attachment 1 sets out the concerns of Public Health Wales in relegating the reference to health to one of six well-being goals rather than its explicit inclusion in the common aim. This omission results in a failure to optimise the opportunity to embed "good health at the centre of the Wales we want" (Welsh Government, 2014, Public Health White Paper).

In addition, whilst implicit in the majority of the well-being goals, Public Health Wales would highlight the significant omission of the alleviation of poverty within the well-being goals. The significance of poverty and inequalities are acknowledged in the Explanatory Memorandum but are not referred to on the face of the Bill. This diminishes these important wellbeing considerations. Sustainable development is impossible if we do not address the inequities that exist within Wales and how Wales relates to the rest of the World. The Future Generations Bill does not explicitly reference the need to tackle inequalities today in order to address the impact on future generations - a fundamental aim for sustainable development in Wales. More importantly inequities exist in disadvantaged communities in Wales which, because of pre-existing health and socioeconomic problems, compromise the ability of individuals and communities to cope with, or adapt to, the challenging environment in which they live. Failure to recognise explicitly these inequities is likely to result in missed opportunities to collaborate, misplaced and ineffective interventions aimed at confronting and addressing these issues, poor use of scarce resources and ultimately failure in closing wide inequality and inequity gaps for future generations.

The Bill repeals existing legislative requirements in which health and wellbeing are explicit considerations (NHS (Wales) Act 2006, requirement for local health, social care and wellbeing strategies). Public Health Wales understands that this is part of the legislative process and of streamlining local planning processes. However, whilst the Explanatory Memorandum (para 217) states "*The Bill as a whole .....is intended to implement the "health in all policies" approach*" this is not explicitly stated on the face of the Bill. This gives rise to concerns that health may not receive the priority consideration that it warrants in the local integrated planning process.

Public Health Wales is keen to appropriately support the Welsh Government in the preparation of statutory guidance referred to in the Explanatory Memorandum, with particular reference to health in all policies and health impact assessment.

### **3.3 The approach to measuring progress towards achieving well-being goals and reporting on progress**

Public Health Wales urges that development of the approach to measuring progress takes account and is highly cognisant of processes and structures already in place when seeking to improve the measurement and documentation of progress towards achieving well-being goals. There are already substantial reporting arrangements, a plethora of local and national plans and outcome frameworks in place and under development. At a time when resources are limited, care must be taken to recognise what already exists, to set clear expectations and reasonable timescales and thus allow transition towards the coherent and robust approach that is envisaged.

The Bill does provide an opportunity for the NHS in Wales to work closely with the rest of the public sector. The explicit requirement for shared responsibility to achieve well being goals will assist the NHS in holding others to account and to being held to account for a range of actions intended to promote health improvement in both national and local populations.

As a public sector body, Public Health Wales will seek to act as an exemplar in how we meet the requirements of the Bill and share our experience with partners across the public sector and society as a whole.

### **3.4 The establishment of a Future Generations Commissioner for Wales, the Commissioner's role, powers, responsibility, governance and accountability**

Public Health Wales would expect the Commissioner's role to be on a par with other commissioner roles established in Wales, in respect of the independent voice and scrutiny role associated with such positions. The establishment of this position sends an important signal that sustainable development is indeed central to Welsh policy and that systems are being established to strengthen existing governance systems for improving wellbeing in Wales. Public Health Wales notes

that the Explanatory Memorandum, read alongside *Devolution, Democracy and Delivery – Improving public services for people in Wales* sets out a reform agenda that seeks to strengthen local integrated planning and democratic scrutiny of local progress.

It is disappointing that the Future Generations Commissioner would be accountable to the Welsh Government rather than to the National Assembly as are existing Commissioners.

### **3.5 The establishment of statutory Public Services Boards, assessments of local Well-being and development / implementation of local well-being plans.**

It will be important to move carefully and prudently from the existing local integrated planning arrangements, as outlined in the Explanatory Memorandum to build upon and exploit the important foundations of integration and partnership working that already exist at locality level. We welcome the placement of these voluntary partnerships onto a statutory footing, but wish to stress that the voice of health and wellbeing must have equivalence with those of social, economic and environmental concerns.

Public Health Wales welcomes appropriate efforts to strengthen, integrate and simplify the system for planning public services. However, we are troubled that the duration of any Public Service Board is tied so clearly to the local political cycle. Planning for health (and indeed for sustainable development) requires periods much longer than the local electoral cycle allows and the Explanatory Memorandum recognises long term as 25 years or more. Improvements in, and steps to protect, public health can be short, medium and long term. It will be difficult to reconcile short term political priorities with a long term agenda.

Public Health Wales would advocate for clear direction and consistency in determining how Public Service Boards will define a “community”. It is important to consider how data is routinely collected, collated and capable of being analysed. This is important in ensuring that local data can be easily and appropriately accessed and presented to inform various assessments.

## **4 Addressing Welsh international obligations in relation to sustainable development**

The Welsh Government must work with governments across the UK, in Europe and internationally to ensure that the best outcomes are achieved for all. While this legislation encourages progress in Wales, there remain critical issues that demand a UK-wide, or international approach, for example food and product safety, environmental controls, agricultural policy, scientific and technological developments and controls.

The current Bill does not adequately address Welsh international obligations. Wales should be actively: sharing best practices; engaging more with the European Commission; learning from/sharing with small countries comparable

with Wales in tackling social disadvantages and inequities in dealing with the impacts of austerity; and developing closer working with countries such as New Zealand which have a similar focus on sustainability. From the public health perspective, Sir Michael Marmot's endeavour to work with a wide range of countries to tackle health inequities and social disadvantage offers a platform for Wales to contribute to this agenda on the international stage.

## **5 Potential barriers to the implementation of these provisions**

Potential barriers to the implementation of this Bill include those of a practical nature, moving from existing arrangements to the newly introduced requirements, ensuring continuity of services and partnership working whilst re-writing and re-formatting plans and setting up governance structures. These opportunity costs should not be under-estimated at this time of austerity, change and uncertainty, particularly in local government.

The Bill is reliant upon a major change in culture, in the public sector itself and in the communities that these bodies serve. As far as individuals are concerned, it is recognised that their ability to make choices and adopt particular behaviours is very much a product of the circumstances in which people live their lives. People need to be educated and empowered to have the knowledge and understanding to remain in good health and receive appropriate interventions. The public sector will need to move from the model of the public as passive recipients to a model in which people are enabled and empowered to take responsibility in shaping and contributing to their communities and to improving and maintaining their own quality of life. Importantly, there are major changes required in outlooks, attitudes, practices and cultures in the public sector that must be addressed, that the Bill does not take account of. The proposals for public sector reform will of course seek to address this, to align national and local political priorities in order to overcome the considerable barriers to achieving the common aim. The success of the Bill is reliant upon Welsh Government departments working cohesively towards the common aim. There will be significant challenges and debates ahead.

## **6 Unintended consequences arising from the Bill**

The very existence of the Bill appears to have had consequences in terms of the nature of the proposed Public Health Bill. The latter has been reduced to a narrowly focused set of short to medium term objectives to be achieved in one government term. The holistic and strategic consideration of health in all policies, for the short, medium and importantly long term was trailed to be in the Well being of Future Generations Bill. The Bill has been drafted in a manner which fails to include health in the common aim and health in all policies is merely implicit. This means that there is every chance that despite two potentially impactful pieces of legislation that could set public health in Wales on a trajectory to be envied on the international stage, Wales could be left with no notable levers to

make the strategic, large scale changes that are needed to address public health challenges. Amongst these are the legacy of ill-health in Wales, an ageing population with higher expectations and demands of public services at times of austerity and a population facing contemporary threats to their health and wellbeing

This point is explored fully in Attachment 1.

## **7 The financial implications of the Bill**

It is essential that there are further discussions on the implementation of the Bill to ensure that there is a realistic assessment of the costs, capacity and time needed to implement the Bill. The Explanatory Memorandum in relation to the Regulatory Impact Assessment appears to underestimate how much work all public bodies will need to undertake in order to fully exploit the opportunities envisaged by the Bill. The calculations presented regarding the costs of undertaking needs assessments appear to fall short of the likely true costs of such an exercise.

## **8 The powers in the Bill for Welsh Ministers to make subordinate legislation**

Public Health Wales notes that in Section 36(3)(h) of the Bill Welsh Ministers have the power to prescribe other assessments that must be taken into account by Public Service Boards. Public Health Wales hopes that our concerns on the omission of health impact assessment and health needs assessment are heeded in any amending of the Bill and incorporated on the face of the Bill.





# Attachment 1 - Supplementary Response to the Public Health White Paper

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# 1 Summary

At the time of the initial response to the Public Health Bill the view of Public Health Wales was that the absence of both the adoption of a „health in all policies“ approach, and requirements for the use of health impact assessment in the Public Health White Paper, were only acceptable if they were then addressed adequately in the Future Generations Bill.

Having now reviewed the Future Generations Bill, Public Health Wales is of the view that „health in all policies“ and the requirements for health impact assessment are not adequately incorporated within the Future Generations Bill. This makes their omission from the Public Health White Paper all the more significant. Public Health Wales would recommend that this is addressed by encompassing health in all policies and health impact assessment explicitly within the proposed Public Health Bill.

Other comments relevant to the Public Health White Paper response that Public Health Wales wishes to make in light of the Future Generations Bill include:

- Public Health Wales would stress that the failure to specifically reference health in the „Common Aim“, illustrates the concerns that Public Health Wales expressed in our response to the Public Health White Paper, *“the strategic, holistic vision that Public Health Wales envisaged for the Public Health Bill risks being dissipated and lost, unless they are comprehensively covered in the Future Generations Bill.”*
- Public Health Wales believes that an opportunity to prioritise and promulgate the understanding of health and well-being has been missed by omitting to specify health as one of the aspects of well-being alongside *social, economic and environmental considerations*.
- Public Health Wales welcomes sustainable development as a central organising principle being placed on a statutory basis.
- Public Health Wales would wish the definition of “a healthier Wales” used in the Future Generations Bill to extend beyond telling people how to behave and the choices that they should make, towards implementing evidence based interventions on a large scale, encompassing health protection, improvement and health service quality. Public Health Wales is concerned that the lifespan of Public Service Boards is reliant upon local authority electoral cycles, which are incompatible with the longer term timescales required for health

(specifically public health) planning. Consequently, this may impact on the ability to achieve medium and long term sustainable improvement.

- Public Health Wales highlights the need for careful introduction of these proposals, during a challenging period for local government and other local services.
- Public Health Wales is committed to support the successful implementation of the Future Generations Bill and the Public Health Bill.

## 2 Introduction

Public Health Wales submitted its initial response to the Public Health White Paper in June 2014. That submission was produced prior to the publication of the *Well-being of Future Generations (Wales) Bill* (Future Generations Bill). Therefore, Public Health Wales requested an opportunity to submit a supplementary response to the Public Health White Paper, having had the opportunity to review the content of the Future Generations Bill. This document provides that supplementary response.

The main concerns raised in the initial response to the Public Health Wales response to the Public Health White Paper were the lack of reference to "health in all policies" and health impact assessment.

## 3 Health in All Policies

For many years, Wales has been ambitious in efforts to integrate health considerations into policy making at national and local levels. This has manifested in, for example, the introduction and support of partnership working as the norm; a local strategic planning framework which places health and well-being as an integral element of protecting and improving quality of life and the active promotion of "health in all policies". These ambitions have been clearly articulated in current policy documents, including Together for Health, Our Healthy Future and Fairer Health Outcomes for All (FHOFA). The Welsh Government's ambitions reflect an international agenda, endorsed by WHO (see for example Leppo et al, 2013)

In the Ministerial Foreword to the Public Health White Paper, it is stated that;

*"The Future Generations Bill will.....demonstrate how a "Health in All Policies" approach forms a central part of our wider agenda."*

Public Health Wales responded to the Public Health White Paper with a variety of comments including:

*"... it must carry the commitment for health in all policies and it must set out the duties and responsibilities for the main challenges for the public health system in Wales. Unless these are covered within the Future Generations Bill, by reducing the ambitions of the Public Health Bill to "a set of practical measures- capable of being put into practice in this Assembly term", there is a risk that the Bill significantly loses its status."*

*"Public Health Wales believes that the inclusion of the commitment for health in all policies will raise the profile of public health in society and increase awareness and knowledge of public health issues across government departments (national and local) and among those who develop and implement policy. It is only through this mechanism that we can effectively build a society that prides itself on enabling a healthier population, that actively supports people living healthier for longer across all age groups and that provides an equitable and fit for purpose model of care and support when people need it."*

Public Health Wales is concerned that the narrow focus on specific issues in the Public Health White Paper, and the failure to promote "health in all policies" in the Future Generations Bill, leaves a chasm where major levers for public health, such as the use of local authority planning policy to address obesogenic environments, are not encompassed within legislation. Therefore, Public Health Wales remains concerned that the major public health challenges that we face may not be effectively addressed within the proposed legislative framework as outlined in the current versions of Public Health White Paper and the Future Generations Bill.

Public Health Wales welcomes sustainable development as a central organising principle being placed on a statutory basis.

However, Public Health Wales is of the opinion that the relevance and importance of health and wellbeing has been diluted within the Future Generations Bill. The failure to specifically reference health in the "Common Aim", illustrates the concerns that Public Health Wales expressed

in our response to the Public Health White Paper, *“the strategic, holistic vision that Public Health Wales envisaged for the Public Health Bill risks being dissipated and lost, unless they are comprehensively covered in the Future Generations Bill.”*

## 4 Health Impact Assessment

Health impact assessment is a flexible and systematic process that can (and does) support the Welsh Government’s stated aims of open and transparent engagement, collaboration and partnership working and preventative action and mitigation. In Wales, health impact assessment is an integrated process, incorporating consideration of the economic, social and environmental determinants of health and well-being.

Wales has a long established international reputation in this area and Public Health Wales’ practical expertise is regularly drawn upon in respect of international publications, conference presentations and training of people from across the World. Public Health Wales endorses this internationally recognised approach to considering the impact on health and wellbeing of policy and decision making at national and local level.

*Fairer Health Outcomes for All* recognised the importance of health impact assessment *“to support a health in all policies approach as a systematic way of taking health into account as part of the policy making process”*.

Public Health Wales, in the initial response to the Public Health White Paper, stated that:

*“...there is the opportunity to reinforce the use of health impact assessment (HIA) as an important element of such an approach to policy (health in all policies). Public Health Wales recommends that HIA is made a statutory requirement for all policies, with due regard to proportionality, resource implications and costs.”*

Elements of health impact assessment are included within the Future Generations Bill. However, the broad ranging health impact assessment as practised in Wales is not referred to explicitly. Reference is made to an “integrated approach to considering how a body’s objectives may impact upon the three aspects of wellbeing”. This will inevitably lead to impact assessments that focus primarily on social, economic and environmental wellbeing, with no consideration of the depth and breadth of potential health impacts.

Public Health Wales wishes to see the inclusion of a requirement to undertake health impact assessment in the Public Health Bill in light of the content of the Future Generations Bill.

## **5 Other Comments on the Future Generations Bill pertinent to the consideration of the Public Health White Paper and a proposed Public Health Bill.**

There are aspects of the Future Generations Bill that Public Health Wales view as very relevant to achieving our collective ambition of a healthier, happier and fairer Wales. These are outlined below.

### **5.1 The Common Aim and health**

The Common Aim as drafted highlights elements that are intrinsically linked with public health - economic, social, and environmental well-being.

The Interim Report from the pilot National Conversation on "The Wales We Want" reflects discussions:

*"Many also stated the critical need to align the Well-Being of Future Generations (Wales) Bill with the Social Services and Public Health Bill, among others, with suggestions that "Health in all policies" is reflected in achieving each of the goals"*

*"Although the goals need to be seen as an integrated set, the on-line survey asked for priorities, with responses highlighting "health" followed by "use of natural resources" and "safer, more cohesive communities" as the top priorities."*

This suggests that rather than being one of six well-being goals, participants thought that the top priority of health should be reflected in each of the goals. The simplest way of achieving this is to elevate health into elements of the common aim by including its specific reference in the definition alongside economic, social and environmental well-being.

### **5.2 Health as a Well-being Goal**

Public Health Wales notes that health has been included as a well-being goal in the Future Generations Bill. This gives some assurance that health is a consideration that must be taken into account at national and local level

However, Public Health Wales is concerned that health considerations will not receive sufficient prominence during the implementation of the future Act. Positioning health as a well-being goal rather than as a core element of well-being is too indirect and runs the risk of health being downgraded in the hierarchy of considerations.

Public Health Wales feels that it is insufficient to place reliance on health considerations being "implicit". These concerns are furthered by:

- a) the intention to repeal Section 40 of the National Health Service (Wales) Act 2006, (the requirement for each local authority and each Local Health Board to jointly produce a health and wellbeing strategy). A reliance on an "implicit" obligation rather than a requirement for explicit consideration of local health and well-being is a backward step.
- b) the lack of reference to local health needs assessments in the indicative list of local assessments in Section 36(3) of the Future Generations Bill. Such health needs assessments, have routinely been undertaken in past years to support local health and well-being planning arrangements. It is Public Health Wales' view that if health was one of the key aspects of the common aim, such an omission in the Future Generations Bill would not have arisen.

### **5.3 The definition of "a healthier Wales" used in the well-being goal**

A bespoke definition has been developed for "a healthier Wales" for the Future Generations Bill which is:

*"A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood".*

Public Health Wales welcomes the inclusion of both mental and physical health in this definition and also the recognition that we are seeking to "maximise" health for all, no matter what their current health status.

However, this definition is too narrow, and there is insufficient emphasis on the protection and promotion of health, whether secured through policy, existing high quality services, legislation or other means.

There is a focus on understanding choices and behaviours in the definition. It is well-recognised that the freedom and ability to make choices and

behaviours are strongly associated with the circumstances in which people live- the essence of a public health approach and of this Bill.

There is undoubtedly more that can be done to increase professional and public understanding about motivation and drivers for healthy choices and behaviours. However, Public Health Wales would wish the definition of "a healthier Wales" used in the Future Generations Bill to extend beyond telling people how to behave and the choices that they should make, towards implementing evidence based interventions on a large scale, encompassing health protection, improvement and health service quality.

#### **5.4 The Role, Duties and Functions of the Future Generations Commissioner**

Public Health Wales is interested in how the Commissioner's role as adviser, as described in Section 41, will be reconciled with local accountability. The positioning of the Commissioner in an "approval" role appears to be a potential impediment to local decision making powers.

#### **5.5 The Lifespan of a Public Service Board**

The lifespan of the proposed Public Services Boards is wholly reliant upon local authority election cycles.

Public Health Wales is concerned that this reliance is incompatible with the longer term timescales required for health (specifically public health) planning. Consequently, there is a risk that the success of the Future Generations Bill, established to stimulate sustainable, long term thinking, may be compromised by the potential to interrupt medium and long term sustainable improvement.

#### **5.6 Resource implications for Public Bodies during the transition to the new arrangements**

It is recognised that these arrangements will take the place of existing strategic planning arrangements for public bodies. The time to make this transition, the impact on service delivery and opportunity costs associated with such changes, cannot be disregarded and Public Health Wales would stress the need for careful introduction with realistic timescales. These changes are proposed at a time of austerity and of system change particularly for local government.

It is recognised that as a public body, the introduction of the Future Generations Bill will have associated resource implications for Public Health Wales, including the provision of support at national level and the



support of up to 22 Public Service Boards through our local teams. Public Health Wales is committed to supporting the successful implementation of this legislation and would welcome early discussions as to what might be required.

## 6 Conclusion

Having considered the Well-being of Future Generations (Wales) Bill, Public Health Wales reiterates our view that in the Public Health Bill there is a once in a generation opportunity to place public health at the centre of our public policy and practice in Wales in order to enable people to live healthy, long lives with a public service that is organised to promote self-care, prevent ill-health and keep people healthier for longer.

Public Health Wales thinks that as currently drafted, the Public Health White Paper and the Future Generations Bill do not comprehensively provide the legislative basis to address the major public health challenges in Wales and would like to see strengthening of the elements outlined above.

Public Health Wales would be happy to assist in any further discussions and/or suggestions as to how to strengthen these areas in order to optimise these pivotal pieces of legislation.

## 7 References

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