



Faculty of Public Health

of the Royal Colleges of Physicians of the United Kingdom

Working to improve the public's health

Response from the Faculty of Public Health to the *Proposal to clarify the status of NICE public health guidance for implementation in the NHS*

Introduction

1. The Faculty welcomes the opportunity to comment on this proposal and strongly supports the work of NICE in providing public health intervention guidance and public health programme guidance which is based on evidence of cost effectiveness which has been soundly reviewed.
2. Because our members are committed to implementing guidance of this sort and need to work through colleagues in the NHS and elsewhere, the Faculty is keen to see the NHS, at least, under some direction to deliver these interventions and programmes as a matter of priority.

The key issues for consultation (paragraph eight in the consultation document)

3. The proposed amendment to developmental standard D13b of the NHS 'Standards for Better Health' (which adds a further aspiration – that healthcare organisations should conform to NICE guidance on public health interventions) will undoubtedly support the delivery of public health policy in the NHS to some extent.

However, because this is a developmental standard and not a core standard, organisations may not invest sufficient or any management time and financial resources as a matter of priority.

4. The likely impact on commissioners and providers in the NHS of the proposed amendment will depend on the prevailing competition for resources, particularly from services for which there is heavy demand. For example, there is clear direction from the Department of Health that Health Technology Appraisals (on new drugs, for instance) from NICE must be implemented in full. This status should be accorded public health guidance.
5. The proposal concerns NHS standards only and has no force – other than that of establishing the high quality of the guidance – among partner organisations. Nevertheless, the need to clarify the status of NICE public health guidance for the NHS provides an excellent opportunity to cascade the guidelines through similar standard setting or other means of direction in other public sector areas.

6. It is reasonable to expect NHS organisations to be assessed against the amended developmental standard from 2007/08. We understand that the guidance documents from NICE will include auditable criteria. The nature of the guidance which we have seen is sufficiently robust for standards to be assessed.

Conclusion

7. The Faculty strongly supports the idea that NICE guidance on public health interventions and programmes should be backed up through the NHS' performance management processes and believes they should be accorded similar status to NICE guidance on health technologies; that is there should be clear direction from the centre that public health interventions should be made available throughout the NHS in full.
8. Amending developmental standard D13b as proposed will go some way to supporting the delivery of public health priorities. However, because it is a developmental standard, health organisations may still choose to play down public health activities, even though they are endorsed by NICE, in favour of others which they are under direction to deliver or which are core standards.
9. We believe the Department of Health should use this standard setting exercise in the NHS as an opportunity to press for NICE guidance to be given appropriate status in other public sector areas, for example the Office of the Deputy Prime Minister and the Department for Education and Skills. For this to work, NICE guidance would need to indicate which of its component parts are applicable in sectors other than the NHS, something which would be useful in its own right.
10. It is important to recognise that there may be areas of activity where there is no clear evidence of effective action. In these circumstances, public health experts may still be required to act, using their professional judgement in the absence of evidence. We would expect to work with NICE to learn from such situations and reduce uncertainty in the future.