



Faculty of Public Health

Of the Royal Colleges of Physicians of the United Kingdom

Working to improve the public's health

Faculty of Public Health to Review of Public Health Regulation

The Faculty of Public Health (FPH) is the standard setting body for public health in the UK, maintaining professional and educational standards for specialists in public health and quality-assuring the profession. FPH provides professional advice to employers and others on statutory and good practice procedures for senior public health appointments. In addition, FPH advocates on key public health issues and provides practical information and guidance for public health professionals, aiming to advance the health of the population through three key areas of work: health promotion, health protection and healthcare improvement.

DH proposal

All non-medically qualified public health 'specialists' currently on the UK Voluntary Register for Public Health Specialists should instead be placed on a statutory register. The wider Public Health workforce (i.e. those not eligible for inclusion on a Public Health Specialist register) should be subject to a self-regulation register'

FPH strongly agrees that all non-medically qualified public health specialists should be placed on a statutory register, underpinned by FPH standards. However, that all are on a *single* register is less important than all being subject to a single standard setter. FPH believes that all posts at consultant level and above should be subject to statutory specialist registration. From a non-medical perspective, these include, but are not limited to, posts banded 8d and above on the Agenda for Change (AfC) contract. Typical job titles include (but are not limited to): Consultant in Public Health, Consultant in Health Protection and Deputy/Associate/Assistant Director of Public Health. Posts on the Very Senior Managers (VSM) contract with a predominantly public health portfolio should also require inclusion on such a statutory register. This would take in job titles such as Director of Public Health. Senior Civil Service posts in public health should also require inclusion. Job titles in the Senior Civil Service are less standardised than in the NHS and as such it might not be possible to list specific job titles to be protected.

The above suggestions should also apply equally to substantive NHS posts, honorary NHS posts and joint posts between the NHS and a local authority.

FPH believes that robust and proportionate systems of professional regulation are essential in quality-assuring specialists and safeguarding employers, patients and the public. FPH is fully committed to multi-disciplinary public health with parity of standards and status across the specialty. We believe a statutory register for non-medical PH specialists would help to achieve parity with medical specialists (who are already required to be registered with a statutory regulator) providing they share common standards. A statutory register would pave the way for consistency between training routes and the need for quality assurance by PMETB (or similar) of training across all training placements, and not those only occupied by medics.

A statutory register for non-medicals must ensure that standards for training and assessment leading to eligibility to join the specialist register are equivalent and maintained and regulated in a manner that is robust, appropriate and transparent and in the public domain. Mechanisms for challenge and appeal must be independently scrutinised.

A statutory register for non-medics must be able to publish robust fitness-to-practise expectations and subsequently undertake disciplinary proceedings and sanctions, remediation strategies and a revalidation programme to ensure continued competence of its registrants. It would be beneficial if such a register could provide access to services, currently available to medics, such as adjudications undertaken by the Office of the Health Professions Adjudicator and support from the National Clinical Assessment Service. It is also noted that these essential statutory regulatory functions would require adequate and continuing resources.

A statutory register for non-medics must be open and accessible to those who work outside mainstream service public health. This may include those who work in academic, international and local authority settings as well as independent contractors and those with portfolio careers. Statutory registration and the parity this brings with medics are also important for the careers of individual specialists and their professional development and opportunities.

Should a new system be implemented, clear lines of communication must be established between various registers, for example to disseminate any fitness-to-practise decisions. This is especially important where specialists hold dual registration across multiple registers.

The wider public health workforce

FPH defines the non-specialist level public health workforce as both practitioners and the wider public health workforce as demonstrated in the Public Health Skills and Careers Framework

FPH considers that voluntary self-regulation for the wider public health workforce is beneficial to the capacity and capability of the public health function. It has supported this development through its practitioner development workstream. The definition of competencies and a career framework along the lines of the Public Health Careers and Skills framework will not only aid the development of individual careers but also the wider public health team and support specialists. FPH, as the standard setter for public health, would be the appropriate body for the development and ongoing review of standards for the wider public health workforce.

Additional comments from FPH

FPH has some concerns around the desired outcome as stated by the Department of Health:

'All individuals on the register will be specialist in public health (i.e. those with another specialty alone will not be eligible)'

Care must be taken not to exclude individuals who trained in a different specialty but have subsequently reached accredited specialist status in Public Health, Public Health Medicine or Dental Public Health. Additionally, FPH has identified 15 specialties on the GMC Specialist Register (besides Public Health Medicine) and 1 specialty on the GDC Specialist List (besides Dental Public Health) which are related to public health, for example Community Paediatrics, Microbiology and Communicable Disease Control and Oral Microbiology.

In relation to medical consultants, FPH believes that standards are best preserved by all members of this group maintaining their specialist registration with the GMC. This

will be particularly important for the minority of public health posts that require medical registration or the exercise of clinical skills.