



10-Year Health Plan for England

CIEH response to Department of Health and Social Care's 10-Year Health Plan for England

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About the Chartered Institute of Environmental Health (CIEH)

CIEH is the professional voice for environmental health representing over 7,500 members working in the public, private and third sectors, in 52 countries around the world. It ensures the highest standards of professional competence in its members, in the belief that through environmental health action people's health can be improved.

Environmental health has an important and unique contribution to make to improving public health and reducing health inequalities. CIEH campaigns to ensure that government policy addresses the needs of communities and business in achieving and maintaining improvements to health and health protection.

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Any enquiries about this response should be directed to:

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Key points:

- We welcome this opportunity to comment on a 10 year Health plan, however as important as the NHS is in health it is part of a more complex system where Local Authority environmental health and public health play a significant role in health protection and health improvement especially in Shift 3 – preventing sickness not just treating it.
- Establish clear roles and responsibilities for Environmental Health (EH) in health protection, supported by national frameworks.
- We welcome the work currently being undertaken by OHID and UKHSA, working with CIEH and ADPH around the future of the health protection and think that the modernising of the Public Health (Control of Disease) Act 1984 and Health Protection Regulations to address emerging threats will significantly contribute to the 10-year health plan.
- Invest in Environmental Health teams to enable proactive health protection and tackle health inequalities.
- Develop cost-benefit analyses of Environmental Health interventions to demonstrate their value.
- Create real-time digital data-sharing platforms for outbreak response and multi-agency coordination.
- Mandate standardised Memorandums of Understanding (MOUs) to enhance collaboration between EH, public health, and NHS teams.
- Embed climate resilience into national health protection policies, recognising Environmental Health's role in air quality, housing, and disease surveillance.
- Utilise Environmental Health professionals in infection prevention and control (IPC) and digital technologies and ensure that they are included in national training frameworks.
- Recognise the evidence base about the value of reducing health inequalities using local partnerships and the importance of improving access to preventative healthcare in deprived areas, not just where they are delivered but how and when and by whom.
- Pilot early warning systems and data feedback mechanisms to identify and address illnesses earlier.

1. What does your organisation want to see included in the 10-Year Health Plan and why?

- **A clear definition of roles and responsibilities in health protection:** Establish a standardised framework with national guidance to ensure consistency across local authorities and public health bodies, including Environmental Health (EH) professionals and in particular the value of their interventions.
- **Legislative reform:** Modernise the Public Health (Control of Disease) Act 1984 and Health Protection Regulations to reflect current and emerging health threats, with a focus on outbreak management, quarantine, and International Health Regulations (IHR) compliance.
- **Investment in Environmental Health capacity:** Address chronic underfunding of EH teams to enable a proactive approach to health protection and tackle health inequalities. CIEH also support the development of cost-benefit analysis of Environmental Health interventions.
- **Digital integration:** Develop integrated platforms for real-time data-sharing and communication between agencies to improve response coordination and effectiveness.
- **Climate change readiness:** Integrate climate resilience into national health protection policies, ensuring it is embedded as a core competency for Environmental Health Practitioners (EHPs). This recognises the pivotal role of EHPs in addressing air quality, housing standards, and infectious disease surveillance within the broader context of climate adaptation.

2. What does your organisation see as the biggest challenges and enablers to move more care from hospitals to communities?

Challenges:

- **Resource limitations:** Underfunded EH teams struggle to meet demand for community-based services.
- **Inconsistent commissioning models:** Variability in how community Infection Prevention and Control (IPC) services are delivered across regions.
- **Role clarity:** Lack of clear responsibilities among EH professionals, public health teams, and the NHS.
- **Regulatory framework:** Current regulatory framework insufficiently supports preventive Environmental Health interventions

Enablers:

- **Formal agreements and partnerships:** Mandated Memorandums of Understanding (MOUs) and frameworks like Health Protection Assurance Groups (HPAGs).
- **Training and workforce development:** Upskilling EH professionals to lead on community IPC and other health protection measures.
- **Cross-sector collaboration:** Strengthening ties between EH teams, Integrated Care Boards (ICBs), and community health services.

3. What does your organisation see as the biggest challenges and enablers to making better use of technology in health and care?

Challenges:

- **Fragmented systems:** Inconsistent digital platforms across local and regional agencies hinder data-sharing.
- **Funding gaps:** Lack of investment in digital infrastructure for EH and public health.
- **Skills shortages:** Limited digital literacy among health protection professionals.
- **Data feedback:** Unclear how relevant data from Environmental Health interventions is to be fed back.

Enablers:

- **Integrated platforms:** Real-time digital tools to share outbreak data and enhance multi-agency responses.
- **Training programs:** Building digital competency within the EH workforce.
- **Policy alignment:** Incorporate digitalisation into legislative reforms to standardise adoption and usage.
- **Clarity on data feedback:** Have clearly defined feedback mechanisms so Environmental Health interventions can be shown to have relevance within wider public health in contributing towards measurable outcomes.

4. What does your organisation see as the biggest challenges and enablers to spotting illnesses earlier and tackling the causes of ill health?

Challenges:

- **Health inequalities:** Deprivation-driven disparities in access to preventative measures and healthcare services.
- **Reactive focus:** Limited capacity for proactive health protection due to resource constraints.
- **Coordination gaps:** Inconsistent collaboration between EH professionals, public health teams, and healthcare providers.

Enablers:

- **Community engagement:** Foster local partnerships to address social determinants of health and improve health literacy.
- **Early warning systems:** Leverage real-time data-sharing platforms for faster identification of outbreaks and public health threats.
- **Workforce capacity building:** Increase investment in EH teams to focus on prevention and early intervention.

5. Please use this box to share specific policy ideas for change.

- Quick to do (within the next year or so)

- We welcome the current update and are pleased to support the development of the reissued guidance on Health Protection Regulations which included the use of Part 2A Orders under the Public Health Regulations.
 - Pilot expanding access to UKHSA real-time data-sharing platforms to ensure key stakeholders, including public health and environmental health practitioners in local authorities, can use these tools to improve outbreak response coordination. This will address current limitations where these platforms are inaccessible outside UKHSA.
 - Establish HPAGs in all regions to enhance clarity and governance in health protection.
 - Clarify role Environmental Health interventions plays in preventing and controlling diseases support by a suitable data feedback system.
- Medium term (within 2 to 5 years)
 - standardised MOUs across NHS bodies public health, and EH teams on a local footprint.
 - Ensure that environmental health professionals are involved in developing national training framework around community IPC Invest in digital infrastructure to integrate health protection data systems.
- Long term (more than 5 years).
 - Integrate climate resilience into national health protection policies, ensuring it is embedded as a core competency for Environmental Health Practitioners (EHPs). This recognises the pivotal role of EHPs in addressing air quality, housing standards, and infectious disease surveillance within the broader context of climate adaptation.
 - Develop a sustainable funding model to ensure proactive health protection measures are prioritised.