

Response from the Royal College of Nursing Wales to the Health, Social Care & Sport Committee's Consultation on the Public Health (Wales) Bill

General remarks

- 1) The Royal College of Nursing Wales welcomes the reintroduction of the Public Health (Wales) Bill. The Health Service is facing challenging times, with standstill budgets, increasing demands and an ageing population who are presenting with ever more complex needs. Health inequalities are widening, with those living in our more deprived communities having lower life expectancies than their wealthier neighbours. It is vital that Wales focuses on improving public health, increasing the public health workforce and reducing health inequalities, in order to avoid those working in, and using, our public services being overwhelmed.

Comments on specific areas

- 2) Register of retailers of tobacco and nicotine products
The Royal College of Nursing has a long history of supporting measures to enhance tobacco control and reduce smoking rates and has especially supported further action to reduce smoking rates and health inequalities; measures to protect children and young people from smoking and from exposure to tobacco promotion. RCN Wales is an active member of the Wales Tobacco Control Alliance. Creating a tobacco retailers' register in Wales will help reduce underage sales and illegal sales of tobacco.
- 3) Handing over tobacco etc. to persons under 18
The RCN is supportive of measures to protect children and young people from smoking and from exposure to tobacco promotion. Age verification mechanisms need to be in place to ensure that tobacco products are not sold directly to children and young teenagers nor should they be able to receive tobacco products that have been ordered online by an adult.
- 4) Pharmaceutical needs assessments
The Royal College of Nursing would agree that any assessment of pharmaceutical needs of the population should include not only the adequacy of dispensing needs but also the broader wellbeing needs of the local populations.
- 5) Special procedures - exemption from requirement to be licensed
The RCN are supportive of section 57 of the Bill which allows for certain individuals to be exempt from the requirement to be licensed to perform certain special procedures. We previously stated some concerns that the reputable therapeutic technique of acupuncture was included in the list with tattooing and cosmetic practices. Some nurses and midwives will incorporate one or more complementary therapies, such as acupuncture, as an integral part of their practice. Nurses and midwives practising complementary or alternative therapies are accountable through The Code: standards of conduct,

performance and ethics for nurses and midwives. The Royal College therefore had concerns that Registered Nurses already accountable to the NMC would be required to register twice or hold an unnecessary license. We are pleased that the Bill addresses this issue by including Registered Nurses in the list of exemptions for this requirement.

6) Provision of toilets

The RCN is supportive of placing duty on local authorities to develop a strategy for the provision of and access to toilets for public use in their area. Accessible public toilets are a necessity to maintain population health for everyone, and in particular certain groups with specific needs, for instance disabled people, pregnant women, parents with babies and children, older people and those with specific health conditions.

7) Improving public health at a community level

Nurses and health care support workers employed by GPs and in a variety of other settings provide well established, valued and effective clinical services in primary care. The Royal College of Nursing is concerned that this has not been recognised in this Bill. Public Health nurses play a key role in health protection activity. Nurses delivering primary care services will usually be employed by the GP but could also be employed by the LHB or an alternative provider such as a community pharmacy or Public Health Wales.

8) Developing the nursing profession in primary care is a clear opportunity to improve access for patients. Nurses are in an ideal position to influence the people they interact with be it in primary prevention, secondary prevention or in teaching the promotion of self-care and management. It is vital though that all nurses and midwives promote every encounter with their patients as a public health encounter. If we are to close the gap in health inequalities and the burden of avoidable ill health then we must harness the full potential of the nursing workforce.

About the Royal College of Nursing

The RCN is the world's largest professional union of nurses, representing over 430,000 nurses, midwives, health visitors and nursing students, including over 25,000 members in Wales. The majority of RCN members work in the NHS with around a quarter working in the independent sector. The RCN works locally, nationally and internationally to promote standards of care and the interests of patients and nurses, and of nursing as a profession. The RCN is a UK-wide organisation, with its own National Boards for Wales, Scotland and Northern Ireland. The RCN is a major contributor to nursing practice, standards of care, and public policy as it affects health and nursing. The RCN represents nurses and nursing, promotes excellence in practice and shapes health policies.