



# NICE guidance: Consultation on the Surveillance proposal to withdraw some recommendations from Cardiovascular disease prevention (PH25)

ADPH London response, 14 June 2018

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## About this response

This response is from the Association of Directors of Public Health for London, which represents Directors of Public Health (DsPH) in London's 33 local authorities, and supports them to improve and protect the health of their local populations. ADPH London brings together DsPH and their teams to work together to address issues which can either only be successfully tackled on a pan-London basis and/or which enhance the ability of boroughs to meet their responsibilities locally, for example through delivering efficiencies, sharing of best practice, reducing duplication, and improving coordination of related work.

Further information on ADPH London, including current priorities, is available online here: <http://adph.org.uk/networks/london/>

This response represents the professional collective response of Directors of Public Health in London local government. At a local level, individual boroughs may submit their own responses to the consultation.

ADPH London welcomes the opportunity to comment on the Surveillance proposal. Our response does not attempt to provide a comprehensive public health response, but rather pulls together our thoughts on how our response to the proposal can most effectively:

- Improve public health outcomes in London
- Assist councils in developing high value approaches to support their residents' health and wellbeing
- Reduce demand on health and social care services

### Contact for further information:

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**The task: (see <https://www.nice.org.uk/guidance/PH25/documents/surveillance-review-proposal>)**

1. Do you agree with the proposal to withdraw the recommendations 1 to 12?
2. If you disagree – please give reasons in the “Comments” column

**ADPH London response Posted in requested format):**

1. No
2. ADPH London disagrees with the proposal to withdraw the recommendations 1 to 12 and **we request that NICE reviews and updates the recommendations** rather than withdraws them.

ADPH London reasons are:

- **ADPH London encourages NICE to continue to be pursue its objective ‘to improve outcomes for people using the NHS and other public health and social care services’.** ADPH London assumes that the drivers of the vision for NICE (see <https://www.nice.org.uk/about/who-we-are/our-vision>) still remain as:
  - ‘Using evidence to inform the ambition for health and social care’
  - ‘Engaging and influencing central and local government and the NHS’
  - ‘Visible impact on national and local strategies and policies’.
- **ADPH requests that NICE should provide advice and guidance to national government and policy development based on the best evidence available.**
- ADPH appreciates that the current activities highlighted in the ‘Consultation on Surveillance proposal to withdraw recommendations’ are all available in the public domain, however:
  - Firstly, we don’t know or can’t be sure to what extent the organisations mentioned review the evidence in the way NICE would do or consult on
  - Secondly, ADPH London advocates these sorts of ‘activities’ to be rooted in or underpinned by NICE Guidance
- Cardiovascular disease prevention continues to be an area of concern for Directors of Public Health in London, and as such **we want to continue to look to updated NICE Guidance to ensure our approaches to prevention are based on the best possible evidence and guidance.**
- In order for evidence based action to prevent CVD to be taken at the regional or local level by regional and local government and NHS bodies working at these spatial levels, the national policy framework is a vital enabler (or inhibitor) of that action and implementation. Hence, **ADPH London strongly urges NICE to update recommendations 1 to 12 that relate to this national policy framework, as the effectiveness or indeed ability to take forward**



**recommended, evidence based action at the local and regional levels is contingent on a supportive national policy framework.**

- The Mayor of London continues to play an extremely positive, active and influential role in addressing the health of Londoners – and many of the updated recommendations will be relevant for consideration as pan London plans are created and implemented. Examples of the Mayor’s intentions include:
  - The Health Inequalities Strategy ([https://www.london.gov.uk/sites/default/files/draft\\_health\\_inequalities\\_strategy\\_2017.pdf](https://www.london.gov.uk/sites/default/files/draft_health_inequalities_strategy_2017.pdf))
  - The Draft London Food Strategy ([https://www.london.gov.uk/sites/default/files/london\\_food\\_strategy\\_2018\\_15.pdf](https://www.london.gov.uk/sites/default/files/london_food_strategy_2018_15.pdf)).
- The Mayor has recently announced, for example:
  - A proposed ban of advertising of food and drink that is not healthy across the Transport for London estate (see London Food Strategy link above, page 19)
  - The intention to set up a child obesity taskforce (<https://www.london.gov.uk/press-releases/mayoral/mayor-recruits-for-new-child-obesity-taskforce>)

**An updated, for example, ‘Recommendation 4 Marketing and promotions aimed at children and young people’ will provide a significant boost in supporting implementation plans.**

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