

# Reviewing your council's Regional Public Health Plan

This Guidance is a resource for all councils working through the process to review their Regional Public Health Plan (RPHP). It describes requirements under the *South Australian Public Health Act 2011* (the Act) for maintaining and reviewing your RPHP and identifies the key questions, possible areas of focus, and processes to consider in conducting a review of a RPHP.

The Guidance supplements the development of comprehensive guidance on the review of RPHP content by the Local Government Association of SA which will be available later in 2019.

## Do we have to review our RPHP?

Yes. Section 51(19) of the Act requires that, once prepared and in place, the plan 'must be reviewed at least once in every 5 years'.

At 30 June 2019, most councils were due, or were soon to be due, for a review of their RPHP consistent with the Act's requirements. This is the first review of RPHPs to be triggered under the Act.

## What does this requirement mean for our plan?

A review of your council's RPHP means a reconsideration of the plan in light of developments over time so it fits with the current circumstances. The circumstances for each reviewing council are likely to be different, and this affects the nature and extent of the RPHP review process. There is no prescribed RPHP review format, meaning that reviews will be conducted according to procedures that councils find most useful and appropriate.

The review of your council's RPHP is an opportunity to reflect on whether the RPHP is meeting its objectives, taking into account learnings from the first plan, assessment of local priorities, demand and capabilities to deliver. Councils may wish to consider:

- > if implementation is on track;
- > what is working well, what is not;
- > opportunities and risks ahead;
- > what needs to be retained, and what can/should change; and
- > engagement and plan governance for the next planning cycle.

The review process must also consider requirements under the Act for maintaining and changing your council's RPHP. Specifically, the Act requires councils to reflect on circumstances that may have changed since the RPHP was made or last reviewed. The table below details these areas, the practical considerations involved, and the Act provisions that are addressed.



Areas to consider	What is involved	Act requirements met
<p>Have substantial changes been made to the State Public Health Plan that may necessitate changes to the RPHP?</p>	<p>This entails reflection on changes to the State Public Health Plan (2019-2024) in relation to local circumstances and plans.</p> <p>The State Public Health Plan priorities are:</p> <p><b>Promote:</b> build stronger communities and healthier environments.  <b>Protect:</b> against public and environmental health risks and responds to climate change.  <b>Prevent:</b> chronic disease, communicable disease and injury.  <b>Progress:</b> strengthen the systems that support public health and community wellbeing.</p> <p>The State Public Health Plan has maintained continuity with the inaugural plan’s strategic priorities while introducing:</p> <ul style="list-style-type: none"> <li>&gt; a new system-building priority, and</li> <li>&gt; strengthening focus on priority populations.</li> </ul> <p>The State Public Health Plan also responds to issues specified by the Minister, and details other plans, policies or strategies determined to be appropriate to the public health planning context.</p>	<p>51(5); 51(9); 51(21)</p>
<p>Have there been substantial changes in demographics, health profile or other circumstances of the community that warrant a re-think of the identified public health strategies and actions?</p> <p>In implementing the RPHP, has council identified substantial gaps, omissions or difficulties that will require reconsideration of elements of the plan?</p>	<p>To assess changes and gaps, councils have access to data and sources, including:</p> <ul style="list-style-type: none"> <li>&gt; updated Population Health Profiles (inclusive of data from the 2016 National Census) to assist with identifying demographic changes and assessing population health and public health issues;</li> <li>&gt; biennial Section 52 reports on implementation inclusive of local area and regional data which are useful for public health planning; and</li> <li>&gt; the CPHO reports that include South Australian Public Health Indicator Framework which can be used to assess the scope and state of public health at a state level, and which underpins the biennial CPHO report.</li> </ul> <p>Key implementation issues highlighted across councils during the first RPHP cycle that you may want to consider in reviewing your council’s RPHP:</p> <ul style="list-style-type: none"> <li>&gt; Any necessary governance changes (operational and strategic)</li> <li>&gt; Partnership opportunities</li> <li>&gt; Merits of RPHP action plans</li> </ul>	<p>51(8)(a-c,e)</p> <p>51(8) (b-e)</p>

Areas to consider	What is involved	Act requirements met
<p>Is the RPHP aligned well with other council plans / procedures?</p>	<p>Councils are required to prepare multiple plans under different Acts, each with their own key objectives. There is often strong alignment between directions and objectives that, when linked, can support existing and new strategies to promote public health. Where alignment is identified in reviewing your council's RPHP, it is useful to cross-reference across plans, to assist with:</p> <ul style="list-style-type: none"> <li>&gt; consolidating and embedding public health priorities and/or integrating public health planning into strategic management plans;</li> <li>&gt; building networks and influencing resource allocation; and</li> <li>&gt; reporting requirements.</li> </ul> <p>The Act also enables greater integration of public health planning with Councils' strategic management plans, consistent with Section 122 Local Government Act (1999) - Strategic Management Plans.</p>	<p>51(17) 51(20)</p>
<p>Will the reviewed RPHP:</p> <ul style="list-style-type: none"> <li>&gt; have regard to other RPHPs operating within your area/region?</li> <li>&gt; consider other plans that may relate to your area's priorities?</li> </ul>	<p>This is about identifying public health issues, risks and opportunities across council boundaries that can be reasonably factored into your council's planning. It includes:</p> <ul style="list-style-type: none"> <li>&gt; neighbouring council RPHPs; and</li> <li>&gt; plans external to council that are not 'badged' as public health (e.g. regional transport / tourism / climate adaptation plans) but which can still deliver public health improvements and community wellbeing.</li> </ul> <p>The aim is to continue developing – as far as desirable and practicable – consistency and coordination of action between councils, across boundaries, and stakeholders.</p>	<p>51(20-21)</p>

There is no requirement to undertake the whole plan development process anew. By considering these questions, councils will be in a position to determine whether their RPHP requires significant change, minor adjustments or if their existing RPHP remains relevant. It may also be useful to look at your council's internal procedures for reviewing a plan or policy to see if or what steps are required regarding:

- > tracking/documenting proposed changes;
- > timing of consultation with interested parties;
- > consideration of any comments received;
- > discussion of review findings;
- > getting agreement on the next steps to complete the plan; and
- > internal endorsement and approval procedures/requirements (e.g. it may need to be in form of a report, that may or may not need to go to Council).

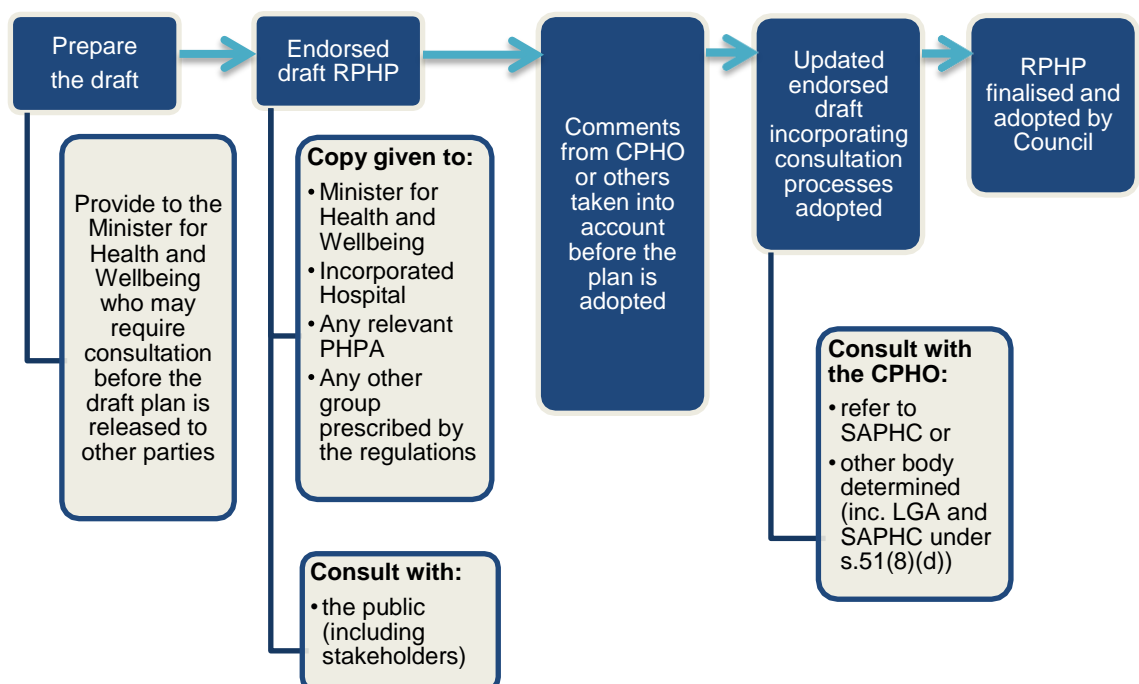
## Consultation on a revised plan

Any amendments to the plan requires working through a number of steps prescribed by the Act, notably providing the draft plan to specified bodies, to the Chief Public Health Officer (CPHO) and to the public for consultation, in addition to any relevant council policy on consultation.

Councils / groups of councils planning together are not required to submit reports about the RPHP review process itself to external parties (including the Minister for Health and Wellbeing, and CPHO). However, if your RPHP review results in a proposal to change your RPHP (from minor amendments or a wholesale re-write), this will trigger the Act's prescribed process for making and consulting upon amendments to a RPHP [section 51(11-16)].

The formal requirement to consult provides an opportunity for communication about other strategic alignments and policy directions that are relevant to the renewed RPHP from key planning partners and perspectives, as shown in this flow chart.

### Steps in preparing a draft RPHP for consultation



The Act is silent on consultation timeframes, so achieving adequate consultation on a reviewed RPHP relies on shared recognition of the need to:

- > give consulted parties enough time to consider the information and reasonable opportunity to consult with other persons and bodies that are expressly required under the Act; and
- > allow responses to the revised RPHP to be given proper consideration by the council.

Councils have their own consultation policies / procedures, as provided for under the *Local Government Act (1999)*, which specifically provides that the steps the council will follow must provide a reasonable opportunity to make submissions in the relevant circumstances.

### Which organisations does Council need to send its draft RPHP to?

Local Health Networks (LHNs), groups prescribed by the regulations and relevant Public Health Partner Authorities (PHPAs) must be given a draft of the proposed RPHP. The State Government has now established 10 LHNs, each with its own Governing Board. Under the *Health Care Act (2008)*, each LHN is considered to be an incorporated hospital facility.

Statewide	Women's and Children's Health Network <a href="mailto:Health.WCHNOCEOCorrespondence@sa.gov.au">Health.WCHNOCEOCorrespondence@sa.gov.au</a> <a href="mailto:Kate.hawke2@sa.gov.au">Kate.hawke2@sa.gov.au</a>
Metropolitan	Central Adelaide Local Health Network <a href="mailto:Health.CALHNOCEOCorrespondence@sa.gov.au">Health.CALHNOCEOCorrespondence@sa.gov.au</a> <a href="mailto:Helen.Rodwell@sa.gov.au">Helen.Rodwell@sa.gov.au</a>  Southern Adelaide Local Health Network <a href="mailto:Health.SALHNBoard@sa.gov.au">Health.SALHNBoard@sa.gov.au</a> <a href="mailto:Julie.Bowman@sa.gov.au">Julie.Bowman@sa.gov.au</a>  Northern Adelaide Local Health Network <a href="mailto:HEALTH.NorthernCommunication@sa.gov.au">HEALTH.NorthernCommunication@sa.gov.au</a> <a href="mailto:Andrej.knez@sa.gov.au">Andrej.knez@sa.gov.au</a>
Regional	Barossa Hills Fleurieu Local Health Network <a href="mailto:BHFLHNCEOCorrespondence@sa.gov.au">BHFLHNCEOCorrespondence@sa.gov.au</a> <a href="mailto:kylie.williams@sa.gov.au">kylie.williams@sa.gov.au</a>  Yorke and Northern Local Health Network <a href="mailto:Health.YNLHNCEOOffice@sa.gov.au">Health.YNLHNCEOOffice@sa.gov.au</a> <a href="mailto:Leeanne.Stringer@sa.gov.au">Leeanne.Stringer@sa.gov.au</a>  Flinders and Upper North Local Health Network <a href="mailto:Health.FUNOCEOCorrespondence@sa.gov.au">Health.FUNOCEOCorrespondence@sa.gov.au</a> <a href="mailto:craig.packard@sa.gov.au">craig.packard@sa.gov.au</a>  Riverland Mallee Coorong Local Health Network <a href="mailto:Health.RMCOCEOCorrespondence@sa.gov.au">Health.RMCOCEOCorrespondence@sa.gov.au</a> <a href="mailto:jeanette.brown@sa.gov.au">jeanette.brown@sa.gov.au</a>  Eyre and Far North Local Health Network <a href="mailto:Health.EFNOCEOCorrespondence@sa.gov.au">Health.EFNOCEOCorrespondence@sa.gov.au</a> <a href="mailto:jane.robinson@sa.gov.au">jane.robinson@sa.gov.au</a>  Limestone Coast Local Health Network <a href="mailto:Health.LCOCEOCorrespondence@sa.gov.au">Health.LCOCEOCorrespondence@sa.gov.au</a> <a href="mailto:angela.miller2@sa.gov.au">angela.miller2@sa.gov.au</a>

The provision of a draft RPHP to LHN can be an opportunity for councils to engage with the broader health system on matters of mutual concern.

LHN Board chairs have been advised that they may receive draft RPHPs from councils in their areas. Secretariat email addresses are included for all correspondence with LHN Governing Boards. Councils can access more information about LHNs on the SA Health website:

<https://www.sahealth.sa.gov.au/wps/wcm/connect/public+content/sa+health+internet/about+us/our+local+health+networks>.

In terms of engagement with relevant PHPAs, the Office of the CPHO, in consultation with Wellbeing SA, will bring any relevant changes to RPHPs to the attention of the existing 17 PHPAs rather than seeking individual councils to engage with these groups.

## Review timeframes

The Act does not prescribe a timeframe or completion period for reviews of the RPHP, and a range of factors can influence this, including the timing of key strategic reviews (e.g. Council's Strategic Management Plan) will vary. As such, this process is guided by your council and region's requirements.

## Where to from here?

This information, which maps requirements to undertake a review under the Act, provides part of the picture about regional public health planning. For councils deciding to make changes to their RPHP, more comprehensive advice will be available with the Local Government Association's release of RPHP Guidance in late 2019.

## Further Information

For further questions about the RPHP review process for 2019/2020, and information about Public Health Regional Public Health Planning, please contact Local Government Relations and Policy on 8226 6238, or email [PublicHealthAct@sa.gov.au](mailto:PublicHealthAct@sa.gov.au).

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## For more information

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