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Public Health Division  
Scottish Executive  
Room 3E(S)  
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EH1 3DG

29<sup>th</sup> January 2003

Dear Sandra Smith,

### **Response to Consultation on Health Protection in Scotland**

This response has been put together at short notice as the SRP, the leading professional body concerned with radiological protection in the UK, is not one of the formal consultees. SRP notes that other eminent professional bodies, whose members would be directly affected by the proposals, also have not been consulted.

It is not appropriate for the SRP to comment on the issues concerning the proposed options for new organisational arrangements for Health Protection in Scotland except in regard to the National Radiological Protection Board (NRPB).

The views of the SRP are as follows.

#### **Preferred option**

SRP believes that the incorporation of the NRPB into the proposed HPA in England has no advantages and several practical disadvantages to the practice of radiological protection. It is understood from recent Ministerial announcements that the moves to incorporate NRPB into HPA (which will start life as a Special Health Authority) have been postponed for at least a year, until primary legislation (Parliamentary time permitting) can be introduced. The SRP would wish to see the NRPB remain a separate body concerned with radiological protection throughout the UK for the following reasons.

1. It would severely diminish the authority and influence of the NRPB, and hence the UK, in international radiological protection matters. The chairmen of the ICRP and ICNIRP are currently NRPB staff and a former member was until recently president of IRPA. They are supported by many staff members, who themselves also contribute directly to these bodies. The NRPB is a leading body internationally.
2. The NRPB is generally perceived to be an independent organisation which gives impartial advice. The Health Protection Agency would not be seen as impartial and independent,

particularly if it were a special health authority. The NRPB has earned trust and respect over many years. Any new body would have to start from scratch.

3. A major strength of the NRPB is in its combination of services, research and advice, under its own control, forming an integrated whole. This combination is unique in radiological protection in the UK and is envied by many other countries. The expertise that this generates gives it flexibility and the ability to respond to new situations. When the need arises research workers can provide additional expertise and manpower to deal with emergencies. It has been a major training ground for young radiation protection professionals that have gone on as users, consultants and regulators to influence the radiological protection culture of the UK.
4. As a small organisation the NRPB can respond rapidly to radiological incidents, emergencies and issues of public concern. Extra levels of bureaucracy, as would be the case in the larger HPA, would detract from a focussed and speedy response. It is believed that the NRPB Board, as currently set up, could be directed to co-ordinate its response with the HPA, and thereby achieve all the benefits without the detriments.
5. As a small organisation the NRPB can respond rapidly to radiological incidents, emergencies and issues of public concern. Extra levels of bureaucracy, as would be the case in the larger HPA, would detract from a focussed and speedy response. It is believed that the NRPB Board, as currently set up, could be directed to co-ordinate its response with the HPA, and thereby achieve all the benefits without the detriments.
6. If the NRPB were to be subsumed into the HPA, this might undermine public confidence in the Government's efforts to identify and implement a long-term radioactive waste management strategy for the UK.

## **Second option**

If the NRPB in England is incorporated into the HPA in due course then its functions in Scotland should also be taken over by the HPA so that the NRPB remains as a UK wide body. A separate NRPB in Scotland would not be a reasonable option for the reasons given below. The SRP has no opinion as to whether Option 1, 2, 3 or 4 in the Consultation Document would be preferable but it rejects Options 5 and 6.

1. It is unlikely that a separate Scottish body could provide the range of expertise and services required. The NRPB has sites in England and Scotland which between them provide a full range of radiological protection services throughout the UK. The ability to operate throughout the UK is a significant advantage. The need to have special arrangements could decrease the level of radiological protection in Scotland and possibly in Wales and Northern Ireland. Having a separate Scottish body would result in increased bureaucracy and additional expense.
2. The NRPB has a legal obligation to interpret and give advice on international guidance and recommendations, which is no different in Scotland and Northern Ireland from England and Wales. The proposed arrangements would result in duplication and dilution of effort in providing this service to the UK.

Yours sincerely,

Dr. Mike Marshall,  
President