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**COMMITTEE ON THE MEDICAL EFFECTS OF AIR
POLLUTANTS**

REVIEW OF COMEAP – DR ROY HAMLET

The report of the review of COMEAP by Dr Roy Hamlet is attached.
Discussion is invited.

**COMEAP Secretariat
February 2008**

Committee on the Medical Effects of Air Pollutants (COMEAP)

Review of function and effectiveness. September 2007

1. INTRODUCTION

1.1 The central programme of quinquennial or financial, management and policy reviews of executive agencies and Non Departmental Public Bodies (NDPB's) have been replaced with business reviews of the end to end processes involved in achieving the outcomes specified in Departmental Public Service Agreements. However, the Cabinet Office and Treasury appreciated that small NDPB's would generally fall outside the proposed business review processes. Typical examples are advisory NDPB's such as the Committee on Medical Effects of Air Pollutants (COMEAP), which is the subject of the review described in this report.

Light-Touch Reviews

1.2 Cabinet Office has, therefore, drawn up what it refers to as light-touch review guidance on how to review these bodies. The review must look at whether the function which the body carries out is still required and whether the current NDPB model is the most effective way of carrying out that function. Although there is no longer a rigid requirement for these reviews to be carried out very five years nor is any other minimum period stipulated between reviews, these NDPS's remain accountable to their sponsor department and Minister. Therefore, guidance says that reviews should be carried out with sufficient frequency to give confidence that the NDPB is delivering high quality services, efficiently and effectively and fits in with the department's overall delivery structure. When the need for such a review has been identified guidance says that the review should be completed within a six-month timeframe to avoid creating undue uncertainty for the NDPB concerned. The current review of COMEAP has been undertaken under the principles of the Cabinet Office Light-Touch Review Guidance.

1.3 I was asked to undertake a review of COMEAP on 4 June 2007 when I had a first meeting with the full secretariat. The timing of this meeting allowed me to attend the next full meeting of the Committee, which was held on 22 June 2007. Over the following weeks I have been able to interview the Committee Chairman as well as the members of the secretariat and also the principle officials in the Committee's client departments (Department of Health [DH] and the Department for the Environment, Food and Rural Affairs [DEFRA]). Furthermore, I have reviewed the most recent committee publications, its web site and other methods of disseminating its conclusions and advice. This report also considers organisational options, performance, partnership issues and possible technological improvements. The final section of the report deals with

recommendations for changes to practice. These are aimed at either improved delivery of the Committee objectives or more efficient performance as an advisory NDPB.

2. ORGANISATIONAL OPTIONS

2.1 Examination of COMEAP's most recent publications, whether full reports or statements on particular issues, demonstrate the direct relevance of the committee's work to Government, particularly the concerns of DEFRA with air quality in the UK and DH with the implications of the potential health detriment from exposure to a variety of airborne pollutants. The current work programme and the requests for advice, from both Government departments and Agencies, illustrate the ongoing need for advice from COMEAP. No other organisation has been identified which could provide this advice with such consistent impartiality, whether within a Government department, industry or the voluntary sector. This applies to this independent advisory group in the same manner as many other (originally DH sponsored) advisory committees. Members are not paid apart from expenses and a very moderate attendance allowance. They serve out of devotion to their science and a belief that such advice should be provided when requested. It would be most difficult to offer an alternative which would be so patently independent and cost effective.

Cost effectiveness

2.2 The committee itself is, therefore, extremely cost effective. The main costs will pertain to the members of the secretariat whose input is provided on a part time basis. On my own experience I was able to consider these costs as entirely within reason. A more detailed breakdown of cost would make this apparent to all outsiders and I will touch on this again in my recommendations.

Appointments

2.3 All appointments are in line with the Commissioner for Public Appointments principles and detailed Code of Practice. Whilst every effort is made to contribute to the Government diversity targets for under-represented groups it is difficult to make substantial contributions given the small numbers of high quality practitioners in this field of expertise within the UK. Again this problem is encountered with many similar advisory NDPB's.

The Committee Secretariat

2.4 Discussions with the chairman and the client representatives reinforce the high opinion that I have formed of the COMEAP secretariat. The organisation of meetings and publication of results have reached a high degree of attainment and these have recently been maintained under conditions of changes in staff and employer. However, it is clear that the secretariat is under-resourced with regard to the peripheral work now required of such a secretariat, examples of which are noted in the sections below. This bears no reflection on the performance of the current members of the secretariat but these deficiencies in resource need to be addressed. There is currently a vacancy for the post which supplies the administrative secretary function to COMEAP. Until this post is

filled it is very difficult to determine whether this committee has adequate administrative support. However, it is clear from discussions with the current secretariat that the level of support in this area has not been considered adequate in the recent past. This resource should be reviewed when the vacant position is filled and the post holder has time to get up to speed with the work of the post. Similarly, I judge the secretariat to be short of research input that could be provided by a senior scientist. The great efforts made by the current medical and scientific secretariat are only being achieved by significant extra work being carried out in the evenings and at week-ends. This is not tenable in the long term.

Past performance

2.5 Past performance was reviewed by examination of published committee advice and reports but mainly through interview of clients/customers of past advice. These are mainly officials from DH and DEFRA. Officials from both departments expressed themselves as being very content with the advice from this committee. Officials went to some lengths to point out the detailed and particular way in which advice was researched and discussed and the *considerable* contribution that the secretariat made to this process. Both Government departments have officials who act as assessors to this committee. These assessors attend all committee meetings and receive all committee papers, draft reports etc. They have access to subcommittee meetings and papers in the same manner. This way they can both monitor and also influence the progress of the advice production process. When assessors are unable to attend meetings the committee is content to receive substitute assessors from Government. Thus accountability to the client departments is an ongoing process. These seem to me to be extremely competent ways of monitoring progress and as such they can also be used to monitor changes and improvements following this review process.

Openness and transparency

2.6 This committee operates in accordance with the requirements of the Freedom of Information act of 2000. It publishes annual reports as well as detailed reports on specific topics and these reports, along with a summary of the minutes of meetings, are published on its web site. It has a public interest member who is appointed for his knowledge of consumer and learning/teaching considerations. The committee does not hold open meetings on a regular basis and as a scientific advisory committee this is not required. At this time it is probably right for the Chairman and secretariat to review their procedures and I will address these issues again in the recommendation section of this report.

3. EFFECTIVE PARTNERSHIP WORKING

3.1 NDPB's, like other public sector organisations, are required to explore the possibilities of delivering services and functions in partnership with others. Partnership can increase the effectiveness of service delivery and help NDPB's improve their performance and the achievement of the wider outcomes to which

they seek to contribute. Partnerships are often also a key factor in taking an innovative approach to the delivery of services and functions. However, partnership arrangements need to be well thought out if they are to achieve their potential as creating such links can present risks. Many NDPB's have already begun to do this and in fact COMEAP has recently joined with the Expert Panel on Air Quality Standards (EPAQS). This has had certain consequences, one of which is this review of COMEAP itself.

3.2 It is, therefore, necessary to consider the effect of this partnership and its consequences in some detail. At the start of the review of EPAQS it was considered that there was some confusion concerning the exact relationship between COMEAP and EPAQS and some clarification and rationalisation of their roles was considered desirable to remove any overlap. It was concluded that combination was possible. However, it is necessary to note that when this suggestion went to consultation the viewpoint of the majority of consultees was that EPAQS should remain as a separate entity. This was summarised in the review and is quoted here for the sake of clarity....."the functions of COMEAP and EPAQS are fundamentally different and require different expertise. COMEAP is especially dependent upon epidemiology for preparing its health related reports whereas EPAQS with its role in guideline value and standard setting requires additional input from those who are familiar with air pollution chemistry, emissions and monitoring." The suggestion was also made that the management of a new body should be moved to the then new Health Protection Agency (HPA). It was noted at the time that if this were to take place adequate resources would need to be transferred since the HPA was already overstretched. Concern was also expressed that combining the two bodies would result in an excessive workload for a single body. The skill sets of the two committees are overlapping but not identical so that any single body would require strengthening to ensure that the full range of necessary skills is available.

3.3 Eventually the two bodies were united, with EPAQS being run as a subgroup of COMEAP and the management of the committee being transferred to the HPA. This necessarily meant changes for the secretariat which they have taken admirably in their stride. However, these changes must undoubtedly have had an effect on their work load and immediate priorities. It will also have had an effect on the continuity of the work of both COMEAP and EPAQS as any changes in personnel always do. However, it is quite apparent that this advisory NDPB is perfectly aware of the need for effective partnership working.

4. MAKING BETTER USE OF TECHNOLOGY

4.1 COMEAP at the moment has an inadequate web site which is situated on the large Department of Health site. The COMEAP site is very easy to find whether directly or by search engine. However, it is obvious that the web site has not been updated for some time. This is almost certainly due to the fact that the move of the secretariat to the HPA and its current work load allows little time for what may appear as side issues. However, more and more such sites are becoming the main point of contact between the public and an organisation and the COMEAP web site should be updated as soon as time allows. The secretariat

is advised to examine the web sites of other similar organisations as they may gain some useful ideas for inclusion in the COMEAP site. For example a “FAQ” (Frequently Asked Questions) page might prove useful, as might a “News” page. Other than this I believe the technological achievements of the scientific members of the secretariat are more than adequate for the management and process of the committee’s work.

Data sharing and data protection

4.2 The COMEAP web site states that the committee has a freedom of information publication schedule and indeed the web site and other publications conform to current standards. The schedule is now a few years old and it may be timely for the chairman and secretariat to review it and at the same time it would be useful to ensure that data protection procedures come up to the required standards.

5 MONITORING PROGRESS AFTER THE REVIEW

5.1 Obviously the implementation of any recommendations made following this review will mainly fall to the secretariat with the chairman monitoring progress. However, this is a process that should be shared by the main client/customer bodies. In the case of COMEAP the main clients are DH and DEFRA. As has already been pointed out, both of these Government departments already have assessors to the committee and hence they will be in an ideal position to monitor progress.

5.2 The COMEAP secretariat now sits in the Chemical Hazards and Poisons Division (CHaPD) of the Centre for Radiation, Chemical and Environmental Hazards (CRCE) of the HPA. The Director of the CRCE has assured me of his and his staff’s commitment to the support of COMEAP and the other advisory committees whose secretariats it now employs. It is realistic, therefore, that the host division should take an interest in the progress of any recommendations made in this review.

6 MAIN CONCLUSIONS

6.1 I have concluded that I can find no better way of getting first class advice on the possible effects of air borne pollutants than by a committee constituted in the same manner as COMEAP. This finding in itself is a tribute to the dedication of its chairman and members who continue to provide pertinent and timely advice to Government as and when required. The way the committee is run makes it very cost effective which reinforces my findings and it has been made clear by the client representatives that there is a clear need for the continued working and advice of COMEAP.

6.2 All the committee procedures, appointments, openness and transparency measures, effective partnerships etc are all working to required standards. These procedures appear to be kept under continuous review by both

the chairman and the secretariat, which should ensure no slippage in performance levels. Indeed past performance has been to a high standard judging both from the quality of the committee's publications and the comments from the client departments. The chairman and secretariat have been praised for their dedication both to the workings of the committee and to the advice it has produced. However, no organisation is without limitations and those I have found are addressed in the next section of this report.

7 RECOMMENDATIONS

Recommendation 1

7.1 As I understand it the costs and expenditure of COMEAP have not been reviewed for the last financial year as well as the current financial year. I recommend that such a review is undertaken as soon as possible. Expenditure should ideally be reviewed on an annual basis. This will also allow the host agency and Government Departments to determine whether sufficient resources are currently being devoted to the work of this committee.

Recommendation 2

7.2 Some of the basic policies regarding data sharing and data protection, such as the Freedom of information act publication schedule, have now been in place since before the transfer of the committee and its secretariat from the DH to the HPA. I recommend that these procedures are reviewed by the chairman and secretariat in the near future so as to demonstrate that they are still fit for purpose and come up to current standards.

Recommendation 3

7.3 The COMEAP web site is in need of urgent updating. As it is it does not answer correctly questions of how to contact the committee or how to gain information on other questions relating to the committee's mandate other than through its publications. I recommend that the web site is updated by the secretariat after that body has examined several other similar web sites and consulted with people with the relevant expertise, who are available within the HPA. I further recommend that the HPA and the Department of Health should consider whether the current arrangement for providing a web site for COMEAP is the most applicable or practical.

Recommendation 4

7.4 In the body of my report I have commented on the extra work the committee has recently taken on by absorbing the Expert Panel on Air Quality Standards. I have also noted that changes of individual members of staff of the secretariat do cause problems with performance continuity which, however temporary, can lead to areas of performance becoming neglected. The secretariat has also had to put up with a move between host bodies with different management and working structures as well as a not inconsiderable

geographical change in work place. Perhaps this reflects in the need to update the web site and review publication schedules etc. Although the committee is well served by the secretariat I judge that its current resources are stretched. So that this situation is not allowed to deteriorate further, I recommend that the HPA as host institute reviews the resource available to the secretariat. I further recommend that is review is carried out in conjunction with the senior representatives of the client departments. In section 3.3 of this report it has been noted that HPA resources are themselves somewhat stretched. I hope Government will give thought to adjusting this situation if a review of the COMEAP secretariat demonstrates a clear need for an increase in resource.

7.5 I believe the COMEAP secretariat is already aware of its need for additional support and without any prejudice to a proper internal review of their work and output I suggest that the major requirement would be scientific input at a fairly senior level. Also I wish to note that I have already said that the provision of administrative input should be reviewed once current vacancies have been filled.

Recommendation 5

7.6 When the secretariats of COMEAP, COM, COC and COMARE were employed by DH they were all in one departmental group and therefore, were mutually supported by a basic infrastructure. There is no reason why this should not be reconstructed in the HPA although the individual secretariat members are now housed in different parts of buildings or even in separate buildings. Once the current round of reviews is completed I recommend that the various committee secretariats meet to discuss how a mutual support structure can be built and maintained.

Signed: R Hamlet

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