

Submission to the Senedd Public Accounts and Public Administration Committee (PAPAC)

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Basis of Submission

This submission is made by me in a personal capacity and provides an independent, evidence-based assessment of the Welsh Government's response to the UK Covid-19 Inquiry Module 1 recommendations. It is informed by my experience of pandemic oversight, my role as a core participant in Module 1 of the UK Covid-19 Inquiry, detailed analysis of the Module 1 report, and scrutiny of Welsh Government public statements and updates.

The observations and recommendations set out below reflect my independent judgment of the actions taken, and not taken, by the Welsh Government in response to the Module 1 recommendations. They are based solely on publicly available evidence and my own analysis and are not submitted on behalf of any organisation.

This submission builds on evidence previously provided by the author to the Senedd Public Accounts and Public Administration Committee on 9 December 2025.

Executive Summary

This submission assesses the extent to which the Welsh Government has implemented the UK Covid-19 Inquiry Module 1 recommendations and identifies where further action is required to strengthen pandemic preparedness in Wales. While progress has been made in areas such as governance arrangements, Wales-specific risk assessment, and participation in planned preparedness exercises, **significant gaps remain**.

These include the absence of fully operational, emergency-ready data systems; incomplete delivery, testing and publication of pandemic exercises and their lessons; limited use of systematic red-team challenge; and the lack of statutory arrangements for independent preparedness oversight. Unless addressed, these gaps risk undermining Wales's ability to respond effectively to a future pandemic. The submission concludes with practical recommendations aimed at closing these gaps and strengthening preparedness.

Annex A, below, summarises each Module 1 recommendations, Welsh Government progress, observed gaps, and my recommendations.

UK Covid-19 Inquiry, Module 1, Scope

Module 1 of the UK Covid Inquiry covers **the UK's early pandemic response, governance, and preparedness**, including:

- Pandemic planning and readiness
- Early alerting and surveillance
- Decision-making structures
- Communication and public messaging
- Health and social care system readiness
- Coordination across UK nations

1. What the Welsh Government *has reported as done* in response to Module 1

These are actions *the Welsh Government are self-reporting as completed or in progress* in response to the 10 Module 1 recommendations. There is no external & independent auditing in place.

1.1 Simplified governance for emergency preparedness

Revised structures and oversight committees are in place and reviewed; **Welsh Government considers this recommendation *completed* but there is limited evidence demonstrating simplification or its material impact on preparedness.**

1.2 Developed Wales-specific risk assessment tools and risk register

Wales now has its own risk evidence base and risk register. **This wasn't implemented until Autumn 2024 & has not been stress tested.**

1.3 Participation in UK-level pandemic exercises

Planning and engagement in Exercise Pegasus and warm-up exercises are underway. **Please note this is a UK Government led & healthcare focused exercise not a 4-nations, whole systems simulation as per the M1 Recommendation.**

2. What the Welsh Government *hasn't fully done yet* (gaps remaining)

These are areas where Wales has *work under way, partial implementation, or hasn't fully met the spirit of the Module 1 recommendations*:

2.1 Data and real-time sharing systems not fully mature

Module 1 Recommendation: Establish timely, secure, tested data systems and data sharing mechanisms *ahead of future pandemics*.

Welsh Government position:

- *A data, evidence and analytical team has begun establishment*
- *A memorandum with the UK National Situation Centre will be signed soon.*
- *Some health data platforms (Care Data Repository, National Data & Analytics Platform) are operational, but these are still being developed.*
- *There isn't yet a fully integrated, tested, interoperable emergency data-sharing system that meets the Inquiry's expectations for real-time pandemic response readiness.*

Gap:

- **Emergency-ready data systems are *not yet fully integrated, tested, or operational.***
- **Real-time, interoperable data pipelines for future pandemics remain incomplete.**

Wales hasn't fully implemented *tested, emergency-ready data pipelines that meet the Inquiry's recommendations for future pandemics*. Progress is ongoing *but incomplete* compared with the Inquiry's intent.

2.2 Full implementation of regular UK-wide pandemic exercises

Module 1 Recommendation: Run joint pandemic exercises *at least every three years* to test preparedness.

Welsh Government position: Wales is *participating* in planned exercises (Pegasus, Solaris, Alkarab), and a Welsh coordination group was established.

Gap: While planning and participation are underway, **there is not yet evidence that such exercises have been fully completed and evaluated**; some exercises are prospective (scheduled). This means the cycle of *exercise → evaluation → implementation of lessons* has *not run to completion yet*.

2.3 Publication of preparedness reporting

Module 1 Recommendation: Produce *regular published reports* on civil emergency preparedness and resilience to legislature (e.g., Senedd)

Welsh Government position: Wales has committed to an annual resilience statement and a four-year **State of Resilience Report**.

Gap: No reports have been published yet, **limiting independent scrutiny**.

These reporting commitments are *future commitments*, **not yet delivered**, and so Wales has *not yet fully implemented* this transparency measure.

2.4 Red teaming beyond existing exercise

Module 1 Recommendation: Make “red team” threat testing a *regular preparedness tool*, not just a component of exercises.

Welsh Government position: Red teaming is *currently part* of exercise programmes, and Wales intends to *explore more opportunities*.

Gap: This is *exploratory* rather than a **fully embedded capability** — not yet meeting the recommendation in a structured, ongoing way. Red teaming is incorporated only within exercises and is not yet a **regular standalone capability**.

2.5 Independent statutory preparedness body

Module 1 Recommendation: Establish a *UK-wide independent statutory body* for preparedness.

Welsh Government position: The WG *does not support* this, believing it would divert resources. Instead, they agreed to *independent expert panels via the UK Resilience Academy*.

Gap: Wales **lacks formal, statutory oversight** of pandemic preparedness.

Wales has *explicitly rejected* the Inquiry's recommended model, so *this recommendation has not been implemented as written*.

3. Recommendations

3.1 Data & System Readiness

- **Strengthen and finalise emergency-ready data systems** with *tested, rapid interoperability* — not just health data platforms.
- Require **formal testing of data-sharing in scenario drills** so tools work under stress.

3.2 Exercise Full Implementation

- Move from *planning* to *fully executed exercises* with published results and action-implementation tracking.

3.3 Transparency & Accountability

- Publish the **annual Senedd resilience report now**, not just commit for the future, to show measurable progress.

3.4 Capability Expansion

- Embed **red teaming** as a regular, funded part of preparedness, with clear outputs and integration into risk assessment.

3.5 Independent Oversight

- Re-evaluate the case for an **independent statutory preparedness body**, or at least a clear *performance oversight mechanism* with objective metrics and public reporting.
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4. Pandemic Preparedness Specific Recommendations

4.1 Governance & Planning

- Update and stress-test Wales-specific pandemic response plans regularly.
- Establish a permanent **Welsh Pandemic Preparedness Unit** & consider a truly independent Wales Preparedness Commissioner.
- Strengthen coordination protocols with UK-wide bodies for early alerts.

4.2 Data & Surveillance

- Implement real-time surveillance dashboards for hospitals, care homes, and community transmission.
- Integrate genomic sequencing capacity for early variant detection.
- Ensure interoperable health and social care IT systems.

4.3 Healthcare & Social Care

- Mitigate for airborne viruses in all healthcare settings & care homes- safe clean indoor air is vital.
- Maintain strategic reserves of PPE, ventilators, and essential medicines.
- Design a robust test & trace strategy & plan.
- Develop surge staffing plans for NHS Wales and social care.
- Pre-plan protocols to protect care homes and vulnerable populations

4.4 Communication & Public Trust

- Clear, bilingual communication strategy emphasising transparency.
- Pre-design public guidance templates to reduce confusion between UK and Welsh messaging.

4.5 Research & Innovation

- Fund rapid-response public health research capacity in Wales.
- Encourage collaboration between Welsh universities, NHS, and UK agencies.

4.6 Training & Exercises

- Annual pandemic simulation exercises for public health, government, and NHS.
- Training modules for rapid deployment of community testing, vaccination, and emergency logistics.

Annex A: Module 1 Observations and Recommendations

Module 1 Recommendation	Welsh Government Status	Observed Gap	Independent Recommendation	Status
1 Simplified governance structures	WG considers done	None	Maintain and regularly review governance to ensure agility	Green
2 Cabinet Office leadership and coordination	Partially adopted via internal systems	Cross-Wales/UK coordination protocols not fully tested	Fully test cross-government coordination in emergency scenarios	Amber
3 Wales-specific risk assessment	New Wales risk register delivered	None	Keep risk register updated; integrate with real-time monitoring systems	Green
4 UK-wide emergency strategy alignment	Framework published	Full alignment with UK structures still developing	Conduct joint Wales-UK scenario exercises to ensure interoperability	Amber
5 Data & research	Team and platforms in development	Systems not fully integrated/tested; real-time data pipelines incomplete	Complete emergency-ready, interoperable data systems; run stress tests; embed dashboards and nowcasting tools	Amber
6 Regular pandemic exercises	Engagement in upcoming exercises	Exercise cycle not completed; lessons not fully published; red teaming limited	Fully execute exercises; publish lessons; embed red team testing as routine	Amber
7 Publish lessons from exercises	Framework in place	No published outputs yet	Publish lessons from exercises and implement action plans systematically	Red
8 Regular published preparedness reports	Framework commits to future reporting	No reports yet	Publish first annual resilience report; establish measurable preparedness metrics	Red
9 Red team threat testing	Incorporated within exercises	Not yet a standalone, recurring capability	Make red teaming a regular, standalone part of preparedness planning	Amber
10 Independent statutory preparedness body	Rejected; relies on expert panels	Lacks statutory oversight	Consider establishing a Wales-specific independent advisory body with statutory backing	Red