Dear

ATISN 26293 - RSV Vaccination

Thank you for your request to the Welsh Government for information under the Freedom of Information Act (2000) received on 23 October 2025 regarding Respiratory Syncytial Virus (RSV) vaccination rollout.

You requested the following:

 Information on the development, planning and modelling of potential risk associated with the implementation of RSV vaccination rollout to people aged over 80 in relation to JCVI advice issued on 16 July 2025.

Specifically:

- Copies of any epidemiological, actuarial, or clinical modelling undertaken by or on behalf of the Welsh Government to assess the impact of delaying implementation of RSV vaccination for the over-80 cohort, including predicted RSV-related morbidity and mortality for winter 2025–26.
- 2. Any internal briefing materials, Cabinet submissions, or correspondence that reference the JCVI's July 2025 recommendation and assess its feasibility, affordability, or operational implications in Wales.
- 3. Any risk stratification analysis or clinical vulnerability assessments that consider the over-80 cohort, particularly those previously categorised as "shielded" or prioritised for COVID vaccination.
- Any comparative analysis or correspondence with other UK nations regarding the pace of implementation, supply chain considerations, or projected outcomes for the over-80 cohort.
- 5. Any contingency planning documents or winter preparedness strategies that address potential RSV hospitalisation surges among unvaccinated individuals aged 80 and over.

Our Response

1. Welsh Government does not hold the information requested.

In Wales, we are guided by the latest scientific evidence from the Joint Committee on Vaccination and Immunisation (JCVI) to inform our vaccination programmes, including the RSV vaccination programme.

The Welsh Government accepted the advice from the JCVI to implement an RSV vaccination programme in Wales. A year-round routine vaccine programme for pregnant women (to provide protection for newborn children) and adults turning 75 began on 1 September 2024. This was supported by a catch-up programme for those aged between 75 and 79. Those adults over the age of 80 on the 1 September 2024 were excluded from the recommended cohort due to uncertainty on the evidence of vaccine protection effectiveness for that group.

When publishing its initial advice in June 2024, JCVI advised that extension of the programme would be considered once there was greater certainty about:

- Protection for individuals at higher risk of severe illness from RSV, including those aged 80 years and older
- The real-world impact of the programme for those aged 75 to 80 years old

JCVI has subsequently issued additional advice in July 2025, highlighting new additional evidence on the impact and vaccine effectiveness of the programme - including in those over 80. JCVI advice is typically received several months ahead of a formal decision on programme change, allowing policy and public health partners time to address any considerations of procurement and deployment, which includes collaboration across the UK Nations seeking to align programme start dates where possible.

- 2. Welsh Government holds information which fits the description of your request. We have concluded the information requested is exempt from disclosure under the following sections of the Freedom of Information Act:
 - section 35 1(a) Information held by a government department or by the Welsh Government is exempt information if it relates to— (a) the formulation or development of government policy.
 An explanation of our application of this exemption is set out at Annex 1 to this letter.
- 3. Information on the JCVI's considerations around vaccine safety and effectiveness in this age group were published with their advice and can be accessed here:

 Respiratory syncytial virus (RSV) immunisation programme for adults aged 80 years and older: JCVI advice, 16 July 2025 GOV.UK
- **4.** See response to point 2.
- 5. Welsh Government has winter preparedness and planning documents, but these do not address potential hospitalisation surges in RSV for unvaccinated individuals who are over 80 years. There is already published modelling information which looks in detail at the effect of RSV vaccination on hospitalisation. This modelling was targeted at the existing vaccination programme which covered people aged 75-79 years old. It also contains information on people aged 80+ as part of the modelling. This report can be found here: Science Research Evidence: winter modelling 2025 to 2026 | GOV.WALES

Next Steps

If you are dissatisfied with the Welsh Government's handling of your request, you can ask for an internal review within 40 working days of the date of this response. Requests for an internal review should be addressed to the Welsh Government's Freedom of Information Officer at:

Information Rights Unit Welsh Government Cathays Park Cardiff CF10 3NQ

or Email: Freedom.ofinformation@gov.wales

Please remember to quote the ATISN reference number above.

You also have the right to complain to the Information Commissioner. The Information Commissioner can be contacted at:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

However, please note that the Commissioner will not normally investigate a complaint until it has been through our own internal review process.

Yours sincerely,

Annex 1

Engagement of Exemptions

When considering the release of information captured by a request we are required to consider the potential effects of disclosure of the information to the wider world. This is because information released in response to a Fol request is released to the world, not just to the person submitting the request. As such we need to consider how any other individual may use, or misuse, the information if it is placed into the wider public domain. So, whilst the requestor may have a legitimate, and benign, interest in accessing the requested information, we could conclude that the risk that the information could be misunderstood or misused by others is more compelling and thus the information should be withheld.

This Annex sets out the information you have requested and the corresponding reasons for the engagement of: Section 35, Information held by a government department or by the Welsh Government is exempt information if it relates to— (a) the formulation or development of government policy and where required, our subsequent consideration of the Public Interest Test.

Section 35(1)(a)

Section 35(1)(a) covers any information relating to the formulation or development of government policy. This exemption is only engaged by information being used in the formulation of government policy.

The information requested has been generated to inform the formulation of government policies with regards to the Respiratory Syncytial Virus (RSV) vaccination programme

Welsh Government officials are in discussion with NHS Wales and other devolved governments to consider the JCVI's July 2025 recommendation on the extension of the RSV programme to assess its feasibility, affordability, and operational implications in Wales. The policy is being formulated, and a Ministerial decision is yet to be made. Therefore s35(1)(a) exemption is engaged by the information captured by this request.

Public interest arguments in favour of release

There is a strong public interest in the public understanding the ongoing development of our policies in relation to the RSV vaccination programme and the information underpinning this policy. We also recognise the public interest in making this information available for the sake of greater transparency and openness.

Public interest arguments in favour of withholding

We take the view that section 35(1)(a) is intended to ensure that the possibility of public exposure does not deter from full, candid, and proper deliberation of policy formulation and development, including the exploration of all options.

The withheld information relates to the future policy on the RSV vaccination programme. The Welsh Government needs to be able to openly discuss the JCVI's recommendations and assess its feasibility, affordability, and the operational implications in Wales with its partners before advice is drafted and a final decision is made by the Minister on the way forward.

The disclosure of the information requested would have a prejudicial effect on engagement between Ministers, officials, devolved governments and the NHS as it would remove the secure environment which allows Welsh Government to gather information from partners.

Releasing information would inhibit free and frank discussion among officials, which in turn undermines the quality of the policy being formulated. Early disclosure may damage trust between departments or with external stakeholders involved in policy development.

Removing the secure environment in which officials and partners can express views openly could result in advice being less robust. It would be likely to result in a reduction in the frankness and candour of those involved in the process if they believed discussions and other information would be made public. This could have a detrimental effect on any potential change to the delivery of the RSV vaccination programme and, in turn, the Welsh Government's implementation of this programme in the future. Timing is important here also, as disclosure at this stage, may also disrupt the progress of policy development and potentially its effectiveness. Releasing information on the detail and potential outcomes of the policy in advance of a Ministerial decision and announcement is ill advised, as the information is incomplete and in draft form, which could lead to confusion or a misinterpretation of the policy position. Publishing this information could also lead to premature public pressure or lobbying that could distort the process necessary to finalise policy. This in turn would impact on the public perception of how the RSV programme would operate in the future and has the potential to not only falsely raise expectations but could tie the Government into a position before a full analysis is complete.

In conclusion, it is within the wider public interest to withhold the information related to this request to provide the government with a safe space to consider and form policy and plans to manage the RSV vaccination programme. The Welsh Government has endeavoured to ensure the organisation is as transparent as possible, through the media, publication of documents, Ministerial Written Statements, and public statements in the Senedd. In so doing, we believe this public interest has been satisfied. Accordingly, the information requested has been withheld under section 35(1)(a) of the Act for the reasons set out above.