



Llywodraeth Cymru
Welsh Government

The Welsh Government response to the UK Covid-19 Inquiry Modules 2, 2A, 2B, 2C Report: Core decision-making and political governance

March 2026



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Ministerial Foreword

The Rt Hon Baroness Hallett DBE, Chair of the UK Covid-19 Inquiry, published her second report for the Covid-19 Inquiry on 20 November 2025 entitled 'Core decision-making and political governance'. The report reflects the evidence heard in Module 2, which considered, for each of the four nations of the UK, the initial response, central government decision making, political and civil service performance as well as the effectiveness of relationships with devolved governments. Module 2 examined these matters in respect of the UK Government, whilst Modules 2A, 2B and 2C were individual modules which examined the same matters from the perspective of Scotland, Wales and Northern Ireland respectively, with hearings held in each nation. The Welsh Government submitted more than 70 witness statements to this Module and 14 Welsh Government witnesses provided evidence at the oral hearings held in Wales in February and March 2024.

The pandemic had a profound and lasting impact on everyone in Wales. Our thoughts continue to be with the families and individuals who experienced the immense loss of a loved one and all those whose lives have been affected. It is important that we learn the lessons from our response to the pandemic to ensure we are as well-prepared as possible for any future pandemic or other emergency.

The Welsh Government therefore welcomes the publication of the Module 2 report and thanks the Chair and the Inquiry team for the comprehensive work they have undertaken to gather an inclusive range of evidence from factual and expert witnesses and those impacted by the pandemic, in order to make recommendations for how core decision-making can be improved in future emergencies.

During the pandemic, effective governance and clear decision-making structures were fundamental to the Welsh Government's response and enabled us to respond decisively and transparently during an exceptionally challenging period. We welcome the Inquiry's recognition of many of the strengths of our decision-making: the way in which Cabinet was fully engaged throughout the pandemic, making transparent and collective decisions; our commitment to social partnership and partnership working with local government. Several of the Inquiry's recommendations reflect best practice

actions and initiatives implemented in Wales, whilst others relate to matters where we have already taken further significant action since the pandemic, such as the publication of our Wales Resilience Framework, the further development of our five harms framework, and work to develop and test an enduring task force model for whole systems emergencies.

However, we know that there is more to do, as we describe below in our response to the recommendations made by the Inquiry; we also continue to make progress in response to Module 1, as set out in our recently published Module 1 update.

The Welsh Government recognises that several of the recommendations contained in the Module 2 report, particularly those relating to intergovernmental structures, relations, communications and emergency decision making structures require collaboration. In developing our response to the Module 2 report, we have therefore worked closely with the UK Government, the Scottish Government and the Northern Ireland Executive.

As First Minister, I am proud of the work the Welsh Government has undertaken to respond to the Covid-19 pandemic and build a stronger, more resilient Wales.

Introduction

The primary responsibility of the Welsh Government is to keep the people of Wales safe, including in an emergency, and is democratically accountable for the way in which it does so. The Senedd also has a critical constitutional role making law in devolved areas and in holding the Welsh Government to account for the decisions it makes.

An effective emergency response requires effective decision-making structures: this means

- Decision making in the right place, based on the best evidence;
- Listening to and acting upon the views of our stakeholders through a social partnership approach;
- Properly assessing how people will be impacted by both the emergency itself and the measures taken to respond to it; and
- Putting in place effective mechanisms to implement decisions and monitor their effectiveness; and
- Having robust intergovernmental arrangements to enable effective four-nation working.

Baroness Hallett and her team have carefully examined the way in which Wales took decisions in response to the pandemic and has made a series of recommendations aimed at improving decision-making in an emergency. The Welsh Government welcomes the Inquiry's detailed examination of decision-making and sets out below its responses to the recommendations, across a series of themes:

- Scientific and technical advice
- Identifying those at risk in an emergency
- Government decision-making
- Legislation
- Intergovernmental working
- Communicating with the public

We have agreed with the Inquiry that we will provide six-monthly updates on progress against module recommendations at fixed intervals, in May and November each year. Given the proximity between publication of this report and May 2026, and the Senedd election which also takes place in May 2026, we will provide an update on our progress in November 2026.

1. Scientific and technical advice

Recommendation 2: Attendance of the devolved administrations at SAGE meetings

The Government Office for Science (GO-Science) should invite the governments of Scotland, Wales and Northern Ireland to nominate a small number of representatives to attend meetings of the Scientific Advisory Group for Emergencies (SAGE) from the outset of any future emergency. The status of those representatives as either 'participant' or 'observer' should depend upon their expertise and should be a matter for SAGE to determine.

Recommendation 3: Register of experts

The Government Office for Science (GO-Science) should develop and maintain a register of experts across the four nations of the UK who would be willing to participate in scientific advisory groups, covering a broad range of potential civil emergencies. The register should be regularly refreshed through open calls for applications.

Recommendation 4: Publication of technical advice

During a whole-system civil emergency, the UK government and devolved administrations should each routinely publish technical advice on scientific, economic and social matters at the earliest opportunity, as well as the minutes of expert advisory groups – except where there are good reasons that prevent publication, such as commercial confidentiality, personal safety or national security, or because legal advice privilege applies.

Recommendation 5: Support to participants in advisory groups

The Government Office for Science (GO-Science), the Scottish Government, the Welsh Government and the Department of Health (Northern Ireland) should each develop standard terms of appointment for all participants in scientific advisory groups. These terms should include:

- clarity around the nature of an individual's role and the extent of their responsibility, as well as the likely time commitment;
- payment where their time commitment means that they have to spend time away from their substantive role;
- access to support services; and
- access to advice on personal and online security, with procedures for escalating specific concerns.

- 1.1. The Welsh Government wishes at the outset of this section to endorse the Inquiry's introduction to its chapter on scientific advice. We too recognise how fortunate Wales and the UK were to have access to the expertise of scientists and other experts, who worked under great pressure to provide advice to ministers, and we offer them our unreserved thanks. We also agree strongly that the personal attacks, abuse and threats which many experts suffered were completely unacceptable.

Access to scientific and technical advice

- 1.2. In responding to any system-wide emergency, it is critical that all governments can access the best scientific advice. However, in its Module 2 report the Inquiry notes that the devolved governments were not invited to attend SAGE from the outset of the pandemic, and that the processes by which the devolved governments subsequently secured appropriate representation lacked clarity.
- 1.3. The Welsh Government agrees with this assessment and welcomes the inquiry's **recommendation 2**, that the UK Government Office for Science should invite the governments of Scotland, Wales and Northern Ireland to nominate a small number of representatives to attend meetings of SAGE from the outset of any future emergency. In doing so we note that the SAGE guidance itself says that *"Departmental, DA and non-departmental government body CSAs (and CMOs and CVOs if relevant) are likely to form the initial core participants of any SAGE."*
- 1.4. The composition of SAGE should reflect all nations of the UK if it is established on a UK basis to provide scientific advice, as a situation can originate in any part of the country. In such circumstances the Welsh Government will discuss and agree appropriate attendance at SAGE with the secretariat applying the principles of the SAGE guidance. We recognise the need to balance proper representation at SAGE with ensuring that it can undertake its functions efficiently and effectively. The Welsh Government will work with the Government Office for Science, and with the other devolved governments, to refine and agree updated arrangements for devolved representation at SAGE.
- 1.5. The Welsh Government also welcomes the Inquiry's **recommendation 3**, that the UK Government Office for Science should develop and maintain a register of experts across the four nations who would be willing to participate

in scientific advisory groups, to cover a broad range of potential civil emergencies.

- 1.6. The Welsh Government plans to develop a pool of potential experts who would be able to provide expert technical and scientific advice to the Welsh Government in an emergency. This register will be maintained and developed by the Welsh Government's Office for Science, with input from across the Welsh Government. In the event of an emergency, a 'Science and Technical Advisory Group' will have a role in ensuring the right systems and processes are in place to provide scientific and technical advice, drawing on the register of experts as required.
- 1.7. We will also provide input and support to the UK Government Office for Science in developing its register, drawing on the expertise and networks of our Chief Scientific Adviser, the Chief Medical Officer for Wales, and other experts such as the Chief Veterinary Officer for Wales. In doing so, we recognise the need identified by the Inquiry to try to ensure that scientific advisory groups across the UK are drawn from a diverse range of disciplines, background and experience.

Publication of scientific and technical advice

- 1.8. The Welsh Government is committed to ensuring transparency continues to be at the heart of its approach to future emergencies, as it was during the Covid-19 pandemic. As the Inquiry notes, during the pandemic nearly all Technical Advisory Cell and Technical Advisory Group documents were published from May 2020 onwards, and we welcome its conclusion that "*publishing these documents gave the Welsh public insight into the science behind key decisions, helping to explain lockdowns and social distancing rules.*"
- 1.9. We therefore accept the Inquiry's **recommendation 4**, that during a whole-system civil emergency, each government should routinely publish advice on scientific, economic and social matters at the earliest opportunity, along with minutes of meetings, except where there are good reasons such as commercial confidentiality, personal safety or national security, or because legal advice privilege applies.

- 1.10. We have already made a firm commitment to transparency in our Wales Resilience Framework published in May 2025, which includes enhanced transparency and engagement as a key strategic aim, the purpose being to ensure that the people of Wales have a shared understanding and an increased awareness of the risks and the arrangements to manage those risks, and that we improve accountability to the public, maintaining confidence in the actions the Welsh Government is taking to keep our citizens safe. Our Wales Resilience Delivery Framework ([Wales Resilience Framework 2025](#)) sets out a range of other actions we will take to ensure the public has an improved awareness of the civil contingencies risks in Wales.
- 1.11. Consistent with our commitments in the Wales Resilience Framework, in any future whole system emergency our aim will be for the maximum possible transparency about the advice upon which decisions are made. However, publication of individual pieces of advice will depend upon the specific circumstances of the emergency at the time as well as the content of the advice; for example, it may not be practical or desirable to publish advice during an emergency of short duration. Publication of advice will ultimately be a decision for the Welsh Government which is in office at the time of the emergency, balancing transparency with the risks of disclosing specific pieces of advice.

Support for participants in scientific advisory groups

- 1.12. The Welsh Government accepts the Inquiry's **recommendation 5**, that it and the other governments should develop standard terms of appointment for all participants in scientific advisory groups. We recognise the huge contribution made by scientific experts, and we deplore the abuse and threats many of them faced, and we agree that the development of standard terms of appointment is essential if experts are to feel confident in supporting the work of governments in tackling future emergencies.
- 1.13. The Welsh Government agrees that each of the four nations should develop its own terms of appointment, which will enable us to reflect circumstances in each nation, but we also believe that there is a strong case for consistency across the UK. We will therefore work closely with the UK Government Office for Science, the Scottish Government and the Northern Ireland Executive in developing our terms of appointment, with a view to further advice being developed on progress for incoming Welsh Ministers by 30 September 2026.

2. Identifying those at risk in an emergency

Recommendation 8: A framework for considering those at risk in an emergency

The UK government, Scottish Government, Welsh Government and Northern Ireland Executive should each agree a framework that identifies people who would be most at risk of becoming infected by and dying from a disease and those who are most likely to be negatively impacted by any steps taken to respond to a future pandemic. The framework should set out the specific steps that could be taken to mitigate the risks to these people.

Equality impact assessments should form part of this framework. Where they cannot be undertaken in a national crisis, they should be reinstated as soon as possible.

Each government should agree and publish in its response to this Report how it will ensure that this framework is embedded into emergency decision-making and who will be responsible for ensuring these issues remain under consideration throughout a national crisis.

- 2.1. As noted above, the Welsh Government's primary responsibility is to keep the people of Wales safe. To do so, it is critically important that we are able identify as far as is practical those at risk during an emergency, and we therefore accept recommendation 8. We have already made substantial progress, as set out below.

Wales Resilience Framework

- 2.2. Our Wales Resilience Framework highlights the need for efficient and effective systems to support Category 1 and 2 responders in discharging their statutory obligations, which includes sharing information under the Civil Contingencies Act 2004 and consideration of the impact of people more at risk before, during and after an emergency crisis. Since then, we have strengthened our emergency preparedness, including:-
 - A dedicated data, evidence and analytical capability, integrating data into planning and response; and
 - A memorandum of understanding with the UK's National Situation Centre, which ensures reciprocal data sharing during crises.

- 2.3. We have developed a Concept of Operations which applies to all categories of incident (levels 0-3). For our level 2 and 3 categories of incident – those that are significant or catastrophic, the Concept of Operations includes an Equity and Equalities Cell in our response structure. We will also draw on existing groups which could be used to share information or inform action as we did during the Covid-19 pandemic. These include, for example, the Wales Race Forum, the Faith Communities Forum, a Gypsy, Roma and Traveller stakeholder group, the Third Sector Partnership Council, the Disabled Persons Rights Plan Advisory Group, the LGBTQ+ Stakeholder group, a Gender Equality Forum and a British Sign Language group. These fora include people with lived experience who work on an on-going basis with the Welsh Government and are well placed to provide evidence and information particularly about specific high-risk groups.

Building on our five harms approach

- 2.4. We welcome the Inquiry's acknowledgement of the harms framework we adopted and developed during the Covid-19 pandemic that identified the four (and later five) ways in which Covid-19 could harm people in Wales¹. We recognise the need for further progress in considering those at risk and undertake further work to develop our approach.
- 2.5. The Welsh Government agrees the importance of identifying and continuing to assess - as far as is practical - those who would be most at risk from a disease and those most likely to be affected by measures taken in response throughout a pandemic from the emergence to recovery phases. This will include gathering evidence and analysis from various sources, including internationally, on the characteristics of the disease and whether any individuals are more at risk – either of developing the disease or of negative outcomes. We cannot assume the more 'at risk' group(s) is the same as previous emergencies or pandemics. Decisions always need to be taken on

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1. ¹ *Direct harms from Covid-19 and other infectious diseases;*
 2. *Indirect harms due to pressures on the health and social care system;*
 3. *Harms from population-based health protection measures;*
 4. *Economic harms; and*
 5. *Harms around inequalities – cross-cutting and exacerbated by the above*

the best available evidence at the time, which can sometimes be limited or incomplete – particularly during the early stages of an emerging pandemic.

- 2.6. The approach we will take will involve continual analysis of the evidence and include reviewing and amending decisions as more data, evidence and research is available.
- 2.7. The framework has been updated to be disease-agnostic and will remain a key component to support decision-making in relation to future threats, helping us to balance impacts and make decisions in a transparent way, taking into account public health, social care, economic and equality impacts.
- 2.8. This was tested through Exercise Pegasus and will be reviewed as part of the evaluation. This review will be completed by December 2026. In the event of another emergency, we will also work with other governments and public health agencies to agree clear definitions of those at risk based on the latest available scientific and clinical evidence and advice for that particular event. This would inform the five harms framework to support decision making in a future emergency, alongside dynamic risk and impact assessments.

Data

- 2.9. The Wales Resilience Framework recognises the importance, when preparing and responding to an emergency, of working collaboratively across the UK to access the most relevant data sets, wherever they are held, to help us both deliver insight on vulnerability and to operationally support those individuals.
- 2.10. Having the right data is a critical factor in assessing risks to vulnerable groups, and we continue to work with organisations in Wales to share best practice in relation to assessing the impacts of risks on people with vulnerabilities and specific needs. We are looking at ways to use data and information to help partners identify vulnerable and at-risk groups to ensure more specific and tailored support can be prioritised nationally and locally during any incident to those people who may need it the most. The data subgroup of the Wales Resilience Partnership will focus this year on evidence gathering to assess the issues, needs and data gaps across a

range of emergencies (not just pandemics). This work will be completed by March 2027.

- 2.11. The Welsh Government is also working to enhance the JIGSO data platform, which is used for both emergency planning and response. JIGSO provides secure access to enable responders to identify households that include individuals on Dŵr Cymru's Priority Services Register. This allows authorised partners across the resilience community and emergency services to locate and support those who may be at greater risk. Ongoing improvements to JIGSO will deliver faster, more comprehensive data access for responders, and we are working with utility companies and public bodies to expand the range of vulnerability-related data that can be shared through the platform.

Improving Equality Impact Assessments

- 2.12. On 21 November 2025, the Welsh Government entered into a formal legal agreement with the Equality and Human Rights Commission under section 23 of the Equality Act 2006. The agreement relates in part to concerns raised by the Commission about inconsistencies in how equality impact assessments are conducted and published.
- 2.13. The Welsh Government has agreed to a two-year Action Plan. The plan will be centred around cultural reforms to the equality impact assessment process and governance oversight. This agreement presents a unique opportunity for us to strengthen our approach to assessing equality impact, ensuring it is embedded consistently across the organisation, including in preparing and responding to emergencies. The Welsh Government will report to the Commission at regular intervals on its progress in delivering the action plan.

Identifying the impact of inequalities during Exercise Pegasus

- 2.14. One of the overarching objectives of Exercise Pegasus was to explore the impact of inequalities and their consideration within pandemic decision making.
- 2.15. In preparation for Exercise Pegasus, we supported the UK National Situation Centre to source data, develop, and test its Pandemic Risk

Vulnerability Tool, which provides an overview of individuals and households that may be more adversely affected by a human health pandemic. The tool draws on indicators from academic literature and Covid-19 evidence to map the geographic distribution of potentially vulnerable groups who may be at higher risk due to both the direct health impacts of the disease and the effects of mitigation measures such as school closures, household isolation, and restrictions on hospitality and retail, and socio-economic impacts in relation to housing conditions, employment status and financial circumstances.

- 2.16. A UK-wide evaluation of Exercise Pegasus is underway. In Wales, we are establishing a small group to assist with the process. Initial Welsh Government findings will be published at the end of March, with a view to publishing a final report autumn 2026. This will need to take account of the outputs from phase 4 of the exercise which is due to take place in mid-June. However, our initial reflections from Exercise Pegasus highlighted the need to access and share health data more quickly during a pandemic. We are now working closely with Digital Health and Care Wales to test, using simulated data, the end-to-end process for lawful and secure access to health datasets via the National Data Resource. This will help us understand how responders, analysts, and researchers can generate insights and identify at-risk groups more rapidly during future public health emergencies. We plan to complete this test by the end of 2026.
- 2.17. To also assist with meeting this objective, during the exercise, we tested our Concept of Operations and structures, including establishing an Equity and Equalities Cell, as noted above. This cell included representatives from third sector groups within its membership. We also tested a specific equity and equalities team to ensure that vulnerable people and equalities were considered across policy development and decision making.

How we will embed our work into emergency decision-making

- 2.18. To ensure that our work to identify vulnerable groups is embedded into emergency decision-making, we will reflect our arrangements in our Concept of Operations, alongside consideration and implementation of the lessons identified through the wider evaluation of Exercise Pegasus that will report later in 2026. This will include identifying responsibilities through different phases of the emergency, including in an enduring crisis the creation of an equity and equalities team under the taskforce arrangements.

3. Government decision-making

Recommendation 10 – Civil emergency decision-making structures

The UK government and devolved administrations should set out in future pandemic preparedness strategies (see the Inquiry's Module 1 Report Recommendation 4) how decision-making will work in a future pandemic. This should include provision for COBR to be used as the initial response structure and set out how the UK government and devolved administrations will transition from managing a pandemic through COBR to managing it through separate arrangements in each nation when it becomes clear that the emergency will be longer-term.

It should include provision for longer-term decision-making structures in the UK government which consist of:

- a strategy group to set the overall approach to each stage of the pandemic and take decisions on major interventions (eg entering and exiting lockdown); and
- an operational group to take decisions on the implementation of the agreed strategy throughout the pandemic.

The design of these structures should include an outline of decision-making procedures for each group.

The strategy should make express provision for the involvement of the UK Cabinet in the decision-making of the strategy and operational groups. It should also provide that longer-term decision-making should be conducted primarily by the UK, Scottish and Welsh Cabinets and the Northern Ireland Executive.

Decision-making groups in each nation should include a minister with responsibility for representing the interests of vulnerable groups. In the UK government, the Minister for Women and Equalities may be the most appropriate minister in this regard.

Recommendation 11 – Contingency arrangements for key individuals

The UK government and the devolved administrations should each establish formal arrangements for covering the roles of Prime Minister and First Minister (and in Northern Ireland, deputy First Minister) as applicable during a whole-system civil emergency, should the incumbent be unable to undertake their duties for any reason.

Recommendation 12 – Taskforces

The response to a future whole-system civil emergency should be coordinated via central taskforces in each of the UK, Scotland, Wales and Northern Ireland, with responsibility for the commissioning and synthesis of advice, coordination of a single data picture and facilitation of decision-making processes. In preparation, the UK government and the devolved administrations should each design the operating procedures for these taskforces, including, but not limited to, identifying the key roles needed to run the taskforces and how those roles would be appointed.

The UK government should also identify the role of its taskforce in supporting decision-making procedures within the strategy and operational decision-making structures.

These arrangements should be incorporated into future pandemic preparedness strategies (see the Inquiry's Module 1 Report, Recommendation 4).

Decision-making structures

- 3.1. The Welsh Government recognises that an effective response to large-scale emergencies affecting all parts of the UK requires close working among all four nations. We agree that decision-making and coordination processes and structures need to be clearly defined and transparent, reflecting that responsibility for decisions in respect of areas devolved to Wales lies with Welsh Ministers. Arrangements for working together on a four-nations basis should be grounded in partnership, trust and mutual respect – never on perceived hierarchy – and should adhere to the principles, structures and approaches set out in the Review of Intergovernmental Relations². Where an incident is impacting, or has the potential to impact Wales, the Welsh Government will activate its crisis management arrangements without delay in a way which is proportionate to the scale and extent of the incident.

- 3.2. We support continuing the practice of early COBR meetings or four-nation discussions at the start of a UK-wide crisis. We accept that COBR will in many scenarios be the forum where potential decisions are discussed (and

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https://assets.publishing.service.gov.uk/media/61df0068e90e07037ba76b4c/The_Review_of_Intergovernmental_Relations.pdf

where a four-nation consensus on the decisions which need to be taken can hopefully be achieved). However, decisions relating to devolved matters must be taken by the Welsh Government from the outset, and not by COBR. The exercise of devolved responsibilities cannot be delegated to any other body, even in an emergency: the Welsh Government is accountable to the Senedd for the exercise of devolved powers, including in respect of decision-making during any future pandemic or other emergency.

- 3.3. We also agree in principle that decision-making groups should include a minister with responsibility for representing the interests of vulnerable groups; it will be for the Welsh Government in office after the Senedd elections in May 2026 to determine its Ministerial portfolios.

Continuity arrangements

- 3.4. The Welsh Government agrees and welcomes **recommendation 11** and can confirm that succession measures are already in place.
- 3.5. There are established constitutional provisions to guarantee leadership continuity in severe scenarios. Under the Government of Wales Act 2006, as an interim measure, if the First Minister is for any reason unable to act (through illness or other cause), the functions of the First Minister are exercisable by a person designated by the Presiding Officer of the Senedd. If the First Minister were to become permanently unable to hold office (through death, permanent absence, serious illness or other cause), the law requires the Senedd to nominate a new First Minister within 28 days. These statutory mechanisms provide a formal underpinning to our succession planning by ensuring that even in extreme circumstances there is a clear, democratic process for appointing new leadership.
- 3.6. Currently by virtue of the Deputy First Minister's role, which explicitly includes deputising for the First Minister, we maintain continuity of leadership during emergencies. If the First Minister is unavailable or incapacitated, the Deputy First Minister stands ready to assume the First Minister's duties, ensuring that Cabinet, government and critical decision-making can continue without interruption. We also have formal protocols in place to support this continuity – for example, long-established practices dictate that if the First Minister cannot chair a Cabinet or emergency session, the Deputy First Minister (or another senior Minister as appropriate) will chair on their behalf. These arrangements were

effectively demonstrated during 2020-21, and they remain a cornerstone of our continuity of government arrangements and resilience.

- 3.7. Together, the immediate deputising role of the Deputy First Minister and the legal framework for temporary and permanent replacement of a First Minister represent a comprehensive contingency arrangement covering all timescales – from sudden short-term incapacity to more sustained disruption.
- 3.8. Looking ahead, this matter will be considered by the First Minister and Cabinet following the 2026 Senedd election in the light of the new Ministerial portfolios which will be created. The Welsh Government's aim is to ensure that, whatever the circumstance, there is no doubt about how leadership responsibilities will be covered during a whole-system emergency.

Implementing and supporting decision-making

- 3.9. In our response to recommendation 2 of the Module 1 report, we recognised that in the event of a prolonged, whole system emergency, that the lead government department model has limitations and a different model might be required. We also recognise that effective emergency response requires structures for making decisions, but it also requires structures which ensure that decision-makers have the advice they need to make those decisions and then ensure that the decisions taken are implemented.
- 3.10. We accept **recommendation 12**, that the response to a future whole-system civil emergency should be coordinated via central taskforces in each nation, which will have responsibility for the commissioning and synthesis of advice, the coordination of a single data picture and the facilitation of decision-making processes. The Welsh Government's Covid-19 Taskforce was an essential component of our internal arrangements during the pandemic, as the Inquiry itself has noted.
- 3.11. In response to recommendation 2 of the Module 1 report, we established a sub-group, under our Risk & Preparedness Committee, to consider potential models including an enduring taskforce for whole system emergencies. The enduring taskforce will provide a dedicated vehicle for scenarios where the coordination of a prolonged emergency response is required. The objectives of the taskforce are:

- Dedicated resources to coordinate a cross-government response for a whole-system prolonged crisis;
- Dedicated governance structures to enable cross-government decision-making and accountability;
- Enable strategic leadership; and
- Integrate recovery of communities, economy and society within decision making earlier within the response considerations.

3.12. As part of our commitments to continued learning, we included a pilot of the task force during Exercise Pegasus. Information from the exercise will be used to refine the taskforce model, including key roles, escalation and de-escalation processes. The enduring taskforce will be incorporated into the Crisis Management Concept of Operations which will be published in early summer 2026.

4. Legislation

Recommendation 15 – Scrutiny of emergency powers

The UK government and devolved administrations should ensure that the draft affirmative procedure is the standard process for enacting substantial and wide-ranging powers in a civil emergency, such as a pandemic, under primary public health legislation.

Any departure from this procedure should be the exception, with clear criteria and safeguards in place to prevent the bypassing of parliamentary scrutiny. These safeguards should include:

- ‘sunset clauses’ for regulations made using the made affirmative procedure, specifying a clear expiration date, typically within two months; and
- a duty on ministers to report to their respective legislatures every two months on the exercise of emergency powers.

Recommendation 16 – Review of the Civil Contingencies Act

The UK government should undertake a review of the Civil Contingencies Act 2004 to assess its potential role in managing future civil emergencies, including pandemics, and whether it could be employed as an interim emergency framework until more specific legislation with appropriate parliamentary safeguards is passed.

The review should:

- examine the conditions under which the Civil Contingencies Act 2004 may be invoked in a public health emergency;
- consider any adjustments to the Act’s safeguards, such as the triple lock test or time limits, that would make it more adaptable to pandemics; and
- produce clear guidance on the Act’s application for use in civil emergencies, including pandemics, to support its use as an emergency measure in advance of specific legislation – such as a dedicated pandemic bill – being passed.

Legislative scrutiny of regulations

- 4.1. Responding to a pandemic or other whole-system emergency will sometimes require the introduction, via regulations, of restrictions on people’s freedoms. During Covid-19 these freedoms were at times significantly curtailed. The Welsh Government therefore agrees with the Inquiry that the legislative response to emergencies should be clear, well-

defined and subject to the appropriate parliamentary oversight and scrutiny and accepts in principle recommendation 15.

- 4.2. During the Covid-19 pandemic the Public Health (Control of Disease) Act 1984 (“the 1984 Act”) provided the emergency procedure which enabled regulations to be made by Welsh Ministers without a draft being laid and approved by the Senedd. This is the “made affirmative” procedure referenced in the Inquiry’s Module 2 Report. The Senedd has enacted legislation in a range of areas which permit subordinate legislation to be made under this procedure recognising that at times there may be an expectation on ministers, following careful consideration and judgement, to take urgent action, for example, in relation to a severe health protection emergency such as the Covid-19 pandemic or to swiftly make changes to tax thresholds or exemptions.
- 4.3. Notwithstanding the need for such emergency procedures, the Welsh Government is committed to improving the accessibility, coherence and democratic oversight of Welsh law. The Welsh Government’s programme to improve the accessibility of Welsh law (*The Future of Welsh Law, a programme for 2021 to 2026*) includes the making of the Legislation (Procedure, Publication and Repeals) (Wales) Act 2025 (“the 2025 Act”). Its purpose is to bring together and formalise the arrangements for making Welsh legislation.
- 4.4. Since 1 January 2026, the “made affirmative” procedure has been replaced in Welsh law by a newly created “Senedd confirmation procedure”. While this procedure continues to operate in the same way as the “made affirmative” procedure, the “Senedd confirmation procedure” uses clearer and more accessible terminology. The name explains in plain language that the Senedd must confirm the regulations for them to remain in force, reflecting the wider policy aim of ensuring that legislative processes have straightforward titles that are easily understood by the public.
- 4.5. This change in terminology aligns with the broader reforms introduced by the 2025 Act bringing procedures together in one place, simplifying them into core categories, using modern drafting techniques and language, and ensuring full accessibility in both Welsh and English. This clarity is particularly valuable during fast-moving situations, such as civil

emergencies, where accessible and intuitive naming supports public understanding and effective scrutiny.

- 4.6. Where the Senedd confirmation procedure is the appropriate procedure, the Welsh Government agrees that the use of sunset clauses and reporting to the Senedd on the exercise of emergency powers may provide useful mechanisms to improve transparency, scrutiny and collaboration. During the Covid-19 pandemic the regulations which imposed restrictions on businesses and individuals were reviewed every 21 days in Wales and both the Chief Medical Officer's advice and the Technical Advisory Cell summary, upon which 21-day review decisions were made, were published to ensure that Members of the Senedd and the public understood the evidence and advice supporting the Welsh Government's decisions and decision-making process. Ministerial Written Statements issued to inform Members of the Senedd, and the public, of the making of key Covid-19-related legislation also provided regular consolidated reports to the Senedd on all Covid-19 related legislation as well as the use of the Welsh Ministers' powers under the Coronavirus Act 2020.
- 4.7. It is important to recognise that different emergencies will require different legislative approaches and would need to be considered on a case-by-case basis to assess the most appropriate response, including the appropriate Senedd procedures. This would be a matter for the government at that time, when considering the balance of sufficient Senedd scrutiny against the appropriate emergency response to protect people and save lives.

Reviewing the Civil Contingencies Act 2004

- 4.8. The Welsh Government accepts the Inquiry's **recommendation 16**, that a review of Part 2 of the Civil Contingencies Act 2004 should be undertaken. Regulation 59 of the Civil Contingencies Act 2004 (Contingency Planning) Regulations 2005 places a legal obligation on the Minister for the Cabinet Office to review regulations made under the 2004 Act every five years, but the UK Government typically treats this provision as an opportunity to review the Civil Contingency Act regime as a whole.
- 4.9. The next review is due to be completed by March 2027, and we agree with the UK Government's proposal to consider the areas set out by the Inquiry in relation to the applicability of Part 2 of the Act as part of this review. We welcome the assurances we have received from the UK Government that

the review will involve significant consultation with the devolved governments and the wider resilience community; it will be essential for the devolved governments to be involved from the outset rather than consulted at a later stage, and we intend to participate fully in the review. We do not wish to pre-judge the outcome of this review, but we do not believe that Part 2 of the Act will be the right vehicle for a public health emergency, given that public health is devolved and relevant Ministerial powers are set out in the Public Health (Control of Disease) Act 1984. Rather than looking to the Civil Contingencies Act 2004 as an interim tool to manage whole-system emergencies, the Welsh Government believes that future civil emergencies should be met with solutions that enhance, not sideline, devolved engagement and decision-making.

- 4.10. The Act itself is supported by concordats between the UK Government and each of the devolved governments, which provide frameworks for co-operation in relation to the operation of Part 2 of the Civil Contingencies Act 2004. However, the concordat with the Welsh Government has not been reviewed for many years and does not reflect developments in civil contingencies and emergency response. We therefore believe that in addition to a review of the Act, the UK Government and the Welsh Government should review and update the concordat, re-emphasising the role of intergovernmental arrangements on resilience to support a UK-wide approach to whole system emergencies. We will make the case for doing so to the UK Government.

5. Intergovernmental relations

Recommendation 18 – Attendance at COBR meetings by representatives of devolved governments

The UK government should invite the devolved administrations, as a matter of standard practice, to nominate relevant ministers and officials to attend COBR meetings in the event of relevant whole-system civil emergencies that have the potential to have UK-wide effects.

Recommendation 19 – Intergovernmental structure and relations

While intergovernmental relations should be facilitated through COBR in the initial months of any future pandemic, the UK government and devolved administrations should ensure that a specific four-nations structure, concerning pandemic response, is stood up at the same time as the transition away from COBR to nation-specific decision-making structures. This should meet regularly during a pandemic and be attended by all heads of government.

Arrangements for these four-nations meetings should be incorporated into future pandemic preparedness strategies (see the Inquiry's Module 1 Report, Recommendation 4).

Intergovernmental forums for emergency response

- 5.1. As we describe earlier in our response, the Welsh Government recognises that an effective response to any whole-system emergency will require close working between the four nations of the United Kingdom, through intergovernmental structures attended by all four nations of the UK wherever required.
- 5.2. We therefore welcome **recommendation 18**, that the UK Government should invite the devolved governments, as a matter of standard practice, to nominate relevant ministers and officials to attend COBR meetings in the event of relevant whole-system civil emergencies that have the potential to have UK-wide effects. The Welsh Government's view is that officials and ministers should be invited to all COBR meetings when risks are identified that may have implications for Wales, irrespective of whether the origin of the risk or issue is a reserved (such as counter-terrorism or national

security) or devolved (such as flood risk or public health) responsibility. This is because consequence and impact management on communities, the economy, essential public services and the environment will fall to devolved governments, as noted above.

- 5.3. The Welsh Government also agrees that whilst intergovernmental relations should in most cases be facilitated through COBR in the initial phase of a future pandemic, a specific four-nations forum at heads of government level response should also be stood up, as per **recommendation 19**. We note the Inquiry's recommendation that this forum is stood up at the same time as the transition away from COBR to nation-specific decision-making structures, but as stated above decisions about pandemic response in devolved areas must be made by the devolved governments from the outset of a pandemic (or any other whole system emergency). To deliver this recommendation, we will work with the UK Government and other devolved governments to develop collectively agreed arrangements, building on the existing overall intergovernmental structures and incorporating established best practice. If this approach is taken, we believe that four nations agreement is achievable within 12 months.

6. Communicating with the public during an emergency

Recommendation 14: Plans for accessible communications

The UK government and the devolved administrations should each develop action plans for how government communications will be made more accessible during a pandemic.

As a minimum, these should include making provision for the translation of government press conferences into British Sign Language (and Irish Sign Language in Northern Ireland) and the translation of key announcements into the most frequently spoken languages in the UK.

Recommendation 17: A central repository for restrictions and guidance

The UK government, Scottish Government, Welsh Government and Northern Ireland Executive should develop an online portal for use in future civil emergencies, where members of the public can access information on the legal restrictions that apply in their area and any associated guidance.

This portal should be easily accessible and its content should be written in straightforward and unambiguous language.

- 6.1. The Welsh Government accepts **recommendation 14**, for the development of action plans setting out how government communications will be made accessible during a pandemic, and we remain committed to the delivery of clear and accessible communications during a future pandemic (or any other whole-system emergency). Our communications during the Covid-19 pandemic demonstrated our commitment to accessibility: as the Inquiry notes, we established in early June 2020 an Accessible Communications Group to improve access to information about Covid-19. This included a wide range of organisations representing the interests of those who might have faced barriers in accessing the Welsh Government's communications, and we took steps to make our communications more accessible in response to their feedback.
- 6.2. Since the pandemic, we have put in place guidance, setting out how to ensure our communications are accessible; it identifies the main needs for accessible communications (including being D/deaf, being blind or partially

sighted, learning difficulties, neurodiversity, levels of literacy, language and age) and explains the different needs and formats that can help when communicating with people who need accessible communications. We have also produced an Inclusive Communications Guide, setting out best practice and practical examples for inclusive communications based upon six inclusive communications principles. The guidance is based on the latest best practice for inclusive communications; we also held workshops and interviews with external stakeholders and groups with lived experience, who provided valuable input and examples that have informed the guidance.

- 6.3. Within the next six months we will also add a specific section to the Inclusive Communications Guide to reflect best practice during crisis communications activities.
- 6.4. The Welsh Government accepts in principle the Inquiry's **recommendation 17**, for a single repository of information on legal restrictions and other guidance. We agree it is essential that the public in Wales can access information on legal restrictions and other guidance that is relevant to them, and that steps are taken to avoid any confusion from different restrictions in other nations of the UK. During the pandemic, we used every channel at our disposal to provide clear, consistent information to the Welsh public, updated in real time, as restrictions changed.
- 6.5. The bilingual GOV.WALES platform was central to this, including the dedicated landing page at gov.wales/coronavirus, where clearly written information about the main restrictions in place in Wales was hosted, with links signposting to further guidance. The platform received more than 25 million visits in 2020, indicating that our strategy of driving people to the platform as a 'single version of the truth' was effective for us and our partners. We believe this single platform approach is the best way for the Welsh Government to communicate directly with the public in Wales, rather than the creation of a separate portal for civil emergency information.
- 6.6. However, the Inquiry itself found *that "[t]he UK government's announcements often failed sufficiently to explain whether they applied to all four nations or to England alone."*

- 6.7. We will therefore work with the UK Government and the other devolved governments to improve the coordination of public communications, and to co-produce during 2026 a new set of principles on a four nations basis for the communications of legal restrictions and guidance during civil emergencies. These should include agreements that all communications content in each nation will make its geographical extent clear at the outset, that messages will be co-ordinated between governments, and that ministers in each nation undertake that they will not communicate in a way that could confuse the public living elsewhere.

- 6.8. Adopting these principles, we believe, would be a major step forward in fulfilling each government's duty to provide clear information and guidance to their people about any legal restrictions that may apply to them in an emergency. Geographic clarity must be at the heart of all communications, making clear whether the information relates to the whole of the UK, a specific nation or nations, a region, or local area.

Table of Actions

Action	By When	Comment
Recommendation 2		
Work with the Government Office for Science, and with the other devolved governments, to refine and agree updated arrangements for devolved representation at SAGE	Provide an update by November 2026	
Recommendation 3		
Develop a pool of potential experts to provide expert technical and scientific advice	Provide an update by November 2026	
Recommendation 4		
No identified actions		
Recommendation 5		
Develop standard terms of appointment for participants in scientific advisory groups	Further advice on progress to be developed by September 2026	
Recommendation 8		
Review of Exercise Pegasus	Initial March 2026, full December 2026	
Gather evidence on data gaps across a range of emergencies	March 2027	
Two-year action plan on Equality Impact Assessments	November 2027	
Test secure access to health datasets via the National Data Resource	December 2026	
Enhance the JIGSO data platform	Provide an update by November 2026	
Recommendation 10		
Determine Ministerial portfolios	Post Senedd election	
Recommendation 11		
Determine Ministerial portfolios	Post Senedd election	

Recommendation 12		
Publish the Crisis Management Concept of Operations	Summer 2026	
Recommendation 14		
Add a best practice during crisis communications section to the Inclusive Communications Guide	September 2026	
Recommendation 15		
No identified actions		
Recommendation 16		
Participate in the UK review of Part 2 of the Civil Contingencies Act 2004	March 2027	
Work with UK Government to review and update the concordat between UK Government and the Welsh Government	Post Senedd election	
Recommendation 17		
Work with the UK Government and the other devolved governments to co-produce a new set of principles for the communications of legal restrictions and guidance during civil emergencies	December 2026	
Recommendation 18		
No identified actions		
Recommendation 19		
Develop collectively agreed arrangements for proposed structures	March 2027	