

# **Consideration of the UK COVID-19 Inquiry Module 1 Report: Resilience and Preparedness**

Examination of the gaps identified in the preparedness and response of the Welsh Government and Welsh public bodies during the COVID-19 pandemic

March 2026



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**Public Accounts and Public Administration Committee**  
**Welsh Parliament**  
**Cardiff Bay**  
**CF99 1SN**

Tel: **0300 200 6565**  
Email: **[SeneddPAPA@senedd.wales](mailto:SeneddPAPA@senedd.wales)**  
X: **@SeneddPAC**

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# About the Committee

The Committee was established on 23 June 2021. Its remit can be found at:  
[www.senedd.wales/SeneddPAPA](http://www.senedd.wales/SeneddPAPA)

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Current Committee membership:



**Committee Chair:  
Mark Isherwood MS**  
Welsh Conservatives



**Tom Giffard MS**  
Welsh Conservatives



**Mike Hedges MS**  
Welsh Labour



**Rhianon Passmore MS**  
Welsh Labour



**Adam Price MS**  
Plaid Cymru

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## Chair's foreword

The COVID-19 pandemic was one of the most consequential and devastating events in living memory. It tragically claimed lives and placed an unprecedented strain on our health, care, and education systems as well as our economy and public finances. It touched every community across Wales, disrupted lives and businesses, and exposed deep rooted inequalities across our society. For many, its consequences continue to be felt, and will be for decades to come.

As a Senedd, we owe it to those who lost loved ones, who have suffered long term health implications, and who carried the burden of the response, to examine openly and honestly the decisions that shaped Wales's experience of the pandemic and ensure they are subject to robust scrutiny. This report represents the Public Accounts and Public Administration Committee's contribution to that vital task, building on the findings of the UK COVID-19 Inquiry Module 1 and the work of the Wales COVID-19 Inquiry Special Purpose Committee. As a Committee, we felt it was of the utmost importance that the Senedd has the opportunity to scrutinise the extent to which the Welsh Government has responded to the findings and recommendations of Module 1, the adequacy of the changes made to its approach to civil contingencies planning, and its preparedness for future emergencies.

We heard about the reforms the Welsh Government has introduced since the pandemic, including the development of the Wales Resilience Framework, the reconstitution of the Wales Resilience Forum, and steps to strengthen governance and risk management. Yet while significant progress has been made, our work highlights persistent concerns, particularly in relation to monitoring, accountability and independent scrutiny of Wales's revised resilience and preparedness arrangements.

Bereaved families and other stakeholders felt that much of the Welsh Government's reporting on progress is too reliant on self-assessment, without sufficient independent verification. They emphasised that while structures may have been simplified on paper, there is insufficient publicly available evidence to demonstrate how effectively these revised systems are working in practice, or whether they would withstand the pressures of another major emergency. The Committee therefore concludes that Wales's system for evaluating the effectiveness of its civil contingencies arrangements remains insufficiently robust, with an over-reliance on self-reporting to assess whether the revised structures are delivering measurable improvements to the way we respond to emergencies.

Current assessments rely heavily on qualitative judgements, such as unpublished feedback from responders or the absence of noticeable disruption during recent incidents, rather than measurable, independently substantiated evidence. Expert stakeholders made a strong case for the need for clear performance indicators, based on international best practice, to evaluate Wales's preparedness for future emergencies and the effectiveness of our response mechanisms.

We also heard that, despite significant revisions since the pandemic, Wales's civil contingencies system remains complex, with significant pressures placed on national responders expected to service multiple local response structures simultaneously. We heard there is a need for improved coordination, clearer escalation pathways, better cross-border alignment, and detailed mapping of civil contingency structures to give responders confidence in how decisions flow during crises.

We heard how vital regular preparedness exercises are to make sure our response systems are working effectively and that we are ready to respond to a variety of potential scenarios. Yet we remain concerned about the resourcing challenges facing emergency responders who need to balance maintaining frontline services with preparing for future emergencies. The Committee therefore emphasises the need for a more coherent national approach to scheduling, resourcing and coordinating exercises, ensuring that responders are not overburdened and that lessons are systematically captured and shared. Strengthening this support is essential if Wales is to embed learning, maintain institutional memory, and ensure that emergency response systems are stress tested against the full range of scenarios that might face Wales in future.

Our work highlighted the indispensable role that Wales's voluntary organisations play in strengthening national resilience. Yet it is equally clear that the potential of this sector to support our response and recovery efforts is not being fully realised, with voluntary organisations too often remaining on the periphery of decision making, emergency planning structures, and resourcing. We also heard repeated concerns that barriers to data sharing and the absence of an agile emergency funding model impedes their ability to respond swiftly and effectively. This is despite examples during the pandemic which demonstrated that these challenges can be overcome when the will exists. The Committee therefore recommends a more systematic integration of the voluntary sector into Wales's civil contingencies arrangements, supported by improved mechanisms for lawful and timely data sharing and a funding model which ensures the sector is able to

direct funds to where they are needed most and adequately resourced to contribute when they are called upon.

As a Committee, we have approached this work with a clear intention: to ensure that the difficult lessons of the pandemic lead to real and lasting improvements for the people of Wales. Our intention has been not only to scrutinise but to contribute constructively to the development of a civil contingencies system that is robust, stress-tested, independently scrutinised, and capable of protecting our communities. We must learn the lessons of the pandemic and improve our preparedness systems to make Wales more resilient, better protected, and able to respond to the challenges that we will inevitably face in the future. The people of Wales deserve no less.

I would like to thank all those who gave evidence, particularly individuals and families who shared deeply personal experiences. Their contributions were invaluable. It is our sincere hope that this work will help ensure that the sacrifices made during the pandemic are honoured through genuine reform.

**Mark Isherwood MS**

Chair, Public Accounts and Public Administration Committee

## Recommendations

**Recommendation 1.** The Committee recommends that the next Senedd prioritises the examination of each of the remaining inquiry modules to ensure they are subject to thorough, transparent and timely scrutiny..... Page 18

**Recommendation 2.** The Committee recommends that the Welsh Government undertakes a standalone mapping exercise of Wales’s civil contingencies structures to provide clear, accessible information on roles and responsibilities, decision making hierarchies, lines of accountability and communication flows. This should be accompanied by simple, coherent guidance explaining how these structures should work before, during and after an emergency situation..... Page 30

**Recommendation 3.** Committee recommends that the Welsh Government develops national guidance on the scheduling and coordination of Strategic and Tactical Coordinating Group meetings to ensure a clear shared understanding of protocols on meetings and to support responders operating across multiple Local Resilience Forums. This guidance should also provide detail on the criteria that determines when incidents require escalation from local to national response structures and the routes for doing so. .... Page 31

**Recommendation 4.** The Committee recommends that the Welsh Government puts in place tangible, practical arrangements to ensure that national responders can work with all four Local Resilience Forums in a more joined-up way without unnecessary duplication..... Page 31

**Recommendation 5.** Behind all emergency preparedness and resilience systems are the dedicated staff within responder organisations who work tirelessly to keep people safe and to minimise the impact of emergencies, often placing themselves in harm’s way in the course of protecting others. The Committee wishes to place on record our sincere thanks to the emergency responders and volunteers from across Wales for their service and commitment to safeguarding our communities. .... Page 31

**Recommendation 6.** The Committee recommends that the Welsh Government publishes, by December 2026, an emergency preparedness workforce strategy setting out how it will ensure Wales’s revised civil contingency structures are underpinned by a sustainable and resilient workforce, with the capacity, skills and long-term stability needed to respond effectively to future emergencies..... Page 32

**Recommendation 7.** The Committee recommends that the Welsh Government publishes a set of quantitative performance indicators to assess the effectiveness of Wales’s civil contingencies systems, including preparedness levels, response times, exercise participation and implementation of lessons learned. Reporting against these indicators should take place annually..... Page 33

**Recommendation 8.** The Committee recommends that the Welsh Government establishes an appropriate mechanism for conducting regular, independent reviews of Wales’s civil contingency arrangements. This mechanism should deliver rigorous, independent scrutiny while remaining proportionate, sustainable and cost-effective. In determining the most suitable approach, the Welsh Government should consider utilising existing institutions for this purpose. .... Page 35

**Recommendation 9.** The Committee recommends that the Welsh Government introduces public dashboards to monitor its progress in addressing the UK COVID-19 Inquiry’s recommendations and any subsequent recommendations made by independent external audits, to enhance transparency with regard to decision-making and to enable effective scrutiny..... Page 35

**Recommendation 10.** The Committee recommends that the Welsh Government publishes a public-facing version of the Wales National Risk Register to provide up to date assessments of the likelihood and potential impact of the range of risks that may directly affect Wales and the public at large. .... Page 35

**Recommendation 11.** The Committee recommends that the Welsh Government establish a national multi-agency training and exercising unit—similar to Scotland’s SMARTEU—to coordinate exercises to test the full range of risks identified in the national risk register, mitigate resourcing challenges faced by participating organisations and disseminate learning to partner agencies. .... Page 44

**Recommendation 12.** The Committee recommends that the Welsh Government take steps to ensure Wales’s revised preparedness structures, the Wales National Risk Register, and future multi-agency exercises fully account for, and plan for responding to, compound risk scenarios..... Page 44

**Recommendation 13.** The Committee recommends that the Welsh Government take steps to fully integrate social care and other critical sectors into exercise planning, delivery and decision making..... Page 44

**Recommendation 14.** The Committee recommends that the Welsh Government introduces a formal engagement protocol for voluntary organisations in

multi-agency exercises, guaranteeing equal access to information, defined roles, and opportunities to contribute to planning and delivery. ....Page 44

**Recommendation 15.** The Committee recommends that the Welsh Government establishes a standardised framework for cooperation between Category 1 responders and voluntary organisations, to ensure these organisations are formally integrated into emergency response arrangements.....Page 55

**Recommendation 16.** The Committee recommends that the Welsh Government creates a Wales-wide register of voluntary sector capabilities, including clear activation pathways to enable rapid mobilisation and coordination during emergencies. ....Page 55

**Recommendation 17.** The Committee recommends that the Welsh Government develops a system which facilitates timely, lawful data-sharing between statutory agencies and voluntary partners during emergencies, ensuring compliance with data protection requirements while enabling voluntary organisations to respond quickly and effectively. Such a system should make legal provisions which allows for data protection regulations to be relaxed during emergency situations. ....Page 56

**Recommendation 18.** The Committee recommends that any future Welsh Government should maintain the current third sector infrastructure, and look to identify how these structures can be improved and made even more robust to ensure the voluntary sector is embedded from the outset in resilience planning and exercises. ....Page 56

**Recommendation 19.** The Committee recommends that the Welsh Government establishes a standing emergency funding framework with trusted voluntary partners to enable fast mobilisation of resources during emergencies. ....Page 57

**Recommendation 20.** The Committee recommends that the Welsh Government works with the voluntary sector and commissioning organisations to promote more effective use of long-term funding mechanisms that will support infrastructure investment, improve the sector’s resilience, and enhance their ability to cope with the surge in demand for their services during emergencies. ....Page 57

**Recommendation 21.** The Committee recommends that the Welsh Government formally integrates organisations and community networks that represent the range of protected characteristics under the Equality Act 2010 into emergency communication strategies, ensuring messaging and methods of dissemination

are co-designed and reflect lived experience and the particular communication needs of disabled people with differing impairments. ....Page 64

**Recommendation 22.** The Committee recommends that the Welsh Government establishes formal mechanisms for consistent engagement with organisations representing ethnic minority, rural and other marginalised communities, such as standing advisory panels or a Wales-wide register of community partners, to ensure their insights shape planning and decision-making from the outset. ....Page 64

**Recommendation 23.** The Committee recommends that the Welsh Government takes additional steps to embed systematic vulnerability assessments into the Wales National Risk Register, community risk registers, and civil contingencies planning, ensuring these assessments are evidence-based, measurable and updated regularly to reflect emerging risks and their potential impacts on vulnerable communities. ....Page 64

**Recommendation 24.** The Committee recommends that the Welsh Government ensures that future multi-agency preparedness exercises include a mandatory assessment of the likely impact of different emergencies on protected characteristic groups and people living in socioeconomic disadvantage and the effectiveness of interventions to mitigations against these impacts. ....Page 65

**Recommendation 25.** The Committee recommends that the Welsh Government urgently sets out what contingency plans it will implement to ensure surge capacity, mass contact tracing capability and multi-agency access if the new health protection management system and Welsh Emergency Care Dataset are delayed beyond autumn 2026. .... Page 71

**Recommendation 26.** The Committee recommends that the Welsh Government takes steps to guarantee early and active representation on UK scientific advisory forums so that Wales is in a position to influence guidance and decision-making from the outset, rather than reacting after decisions are made. .... Page 72

**Recommendation 27.** The Committee recommends that the Welsh Government takes steps to address persistent data gaps, including improving the completeness and granularity of equality data across NHS Wales, and incorporating wider social indicators into resilience datasets to enable more accurate vulnerability mapping and targeted interventions. .... Page 72

**Recommendation 28.** The Committee recommends that the Welsh Government introduces a dedicated programme of AI and digital resilience auditing as part of

the Wales Resilience Framework. This programme should ensure that Wales remains alert to emerging digital risks—including cyber-attacks, systems vulnerabilities, and the spread of mis and disinformation—and that the Welsh Government is able to access timely expert advice to strengthen preparedness, and safeguard critical digital infrastructure..... Page 73

## 1. Introduction

1. The Wales COVID-19 Inquiry Special Purpose Committee (Wales Special Purpose Committee) was established on 16 May 2023.<sup>1</sup>
2. The Committee's remit was to:
  - a. consider the reports at each stage of the UK COVID-19 Inquiry and in the context of the UK COVID-19 Inquiry's terms of reference and timetable, propose to the Senedd by motion, any gaps identified in the preparedness and response of the Welsh Government and other Welsh public bodies during the COVID-19 pandemic that should be subject to further examination.
  - b. Subject to Senedd approval, undertake a review into those areas identified for further examination.
  - c. Publish reports and make recommendations accordingly.
3. The UK COVID-19 Inquiry's Module 1 report: The resilience and preparedness of the UK was published in July 2024.<sup>2</sup> It concluded that resilience systems in Wales were fragmented, inefficient, and needlessly complex and set out ten key recommendations to strengthen future preparedness.
4. Following the publication of the Module 1 report, the Wales Special Purpose Committee undertook work to identify any gaps in the preparedness and response of the Welsh Government and other Welsh public bodies during the pandemic, which relate to the remit of Module 1.
5. In preparing its report, the Wales Special Purpose Committee drew on a wider programme of work, including an independent Gap Analysis commissioned from Nottingham Trent University<sup>3</sup>, a stakeholder engagement event with representatives from across key sectors<sup>4</sup>, and a public consultation held between November 2024 and January 2025.<sup>5</sup> This additional evidence informed the Wales

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<sup>1</sup> Senedd Plenary, [RoP](#), 16 May 2023

<sup>2</sup> UK COVID-19 Inquiry, [Module 1 report: The resilience and preparedness of the United Kingdom](#), July 2024

<sup>3</sup> Nottingham Trent University, [COVID-19 Public Inquiry Module 1 Gap Analysis](#), February 2025

<sup>4</sup> Wales COVID-19 Inquiry Special Purpose Committee, [Stakeholder Event on the Module 1 Report of the UK Covid-19 Inquiry: Summary Document](#), January 2025

<sup>5</sup> Wales COVID-19 Inquiry Special Purpose Committee, [UK Covid-19 Inquiry Module 1 Report consultation](#), January 2025

Special Purpose Committee's assessment of whether the Module 1 report adequately reflected the specific needs and circumstances of Wales.

**6.** The Wales Special Purpose Committee published its report into Module 1 on 26 March 2025.<sup>6</sup> The report identified a number of gaps it said which should be subject to further examination. The Senedd noted the gaps identified by the Wales Special Purpose Committee and agreed by motion on 16 July 2025 to:

- a. review the most effective resilience and preparedness model for Wales;
- b. effectively learn from Local Resilience Forums (LRFs) and from those with a particular interest in decision-making power in civil contingencies in Wales on how roles and responsibilities can be better clarified and accountability improved;
- c. review the ways data access and sharing occurred in Wales both vertically and horizontally during emergencies;
- d. consider the effectiveness of the clarity, timeliness, coordination, and integration of communication of policy and guidance relating to the public messaging about the pandemic and how this can be improved in the future;
- e. review the need to better clarify the interplay of civil contingencies across borders and where responsibilities are shared, unclear or complex;
- f. review how leading resilience practices and processes can be shared across relevant organisations in Wales;
- g. review how societal inequalities in a Welsh context could be better incorporated into the preparedness and resilience processes and structures;
- h. review the benefits of a Wales-specific approach that incorporates learning from communities and resilience experts, to strengthen Wales's resilience systems and structures;

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<sup>6</sup> Wales COVID-19 Inquiry Special Purpose Committee, [Report on the gaps identified in the preparedness and response of the Welsh Government and other Welsh public bodies during the COVID-19 pandemic that should be subject to further examination: UK COVID-19 Inquiry Module 1](#), March 2025

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- i. consider the most effective way for Wales to approach the implementation of the UK COVID-19 Inquiry Module 1 report recommendations, including:
  - ii. whether there are sufficient resources to implement recommendations such as emergency and pandemic response exercises;
  - iii. how implementation of the recommendations will be effectively monitored in Wales.

## **Role of the Public Accounts and Public Administration Committee**

**7.** The Wales Special Purpose Committee was formally dissolved on 8 October 2025.<sup>7</sup> Following a request from the Business Committee<sup>8</sup>, the Public Accounts and Public Administration Committee (the Committee) agreed to undertake work that was previously referred to the Wales Special Purpose Committee.<sup>9</sup>

**8.** The Committee agreed to proceed on the basis that this work would be constrained to the issues arising from the Module 1 report of the UK COVID Inquiry, given the limited time left in this Senedd term.

**9.** The gaps identified by the Wales Special Purpose Committee (outlined in paragraph 6 above) were used as the basis for the scope of this work.

**10.** The Committee also appointed Dr Simon Williams, public health researcher and Lecturer at Swansea University Faculty of Medicine, Health and Life Sciences as its Expert Adviser.<sup>10</sup>

## **UK COVID-19 Inquiry Module 1 Report and Welsh Government response**

**11.** The recommendations of the UK COVID-19 Inquiry include creating a simplified governance structure for civil emergency planning; improving risk assessment and data-sharing; conducting regular pandemic exercises and

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<sup>7</sup> Senedd Plenary, [RoP - NDM8997 - Senedd Debate](#), 8 October 2025

<sup>8</sup> [Letter from Business Committee to Public Accounts and Public Administration Committee](#), 6 June 2025

<sup>9</sup> [Letter from Public Accounts and Public Administration Committee to Business Committee](#), 14 July 2025

<sup>10</sup> [Dr Simon Williams - LinkedIn](#)

publishing lessons learned; and using ‘red teams’ to subject planning for future civil emergencies to expert external scrutiny and challenge.

**12.** The report also called for LRFs to have clearly defined statutory roles, ensuring all Category 1 responders—including ambulance and fire services—are fully integrated into governance and decision-making. It also urged for structures to be streamlined by reducing overlapping committees and creating simpler, faster escalation routes from local to national level, so accountability and decision-making are clear and efficient.

**13.** The Welsh Government published its response to the Module 1 report in January 2025.<sup>11</sup> The response highlighted existing reforms, such as the Wales Resilience Framework and strengthened governance via the Wales Resilience Forum and Risk and Preparedness Committee. The Welsh Government agreed in principle with most recommendations, pledging to improve risk registers, data collection and local exercises, while working with the UK Government on UK-wide initiatives such as the establishment of a body to provide independent strategic advice.

**14.** The Welsh Government has since published two six-monthly updates. The first on 14 July 2025<sup>12</sup> and the second on 14 January 2026.<sup>13</sup> These outline steps taken such as annual Cabinet reviews of risks, enhanced multi-agency coordination and clearer accountability structures, though further work is needed to fully implement all recommendations.

## **The Wales Resilience Framework**

**15.** In May 2025, the Welsh Government published the Wales Resilience Framework 2025. The Framework says:

*“The purpose of this document is to set out the vision, core principles, strategic approach, priorities and outcomes for enhancing Wales’s resilience. It sets out the arrangements for effective risk management and emergency preparedness, capability building, response to and recovery from emergencies and disruptive challenge. The Framework aligns with the requirements of the Civil Contingencies Act 2004 and*

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<sup>11</sup> Welsh Government, [UK COVID-19 Inquiry module 1 \(resilience and preparedness\): Welsh Government response](#), January 2025

<sup>12</sup> Welsh Government, [Written Statement: Six-month update following the Welsh Government’s response to the COVID-19 Inquiry’s Module 1 report](#), July 2025

<sup>13</sup> Welsh Government, [Written Statement: Second six-monthly update following the Welsh Government’s response to the UK COVID-19 Inquiry’s Module 1 report](#), January 2026

*has been produced in consultation with emergency responders in Wales. It draws on good practice and lessons learned from recent emergencies and the findings of public inquiries.”<sup>14</sup>*

**16.** A delivery plan was published alongside the Framework, which sets out specific actions the Welsh Government and the emergency responder community will take to achieve its aims and outcomes.<sup>15</sup> The UK COVID-19 Inquiry Module 1 report is cited as key evidence which informed the development of the Framework and actions in its delivery plan.<sup>16</sup>

**17.** A summary of the relevant legislative background and information on the organisation of civil contingency and resilience bodies in Wales is included as Annex 3.

### **Future modules of the UK COVID-19 Inquiry**

**18.** The UK COVID-19 Inquiry is divided into ten modules in order to allow a full and focused examination of all of the different aspects of the pandemic that are covered in the Inquiry Terms of Reference.<sup>17</sup>

**19.** Since commencing work on Module 1, the UK COVID-19 inquiry has published its report on Module 2 in November 2025. This Module focused on core decision making and political governance, with Module 2B looking specifically at these issues as they relate to Wales.<sup>18</sup>

**20.** Five further reports are planned for publication in 2026 covering Modules Three to Seven. These reports will consider topics such as Healthcare Systems, Vaccines and Therapeutics, Procurement, the Care Sector and Contact Tracing. The remaining three reports covering Modules Eight to Ten on Children and Young People, Economic Response and Impact on Society will be published in the first half of 2027.<sup>19</sup>

### **Committee view**

**21.** The Committee notes the significant work undertaken by the Wales Special Purpose Committee and extends our thanks to its members and all those who

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<sup>14</sup> Welsh Government, [Wales Resilience Framework 2025](#), May 2025, paragraph 1.26.

<sup>15</sup> Welsh Government, [Wales Resilience Framework: Delivery Plan 2025](#)

<sup>16</sup> Welsh Government, [Wales Resilience Framework 2025](#), May 2025, paragraph 1.26.

<sup>17</sup> UK COVID-19 Inquiry, [Terms of Reference](#), June 2022

<sup>18</sup> UK COVID-19 Inquiry, [Module 2, 2A, 2B, 2C Report – Core decision-making and political governance](#), November 2025

<sup>19</sup> UK COVID-19 Inquiry, [Inquiry sets out 2026 schedule](#), January 2026

contributed to its evidence gathering. The Committee would also like to thank all of the individuals and organisations who took the time to provide evidence to inform this work. The insights and experiences shared were invaluable in identifying the gaps that required further examination. This evidence has provided an essential foundation for our Committee's own work on this issue.

**22.** In considering the request from the Business Committee to continue the work previously undertaken by the Wales Special Purpose Committee, we agreed that it was essential to do so, recognising the importance of this work and the need to ensure that the issues identified were subject to detailed examination by the Senedd. The Committee felt it was of the utmost importance that the Senedd has the opportunity to scrutinise the extent to which the Welsh Government has responded to the findings and recommendations of Module 1, the adequacy of the changes made to its approach to civil contingencies planning, and its preparedness for future emergencies.

**23.** The Committee also wishes to acknowledge calls from the COVID-19 Bereaved Families for Justice Cymru (CBFJC) campaign group and others for the establishment of a dedicated statutory COVID-19 Inquiry for Wales. We wish to emphasise from the outset that we are not a substitute for a Wales-specific COVID inquiry and our work can in no way match the depth and scale of a full statutory public inquiry. The decision on whether or not to commission a Welsh statutory public inquiry is ultimately one for the Welsh Government and not the Senedd. As a Committee, we endeavoured to use the limited time available to highlight areas for improvement and lay the groundwork for further scrutiny in the next Senedd.

**24.** Consideration and scrutiny of the remaining modules of the UK COVID-19 Inquiry will be a matter for the next Senedd. Given the significance of this work, and the importance of ensuring that the lessons from the pandemic are fully embedded, the Committee believes it is essential that this programme of scrutiny continues.

**25.** Similarly, the Committee acknowledges that the Welsh Government will not have time to formally respond to this report, given that we are nearing the end of the Senedd term. We therefore request that the next Welsh Government issues a formal response to this report at the earliest possible opportunity after the 2026 Senedd elections in May.

**Recommendation 1.** The Committee recommends that the next Senedd prioritises the examination of each of the remaining inquiry modules to ensure they are subject to thorough, transparent and timely scrutiny.

## 2. Governance, accountability and coordination of resilience structures

**26.** The UK COVID-19 Inquiry Module 1 considered whether the pandemic was properly planned for and whether the four nations of the UK were ready for such an eventuality. It examined the extent to which the institutions responsible for emergency preparedness and civil contingencies were fit for purpose and whether appropriate structures and procedures were in place to facilitate an effective and coordinated response.<sup>20</sup>

**27.** Despite assurances from the Welsh Government that the resilience and civil contingency system in Wales made sense to those within it, the UK COVID-19 inquiry described it as “labyrinthine.”<sup>21</sup> An overly complicated system involving too many entities with overlapping roles and responsibilities and unclear accountabilities. The inquiry concluded that Wales’s emergency preparedness and response systems were fragmented, incoherent, and hindered by unnecessary complexity.<sup>22</sup>

**28.** Similar observations were made by Audit Wales in 2012.<sup>23</sup> Yet, prior to the pandemic, “not much had been done in the meantime by the Welsh Government to simplify, streamline and rationalise the entities charged with leading and administering emergency preparedness in Wales.”<sup>24</sup>

**29.** The UK COVID-19 Inquiry recommended that the structure for whole-system civil emergency preparedness and resilience be simplified. It should be headed by a single ministerial Committee, chaired by the leader or deputy leader and supported by a cross-governmental group of senior officials. The number of subordinate bodies responsible for supporting this structure should be reduced and those retained should have a clear purpose and be subject to regular reporting requirements. Revised structures should be subject to robust

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<sup>20</sup> UK COVID-19 Inquiry, [Module 1 In Brief report](#), July 2024,

<sup>21</sup> UK COVID-19 Inquiry, [Module 1 report: The resilience and preparedness of the United Kingdom](#), July 2024, paragraph 2.61.

<sup>22</sup> UK COVID-19 Inquiry, [Module 1 report: The resilience and preparedness of the United Kingdom](#), July 2024, paragraph 2.56-2.70.

<sup>23</sup> Audit Wales, [Civil Emergencies in Wales](#), December 2012

<sup>24</sup> UK COVID-19 Inquiry, [Module 1 report: The resilience and preparedness of the United Kingdom](#), July 2024, paragraph 2.70.

independent scrutiny and stress testing to ensure they are ready and able to respond effectively to future emergencies.<sup>25</sup>

**30.** The Wales Special Purpose Committee concluded that, while the UK COVID inquiry recommendations were comprehensive and appropriate, they lacked specificity in relation to Wales. They recommended a deeper review of the effectiveness of Welsh resilience structures, including the direction and coordination of the four LRFs, Wales-specific groups and institutions (e.g. Emergency Coordination Centre Wales and the Wales Recovery Group) and strategic plans (e.g. Wales Resilience Framework, Pan-Wales Response Plan).<sup>26</sup>

### **Persistent complexity within Wales’s resilience structures**

**31.** In giving evidence to the Committee, representatives from emergency services and other Category 1 responders noted efforts on the part of the Welsh Government to streamline and simplify resilience structures, through the development of the Wales Resilience Framework, and with leadership provided by the Wales Resilience Forum.

**32.** Public Health Wales felt the new arrangements under the Wales Resilience Framework provided greater clarity of roles and responsibilities within the command and control structure, strengthened the links and interface between the various organisations responsible for emergency response and helped avoid duplication of efforts to optimise coordination.<sup>27</sup>

**33.** Despite these improvements, we heard that civil contingency and preparedness structures in Wales remain inherently complex and challenging to simplify. The Welsh Ambulance Services University Trust (WASUT) told the Committee:

*“Of course, module 1 inquiry focuses really on simplicity and the advantages of simplicity, and I think from the heart of Government I can see how Government has responded to that. For me, however, there’s an ongoing reality here, that when you come out from the*

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<sup>25</sup> UK COVID-19 Inquiry, [Module 1 report: The resilience and preparedness of the United Kingdom](#), July 2024, pages 4-5.

<sup>26</sup> Wales COVID-19 Inquiry Special Purpose Committee, [Report on the gaps identified in the preparedness and response of the Welsh Government and other Welsh public bodies during the COVID-19 pandemic that should be subject to further examination: UK COVID-19 Inquiry Module 1](#), March 2025, paragraphs 16, 52.

<sup>27</sup> Public Accounts and Public Administration Committee, [RoP](#), 12 November 2025, paragraphs 91-92

*heart of Government into Government departments, and from Government departments into Category 1 and Category 2 responders, and the structures that we would have around us that support civil contingency efforts, it remains vast. And therefore there is that need for the balance of simplicity, where that's going to add advantage, but recognising that there are local responses, there are supporting structures, there are multiple Government departments and multiple agencies. There are therefore always going to be, for me, degrees of complexity.”<sup>28</sup>*

**34.** To address the issue of complexity, and to provide clarity to the many organisations involved in emergency preparedness and response, WASUT suggested that there would be value in mapping out in detail the newly revised civil contingency structures to help clarify accountability across the system.

**35.** They suggested that such a mapping exercise (referred to in the UK COVID-19 Inquiry Module 1 report as ‘spaghetti diagrams’) would:

*“... set out with absolute clarity on who is responsible for what and when, where the decision makers are and where the advisers are... what would be key are two factors in that. The first is co-ordination, effective co-ordination amongst all of the playing groups, and secondly, communication, and how information is flowing sideways, from the bottom up and from the top down.”<sup>29</sup>*

**36.** This suggestion was supported by Mid and West Wales Fire and Rescue Service (MWWFRS), who explained:

*“I agree we’re always going to have complexities...I think the key thing... is that line of communication, vertical and horizontal. But I’d add to that it’s about making sure that, when we do look at the spaghetti diagram and we do look at what groups are meeting and supporting that information flow, we’re very clear and there’s a clarity on*

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<sup>28</sup> Public Accounts and Public Administration Committee, [RoP](#), 10 December 2025, paragraph 28

<sup>29</sup> Public Accounts and Public Administration Committee, [RoP](#), 10 December 2025, paragraphs 29-30

*accountability and responsibility, because I think if we focus on those two areas, then we can deal with the complexity within.”<sup>30</sup>*

## **Challenges for national responders**

**37.** The Committee heard that national responders find it challenging to service four separate LRFs and their associated substructures –which can involve between 50 to 60 subgroups per LRF. These challenges are particularly acute during national level emergencies where multiple LRFs are activated at the same time. This applies in both planning and during response.

**38.** WASUT described the strain on organisations with a national remit to manage their resources and effectively service multiple local resilience structures as “incredibly difficult.”<sup>31</sup> They cited examples from previous responses where coordination conflicts meant that one strategic commander was expected to attend numerous Strategic Coordinating Groups (SCGs) simultaneously.<sup>32</sup>

**39.** WASUT told the Committee it would be helpful to explore ways of coordinating LRFs so that national responders can engage with all four simultaneously. They suggested that a more simplified local resilience structure would minimise the risk of inconsistency in approach across the four LRF areas.<sup>33</sup> They also called for greater consideration of national responders when scheduling SCGs and Tactical Coordinating Groups (TCGs).<sup>34</sup>

**40.** MWWFRS shared this view and stated that more attention needed to be paid to ‘battle rhythm’ timing in the scheduling of SCGs and TCGs. They emphasised that this issue affects a number of other Category 1 and 2 responders that cover wide areas (for example, Natural Resources Wales)<sup>35</sup>.

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<sup>30</sup> Public Accounts and Public Administration Committee, [RoP](#), 10 December 2025, paragraph 35

<sup>31</sup> Welsh Ambulance Services University NHS Trust, [Written evidence to Public Accounts and Public Administration Committee](#), December 2025, paragraph 4.1.7.

<sup>32</sup> Strategic Coordinating Groups are responsible for strategic multi-agency management of an incident at a local level and for establishing a strategic framework within which lower levels of command and coordinating groups will work. An SCG can be activated by any responder organisation represented on an LRF.

<sup>33</sup> Welsh Ambulance Services University NHS Trust, [Written evidence to the Public Accounts and Public Administration Committee](#), December 2025, paragraph 3.4.1.

<sup>34</sup> Tactical Coordinating Groups are multi-agency groups of tactical commanders that meet to determine, coordinate and deliver the tactical response to an emergency.

<sup>35</sup> Public Accounts and Public Administration Committee, [RoP](#), 10 December 2025, paragraph 50

## Monitoring and independent scrutiny of progress

**41.** The Committee heard concerns from the CBFJC, who were core participants in Module 1 of the UK COVID-19 Inquiry<sup>36</sup>, that while the Welsh Government claims to have simplified and strengthened civil contingency structures, there is no clear evidence to demonstrate the effectiveness of these new structures.

*“The inquiry has asked the Welsh Government to report back six monthly...the problem is that you have the Welsh Government self-reporting on their progress. We can see or we are being told that the labyrinthine structures within emergency health planning have been simplified; we have to take their word for that. We’re also told that there are different groups. But again, what we’re not seeing is any evidence of how what they’re saying is being monitored, how it’s being stress tested. Have any of these things been worked—? Who’s monitoring that any of these changes are actually in place, and not just that they’re in place, but that they’re effective?”<sup>37</sup>*

**42.** These were part of broader concerns raised by CBFJC about the Welsh Government’s accountability. They questioned the Welsh Government’s reliance on self-reporting progress against the UK COVID-19 Inquiry Module 1 recommendations and raised concerns about the broader absence of independent scrutiny of Wales’s resilience and preparedness arrangements.

**43.** CBFJC called for independent scrutiny of implementation, which could include establishing a ‘Welsh Resilience Commissioner’ or advisory panel; a legal requirement for an annual pandemic preparedness report to be laid before the Senedd; or the introduction of public dashboards to track progress.

*“It needs independent oversight, as well as the Senedd. Establishing a Welsh resilience commissioner or advisory panel that looks at civil contingency, social care, preparedness, the implementation of the recommendations across all the public bodies. We think there should be a legal mandate to have an annual pandemic preparation report, and that should be laid before the Senedd. Why aren’t there public dashboards monitoring all of these recommendations? Because we’re only looking at Module 1 today; we have another [9] to go. So, I think*

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<sup>36</sup> UK Covid-19 Inquiry, List of Module 1 Core Participants, 12 June 2023

<sup>37</sup> Public Accounts and Public Administration Committee, ROP, 10 December 2025, paragraph 184

*the structures need to be in place now to ensure that this is for the long term.”<sup>38</sup>*

**44.** CBFJC further argued that recommendations should be quantifiable and specific. They noted that some recommendations from the UK COVID-19 Inquiry Module 1 report are too generic, and did not adequately take into account the Welsh context, making progress difficult to track. For example, they questioned what “better data” means in practice and suggested that definitions should include measurable outcomes.<sup>39</sup>

**45.** The UK Government chose not to accept recommendation 10 of the Module 1 report – which called for the establishment of “a UK-wide independent statutory body for whole-system civil emergency preparedness and resilience”, opting instead to rely on independent advice on their preparedness from existing institutions like the National Audit Office, House of Commons Public Accounts Committee and National Security Risk Assessment expert panels.<sup>40</sup> They have also instructed the UK Resilience Academy to convene expert panels, chaired by a figure from outside government, that will scrutinise plans and preparedness for whole-system civil emergencies across the UK.<sup>41</sup>

**46.** The decision by the UK Government not to accept recommendation 10 of the Module 1 report was supported by the Welsh Government, who agreed that they “do not believe an independent statutory body is the most appropriate and effective response as it would divert vital resources from our capabilities to prepare and respond to crises”. Instead, scrutiny of resilience structures in Wales will be provided by UK-level mechanisms.<sup>42</sup>

**47.** The Committee received evidence from our independent expert adviser about alternative models for providing independent scrutiny of resilience and preparedness arrangements used in other jurisdictions. For example, countries like Australia, Canada and the United States (US) publish independent audits of emergency management and preparedness.<sup>43</sup> It is also worth noting that in other jurisdictions such external audits are not confined to the national level. The

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<sup>38</sup> Public Accounts and Public Administration Committee, [RoP](#), 10 December 2025, paragraph 191

<sup>39</sup> Public Accounts and Public Administration Committee, [RoP](#), 10 December 2025, paragraph 182

<sup>40</sup> The National Security Risk Assessment is “the UK Government’s single, authoritative articulation of the most serious acute risks facing the UK and its interests overseas.”

<sup>41</sup> UK Government, [UK COVID-19 Inquiry Response - Module 1 Implementation Update](#), July 2025, paragraphs 25-26

<sup>42</sup> Welsh Government, [Written Statement: Six-month update following the Welsh Government’s response to the COVID-19 Inquiry’s Module 1 report](#), July 2025

<sup>43</sup> Australian National Audit Office, [Auditor-General Report No. 5 2024-25: Performance Audit, Australian Government Crisis Management Framework](#), October 2024

Australian State of Victoria is exemplary in this regard, with its Inspector-General for Emergency Management having conducted eight progress reviews to monitor, review and assess emergency management planning at a system level since their Emergency Management Act in 2013.<sup>44</sup>

**48.** There is also precedent for external audits of this kind here in Wales. Audit Wales previously conducted an audit on Civil Emergencies in Wales in 2012, with the objective of examining “whether the Civil Contingencies Act 2004 has led to effective arrangements for emergency planning and resilience of communities that provide sufficient protection to the public in Wales.”<sup>45</sup>

**49.** The advice the Committee received from our independent expert adviser outlines that in order to evaluate the effectiveness of emergency response arrangements, international best practice calls for clear performance indicators to be defined which can be measured over time and across different contexts, for example during different types of emergencies.

**50.** We heard examples from other countries that already utilise these types of indicators. For example, Canada’s Emergency Preparedness and Response Programme includes quantitative performance indicators which are subject to an annual evaluation.<sup>46</sup> This evaluation uses numerical results to track progress and improvement over time. These include preparedness and response capability measures such as:

- Percentage of emergency exercise objectives met (exercise effectiveness).
- Percentage of risk and capability assessments completed for priority risks.
- Percentage of applicable recommendations implemented, related to activations, that are identified through post-incident debriefing.
- Percentage of local requests for assistance responded to within agreed timeframes.
- Percentage of plans and guidelines updated within review timelines.

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<sup>44</sup> Victoria Inspector-General for Emergency Management [Victorian Emergency Management Strategic Action Plan 2023-26 – Progress Report 2024](#), January 2026

<sup>45</sup> Audit Wales, [Civil Emergencies in Wales](#), December 2012

<sup>46</sup> Government of Canada, [Evaluation of the Emergency Preparedness and Response Program \(2019-2020 to 2023-2024\)](#), Public Health Agency of Canada, June 2025

- Canada’s preparedness score, as assessed against the World Health Organisation (WHO) International Health Regulation (IHR) Monitoring and Evaluation Framework / State Parties Self-Assessment Annual Reporting Tool (SPAR).<sup>47</sup>

**51.** In the US, there are National Preparedness Reports which provide an assessment of the national preparedness for threats and hazards. These reports are published annually by the US Federal Emergency Management Agency (FEMA).

**52.** The assessment looks at ‘core capability targets’ and measures the extent to which they are achieved. Core capability targets are grouped according to five areas of preparedness (or ‘missions’): Prevention, Protection, Mitigation, Response, and Recover. Preparedness is assessed using the Threat and Hazard Identification and Risk Assessment (THIRA) and the Stakeholder Preparedness Review (SPR), which set preparedness goals, targets and the criteria for assessing them. For example, it includes the following performance indicators and data sources:

- National Household Survey data to assess public preparedness actions and awareness, e.g., percent of households with emergency plans, disaster kits, or financial preparedness measures.
- Tracking grant funding, the report assesses whether target grants were met across core capability areas (e.g. how much was invested in each area of preparedness at the community level and what percentage of the target investment was met).
- Using community submissions to THIRA/SPR, to measure gaps and needs in community responders’ emergency preparedness, including, training gaps, supply chain and medical technology gaps, etc.<sup>48</sup>

## **The Welsh Government’s response**

**53.** The Welsh Government says it has “significantly strengthened how emergency services and government agencies co-ordinate in preparing for and

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<sup>47</sup> States Parties report to the WHO on the implementation of the IHR. States Parties use a self-assessment tool for their annual reporting called the IHR SPAR. The SPAR tool consists of 35 indicators for the 15 IHR capacities needed to detect, assess, notify, report and respond to public health risks and acute events of domestic and international concern. Wales

<sup>48</sup> United States Federal Emergency Management Agency, [National Preparedness Report](#), December 2024

responding to major incidents since the pandemic.”<sup>49</sup>. They point to improved governance arrangements, as set out in the Wales Resilience Framework 2025, which include the establishment of the Risk and Preparedness Committee and the reconstitution of the Wales Resilience Forum, chaired by the First Minister, and supported by a strengthened Wales Resilience Partnership.<sup>50</sup>

**54.** These revised resilience governance arrangements are “designed to transition from risk management to crisis response when needed, through strengthened and more agile response activation procedures, which have been stress-tested and refined through more than 50 real-world incident responses in 2024 and 2025 and in exercises.”<sup>51</sup>.

**55.** The First Minister acknowledged that, while civil contingency structures are inherently complex, these reforms address concerns raised by the UK COVID-19 Inquiry and the Wales Special Purpose Committee about the complexity and fragmentation of previous structures. The First Minister emphasised the principle of a “Once for Wales” approach as the foundation for reducing duplication and noted that the revised structures have been subject to numerous rounds of stress-testing and refinement through real world incident responses and exercises.

**56.** The Welsh Government’s written evidence to the Committee stated that these revised structures have “produced tangible gains” and “ultimately led to better responses to real emergencies and disruptive challenges than seen previously”. These claims are based on “feedback from the responder community.”<sup>52</sup>.

**57.** When asked about whether there is sufficient publicly available evidence to substantiate these claims, the First Minister re-iterated her view that the ultimate test of whether the revised structures are working is the effectiveness of the response is to real world incidents.

*“The assessment of our crisis management structures is demonstrated by, more than anything, how we respond now to incidents and what support we give to those multi-agency responses.*”

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<sup>49</sup> Welsh Government, [Written evidence to the Public Accounts and Public Administration Committee](#), January 2026, paragraph 3

<sup>50</sup> Welsh Government, [Written evidence to the Public Accounts and Public Administration Committee](#), January 2026, paragraphs 4-5

<sup>51</sup> Welsh Government, [Written evidence to the Public Accounts and Public Administration Committee](#), January 2026, paragraphs 4

<sup>52</sup> Welsh Government, [Written evidence to the Public Accounts and Public Administration Committee](#), January 2026, paragraph 3.

*It can be proved in real time. The fact that we have seen that in action 31 times this year—you'll be aware of some of it, but the fact that—, That's quite a high number, and the fact that you probably haven't clocked that many, I hope demonstrates that actually the system is working reasonably well.”<sup>53</sup>*

**58.** Responding to questions about the performance indicators the Welsh Government are using to assess the effectiveness of Wales's revised civil contingencies structures, the First Minister emphasised that this is demonstrated through real-time responses to incidents, noting that crisis management arrangements were activated 31 times in 2025. The fact that most of these events passed without significant public awareness was presented as evidence that the system is agile and effective.

**59.** The Welsh Government also highlighted commitments in the Wales Resilience Framework's Delivery Plan which aim to build public confidence in the actions the Welsh Government is taking to keep citizens safe.<sup>54</sup> This includes an annual statement to the Senedd, the first of which was provided in May 2025.<sup>55</sup>

**60.** Addressing criticism that Wales's revised civil contingency arrangements have not been subject to sufficient independent scrutiny, the First Minister highlighted that the UK Government and devolved governments have each rejected the recommendation for a statutory independent scrutiny body. The First Minister explained that this decision was taken on the basis that it would divert resources away from their capacity to prepare for and respond to real world incidents, but stressed that the Welsh Government recognises a need for external oversight and “absolutely value(s) external scrutiny”. The First Minister highlighted the Wales Risk Register, which has been subject to external review by the UK Resilience Academy. The First Minister also noted existing accountability measures, including the annual statement on civil contingencies, annual Cabinet meetings and a commitment to publish a comprehensive ‘State of Resilience’ report every four years.<sup>56</sup>

**61.** Reflecting on the challenges faced by national responders when participating in multiple local resilience structures, the First Minister noted that Category 1 responders have a statutory duty to collaborate under the Civil Contingencies Act 2004 and generally do so effectively, though achieving this at a

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<sup>53</sup> Public Accounts and Public Administration Committee, [RoP](#), 15 January 2026, paragraph 81

<sup>54</sup> Public Accounts and Public Administration Committee, [RoP](#), 15 January 2026, paragraph 86

<sup>55</sup> Senedd Plenary, [RoP](#), 13 May 2025, paragraphs 257-268

<sup>56</sup> Public Accounts and Public Administration Committee, [RoP](#), 15 January 2026, paragraphs 89-90

local level can be more challenging. The Welsh Government also says it has “strengthened multi-agency coordination through the Wales Resilience Partnership and enhanced support for LRFs”, including dedicated funding from 2024-25 of £30k per LRF and £50k per LRF from 2025/6.<sup>57</sup> A new work programme has also been provided to LRFs aimed at optimising efficiency.<sup>58</sup>

**62.** The First Minister stressed that SCG and TCG meetings remain a matter for responders themselves, who require autonomy to activate arrangements as needed. The Welsh Government advises that meetings should be choreographed to avoid clashes but accepted that further clarity and improvements are needed, particularly for large-scale emergencies and committed to refining this approach over time.<sup>59</sup>

### **Committee view**

**63.** The Committee believes that it is vitally important that the people of Wales have confidence that the lessons of the pandemic have been learned and that the Welsh Government and its delivery partners are better prepared to respond to the full range of potential emergencies and serious incidents that we will inevitably face in the future.

**64.** The Committee acknowledges that civil contingencies and emergency response structures are inherently complex, involving a broad range of decision makers, national and local public authorities, emergency services, and voluntary organisations. We support the efforts of the Welsh Government to simplify these structures in response to the UK COVID-19 Inquiry module 1 recommendations.

**65.** The re-constitution of the Wales Resilience Forum, and the creation of the Wales Resilience Partnership is a strong step in the right direction towards clarifying and streamlining resilience processes and rationalising the number of stakeholders involved.

**66.** While it is clear that there has been considerable revision to the resilience architecture in Wales, as captured in the Welsh Resilience Framework, the evidence from those involved in emergency preparedness and response clearly

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<sup>57</sup> Welsh Government, [Written evidence to the Public Accounts and Public Administration Committee](#), January 2026, paragraph 18

<sup>58</sup> Public Accounts and Public Administration Committee, [RoP](#), 15 January 2026, paragraphs 44-5

<sup>59</sup> Public Accounts and Public Administration Committee, [RoP](#), 15 January 2026, paragraphs 50-1, 54

shows that more could be done to reduce the complexity of these structures and provide clarity to enable them to respond as effectively and efficiently as possible.

**67.** The Committee supports the recommendations made by several Category 1 responders that gave evidence to our inquiry that a detailed mapping exercise of Wales's civil contingencies structures, similar to that carried out by the UK COVID-19 Inquiry, should be undertaken. This document should set out, in straightforward terms, how the revised structures are intended to work in practice. Such an exercise would illustrate whether recent reforms have simplified the system and provide clear, accessible information on lines of accountability, roles and responsibilities, decision-making hierarchies, and information flows that exist under the new arrangements.

**68.** The Committee also believes more could be done to support national level responders and those who remit covers multiple LRF structures. The evidence we heard from representatives of these organisations suggests that the demands on them, for example servicing the needs of numerous LRFs and subgroups as well as the scheduling of SCG and TCG meetings, are onerous and inefficiently coordinated. It is vital that those sitting on LRFs, SCGs and TCGs share a clear understanding of protocols on meetings, including frequency, particularly at times of simultaneous activation.

**69.** The need for better coordination and to avoid duplication is captured in the Wales Resilience Framework under the Once for Wales principle but the Committee believe that more detail and specific guidance is needed to realise the intent behind this principle in practice. The Committee also believes that there is a need for clearer guidance to help responder organisations understand the criteria that determines when incidents should be managed at a local level and when they require a more coordinated, national response. This guidance should clarify the thresholds at which escalation protocols are activated, ensuring responders have a clear understanding of the circumstances that necessitate enhanced emergency response arrangements and the routes for doing so.

**Recommendation 2.** The Committee recommends that the Welsh Government undertakes a standalone mapping exercise of Wales's civil contingencies structures to provide clear, accessible information on roles and responsibilities, decision making hierarchies, lines of accountability and communication flows. This should be accompanied by simple, coherent guidance explaining how these structures should work before, during and after an emergency situation.

**Recommendation 3.** Committee recommends that the Welsh Government develops national guidance on the scheduling and coordination of Strategic and Tactical Coordinating Group meetings to ensure a clear shared understanding of protocols on meetings and to support responders operating across multiple Local Resilience Forums. This guidance should also provide detail on the criteria that determines when incidents require escalation from local to national response structures and the routes for doing so.

**Recommendation 4.** The Committee recommends that the Welsh Government puts in place tangible, practical arrangements to ensure that national responders can work with all four Local Resilience Forums in a more joined-up way without unnecessary duplication.

**Recommendation 5.** Behind all emergency preparedness and resilience systems are the dedicated staff within responder organisations who work tirelessly to keep people safe and to minimise the impact of emergencies, often placing themselves in harm's way in the course of protecting others. The Committee wishes to place on record our sincere thanks to the emergency responders and volunteers from across Wales for their service and commitment to safeguarding our communities.

**70.** The Committee also recognises that this dedicated workforce represents the human foundation of Wales's resilience system. Without the skills, judgement and commitment of those working within responder organisations, Wales would not be able to withstand or effectively cope with future emergencies. It is therefore essential that the workforce and the institutions that support them are themselves resilient.

**71.** Strengthening the resilience of this vital workforce is fundamental to strengthening the resilience of Wales as a whole. We therefore believe there is a need for an emergency preparedness workforce strategy to support recruitment and retention across key response roles and ensure operational capacity is able to be maintained during prolonged or concurrent incidents. This strategy should also ensure that Wales has sufficient staffing levels with the right mix of specialist skills and experience and that succession plans are in place for key leadership roles.

**72.** Emergency responders work in an incredibly stressful and high pressure environment, which underscores the importance of measures to support their wellbeing, prevent burnout and ensure that staff can sustain effective performance during periods of heightened demand.

**Recommendation 6.** The Committee recommends that the Welsh Government publishes, by December 2026, an emergency preparedness workforce strategy setting out how it will ensure Wales’s revised civil contingency structures are underpinned by a sustainable and resilient workforce, with the capacity, skills and long-term stability needed to respond effectively to future emergencies.

**73.** The Committee notes that organisations tasked with leading emergency planning and response efforts have undertaken significant work since the pandemic to enhance their collective understanding and management of risks and to rationalise response procedures. We were pleased to hear generally positive feedback from these organisations about the improvements made.

**74.** However, we believe there is some way to go to instil full confidence that Wales’s emergency response structures are as agile and effective as possible. The Committee notes that current arrangements for assessing the effectiveness of Wales’s civil contingency systems seem largely qualitative, relying on reporting lessons learned with a view to adapting the response to future emergencies.

**75.** While we believe there is value in this approach, the Committee agrees that there is an over-reliance on self-reporting to assess whether the revised structures are delivering measurable improvements to the way we respond to emergencies. Subjective evidence such as “feedback from the responder community”<sup>60</sup> or the fact that incidents passed without significant public awareness was cited as proof of that the revised arrangements had led to better responses to real world incidents.<sup>61</sup>

**76.** Asking the public to trust that Wales’s emergency preparedness and response arrangements are as effective as possible simply because there has been an absence of noticeable disruption is not sufficient. We believe that robust, verifiable evidence should be made available in the public domain to substantiate these claims. This would provide the people of Wales with assurance that our emergency response systems are continually improving, learning from experience and working as well as they could be.

**77.** We also believe there is a need for a set of measurable performance indicators, similar to those utilised in other jurisdictions, to assess the effectiveness of Wales’s civil contingencies system. A more robust system for evaluating the effectiveness of Wales’s revised civil contingency structures based on pre-defined

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<sup>60</sup> Welsh Government, [Written evidence to the Public Accounts and Public Administration Committee](#), January 2026, paragraph 3.

<sup>61</sup> Public Accounts and Public Administration Committee, [RoP](#), 15 January 2026, paragraph 81

performance indicators and aligned with international best practice would provide the public with a clear, measurable set of criteria with which to evaluate Wales's preparedness for future emergencies and the effectiveness of our response mechanisms, as well as monitoring improvements over time.

**Recommendation 7.** The Committee recommends that the Welsh Government publishes a set of quantitative performance indicators to assess the effectiveness of Wales's civil contingencies systems, including preparedness levels, response times, exercise participation and implementation of lessons learned. Reporting against these indicators should take place annually.

**78.** The Committee was pleased that the Welsh Government recognises the need for continued scrutiny and improvement, and welcomed our Committee's role in assessing the effectiveness of the changes it has made to civil contingency structures.<sup>62</sup> We welcome the fact that Wales's national civil contingencies risk register has been independently scrutinised by an expert third party – the UK Resilience Academy. However, we are concerned that the risk register appears to be the only major element of the revised structures that has been subject to such independent external scrutiny.

**79.** The Committee recognises that there is value in drawing on expertise from across the UK, especially as many emergencies, such as pandemics, are cross-border in nature. It is therefore sensible to make use of established mechanisms for independent scrutiny, such as the expert panels that are currently being set up by the UK Government, to assess UK wide preparedness where appropriate.

**80.** However, as the Wales Resilience Framework's delivery plan emphasises, it is the primary responsibility of the Welsh Government to keep the citizens of Wales safe.<sup>63</sup> There will inevitably be future emergencies that arise within Wales's borders which fall primarily on the Welsh Government to manage. Equally, as the response to the COVID-19 pandemic demonstrated, devolved governments across the UK have the powers to adopt different positions with regard to emergency preparedness and response which can make a material difference to the outcomes for their populations.

**81.** The Committee therefore believes that Wales's own civil contingencies arrangements should be subject to independent scrutiny and that Welsh

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<sup>62</sup> Welsh Government, [Written evidence to the Public Accounts and Public Administration Committee](#), January 2026, paragraph 9.

<sup>63</sup> Welsh Government, [Wales Resilience Framework: Delivery Plan 2025](#), page 3

preparedness must not be completely reliant on UK-led structures for scrutiny and oversight.

**82.** The Committee acknowledges that the UK and devolved governments have chosen to reject the UK COVID-19 inquiry's recommendation to create a statutory body responsible for providing independent oversight of whole-system civil emergency preparedness and resilience on the basis that it would divert resources away from their capacity to prepare for and respond to real world incidents.

**83.** The Committee notes the importance of value for money in deciding whether to establish a new statutory body. However, we also recognise the importance of independent external audits in contributing to improved performance which may lead to savings and cost benefits.

**84.** We believe that there is real value in drawing on external expertise to test assumptions, ask difficult questions, challenge biases and mitigate against "groupthink". This aligns with the UK COVID-19 Inquiry recommendation that the Welsh Government should utilise "red teams" from outside government and the civil service to scrutinise and challenge the principles, evidence, policies and advice relating to preparedness for and resilience to whole-system civil emergencies. This external scrutiny should apply to the entirety of our resilience and civil contingency systems and not just to discrete parts.

**85.** The Welsh Government's response to the UK COVID-19 Inquiry Module 1 report and subsequent six-monthly updates refer to efforts "to ensure there are sustainable red teaming capabilities within the Welsh Government and within the response community" and the "establishment of independent assessment and auditing processes for our activities."<sup>64</sup>

**86.** While these are to be welcomed in principle, the Committee regrets that there is little available information in the public domain to demonstrate if and how these activities are driving improvement and whether material changes have been made as a result of the feedback received.

**87.** In keeping with the principle of transparency, the Committee believes that the Welsh Government should provide publicly accessible evidence demonstrating how external scrutiny and advice is being acted upon in order to improve Wales's resilience.

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<sup>64</sup> Welsh Government, [Written Statement: Second six-monthly update following the Welsh Government's response to the UK COVID-19 Inquiry's Module 1 report](#), January 2026

**88.** Similarly, while the Committee acknowledges the need to balance national security considerations with transparency, we believe that the Welsh Government should publish a public-facing version of the Wales national risk register, as the UK Government has done.<sup>65</sup>

**Recommendation 8.** The Committee recommends that the Welsh Government establishes an appropriate mechanism for conducting regular, independent reviews of Wales’s civil contingency arrangements. This mechanism should deliver rigorous, independent scrutiny while remaining proportionate, sustainable and cost-effective. In determining the most suitable approach, the Welsh Government should consider utilising existing institutions for this purpose.

**Recommendation 9.** The Committee recommends that the Welsh Government introduces public dashboards to monitor its progress in addressing the UK COVID-19 Inquiry’s recommendations and any subsequent recommendations made by independent external audits, to enhance transparency with regard to decision-making and to enable effective scrutiny.

**Recommendation 10.** The Committee recommends that the Welsh Government publishes a public-facing version of the Wales National Risk Register to provide up to date assessments of the likelihood and potential impact of the range of risks that may directly affect Wales and the public at large.

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<sup>65</sup> UK Government, [National Risk Register 2025](#), January 2025

### 3. Exercise Pegasus

**89.** Module 1 of the UK COVID-19 Inquiry found that Wales failed to implement important and necessary preparations for a pandemic that were identified during previous preparedness exercises.

*“Despite the significant number of exercises held and reports produced on pandemic preparedness by the UK government, devolved administrations and public health agencies, the lessons that were learned from them were not sufficiently shared and debated. In many cases, learning and recommendations, while nominally recorded in documentation, were simply not acted upon or were forgotten.”<sup>66</sup>*

**90.** The Module 1 report notes that exercises undertaken prior to the pandemic highlighted a number of actions that could have been taken to prepare for such an eventuality, including the establishment of a testing and contact tracing system, practicable systems of isolation, surge capacity, personal protective equipment stockpiling and measures to protect vulnerable people.

**91.** Despite this, the inquiry found that the approach to exercises had become overly bureaucratic, with too much focus placed on conducting exercises and producing reports rather than acting on the findings and learning lessons to improve future responses. This meant these exercises did little to improve preparedness. It concluded that the whole system of pandemic preparedness and resilience should also have been subject to more rigorous, more regular and collective stress-testing. It recommended that the UK and devolved governments should together hold a UK-wide pandemic response exercise at least every three years.

**92.** Exercise Pegasus is a tier one pandemic preparedness exercise that was carried out during the autumn of 2025. The exercise, led by the Department of Health and Social Care in partnership with the UK Health Security Agency, simulated a novel enterovirus outbreak, but aims to be applicable across a range of diseases and modes of transmission. Live exercises were conducted on 18

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<sup>66</sup> UK COVID-19 Inquiry, [Module 1 report: The resilience and preparedness of the United Kingdom](#), July 2024, paragraph 5.58

September, 9 October and 30 October 2025. A fourth phase focused on recovery is planned for 2026.<sup>67</sup>

**93.** Pegasus aims to stress-test the UK’s ability to respond to a fast-moving pandemic, focusing on decision-making, coordination and resilience. It involves NHS England, the devolved governments, UK government departments and all 38 LRFs, along with businesses, academics and external stakeholders.

### **Scope of the exercise**

**94.** The Committee heard differing views on the scope of Exercise Pegasus. Public Health Wales described it as a “game changer,” noting its focus on wider public health and social measures and cross-government policy considerations, which marked a departure from previous exercises.<sup>68</sup>

**95.** Other stakeholders highlighted a blind spot around compound risks (where two or more risks occur concurrently), such as a communicable disease outbreak coinciding with severe flooding or prolonged utility failure. South Wales Fire and Rescue Service (SWFRS) emphasised the need to prepare for such eventualities and felt that exercises like Pegasus tend to focus narrowly on pandemics and do not account for concurrent emergencies.<sup>69</sup>

**96.** CBFJC were highly critical of Exercise Pegasus for being overly health-focused and for not adequately considering trade-offs between measures such as lockdowns and school closures.<sup>70</sup> They also questioned whether Exercise Pegasus achieved its intended four-nations approach, suggesting that the Welsh Government were participants rather than having an organising role.

**97.** The Committee also heard criticism concerning the lack of stakeholder involvement, particularly from social care and the funeral and bereavement sectors.<sup>71</sup> Further concerns included a lack of clarity around the exercise’s terms of reference and success criteria.<sup>72</sup>

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<sup>67</sup> NHS England, [Pandemic preparedness & Exercise Pegasus](#), July 2025

<sup>68</sup> Public Accounts and Public Administration Committee, [RoP](#), 12 November 2025, paragraphs 53-54

<sup>69</sup> Public Accounts and Public Administration Committee, [RoP](#), 10 December 2025, paragraph 103

<sup>70</sup> Public Accounts and Public Administration Committee, [RoP](#), 10 December 2025, paragraph 209

<sup>71</sup> Public Accounts and Public Administration Committee, [RoP](#), 10 December 2025, paragraph 238

<sup>72</sup> Public Accounts and Public Administration Committee, [RoP](#), 10 December 2025, paragraph 210

**98.** WASUT acknowledged that Exercise Pegasus had a strong health focus but stated that this did not stop SCGs considering a broader range of issues, including animal health, education, social movement and lockdowns.<sup>73</sup>

### **Capturing the lessons from multi-agency exercises**

**99.** The emergency response organisations that provided evidence to our Committee were unanimous about the importance of preparedness exercises. WASUT highlighted the value of Exercise Pegasus in preserving institutional knowledge from the pandemic, warning that lived experience will diminish over time as staff leave the workforce. They stressed the importance of bringing people together to recall strategies and lessons learned.<sup>74</sup> MWWFRS told the Committee that much more needs to be done in testing and exercising, stressing that plans are only effective once tested and lessons embedded into future practice.<sup>75</sup>

**100.** Despite their importance, concerns were expressed that participation in exercises imposes significant resource pressures, which can adversely affect the delivery of frontline services. WASUT warned that the number of potential emergency scenarios that would need to be exercised in order to adequately prepare would come at a considerable cost and strain on resources. They highlighted that the Wales Risk Register lists over 100 risks, creating a real possibility of investing resources in planning for events that may never occur.<sup>76</sup>

**101.** Several stakeholders noted the absence of a robust mechanism for sharing lessons across agencies in Wales and suggested creating a central repository for multi-agency learning and monitoring progress against recommendations.<sup>77</sup> MWWFRS stated that a central repository would enable Category 1 and 2 responders to access lessons learned and improve structured multi-agency debriefs.<sup>78</sup>

**102.** WASUT also identified inconsistencies in how LRFs engaged with Exercise Pegasus and called for greater clarity and a unified approach to future exercises.<sup>79</sup> They noted that the UK COVID-19 Inquiry Module 1 report recommended exploring the creation of an independent national body to provide oversight, coordination and potentially set standards for emergency preparedness, resilience

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<sup>73</sup> Public Accounts and Public Administration Committee, [RoP](#), 10 December 2025, paragraph 110

<sup>74</sup> Public Accounts and Public Administration Committee, [RoP](#), 10 December 2025, paragraph 71

<sup>75</sup> Public Accounts and Public Administration Committee, [RoP](#), 10 December 2025, paragraph 21

<sup>76</sup> Public Accounts and Public Administration Committee, [RoP](#), 10 December 2025, paragraph 118

<sup>77</sup> Public Accounts and Public Administration Committee, [RoP](#), 10 December 2025, paragraph 94

<sup>78</sup> Public Accounts and Public Administration Committee, [RoP](#), 10 December 2025, paragraph 99

<sup>79</sup> Public Accounts and Public Administration Committee, [RoP](#), 10 December 2025, paragraph 72

and response. It was suggested that exercises which test adherence to such standards would make preparedness more consistent and measurable.

*“The module 1 recommendation [10] included the suggestion of a national body... I think that there could be something worth exploring...because when we come to things like standards—standards of emergency preparedness, resilience and response, both planning and response—holding exercises to test adherence to standards, I think, actually gives something that could become much more measurable. And, of course, sadly we know that what gets measured gets done. So, I think that there might be an opportunity there with some form of national body, which was, I think, the final recommendation from the inquiry.”<sup>80</sup>*

**103.** Others, like MWWFRS, highlighted the Scottish Multi-Agency Resilience Training and Exercise Unit (SMARTEU) as an exemplar model, noting its role in coordinating national exercises and ensuring recommendations from debriefs are implemented and lessons learned. They also suggested that such a unit could help alleviate the capacity and resourcing challenges faced by organisations participating in exercises.

*“In terms of the testing and exercising regime currently, I think that there is a strain on partnership organisations being able to free up capacities to be able to attend them, and I think there are lessons that we could learn from our Scottish colleagues in relation to their set-up. So, the SMARTEU is, for me, is an exemplar of what can be achieved when you’ve got a specific group specifically looking at national testing and exercising, and the dissemination of the learning from that into other partner agencies.”<sup>81</sup>*

**104.** MWWFRS suggested that having a dedicated resilience training and exercise unit would enable “much more of a focus on those national exercises here in Wales” and help to identify and measure the most important elements which should be tested during those exercises. They noted that exercises which simulate responses to certain risks are “very difficult to test as a singular or dual emergency

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<sup>80</sup> Public Accounts and Public Administration Committee, [RoP](#), 10 December 2025, paragraph 105

<sup>81</sup> Public Accounts and Public Administration Committee, [RoP](#), 10 December 2025, paragraph 22

service” and explained that “you need that help from that national body” to run them effectively.<sup>82</sup>

## **Inconsistent involvement of the voluntary sector**

**105.** The Wales Council for Voluntary Action (WCVA) told the Committee that, while they felt their participation in Exercise Pegasus was worthwhile, issues with data sharing between the public and voluntary sectors which meant they weren’t able to play a full role. They described feeling like “armchair passengers” rather than full participants, with limited access to information and no formal role in planning or decision-making.<sup>83</sup>

**106.** Other organisations, such as Powys Association of Voluntary Organisations, were more positive about the sector’s involvement in the exercise, but felt there is sometimes a disparity of esteem between the voluntary and public sectors in relation to emergency planning and response.

*“The big thing for me is around that mutual respect for the voluntary sector. Sometimes, the wording ‘third sector’ is seen as third rate, and actually, the voluntary sector, volunteers and community have a massive role to play. So, it’s about a respect issue in some quarters, I think.”<sup>84</sup>*

**107.** Public Health Wales did not appear aware of voluntary organisations having a formal role in Exercise Pegasus.<sup>85</sup>

## **The Welsh Government’s response**

**108.** The Welsh Government says it played a “full role” in exercise Pegasus, which it said provided a valuable opportunity to stress-test their revised governance and response structures, including the transition from planning to operational response, ability to surge health and care systems and capabilities, the integration of data systems, and the coordination of partners. The Wales Coordination Group was established to oversee the planning and participation of Wales in the exercise.<sup>86</sup>

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<sup>82</sup> Public Accounts and Public Administration Committee, [RoP](#), 10 December 2025, paragraph 114

<sup>83</sup> Public Accounts and Public Administration Committee, [RoP](#), 27 November 2025, paragraph 68

<sup>84</sup> Public Accounts and Public Administration Committee, [RoP](#), 27 November 2025, paragraph 77

<sup>85</sup> Public Accounts and Public Administration Committee, [RoP](#), 27 November 2025, paragraph 73

<sup>86</sup> Welsh Government, [Press release: Wales to take part in largest ever UK-wide pandemic response exercise](#), January 2025

**109.** The First Minister stated that Wales was represented on both the blue (the participating team responsible for responding to the scenario) and red teams (the team responsible for designing the exercise). The Welsh Government said they helped to shape the objectives of the exercise and used the exercise to test plans developed since the pandemic.

*“Early in 2025, we established the Exercise Pegasus co-ordination group...that brought together all the major departments across Welsh Government and the local responder community so that they could start preparing for the exercise and that we could feed into that.*

*Alongside that, there were two specific lead-in exercises, Exercise SOLARIS and Exercise ALKARAB...There was the opportunity through these two exercises and the co-ordination group to take on board points around how this scenario would be developed. That was taken on board by the red team. It also informed the formulation of specific objectives that we wanted to test in Exercise Pegasus.*

*So, there was an agreed set of objectives that the First Minister and Cabinet endorsed so that we could road test and stress test the plans that we had developed since the pandemic. And to that end, it was a really useful and valuable exercise that is generating significant learning.”<sup>87</sup>*

**110.** Officials also noted that the experience of participating in Pegasus promoted cross border interaction, cooperation and inter-ministerial engagement with other UK nations.<sup>88</sup>

**111.** The First Minister stressed that compound risks are routinely tested as part of business-as-usual work, even if not a focus of Pegasus. The First Minister also rejected suggestions that social care was absent, stating that it was a key element of the exercise.<sup>89</sup>

**112.** The First Minister confirmed the Welsh Government has commissioned work on a central repository for lessons learned, directly responding to feedback from

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<sup>87</sup> Public Accounts and Public Administration Committee, [RoP](#), 15 January 2026, paragraphs 105-107

<sup>88</sup> Public Accounts and Public Administration Committee, [RoP](#), 15 January 2026, paragraphs 110

<sup>89</sup> Public Accounts and Public Administration Committee, [RoP](#), 15 January 2026, paragraphs 116, 118

Category 1 responders and learning from Pegasus.<sup>90</sup> The First Minister also stressed that transparency on exercise outcomes is a priority and committed to reporting once the process concludes. The Welsh Government is also working with the Scottish Government to share best practice in this area.<sup>91</sup>

## **Committee view**

**113.** Perhaps the most pointed criticism of the UK’s approach to preparedness exercises from the UK COVID-19 Inquiry was that they were “bureaucratic and ineffective”, with the primary focus being on conducting the exercise and producing a report, rather than on learning the lessons and implementing their recommendations.<sup>92</sup>

**114.** This focus on process rather than outcome is a perennial risk and one that Wales cannot afford to repeat. The Committee was not able to come to a view on whether Exercise Pegasus represents a meaningful departure from this trend, given that the exercise is still ongoing and the Welsh Government is yet to report on the lessons learned and the improvements made as a result. We strongly support the UK COVID-19 Inquiry’s recommendation that an action plan setting out the specific steps that will be taken in response to the exercise’s findings be published within 6 months of its conclusion.

**115.** The Welsh Government confirmed that they have commissioned a lessons-management system to capture lessons from exercises, incidents, and inquiries, as a direct action off the back of learning from Pegasus. This is to be welcomed and reflects the evidence we heard from responder organisations of a need for such a resource.

**116.** We were pleased to hear positive feedback from the responder organisations that participated in Exercise Pegasus. It is clear that regular exercises, focused on learning and improvement, are vital to ensure our systems are working effectively and that we are prepared to respond to a variety of potential scenarios. However, we remain concerned about the resourcing implications associated with exercise participation and we are mindful of the need to balance maintaining frontline services with preparing for the future.

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<sup>90</sup> Public Accounts and Public Administration Committee, [RoP](#), 15 January 2026, paragraphs 125, 138

<sup>91</sup> Public Accounts and Public Administration Committee, [RoP](#), 15 January 2026, paragraph 127

<sup>92</sup> UK COVID-19 Inquiry, [Module 1 report: The resilience and preparedness of the United Kingdom](#), July 2024, paragraph 5.59

**117.** When asked whether the Welsh Government would consider establishing a national multi-agency training and exercise unit, similar to Scotland's SMARTEU, the First Minister pointed to the decision to commission a lessons-management system as evidence this need had already been addressed.

**118.** The Committee believes that the scope and remit of such a national multi-agency training and exercising unit would go beyond providing a mechanism for retaining and sharing learning. Crucially, it would also play a role in the coordination of exercises and help to mitigate resourcing challenges faced by participating organisations. Evidence from stakeholders suggests a unit of this kind could help reduce the operational burden on emergency services by providing shared planning and delivery capacity, ensuring exercises do not disproportionately impact frontline services. It would also provide capacity and expertise to enable exercises to be conducted within Wales to stress test our response systems against the full range of risks identified in the Wales national risk register.

**119.** The Committee considers that the absence of preparation for compound risks was a gap in the scope of Exercise Pegasus, and believes that planning for compound risk scenarios must be fully integrated into all of Wales's revised preparedness structures. In particular, future multi-agency exercises need to incorporate compound risk scenarios to ensure we are well rehearsed for such an eventuality. Likewise, compound risks must be explicitly accounted for in the Wales national risk register and responses should be carefully modelled so that Wales's planning and response arrangements account for emergencies that may occur simultaneously or interact in complex ways.

**120.** We also believe more could be done to better involve a wider range of sectors in future preparedness exercises, given the vital role they play in emergency response and recovery. As a Committee, we reflected on our own experiences during the pandemic and the representations we received from frontline professions such as the Police, Care Home and Bereavement sectors who, despite being at increased likelihood of contracting COVID-19 through coming into contact with infected people in their day to day work, were unable to access the vital personal protective equipment (PPE) they needed to keep themselves safe until later than other frontline professionals. The Police Federation in Wales also raised concern with Members during the pandemic that they did warrant any form of prioritisation in the vaccine roll-out.

**121.** We note that PPE stockpiling, procurement and other aspects which relate to preparedness will be covered in detail in future modules of the UK COVID-19

Inquiry. However, the evidence we received throughout our work on Module 1 highlights that a proactive approach to supporting vital frontline sectors to keep them safe and minimise the spread of infection is an important consideration for emergency planning and preparedness. We believe that Wales's preparedness would only benefit from the involvement of a wider range of affected sectors in future preparedness exercises.

**Recommendation 11.** The Committee recommends that the Welsh Government establish a national multi-agency training and exercising unit—similar to Scotland's SMARTEU—to coordinate exercises to test the full range of risks identified in the national risk register, mitigate resourcing challenges faced by participating organisations and disseminate learning to partner agencies.

**Recommendation 12.** The Committee recommends that the Welsh Government take steps to ensure Wales's revised preparedness structures, the Wales National Risk Register, and future multi-agency exercises fully account for, and plan for responding to, compound risk scenarios.

**Recommendation 13.** The Committee recommends that the Welsh Government take steps to fully integrate social care and other critical sectors into exercise planning, delivery and decision making.

**Recommendation 14.** The Committee recommends that the Welsh Government introduces a formal engagement protocol for voluntary organisations in multi-agency exercises, guaranteeing equal access to information, defined roles, and opportunities to contribute to planning and delivery.

## 4. Contribution of the voluntary sector to resilience

**122.** The UK COVID-19 Inquiry found that those charged with emergency planning were responsible for a failure to engage appropriately with those who know their communities best, including the voluntary sector and community groups.<sup>93</sup> Preparedness exercises that were conducted prior to the COVID-19 pandemic did not adequately consider the role of voluntary, community and social enterprise sectors, despite them being “absolutely essential to pandemic planning.”<sup>94</sup>

**123.** The UK inquiry did, however, note that Wales fared better than other UK nations with regard to the involvement the voluntary sector in emergency planning.<sup>95</sup> The Gap Analysis commissioned by the Wales Special Purpose Committee also identified that “community groups and volunteering structures were more embedded in Wales” but noted that “how this aspect of the response performed is not included in the Module 1 report”.<sup>96</sup>

**124.** Similarly to the UK inquiry, the Wales Special Purpose Committee highlighted the importance of incorporating more local knowledge and expertise in preparedness and resilience planning. They identified a need to review how resilience structures in Wales connect, collaborate and integrate with the community and voluntary sector and to investigate the benefits of a Wales-specific approach that incorporates learning from communities to strengthen Wales’s resilience systems and structures.<sup>97</sup>

### Underutilisation of the sector

**125.** The Committee heard from multiple stakeholders that the voluntary sector has a vital role to play in resilience and preparedness. The WCVA stated that the sector acts as a bridge between communities and statutory agencies, ensuring

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<sup>93</sup> UK COVID-19 Inquiry, [Module 1 report: The resilience and preparedness of the United Kingdom](#), July 2024, executive summary.

<sup>94</sup> UK COVID-19 Inquiry, [Module 1 report: The resilience and preparedness of the United Kingdom](#), July 2024, paragraph 5.55.

<sup>95</sup> UK COVID-19 Inquiry, [Module 1 report: The resilience and preparedness of the United Kingdom](#), July 2024, paragraph 6.67.

<sup>96</sup> Nottingham Trent University, [COVID-19 Public Inquiry Module 1 Gap Analysis](#), February 2025, p.7, 21

<sup>97</sup> Wales COVID-19 Inquiry Special Purpose Committee, [Report on the gaps identified in the preparedness and response of the Welsh Government and other Welsh public bodies during the COVID-19 pandemic that should be subject to further examination: UK COVID-19 Inquiry Module 1](#), March 2025, p. 18, 21

that information and feedback flow effectively in both directions.<sup>98</sup> Building Communities Trust told the Committee that locally based, community-led organisations are deeply embedded in some of the most deprived areas and provide support in ways that people feel comfortable accessing. These trusted, stigma-free environments offer a critical supplementary service to formal local authority and health board provision, particularly as statutory services have become more centralised and distant from peripheral communities.<sup>99</sup>

**126.** Despite the vital role of the voluntary sector, our Committee heard mixed views concerning their involvement within Wales’s revised civil contingency arrangements. WCVA, County Voluntary Councils, and the British Red Cross all told the Committee that they valued their involvement in LRFs. Mantell Gwynedd were positive that the role of voluntary organisations had been strengthened within the North Wales LRF since the pandemic.<sup>100</sup>

**127.** However, the Committee heard that voluntary organisations often experience operational marginalisation. Race Council Cymru, the umbrella organisation that represents ethnic minority communities in Wales, said they had not been contacted in relation to resilience planning since the pandemic, despite the valuable insights they could provide.

*“I do think that, having seen the devastating impact that COVID had on black, Asian and minority ethnic people, it is critical that black, Asian and minority ethnic research professors... should have been engaged in helping to build resilience, understanding and a platform for planning. It makes sense, but we’ve never been contacted.”<sup>101</sup>*

**128.** Several voluntary organisations told us they are often consulted too late in planning processes which limits their ability to shape decisions.

*“The First Minister has been very clear in the framework about the role and the full role of the voluntary sector. That’s clearly in the framework, but that strategic aim and that objective is not yet being met through actual operational delivery, through process barriers on sharing data. I think there needs to be quite a rapid review to look at*

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<sup>98</sup> Public Accounts and Public Administration Committee, [RoP](#), 27 November 2025, paragraphs 20-21

<sup>99</sup> Public Accounts and Public Administration Committee, [RoP](#), 27 November 2025, paragraph 139

<sup>100</sup> Public Accounts and Public Administration Committee, [RoP](#), 27 November 2025, paragraph 32

<sup>101</sup> Public Accounts and Public Administration Committee, [RoP](#), 27 November 2025, paragraph 190

*how we can make sure that the sector is engaged at that national and local level to make sure that the infrastructure is in place to be able to respond quickly and in the best way possible. Whatever happens, the sector will respond and do the best that it can. I think our feeling is that, with some more work and investment and really looking at some of those practical barriers, our response could be much better than it would be at this moment in time.”<sup>102</sup>*

**129.** None of the voluntary organisations the Committee heard from were given an opportunity to contribute their insights to Wales’s bespoke civil contingencies risk register.<sup>103</sup>

### **Data sharing between statutory agencies and voluntary organisations**

**130.** The Committee heard that voluntary organisations were unable to access data during real-world emergency scenarios that would enable them to respond promptly. For example, the British Red Cross reported that they were unable to provide support people affected by the recent Monmouthshire floods because statutory agencies were not willing to share relevant data with them. This prevented them from reaching those in need despite having the resources and capacity available.

*“We were being told by colleagues in the statutory sector—that there were vulnerable people out in communities that needed our support. We were there, we were ready. We had the ability to provide psychosocial support, practical support, cash-based assistance, but we were not given the details of the individuals who needed to be supported. So, we had to sit on our hands, knowing that we had vulnerable people who could have the support that we were sitting there ready to deliver.”<sup>104</sup>*

**131.** WASUT emphasised that data privacy and information governance remain significant challenges, describing the current legislative landscape as a “minefield”. WASUT called for an approach that treats data sharing between

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<sup>102</sup> Public Accounts and Public Administration Committee, *RoP*, 27 November 2025, paragraph 50

<sup>103</sup> Public Accounts and Public Administration Committee, *RoP*, 27 November 2025, paragraphs 106-112.

<sup>104</sup> Public Accounts and Public Administration Committee, *RoP*, 27 November 2025, paragraph 44

organisations as an enabler while maintaining protections for sensitive information.<sup>105</sup>

**132.** But these data-sharing issues do not appear insurmountable. The British Red Cross highlighted a collaboration between themselves, the Welsh Government and the Royal Mail to establish a prescription delivery service during the pandemic as an example of where information governance and data sharing issues were resolved, enabling them to respond effectively.<sup>106</sup>

**133.** MWWFRS stressed the importance of embedding partnerships into systems rather than relying on personal relationships, citing their renewed cooperation agreement with the British Red Cross as an example. They argued that formal integration of voluntary organisations into statutory systems would improve information flow and resilience.<sup>107</sup> They also drew the Committee's attention to the Framework for Co-ordination of Volunteers in Emergency Response Situations (Wales), which sets a standardised approach for formally integrating the voluntary sector into emergency planning, response and recovery efforts. This framework aims to utilise existing structures to ensure direct representation of the voluntary sector on key planning fora and within incident specific recovery teams.<sup>108</sup>

**134.** WASUT highlighted the potential value of creating a central repository of volunteers in Wales, noting that better use could be made of volunteer capacity. They suggested that LRFs should explore how volunteer resources could be understood and integrated into planning and activation at the local level.<sup>109</sup>

## **Trusted messengers and communication**

**135.** Voluntary bodies are uniquely positioned to reach hard-to-engage groups and act as credible messengers during emergencies. Their established networks and cultural insights enable tailored communication that statutory channels often fail to achieve.

**136.** Through the course of our evidence sessions, the Committee heard that there was, and in some cases remains, significant misunderstanding among the public about the way COVID-19 spreads, modes of transmission, and the most effective measures to protect from infection. There was particular confusion from

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<sup>105</sup> Public Accounts and Public Administration Committee, [RoP](#), 10 December 2025, paragraph 153

<sup>106</sup> Public Accounts and Public Administration Committee, [RoP](#), 27 November 2025, paragraph 45

<sup>107</sup> Public Accounts and Public Administration Committee, [RoP](#), 10 December 2025, paragraphs 134-136

<sup>108</sup> British Red Cross, [Framework for Co-ordination of Volunteers in Emergency Response Situations \(Wales\)](#), July 2022

<sup>109</sup> Public Accounts and Public Administration Committee, [RoP](#), 10 December 2025, paragraph 128

witnesses relating to whether COVID 19 can only spread through the air as an aerosol, or whether the virus can also spread as droplets, by direct contact with an infected person or via contaminated surfaces. The latest public health guidance on modes of transmission and effective protection methods are included in paragraph 154 below.

**137.** Several voluntary organisations, including the British Red Cross, Powys Association of Voluntary Organisations, Mantell Gwynedd, WCVA and the Co-Production Network for Wales emphasised the value of voluntary organisations as “trusted messengers” in public communication, noting that they enjoy higher levels of trust than statutory agencies and have access to specific groups, including rural and ethnic minority communities. We heard that, during the pandemic, these organisations were able to leverage this trust to effectively disseminate public health messages and dispel misinformation.<sup>110</sup>

**138.** Race Council Cymru shared an example of good practice during the pandemic when it set up multicultural hubs on WhatsApp which linked around 300 organisations across Wales. A “COVID-19 Leaders Forum” was created to share official information from local authorities, health boards and the NHS, which was then cascaded through community networks.<sup>111</sup> Similarly, we heard of examples where Community Voluntary Councils have established partnerships with their health board and local authority where local insights are shared to inform communication activity. Stakeholders suggested that networks like this could provide an effective medium for tailored communication in future emergencies.

*“Post COVID, in Powys, we’ve set up a joint communications and engagement group, which involves the CVC, the health board and the local authorities. The colleagues there meet regularly and make sure that we’re not duplicating information, but using the best partner to share that information and actually combat some of those myths... asking communities what they want and what matters to them... That’s involved us going to things like the young farmers groups, the agricultural markets, the Welsh language chat groups, a whole range of things, and actually that builds trust in itself. So, should another issue like a pandemic come up, I think we’re very well placed*

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<sup>110</sup> Public Accounts and Public Administration Committee, RoP, 27 November 2025, paragraphs 57, 82-83, 89-91, 214

<sup>111</sup> Public Accounts and Public Administration Committee, RoP, 27 November 2025, paragraph 171

*to have that trusting relationship to help our statutory partners get those key messages out and dispel those myths.”<sup>112</sup>*

**139.** Building Communities Trust stressed the need to make better use of informal communication networks and identify who holds the connections to disseminate information widely. They warned that formal communications do not always reach intended audiences, noting that this is a particular issue in Wales due to its relatively weak media landscape.<sup>113</sup>

## **Emergency funding**

**140.** The Committee heard that there is currently no standing mechanism to channel emergency funding rapidly through trusted voluntary partners, which can create delays when emergencies occur. This is particularly salient given the significant concerns shared by the voluntary organisations we spoke to about the degradation in the resilience and capacity of the sector in recent years.

**141.** We heard that the voluntary sector is currently facing significant financial pressure as a consequence of having to deal with multiple concurrent challenges, including pandemic recovery, the cost of living crisis, national insurance increases and a challenging funding landscape. There was a strong sense that the sector is not in as strong a position as it was pre-pandemic and would therefore be less equipped to respond to future emergencies.<sup>114</sup>

**142.** Stakeholders highlighted acute funding fragilities, with closures of specialist services—such as independent advocacy for people with learning disabilities—reducing the sector’s capacity to deliver tailored support.<sup>115</sup>

**143.** The British Red Cross highlighted concerns that some commissioners of voluntary sector services are not consistently following the Welsh Government’s Third Sector Code of Practice<sup>116</sup>, which is intended to ensure fair and transparent commissioning. As a result, individual organisations often struggle to secure funding for projects and invest in infrastructure, leaving them underprepared to respond when they are most needed.<sup>117</sup>

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<sup>112</sup> Public Accounts and Public Administration Committee, [RoP](#), 27 November 2025, paragraph 86

<sup>113</sup> Public Accounts and Public Administration Committee, [RoP](#), 27 November 2025, paragraph 215

<sup>114</sup> Public Accounts and Public Administration Committee, [RoP](#), 27 November 2025, paragraphs 33, 39, 41, 76.

<sup>115</sup> Public Accounts and Public Administration Committee, [RoP](#), 27 November 2025, paragraph 105

<sup>116</sup> Welsh Government, [Third Sector Scheme: code of practice for funding the third sector](#), April 2025

<sup>117</sup> Public Accounts and Public Administration Committee, [RoP](#), 27 November 2025, paragraph 40

*“Whilst we are often majority voluntary based, are not the cheap option or the free option. There is a requirement for there to be some infrastructure for each voluntary sector organisation—a minimal requirement of resources—but it does need to be there in order for what I call the spine of the organisation to function. And from that, we have a platform within our communities to deliver that good work and those messages... it is about valuing and resourcing the sector appropriately.”<sup>118</sup>*

**144.** Others, like Race Council Cymru and Mantell Gwynedd, noted that many voluntary sector organisations receive no core funding, which means they lack the resource to support resilience or civil contingencies work to the extent they would like to.

*“I do think that people need to recognise that groups like ours have no core funding. A lot of the work we do we have to do in a voluntary capacity because we have no core funding. We’re all project funded, which is a great disadvantage. So, to secure the presence of people who are going to lead this work, it’s important to fund them properly so that we’re better able to be available in times of crisis.”<sup>119</sup>*

**145.** WCVA noted that during the pandemic, the relaxation of procurement rules allowed the Welsh Government to channel funds quickly through trusted bodies such as the WCVA and County Voluntary Councils. However, since those rules reverted, there is no clear mechanism—such as a standing grant agreement or framework—to enable rapid dissemination of funds in emergencies. WCVA stressed that creating such a mechanism should be a key priority to ensure resources can be deployed swiftly when future crises arise.

*“I don’t feel like we’ve still nailed the proper mechanism that allows the Welsh Government to use trusted bodies like us to disseminate funds that are needed in particular areas. So, responding to a flood, responding to a storm, or anything else that may arise, we often find that the will and the budget are there in those emergency scenarios, but there’s still a block in terms of having that mechanism worked up, agreed, whether it’s a grant agreement, a contract or a framework—*

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<sup>118</sup> Public Accounts and Public Administration Committee, [RoP](#), 27 November 2025, paragraph 95

<sup>119</sup> Public Accounts and Public Administration Committee, [RoP](#), 27 November 2025, paragraph 213

*whatever it is. I think we're missing that piece of a framework that might just be a contract for £1 a year that sits there, but when something happens, the mechanism is there, the assurances are in place, everything is ready, so that money can be put in that pot and then used to distribute against whatever the required need is.*<sup>120</sup>

## **The Welsh Government's response**

**146.** Responding to questions regarding the integration of the voluntary sector into Wales's revised civil contingencies structures, the First Minister stated that the Wales Risk Register was developed with the Wales Resilience Partnership and LRFs, which both include voluntary sector representation. The First Minister also stressed that voluntary organisations were also invited to civil contingency meetings during Exercise Pegasus, and the Welsh Government is exploring giving more voluntary organisations access to the ResilienceDirect platform. Funding has also been provided to strengthen the Volunteering Wales platform, but the Welsh Government accepted that more could be done in this area.<sup>121</sup>

**147.** Representatives from the Welsh Government expressed disappointment about the evidence the Committee had received from voluntary sector organisations, who felt that they did not have the opportunity to contribute their insights to the Wales Risk Register. They acknowledged that more could be done to involve the sector and build on the input they have already made.<sup>122</sup>

**148.** The First Minister acknowledged the need to improve data sharing and confirmed a new task-and-finish group has been established to address this which is focused on sharing information about vulnerable people. The First Minister also noted that existing guidance allows statutory bodies to share data in "life and death" situations and the Welsh Government will work with responders to raise awareness of these provisions. The group will also explore consent-based approaches, drawing on examples such as the National Grid's proactive engagement with vulnerable customers.<sup>123</sup>

**149.** On the subject of access to emergency funding for the sector, the First Minister noted that the Welsh Government operates an emergency financial

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<sup>120</sup> Public Accounts and Public Administration Committee, [RoP](#), 27 November 2025, paragraph 117

<sup>121</sup> Public Accounts and Public Administration Committee, [RoP](#), 15 January 2026, paragraphs 195-200

<sup>122</sup> Public Accounts and Public Administration Committee, [RoP](#), 15 January 2026, paragraph 196

<sup>123</sup> Public Accounts and Public Administration Committee, [RoP](#), 15 January 2026, paragraphs 185-190

assistance scheme via local authorities, which has been used to channel funding to County Voluntary Councils, alongside mechanisms such as the Discretionary Assistance Fund. The First Minister confirmed that the Welsh Government is open to exploring options to expand these arrangements to include direct support for voluntary organisations on the ground.<sup>124</sup> Officials pointed to the emergency funding schemes that were set up during the early days of the COVID-19 pandemic to distribute money to voluntary organisations via WCVA and Community Voluntary Councils.<sup>125</sup>

**150.** The First Minister recognised that government is not always the best channel for reaching certain groups and cited Muslim Doctors Cymru as an example of effective engagement during the pandemic. The First Minister stressed the importance of trusted voices in countering misinformation and noted that WCVA and the British Red Cross were represented on the daily briefing group throughout the pandemic.<sup>126</sup>

### **Committee view**

**151.** The Committee recognises the invaluable contribution that the voluntary sector plays in strengthening Wales's national resilience and emergency preparedness. During emergencies, they are able to deploy a wide range of support to affected communities which enhances the relief effort and goes beyond what the statutory sector is able to provide. This support includes practical and financial advice, social, psychological and pastoral support, cash-based assistance, food and medicine deliveries, and the dissemination of tailored information in accessible formats.

**152.** The sector acts as a trusted link between statutory services and the local communities within which they are embedded, making them a valuable source of intelligence and local insights that can help to inform and adapt the response in real time. They also provide the overarching infrastructure to safely and effectively coordinate volunteers who wish to support the relief effort during periods of emergency. These organisations are invaluable assets for those bodies charged with Wales's emergency response efforts. It is vital that their unique expertise and established networks with the communities they represent are utilised to the fullest extent possible.

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<sup>124</sup> Public Accounts and Public Administration Committee, RoP, 15 January 2026, paragraph 205

<sup>125</sup> Public Accounts and Public Administration Committee, RoP, 15 January 2026, paragraph 206

<sup>126</sup> Public Accounts and Public Administration Committee, RoP, 15 January 2026, paragraphs 208-9

**153.** In response to the evidence we received which highlighted the prevalence of misunderstanding about COVID-19 transmission and the effectiveness of protection measures, the Committee believes it is of the utmost importance that public health agencies have a thorough understanding of the ways different types of illnesses spread and are able to dispel misinformation at the earliest stages of a future pandemic. We would also like to reiterate that public health guidance is explicit that COVID-19 can spread in a number of ways including:

- through the air as an aerosol which can stay in the air for a long time;
- through the air by droplets which can spread nearby and onto surfaces;
- by direct contact with an infected person;
- by direct contact with a contaminated surface.

**154.** The following protective behaviours are the most effective measures the public can take to keep themselves and others safe.

- getting vaccinated;
- maintaining good hand hygiene;
- staying at home and limiting your contact with others if you're unwell;
- wearing a face covering in crowded indoor or enclosed places;
- meeting others outdoors;
- when indoors, increasing ventilation and letting fresh air in where possible.<sup>127</sup>

**155.** The Committee was pleased that the UK COVID-19 Inquiry made specific reference to the unique structures which underpin the voluntary sector in Wales. These structures were well established prior to the pandemic and helped ensure that the voluntary sector was able to contribute to the response from the very outset. The existence of established mechanisms for joint working between the statutory and voluntary sectors was a strength of the pandemic response in Wales and one which should not be taken for granted.

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<sup>127</sup> Welsh Government, [Public health guidance for the general public: protect yourself and others from coronavirus](#);  
World Health Organisation, [Advice for the public: Coronavirus disease \(COVID-19\)](#)

**156.** That said, there is still significant room for improvement. We were disappointed to hear that organisations like Race Council Cymru had not had the opportunity to be involved in the LRFs, preparedness exercises, or in wider emergency planning structures. This is especially troubling given the disproportionate numbers of Black, Asian and ethnic minority people who died during the pandemic.<sup>128</sup> More must be done to ensure that organisations with relevant expertise are able to bring their valuable insights to bear to enhance our resilience.

**157.** We heard evidence that issues concerning the sharing of data reduces the capacity of the sector to respond to emergencies. While public bodies must ensure compliance with data protection and information governance regulations, including The General Data Protection Regulation (GDPR), these should not hinder the ability of reputable voluntary organisations to support those in need, particularly during emergency situations. The example of the pandemic prescription delivery service given by the British Red Cross shows what is possible when all parties – both voluntary and statutory – are willing to work together to resolve these challenges. The Committee believes these examples should be the rule, rather than the exception. We therefore believe that the Welsh Government should create emergency legal provisions which allow for data protection regulations to be relaxed during emergency situations to allow for relief to reach those in need at the earliest possible opportunity.

**158.** Stakeholders highlighted the relevance of several recommendations made in the Fifth Senedd by the Equality, Local Government and Communities Committee report: [Impact of COVID-19 on the Voluntary Sector](#), suggesting these issues have been raised with the Welsh Government for some time but remain unresolved.<sup>129</sup> It is clear there is huge potential to make better use of the sector's insights and expertise to strengthen resilience and inform emergency planning.

**Recommendation 15.** The Committee recommends that the Welsh Government establishes a standardised framework for cooperation between Category 1 responders and voluntary organisations, to ensure these organisations are formally integrated into emergency response arrangements.

**Recommendation 16.** The Committee recommends that the Welsh Government creates a Wales-wide register of voluntary sector capabilities, including clear

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<sup>128</sup> UK Government, [Ethnicity and COVID-19](#)

<sup>129</sup> Equality, Local Government and Communities Committee, [Impact of COVID-19 on the voluntary sector](#), February 2021

activation pathways to enable rapid mobilisation and coordination during emergencies.

**Recommendation 17.** The Committee recommends that the Welsh Government develops a system which facilitates timely, lawful data-sharing between statutory agencies and voluntary partners during emergencies, ensuring compliance with data protection requirements while enabling voluntary organisations to respond quickly and effectively. Such a system should make legal provisions which allows for data protection regulations to be relaxed during emergency situations.

**Recommendation 18.** The Committee recommends that any future Welsh Government should maintain the current third sector infrastructure, and look to identify how these structures can be improved and made even more robust to ensure the voluntary sector is embedded from the outset in resilience planning and exercises.

**159.** It was clear from the evidence we received from voluntary organisations that the sector is facing acute funding and resourcing challenges, which are having a negative impact on their own resilience. The Committee was particularly concerned to hear the testimony of several voluntary sector organisations who felt they would be less able to respond to a whole-system emergency situation today than they were in 2020. The COVID-19 pandemic demonstrated the critical role that the voluntary sector plays in enhancing the work of statutory services, protecting vulnerable people, and disseminating messages to the communities within which they are embedded. We also heard evidence that these organisations experienced an unprecedented surge in demand for their services during the pandemic which highlights the crucial role they play in supporting their service users in times of crisis. It is vital that they are in a strong position to respond when they are inevitably called upon again.

**160.** There was a strong sense that the sector is being asked to contribute to Wales's resilience efforts but does not always receive the appropriate financial support for doing so. We acknowledge as a Committee that we have made recommendations calling for greater integration and utilisation of the voluntary sector in Wales's resilience planning and emergency response structures, but we are aware that the work of the voluntary sector does not come for free.

**161.** Better integration of the voluntary sector in emergency preparedness and response systems must be complemented by a sustainable, long-term funding model that enhances the sector's resilience and enables them to maintain the necessary resources and infrastructure to deploy in the event of future

emergencies. In addition, future preparedness exercises should examine the likely impact on voluntary organisations that deliver key services to affected communities and ensure effective mitigations are in place to safeguard their own resilience and business continuity.

**162.** Equally, the Committee agree that there is a need for a standing framework which provides a transparent and clear mechanism for funding to be distributed quickly to voluntary organisations involved in emergency relief.

**Recommendation 19.** The Committee recommends that the Welsh Government establishes a standing emergency funding framework with trusted voluntary partners to enable fast mobilisation of resources during emergencies.

**Recommendation 20.** The Committee recommends that the Welsh Government works with the voluntary sector and commissioning organisations to promote more effective use of long-term funding mechanisms that will support infrastructure investment, improve the sector's resilience, and enhance their ability to cope with the surge in demand for their services during emergencies.

## 5. Societal inequalities

**163.** There is overwhelming evidence that the impact of the COVID-19 pandemic was not felt equally across our society. Age, sex, ethnicity, and disability were key factors which determined a person's likelihood of serious illness or death as a result of contracting COVID-19. Socioeconomic factors were also a key determinant of poorer outcomes during the pandemic. Mortality rates among people living in poverty were far higher than their more affluent counterparts. The lowest earners in Wales were ten times more likely to work in "shut down" sectors than the highest earners and the attainment gap between disadvantaged students and their classmates grew significantly during the pandemic years.<sup>130</sup>

**164.** Patrick Vallance, the UK Government's Chief Scientific Adviser at the time of the COVID-19 pandemic, told the UK COVID-19 Inquiry:

*"[T]here is a terrible, terrible truth, and it's something that we all need to reflect on, which is that all pandemics feed off inequality and drive inequality. ... That is a tragedy that needs to be understood."<sup>131</sup>*

**165.** The same inquiry found that the UK's approach to risk assessment prior to the pandemic "perpetuated the problem of not adequately accounting for the risk to people who are vulnerable". Guidance for those involved in preparedness and resilience about how risks to vulnerable and at-risk groups ought to be mitigated was "too vague to be helpful."<sup>132</sup>

**166.** The failure to properly identify and plan for long-term risks and vulnerabilities caused by societal inequalities was identified by the UK COVID-19 Inquiry as a fundamental flaw in the UK's approach to risk assessment.

**167.** These criticisms are equally applicable to Wales. Prior to the pandemic, the Welsh Government relied solely on UK-level risk assessments which did not provide an assessment of how civil emergency risks faced by the UK might specifically impact the population of Wales. The same flaw therefore flowed

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<sup>130</sup> Equality, Local Government and Communities Committee, [Into Sharp Relief: Inequality and the Pandemic](#), August 2020.

<sup>131</sup> UK COVID-19 Inquiry, [Module 1 report: The resilience and preparedness of the United Kingdom](#), July 2024, paragraph 3.55.

<sup>132</sup> UK COVID-19 Inquiry, [Module 1 report: The resilience and preparedness of the United Kingdom](#), July 2024, paragraph 3.57-3.58

through Wales’s civil contingency systems and “had a material impact on preparedness for and resilience to whole-system civil emergencies.”<sup>133</sup>.

**168.** The UK COVID-19 Inquiry called for a new approach to risk assessment which undertakes an assessment of the impact of each risk on vulnerable people and called on the Welsh Government to perform its own risk assessment that reflects the circumstances and characteristics particular to Wales.

**169.** Similarly, the Wales Special Purpose Committee called for a review into how societal inequalities in a Welsh context could be better incorporated into the preparedness and resilience processes and structures.<sup>134</sup>

### **Disproportionate impacts on vulnerable communities and the importance of co-production**

**170.** Stakeholders that gave evidence to our Committee highlighted the disproportionate impact of the pandemic on Black, Asian and minority ethnic communities, multi-occupancy households, low-paid or visa-dependent workers, and rural or isolated populations. Voluntary organisations stressed that resilience looks different for different communities and that some may require additional support. The British Red Cross called for “intelligent mapping” of these needs and mechanisms to provide tailored assistance.<sup>135</sup>

**171.** We heard many examples of how the pandemic affected communities differently. The Co-production Network for Wales told the Committee that diverse lived experiences were not adequately considered in the initial response and recommended embedding co-production practices into future planning.<sup>136</sup> Race Council Cymru echoed this, stressing the importance of involving communities from the outset rather than as a “box-ticking exercise.”<sup>137</sup>

*“I think that there are lessons to be learned from the challenges that people went through. Not everybody lives in the same way and we need to take into account the style of living that some of our*

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<sup>133</sup> UK COVID-19 Inquiry, [Module 1 report: The resilience and preparedness of the United Kingdom](#), July 2024, paragraph 3.17-3.18.

<sup>134</sup> Wales COVID-19 Inquiry Special Purpose Committee, [Report on the gaps identified in the preparedness and response of the Welsh Government and other Welsh public bodies during the COVID-19 pandemic that should be subject to further examination: UK COVID-19 Inquiry Module 1](#), March 2025, page 21.

<sup>135</sup> Public Accounts and Public Administration Committee, [RoP](#), 27 November 2025, paragraph 103

<sup>136</sup> Public Accounts and Public Administration Committee, [RoP](#), 27 November 2025, paragraph 206

<sup>137</sup> Public Accounts and Public Administration Committee, [RoP](#), 27 November 2025, paragraph 211

*communities have, which is where we draw a lot of support from the elderly. Grandparents help to raise the smaller and the younger children. It's still very close-knit families, where it would be difficult to separate people under those circumstances.”<sup>138</sup>*

**172.** Several witnesses noted that official advice and guidance that was issued early in the pandemic failed to account for the specific needs and experiences of different groups. Fair Treatment for the Women of Wales pointed to a lack of adherence to the social model of disability by public services in Wales, despite the Welsh Government formally committing to adopt the social model of disability since 2002.

*“This is keenly felt in healthcare, where disabled people are routinely ‘locked out’ of the services they need due to a ‘one size fits all’ communication method... leaving patients unable to successfully navigate a system that fails to make reasonable adjustments for them.”<sup>139</sup>*

**173.** Building Communities Trust suggested that some advice – such as not to work or mix with family – was impractical for many people which made compliance impractical and undermined credibility.<sup>140</sup> The Co-production Network for Wales supported this view, and emphasised the importance of co-designing messaging with the communities it is intended for. They called for future guidance to better reflect lived experience.<sup>141</sup>

*“I think one of the issues... is, actually, health policy is largely socially blind. It doesn’t take into account, to a large degree, the different socioeconomic characteristics of different people. Therefore, you have a one-size-fits-all policy, which means that, actually, people who have got more challenging socioeconomic conditions are implicitly disadvantaged.”<sup>142</sup>*

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<sup>138</sup> Public Accounts and Public Administration Committee, [RoP](#), 27 November 2025, paragraph 202

<sup>139</sup> Fair Treatment for the Women of Wales, [Written evidence to the Public Accounts and Public Administration Committee](#), December 2025

<sup>140</sup> Public Accounts and Public Administration Committee, [RoP](#), 27 November 2025, paragraph 215

<sup>141</sup> Public Accounts and Public Administration Committee, [RoP](#), 27 November 2025, paragraph 216

<sup>142</sup> Public Accounts and Public Administration Committee, [RoP](#), 27 November 2025, paragraph 204

**174.** Voluntary organisations reflected on their efforts to influence revisions to guidance and advice to better account for these experiences, but these often came late.

*“My experience during COVID, when I was working, at that time, in domestic abuse, often there were having to be revised and adapted responses of guidance that was coming out from Government, because those initial considerations of people’s different lived experiences and perspectives weren’t taken into consideration in the initial response. So, if we’re planning for the next one, we need to have those structures and that asset mapping of what’s out there, but also that connectivity down into those different lived-experience perspectives, so that that information flows straight into that immediate emergency planning, at the beginning stage, rather than as a retrospective process, which it did feel like, at times, during the pandemic.”<sup>143</sup>*

## The Welsh Government’s response

**175.** The First Minister stressed that equality is “absolutely fundamental to our core beliefs as a government” and central to the Welsh Government’s approach to civil contingencies and noted that equality impact assessments are incorporated into their situation updates and the concept of operations, supported by an equality cell within response structures.<sup>144</sup>

**176.** The First Minister noted that vulnerable groups vary by emergency and that the Welsh Government is working with LRFs to identify these groups and providing data to support the development of community risk registers. The First Minister also noted an ongoing work programme under the Wales Resilience Partnership “to share best practice in relation to assessing the impacts of risks on people with vulnerabilities and specific needs.” This programme aims “to consistently integrate the assessment of the impact of risks on vulnerable people and those with specific needs into local and national risk methodologies.”<sup>145</sup>

**177.** In the Welsh Government’s second six monthly progress statement in response to the UK COVID-19 Inquiry, the First Minister stated that through the

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<sup>143</sup> Public Accounts and Public Administration Committee, [RoP](#), 27 November 2025, paragraph 206

<sup>144</sup> Public Accounts and Public Administration Committee, [RoP](#), 15 January 2026, paragraphs 151-2

<sup>145</sup> Welsh Government, [Written Statement: Second six-monthly update following the Welsh Government’s response to the UK COVID-19 Inquiry’s Module 1 report](#), January 2026

Welsh Government’s partnership arrangements, they 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 during any incident to those people who may need it the most.”<sup>146</sup>.

## **Committee view**

**178.** The Committee agrees with the views shared by voluntary sector organisations that official guidance during the COVID-19 pandemic often did not account for the full range of personal circumstances, protected characteristics, and socioeconomic factors.

**179.** As Members, we reflected on our own experiences during the pandemic and the representations we received from a wide range of organisations to request revisions to guidance and advice, to better account for the needs and experiences of different groups. These included organisations that represent disabled people, people experiencing domestic abuse, people living in poverty and ethnic minority communities. While we were able to identify examples where such revisions were implemented to better account for these diverse needs, as a Committee we believe this needs to be done on a much more proactive basis.

**180.** During the COVID--19 pandemic, the varying communication needs of disabled people with differing impairments, including people with learning disabilities, hearing and sight loss, were not adequately accounted for by the Welsh Government or other public bodies. Official guidance often failed to reflect the communication needs of disabled people and did not adhere to the social model of disability, leaving many “locked out” of essential information that they needed to keep themselves safe.<sup>147</sup> For example, blind and partially sighted people were sent vital information such as shielding and vaccination appointment letters in standard print formats that they were unable to read independently.<sup>148</sup> A lack of consistent British Sign Language (BSL) provision on both broadcast and social media channels was highlighted by deaf people and people with hearing loss as a barrier to accessing essential information throughout the pandemic. In addition, mandatory face masks, which obscured lip-reading and facial cues, and the widespread shift to remote appointments further compounded communication

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<sup>146</sup> Welsh Government, [Written Statement: Second six-monthly update following the Welsh Government’s response to the UK COVID-19 Inquiry’s Module 1 report](#), January 2026

<sup>147</sup> Welsh Government, [Locked out: liberating disabled people’s lives and rights in Wales beyond COVID-19](#), July 2021

<sup>148</sup> RNIB Cymru, [Blind and partially sighted people “forgotten” as COVID vaccine rolled out in Wales](#), March 2021

barriers, making it more difficult for many deaf and hard-of-hearing individuals to access services and fully participate in day-to-day interactions.<sup>149</sup>

**181.** The Committee agrees that future communication strategies need to better involve civil society organisations that represent protected characteristic groups so that government and other public bodies are able to benefit from their established networks and expertise. Formal mechanisms should be established to facilitate consistent engagement and co-production with groups identified as being more vulnerable to specific emergencies so that our resilience systems are better prepared in future. This engagement is particularly relevant for communication planning to ensure messaging reflects lived experience and community realities.

**182.** We were pleased that the Welsh Government is exploring measures to strengthen their understanding and profiling of risks as they relate to vulnerable people. A thorough and robust understanding of the likely impacts of different emergency scenarios on vulnerable and the types of interventions necessary to mitigate those risks is vital. In addition to risk profiling to account for the needs of vulnerable people that the Welsh Government has committed to undertaking, future multi-agency preparedness exercises should also include mandatory stress testing of the likely impacts of different emergencies on protected characteristic groups and people living in socioeconomic disadvantage and an evaluation of the effectiveness of different mitigations against these impacts. Wales cannot afford for the impact of future emergencies to be felt most keenly by specific communities or those most at risk.

**183.** Since our Committee began our work exploring the Welsh Government's response to Module 1 of the UK COVID-19 Inquiry, the Equality and Human Rights Commission (EHRC), Great Britain's statutory equality regulator, found that the Welsh Government has consistently failed to comply with equality law. In November 2025, the EHRC issued a statement, saying that they had "identified several failures to comply with the Public Sector Equality Duty (PSED), which is a legal requirement under the Equality Act 2010."<sup>150</sup>

**184.** Among the basis for this decision, the EHRC noted that the Welsh Government "failed to conduct and publish Equality Impact Assessments for many of its policies which were likely to have a substantial impact on its ability to

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<sup>149</sup> RNID, [RNID and the Disability Charities Consortium are taking part in the UK Covid Inquiry](#), September 2024

<sup>150</sup> Equality and Human Rights Commission, ["Welsh Government did not comply with equality law, regulator says"](#), November 2025

comply with the PSED". The EHRC has taken formal enforcement action in the form of a Section 23 legal agreement to improve the Welsh Government's compliance with equality law. The term of the agreement and associated action plan is expected to conclude on 21 November 2027.<sup>151</sup>

**185.** We were pleased to hear the Welsh Government reaffirm their commitment to equality and the steps it has outlined to ensure that Wales's civil contingency system better accounts for the unequal impact that emergencies can have on protected characteristic groups and people facing socioeconomic disadvantage. The need for enforcement action by the EHRC highlights that the Welsh Government's historic approach to improving equality has been inadequate. The stark disparities exposed during the pandemic demonstrate that much more needs to be done to understand the drivers of inequality and put robust, preventative mitigations in place. The Committee hopes that the EHRC's intervention marks a genuine turning point – one that leads to a more systematic, evidence-led and proactive approach to embedding equality across Wales's preparedness and resilience arrangements.

**Recommendation 21.** The Committee recommends that the Welsh Government formally integrates organisations and community networks that represent the range of protected characteristics under the Equality Act 2010 into emergency communication strategies, ensuring messaging and methods of dissemination are co-designed and reflect lived experience and the particular communication needs of disabled people with differing impairments.

**Recommendation 22.** The Committee recommends that the Welsh Government establishes formal mechanisms for consistent engagement with organisations representing ethnic minority, rural and other marginalised communities, such as standing advisory panels or a Wales-wide register of community partners, to ensure their insights shape planning and decision-making from the outset.

**Recommendation 23.** The Committee recommends that the Welsh Government takes additional steps to embed systematic vulnerability assessments into the Wales National Risk Register, community risk registers, and civil contingencies planning, ensuring these assessments are evidence-based, measurable and updated regularly to reflect emerging risks and their potential impacts on vulnerable communities.

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<sup>151</sup> Equality and Human Rights Commission, [Letter to the Welsh Government: Section 23 agreement](#), November 2025

**Recommendation 24.** The Committee recommends that the Welsh Government ensures that future multi-agency preparedness exercises include a mandatory assessment of the likely impact of different emergencies on protected characteristic groups and people living in socioeconomic disadvantage and the effectiveness of interventions to mitigations against these impacts.

## 6. Data

**186.** The UK COVID-19 Inquiry Module 1 report emphasises that effective emergency preparedness depends on access to reliable, high-quality, up-to-date data. The report emphasises that, from the earliest stages of a pandemic or other major civil emergency, decision-makers require reliable information on system capabilities, potential impacts on vulnerable groups, emerging and concurrent risks, and the nature of the threat itself.

**187.** The inquiry highlights the need for strong data-gathering- systems— which can provide administrative data on things like numbers of available hospital beds) and scientific research (such as the effectiveness of countermeasures)—to be in place before a crisis begins. Without access to such data those managing an emergency face significant uncertainty and are left effectively “driving in the dark.”<sup>152</sup>. It recommended the establishment of “mechanisms for the timely collection, analysis, secure sharing and use of reliable data for informing emergency responses, in advance of future pandemics.”<sup>153</sup>.

**188.** The Inquiry also called for improved cooperation between the UK and devolved governments, particularly in relation to data sharing.

*“There should be cooperation between the UK government and devolved administrations at all levels. The best defence against the spread of pathogens was and remains strong national surveillance and detection mechanisms... and effective collaboration between the various levels of responsibility.*

*Within the UK, surveillance involves the ongoing, systematic collection, collation, analysis and interpretation of data, with dissemination of information to those that need it.”<sup>154</sup>*

**189.** The Wales Special Purpose Committee also identified “the need to address gaps in the sharing and communication of data and experience across resilience organisations and structures, both within Wales and across the UK” as a key issue.

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<sup>152</sup> UK COVID-19 Inquiry, [Module 1 report: The resilience and preparedness of the United Kingdom](#), July 2024, paragraphs 4.68-71

<sup>153</sup> UK COVID-19 Inquiry, [Module 1 report: The resilience and preparedness of the United Kingdom](#), July 2024, page 101

<sup>154</sup> UK COVID-19 Inquiry, [Module 1 report: The resilience and preparedness of the United Kingdom](#), July 2024, paragraphs 2.15-16

## Data availability and usability

**190.** In response to the UK COVID-19 Inquiry, the Welsh Government identified the need to develop a new Welsh Emergency Care Dataset<sup>155</sup> and to replace the 'TARIAN' platform with a new health protection management system with capability to “manage major incidents and mass contact tracing and improve sharing of data.”<sup>156</sup>

**191.** When asked about this, Public Health Wales told the Committee that, while effective for business-as-usual activity, TARIAN was not designed to cope with the scale experienced during the pandemic, highlighting the need for a new system capable of managing significant surge capacity and supporting multi-agency access. Public Health Wales reported that discovery work has taken place with local authorities, health boards, Data Cymru and the Welsh Local Government Association to ensure the system meets cross-sector needs.<sup>157</sup>

**192.** The Committee questioned why the replacement system is still not operational, despite the clear need for a replacement system identified by the UK COVID-19 Inquiry. In response, Public Health Wales explained that the procurement process has taken considerable time due to the scale of the investment required, the need to incorporate extensive user feedback, and the requirement for robust governance arrangements to provide assurance of value for money.<sup>158</sup>

**193.** The British Red Cross and WCVA were critical of the ResilienceDirect portal, a UK-wide service provided by the Cabinet Office, citing usability and accessibility issues.<sup>159</sup>

## Early access to scientific advice

**194.** Public Health Wales stressed the importance of early access to specialist evidence and decision-making forums, such as the UK Government's Scientific Advisory Group for Emergencies (SAGE). They emphasised that Wales should be

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<sup>155</sup> The Welsh Government describes the Welsh Emergency Care Dataset as “the new national standard for emergency care data collection in Wales to improve emergency care planning, performance monitoring, and patient outcomes across the Welsh NHS.”

<sup>156</sup> Welsh Government, [Written Statement: Six-month update following the Welsh Government's response to the COVID-19 Inquiry's Module 1 report](#), July 2025

<sup>157</sup> Public Accounts and Public Administration Committee, [RoP](#), 12 November 2025, paragraphs 61-5

<sup>158</sup> Public Accounts and Public Administration Committee, [RoP](#), 12 November 2025, paragraphs 65

<sup>159</sup> Public Accounts and Public Administration Committee, [RoP](#), 27 November 2025, paragraphs 66, 70

“at the table” from the outset—fully informed about developments as they happen and actively involved in co-designing guidance in real time, rather than reacting later.

**195.** They also noted a reluctance in some sectors to share data across organisational boundaries and highlighted that a UK platform for genomics data established during the pandemic has since fallen away.<sup>160</sup>

## **Data gaps**

**196.** Public Health Wales acknowledged “weaknesses in our access to data that helps us with work on health inequalities” and cited persistent data gaps relating to ethnicity across the NHS in Wales.<sup>161</sup> Race Council Cymru told the Committee that during the pandemic, Welsh data was frequently merged with England’s, making it impossible to disaggregate by ethnicity. This meant there was little information on diverse communities such as Bangladeshis, Africans and Caribbeans, hindering effective mapping and response. Race Council Cymru noted that social scientists at Cardiff and Swansea universities are now working with the Welsh Government to produce more detailed data and stressed that timely sharing of this data could prevent disproportionate impacts in future crises.<sup>162</sup>

**197.** Building Communities Trust highlighted that data collected by public bodies tends to focus narrowly on specific health and social care vulnerabilities, overlooking broader issues such as poverty and isolation. They stressed the need to recognise wider vulnerabilities, including social and economic factors that significantly affect resilience but which are often unrecorded.<sup>163</sup>

**198.** Long COVID Support feel there have been insufficient efforts made to collect data on the numbers of people living with Long COVID in Wales and using this data to develop a clearer understanding of the long-term- health implications associated with the disease and inform planning and preparedness for future outbreaks.<sup>164</sup>

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<sup>160</sup> Public Accounts and Public Administration Committee, [RoP](#), 12 November 2025, paragraphs 140-6

<sup>161</sup> Public Accounts and Public Administration Committee, [RoP](#), 12 November 2025, paragraphs 100-1

<sup>162</sup> Public Accounts and Public Administration Committee, [RoP](#), 27 November 2025, paragraph 249

<sup>163</sup> Public Accounts and Public Administration Committee, [RoP](#), 27 November 2025, paragraph 238-9

<sup>164</sup> Long COVID Support, [Written evidence to the Public Accounts and Public Administration Committee](#), January 2026, paragraphs 28-35

## The Welsh Government's response

**199.** The First Minister acknowledged the urgency of implementing a new health protection management system and confirmed £2.2 million has been allocated to Public Health Wales to deliver this transformation. A supplier has been appointed, and the system is expected to be operational by autumn 2026.<sup>165</sup> However, in the Welsh Government's most recent update it was revealed that the target for the introduction of the Welsh Emergency Care Dataset could be delayed beyond its original target date of Autumn 2026 due to operational pressures.<sup>166</sup>

**200.** The Welsh Government confirmed that there will be an element of parallel running while the new system is phased in. Officials conceded that interim arrangements would need to be put in place in the event that an emergency occurs before the new system is up and running.<sup>167</sup>

*"In the interim, if something did happen, we would have to develop a separate customer relationship management system to provide that scale-up if we needed it, and we're in discussion with Digital Health and Care Wales on how we would do that if we needed something in the interim."<sup>168</sup>*

**201.** Addressing concerns about the barriers to sharing data across organisational boundaries and geographical jurisdictions, the Welsh Government told the Committee that a memorandum of understanding has been signed with the UK's National Situation Centre to ensure reciprocal data provision during crises, which they say "underscore[s] a firm commitment to data-driven decision-making in times of emergency."<sup>169</sup>

*"There was a lot of work put into improving data flows, information sharing between departments and partners across Wales and the UK. One of the major advances was the establishment of a memorandum of understanding with the national situation centre. That's housed in Cabinet Office and that allowed a more free-flowing*

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<sup>165</sup> Public Accounts and Public Administration Committee, [RoP](#), 15 January 2026, paragraph 173

<sup>166</sup> Welsh Government, [Written Statement: Second six-monthly update following the Welsh Government's response to the UK COVID-19 Inquiry's Module 1 report](#), January 2026

<sup>167</sup> Public Accounts and Public Administration Committee, [RoP](#), 15 January 2026, paragraphs 175, 181

<sup>168</sup> Public Accounts and Public Administration Committee, [RoP](#), 15 January 2026, paragraph 175

<sup>169</sup> Welsh Government, [Written Statement: Second six-monthly update following the Welsh Government's response to the UK COVID-19 Inquiry's Module 1 report](#), January 2026

*passing of intelligence and information to inform the response to Pegasus, but also in real-world situations.”<sup>170</sup>*

**202.** The Welsh Government’s latest progress update on implementation of the recommendations of Module 1 also states:

*“We have established a data, evidence and analytical team, which will integrate data into emergency planning and response activities... The role of data, evidence and analysis in an emergency response was tested during Exercise PEGASUS, with the new team providing a crucial coordinating role across the four UK administrations and with local resilience forums.”<sup>171</sup>*

**203.** Responding to questions on steps the Welsh Government is taking to improve the quality of equality data to inform their approach to civil contingencies, the First Minister highlighted that data is central to the Anti-Racist Wales Action Plan confirmed the Welsh Government will engage with equality organisations to inform this work. The First Minister noted the development of a data tool as part of the plan to “input people’s lived experience” and confirmed that workforce equality data is now being collected in the health and social care sectors.<sup>172</sup>

## **Committee view**

**204.** The Committee welcome the significant investment made by the Welsh Government to introduce the new Welsh Emergency Care Dataset. We also recognise the work underway to modernise Wales’s health protection management systems so they are able to effectively manage major incidents in the future, including mass-scale contact tracing capability and improved data sharing.

**205.** But emergencies will not wait. As the First Minister noted, Wales’s crisis management structures were activated 31 times in 2025 alone. In the introduction to the Module 1 report, Baroness Hallett, the Chair of the UK COVID-19 Inquiry also warned:

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<sup>170</sup> Public Accounts and Public Administration Committee, [RoP](#), 15 January 2026, paragraph 109

<sup>171</sup> Welsh Government, [Written Statement: Second six-monthly update following the Welsh Government’s response to the UK COVID-19 Inquiry’s Module 1 report](#), January 2026

<sup>172</sup> Public Accounts and Public Administration Committee, [RoP](#), 15 January 2026, paragraph 41

*“It is not a question of ‘if’ another pandemic will strike but ‘when’. The evidence is overwhelmingly to the effect that another pandemic – potentially one that is even more transmissible and lethal – is likely to occur in the near to medium future.”<sup>173</sup>*

**206.** We remain concerned that vital mechanisms which will provide timely collection, analysis, sharing and use of reliable data for informing emergency responses are still not operational. What is particularly concerning is that, despite confirmation that target date for both the dataset and replacement health protection system of autumn 2026 remains in place, the Welsh Government admits that there remains a considerable risk that other operational pressures could delay implementation beyond this date.

**207.** Six years have now passed since the start of the pandemic. Wales cannot afford any further delay in delivering these essential system upgrades and data improvements, which are critical to ensuring we are better prepared for future public health emergencies.

**Recommendation 25.** The Committee recommends that the Welsh Government urgently sets out what contingency plans it will implement to ensure surge capacity, mass contact tracing capability and multi-agency access if the new health protection management system and Welsh Emergency Care Dataset are delayed beyond autumn 2026.

**208.** The Committee was pleased to learn that the Welsh Government has taken proactive steps to strengthen intergovernmental cooperation and improve data sharing across jurisdictions, and that these arrangements were tested during Exercise Pegasus. The signing of a memorandum of understanding with the UK’s National Situation Centre to establish reciprocal data-sharing commitments represents a positive and practical example of improved coordination.

**209.** However, the Committee believes that this work must not only continue but expand. Public Health Wales emphasised that effective intergovernmental cooperation depends on ensuring Wales has early access to the data, evidence and expert insight that shape the UK-wide response to emerging threats. They highlighted the importance of being included in SAGE meetings so they can contribute to, and benefit from, real-time scientific advice, rather than being in a position where they must react after decisions have already been formed.

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<sup>173</sup> UK COVID-19 Inquiry, [Module 1 report: The resilience and preparedness of the United Kingdom](#), July 2024, page ix.

Strengthening Wales's presence in these core advisory structures will be essential to ensuring that guidance is reflective of the UK's devolved legislative context and that Wales's response efforts are informed by the earliest possible intelligence.

**Recommendation 26.** The Committee recommends that the Welsh Government takes steps to guarantee early and active representation on UK scientific advisory forums so that Wales is in a position to influence guidance and decision-making from the outset, rather than reacting after decisions are made.

**210.** The Committee heard compelling evidence that persistent data gaps continue to hinder Wales's ability to prepare for and respond effectively to civil emergencies. Public Health Wales highlighted significant weaknesses in access to data needed to understand and act on health inequalities, noting that gaps in ethnicity data across NHS Wales remain a longstanding and well-recognised problem. Similarly, the voluntary sector gave numerous examples of data gaps relating to the communities they serve, which prevent meaningful disaggregation and therefore fails to provide an accurate insight into the experiences of specific communities.

**211.** These gaps undermine the ability of responders to conduct accurate vulnerability mapping, provide targeted interventions, and anticipate which groups are most likely to be disproportionately affected during future emergencies. Given the clear evidence that incomplete, inconsistent and insufficiently granular data contributed to unequal outcomes during the COVID-19 pandemic, the Committee believes that addressing these deficiencies must be a priority for the Welsh Government.

**Recommendation 27.** The Committee recommends that the Welsh Government takes steps to address persistent data gaps, including improving the completeness and granularity of equality data across NHS Wales, and incorporating wider social indicators into resilience datasets to enable more accurate vulnerability mapping and targeted interventions.

**212.** The Committee also reflected on broader elements of resilience as they relate to the digital domain. We are seeing an increasing prevalence of cyber-attacks directed at key public services like the NHS as well as critical infrastructure.<sup>174</sup> These fragilities are a perennial threat to our national resilience which will only increase with the development of artificial intelligence (AI). Equally, increases in online mis and disinformation driven by AI-powered tools, threatens to undermine Wales's national security and our ability to respond

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<sup>174</sup> BBC Wales News, [Thousands of Welsh NHS Staff's data stolen in hack](#), 13 March 2017

effectively to emergency situations. Advances in AI have accelerated the pace, scale and sophistication of digital threats, increasing their likelihood and impact and making them more difficult to mitigate against.

**213.** It is also important to note that AI also has significant potential to enhance resilience by improving our data analysis capabilities, early warning systems, support detailed scenario planning and modelling and risk profiling. Realising these benefits, however, will depend on Wales being sufficiently prepared, ensuring that public bodies, responders and decision-makers have the skills, governance structures and safeguards in place to maximise the opportunities that AI presents while managing its associated risks.

**214.** The Cyber Action Plan for Wales<sup>175</sup>, published in 2023, is a welcome step in strengthening Wales's digital resilience. The Committee would be grateful to receive a comprehensive update from the Welsh Government on the progress against the four priority areas that has been made in the three years since publication. As part of this update, the Committee would like to understand how the plan has accounted for, and adapted to, the rapid developments in AI that have taken place over the intervening three years.

**215.** Given the rapidly evolving digital risk landscape, it is vital that the Welsh Government is able to access timely, expert advice and undertakes regular horizon scanning to maintain an up-to-date picture of emerging threats and developments in this area. As such, our Committee wishes to see a greater focus placed on the risks associated with AI and improving our wider digital resilience within our revised structures.

**Recommendation 28.** The Committee recommends that the Welsh Government introduces a dedicated programme of AI and digital resilience auditing as part of the Wales Resilience Framework. This programme should ensure that Wales remains alert to emerging digital risks—including cyber-attacks, systems vulnerabilities, and the spread of mis and disinformation—and that the Welsh Government is able to access timely expert advice to strengthen preparedness, and safeguard critical digital infrastructure.

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<sup>175</sup> Welsh Government, [Cyber Action Plan for Wales](#), 3 May 2023

## Annex 1: List of oral evidence

The following witnesses provided oral evidence to the committee on the dates noted below. Transcripts of all oral evidence sessions can be viewed on the [\*\*Committee's website\*\*](#).

Date	Name and Organisation
<p><b>12 November 2025</b></p>	<p><b>Dr Christopher Williams, Consultant Epidemiologist</b> Public Health Wales</p> <p><b>Dr Tracey Cooper, Chief Executive</b> Public Health Wales</p> <p><b>Professor Fu-Meng Khaw, National Director of Health Protection and Screening Services and Executive Medical Director</b> Public Health Wales</p>
<p><b>27 November 2025</b></p>	<p><b>Bethan Russell Williams, Chief Officer</b> Mantell Gwynedd County Voluntary Council</p> <p><b>Chris Johnes, Chief Executive Officer</b> Building Communities Trust</p> <p><b>Clair Swales, Chief Executive Officer</b> Powys Association of Voluntary Organisations</p> <p><b>Gwendolyn Sterk, Chief Executive Officer</b> Co-production Network for Wales</p> <p><b>Katija Dew, Acting Director</b> British Red Cross</p> <p><b>Matthew Brown, Deputy Chief Executive</b> Wales Council for Voluntary Action</p> <p><b>Professor Uzo Iwobi, Chief Executive</b> Race Council Cymru</p>
<p><b>10 December 2025</b></p>	<p><b>Andy Swinburn, Executive Director of Paramedicine</b> Welsh Ambulance Services University NHS Trust</p> <p><b>Lee Brooks, Executive Director of Operations</b> Welsh Ambulance Services University NHS Trust</p> <p><b>Craig Flannery, Assistant Chief Fire Officer</b> Mid and West Wales Fire and Rescue Service</p>

	<p><b>Dean Loader, Assistant Chief Fire Officer</b> South Wales Fire and Rescue Service</p> <p><b>Anna-Louise Marsh-Rees</b> COVID Bereaved Families for Justice Cymru</p> <p><b>Sam Smith-Higgins</b> COVID Bereaved Families for Justice Cymru</p>
<p><b>15 January 2026</b></p>	<p><b>Eluned Morgan MS, First Minister of Wales</b> Welsh Government</p> <p><b>Alyson Francis, Director, COVID-19 Inquiry</b> Welsh Government</p> <p><b>Andy Fraser, Chief Officer, National Security and Resilience</b> Welsh Government</p> <p><b>Sioned Rees, Director, Public Health Protection</b> Welsh Government</p>

## Annex 2: List of written evidence

The following people and organisations provided written evidence to the Committee. All Consultation responses and additional written information can be viewed on the [Committee's website](#).

Date	Title
<b>10 November 2025</b>	<a href="#">Written evidence from Public Health Wales</a>
<b>1 December 2025</b>	<a href="#">Written evidence from the Welsh Ambulance Services NHS Trust</a>
<b>2 December 2025</b>	<a href="#">Written evidence from COVID-19 Bereaved Families for Justice Cymru</a> <ul style="list-style-type: none"> <li>▪ <a href="#">Annex 1</a>,</li> <li>▪ <a href="#">Annex 2</a>,</li> <li>▪ <a href="#">Annex 3</a></li> </ul>
<b>16 December 2025</b>	<a href="#">Written evidence from Fair Treatment for the Women of Wales</a>
<b>6 January 2026</b>	<a href="#">Written evidence from the Welsh Government</a>
<b>6 January 2026</b>	<a href="#">Written evidence from Anna-Louise Marsh-Rees</a>
<b>7 January 2026</b>	<a href="#">Written evidence from Long COVID Support</a>

## Annex 3: Legislative background and civil contingency bodies in Wales

### Legislative background

1. The Civil Contingencies Act 2004<sup>176</sup> provides the statutory framework for emergency responses by public bodies in the UK. The Act created two categories of local responders for emergency preparation and response:
  - Category 1 responders include local authorities, emergency services and NHS bodies, and are subject to a series of civil protection duties. They are considered core organisations in emergency response and are subject to the full set of civil protection duties, including risk assessment, emergency planning and public communication.
  - Category 2 responders are ‘co-operating bodies.’ They are less likely to be involved with contingency planning work, but will be involved in incidents that affect their own sectors. They are subject to a lesser set of duties, principally to co-operate and share relevant information with other responders.
2. Broad principles for the operation of emergency powers in Wales were provided in a 2011 concordat between the UK and Welsh Governments.<sup>177</sup>

### Organisation of civil contingency and resilience bodies in Wales

3. There are a mixture of groups involved in civil contingency and resilience planning and response at local and national levels in Wales. Some relevant groups are detailed below:
4. LRFs<sup>178</sup> are “the principle mechanism for multi-agency cooperation on civil protection issues.” LRFs include all local Category 1 and 2 Responders. There are four LRFs in Wales, organised by Police Force area:
  - Dyfed Powys Local Resilience Forum;

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<sup>176</sup> [Civil Contingencies Act 2004](#)

<sup>177</sup> UK Government, [Civil Contingencies Act 2004: concordat between the UK Government and the Welsh Government](#), February 2011

<sup>178</sup> Welsh Government, [Local Resilience Forums](#), May 2025

- Gwent Local Resilience Forum;
- North Wales Local Resilience Forum;
- South Wales Local Resilience Forum.

**5.** The Wales Resilience Forum is chaired by the First Minister. Its purpose is to “provide a forum for strategic leadership, assurance and challenge to the Wales Resilience Partnership Team (and its supporting subgroups) in relation to emergency preparedness and strengthening Wales’s resilience.”<sup>179</sup>.

**6.** The Wales Resilience Partnership takes strategic direction from the Wales Resilience Forum, working in partnership with LRFs to deliver agreed objectives at the pan-Wales level. Its purpose is to ensure effective, efficient and coordinated delivery of priorities in relation to emergency preparedness and strengthening Wales’s resilience. The Partnership also organises “sub-groups to develop resilience across Wales in such areas as risk assessment and mass fatalities.”<sup>180</sup>.

**7.** The Risk and Preparedness Committee brings together senior Welsh Government officials and meets quarterly. Its role is to develop an overall picture of the situation and to identify and direct actions to support the local response, managing emerging risks and consequences and to advise and inform Ministers.<sup>181</sup>

**8.** The Emergency Co-ordination Centre Wales is a facility established by the Welsh Government “to gather and disseminate information in Wales on developing emergencies.”<sup>182</sup>.

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<sup>179</sup> Welsh Government, [Wales Resilience Forum: terms of reference](#), July 2025

<sup>180</sup> Welsh Government, [Wales Resilience Partnership: terms of reference](#), September 2025

<sup>181</sup> Welsh Government, [Civil Contingencies and Resilience Arrangements in Wales – Response to COVID-19 Inquiry Module 1 – Technical Briefing to Senedd COVID-19 Inquiry Special Purpose Committee](#), February 2025

<sup>182</sup> Welsh Government, [Wales Resilience Framework 2025](#), May 2025, page 63