Llywodraeth Cynulliad Cymru
Welsh Assembly Government

A Report by Internal Audit Services

Status:	**Final**
Portfolio:	**People, Places and Corporate Services**
Subject area:	**The Welsh Assembly Government's response to the 2009/10 Swine Flu Pandemic.**
Date:	**October 2010**
Audit Manager	**Name Redacted**
Auditors:	
Report No. *File Reference:*	**1542** **A-FNO-11-27-QA837297**

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SECTION 1 – REPORT SUMMARY

1.   Background

1.1.   This Internal Audit was undertaken to review the effectiveness of the Welsh Assembly Government's (Assembly Government) central co-ordinating role in the response to the 2009/10 swine flu pandemic in Wales. This coordinating role falls within the People, Places and Corporate Services Department, with operational responsibility to lead and facilitate the Assembly Government's response to swine flu (and other civil emergencies) delegated to its Emergency Branch.

1.2.   The response to swine flu in Wales commenced on 24th April 2009, following a Cabinet Office briefing to Whitehall Departments and devolved administrations. Response activities ceased in January 2010.

1.3.   During an emergency, the main responsibilities of the Assembly Government are to:

- Establish communications and liaison with all stakeholders including Welsh Ministers and the UK Government;
- Set up and run the Emergency Co-ordination Centre (Wales) (ECC(W));
- Act as secretariat to any central coordinating bodies.

1.4.   Wales also has four regional Local Resilience Forums (LRF) which were immediately notified of the emergency. Each LRF then established a multi-agency Strategic Co-ordinating Group (SCG) which was responsible for managing the swine flu response within that region.

1.5.   The Assembly Government maintains, on permanent standby, an Emergency Co-ordination Centre at its Cathay's Park offices. This facility is managed by Emergencies Branch and provides an operational centre during an emergency. The main role of ECC(W) is to co-ordinate and support SCG communications and responses, brief Welsh Ministers and act as a central link with the UK Government's response machinery (COBR).

1.6.   The agreed scope of the audit was to review the following key assurance areas:

- To ensure that an appropriate management structure was in place; and that resources where available when required;
- To ensure that key roles and responsibilities were identified;
- To ensure that key planning activities had been undertaken;
- To ensure that operational responses were effectively managed;
- To ensure that an effective communications structure was in place.

2.   Overall Conclusion

2.1.   IAS can provide **Substantial Assurance** on the effectiveness of the Assembly Government's central co-ordinating role in the response to the 2009/10 swine flu pandemic in Wales.

2.2.   Outlined below is a table showing the results of the individual control objectives of the audit:

Control Objective (CO)	Overall Assessment	Recommendations		
		Fundamental	Significant	Merits Attention
CO 1 -. To ensure that an appropriate management structure was in place, and that resources where available when required	Substantial Assurance	-	1	-
CO 2 – To ensure that key roles and responsibilities were identified	Substantial Assurance	-	1	-
CO 3 - To ensure that key planning activities had been undertaken	Substantial Assurance	-	-	3
CO4 - To ensure that operational responses were effectively managed	Substantial Assurance	-	-	2
CO5 -To ensure that an effective communications structure was in place.	Full Assurance	-	-	-
TOTAL		-	2	5

2.3.   We have made two significant recommendations within the report which will assist management in:

- Providing a greater level of assurance that key resources will be available to support the ECC(W) during a pan-Wales emergency;
- Ensuring that senior emergency leads within Assembly Government business functions are identified and aware of their responsibilities.

2.4   During our review we identified many areas of good practice where emergency plans are, or were, effective. These include:-

- An effective and appropriate level of liaison and support provided by Emergencies Branch to LRFs;

- The ECC(W), which is a well equipped and well maintained central response centre;
- Good levels of support and commitment provided by volunteers who worked in the ECC(W);
- General and media communications which worked well.

Full detail is contained within Sections 2 and 3 of the report.

2.5   The audit required us to review general emergency plans and arrangements. Whilst not directly within the scope of this audit we can also conclude that the Assembly Government's general arrangements for responding to emergencies are appropriate and effective.

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SECTION 2 – KEY ASSURANCES

Control Objective 1: To ensure that an appropriate management structure was in place, and that resources were available when required.

1.   We conclude that we are able to provide **Substantial Assurance** that controls within this area are operating effectively.

2.   We reviewed the overall organisational structure for managing pan-Wales emergencies and found it to be appropriate. Emergencies Branch performs an effective central coordinating and liaison role and works well with Local Resilience Forums (LRFs).

3.   Following Cabinet Office notification of the swine flu pandemic on Friday 24th April 2009, Assembly Government officials met on Sunday 26th April 2009. The ECC(W) was mobilised immediately, and on Monday 27th April 2009 notifications were sent to LRFs which immediately established Strategic Coordinating Groups (SCGs). Whilst we have made a recommendation within Control Objective 2 relating to the Civil Contingencies Group (CCG) operating within the Assembly Government, nevertheless it worked well and provided an important vehicle for management and decision making during the swine flu response.

4.   Due to the individual nature of specific emergencies, it is not the intention that Emergencies Branch are staffed to fully support the ECC(W) during an emergency response. Rather, a database of volunteers is maintained who would perform a variety of essential roles when the ECC(W) is activated. This relies heavily on the availability of volunteer resources and their release, when requested, by line managers. It is therefore important that on-going engagement with volunteers, line managers and functional heads is maintained.

5.   During the swine flu response difficulties were experienced in securing the services of sufficient volunteers – only around 25% of the volunteer database provided support within the ECC(W). This shortfall in resources placed additional pressures on staff working in the ECC(W). We have recommended increased focus on engaging with emergency volunteers and line managers in order to provide greater assurance that the required resources will be available during an emergency.

6.   We have made one recommendation within this area which we have classed as significant.

Control Objective 2: To ensure that key roles and responsibilities were identified.

7.   We conclude that we are able to provide **Substantial Assurance** that controls within this area are operating effectively.

8.   We found that roles and responsibilities for the Assembly Government (including the ECC(W)) and other agencies have been comprehensively documented within the Pan Wales Response Plan. Specific ECC(W) responsibilities are documented within standard operating procedures which provide effective guidance for volunteers.

9.   However, we note that emergency leads (who would typically perform a functional coordinating role and be a single point of contact) within Assembly Government business functions have not been identified.

10.   During the swine flu response there were regular Civil Contingencies Group (CCG) meetings; this group consisted of senior business representatives who were responsible for considering strategic decisions and actions. In some cases, CCG members had not been involved in any emergency planning activities and were initially unsure of their role within the CCG.

11.   We have recommended that a designated emergency lead be established within each Assembly Government business function, and provided with appropriate training to support the role. This will provide Emergencies Branch with essential single points of contact within each business function, thereby improving the emergency planning process and also emergency responses.

12.   We have made one recommendation within this area which we have classed as significant.

Control Objective 3: To ensure that key planning activities had been undertaken.

13.   We conclude that we are able to provide **Substantial Assurance** that controls within this area are operating effectively.

14.   We reviewed plans and policies and are generally satisfied that appropriate frameworks are in place to support emergency responses. However, we also acknowledge that having procedures for dealing with an emergency situation that are too detailed and rigid may not be appropriate, and that all emergency responses must allow for flexibility depending upon the circumstances.

15.   During our review of documentation we noted that Emergencies Branch have produced a number of different, yet related, plans and policies relating to emergency response. Whilst these are comprehensive it

would appear that in some cases there is duplication of information. We also found that key documents are not subject to regular review, update and version control.

16. Immediately prior to (and independent of) the UK-wide swine flu emergency being declared, the Assembly Government had initiated 'Exercise Taliesin' the objective of which was to test influenza pandemic plans across Wales. This proved a useful and timely rehearsal for the swine flu emergency and provided all participants with an improved level of preparedness for the "live" swine flu response that was required immediately following this exercise.

17. Emergency exercises are generally initiated and funded by the Cabinet Office; these are known as Tier 1 exercises. The Emergencies Branch will often initiate additional exercises to test the Assembly Government's preparedness for particular emergencies. However, we did not identify any separate, risk based planning process in place to support prioritisation of exercises and testing in line with the highest areas of emergency risk.

18. We have made three recommendations in this area which we have classed as merits attention.

Control Objective 4: To ensure that operational responses were effectively managed.

19. We conclude that we are able to provide **Substantial Assurance** that emergency arrangements within this control objective are operating effectively.

20. Within this control objective we reviewed the effectiveness of ECC(W) facilities, the effectiveness of operations within the ECC(W), and also whether any lessons learned exercises had been conducted to identify opportunities for improvement.

21. The ECC(W) is well equipped and we found robust processes to ensure that facilities are regularly tested. Operating instructions are comprehensive. We have met with and placed assurance on the views of SCG members who confirmed that the level of liaison and support provided by the Welsh Assembly Government via the ECC(W) was generally good during the swine flu emergency.

22. There have been a number of initiatives to identify any lessons learned following the swine flu response. A number of actions have been identified, and we have recommended that a programme be established to ensure that they are now implemented.

23.   During the swine flu emergency an action log was established and maintained to register all issues raised by SCGs. However, the action log did not record the priority of requests. Difficulties were also experienced by SCGs in confirming the status of outstanding requests or details of action taken As this log will be used for any future emergencies we have recommended some minor enhancements.

24.   We have made two recommendations in this area both of which we have classed as merits attention.

Control Objective 5: To ensure that an effective communications structure was in place.

25.   We conclude that we are able to provide **Full Assurance** that emergency arrangements within this control objective are operating effectively.

26.   We did not identify any material issues relating to general or media communications. Policy had been established within the Emergency Communications Framework document which was developed at the start of the swine flu pandemic. Any issues relating to communications were managed using a control log that identified the status of all entries. We have made no recommendations in this area.

SECTION 3 – RECOMMENDATIONS AND ACTION PLAN

Findings and Management Response

Control Objective 1: To ensure that an appropriate management structure was in place, and that resources were available when required.

Ref.	Finding / Observation	Risk / Impact	Recommendation	Management Response
1.1	**ECC(W) Volunteer Resources** It is not the intention that Emergencies Branch are staffed to fully support the ECC(W) during an emergency response. A database of volunteers is maintained who would perform a variety of essential roles when the ECC(W) is activated. This system relies heavily on the availability of volunteer resources and their release, when requested, by line managers. It is therefore important that on-going engagement with volunteers, line managers and functional heads is maintained. During the swine flu response difficulties were experienced in securing the services of sufficient volunteers – only around 25% of the volunteer database provided support within the ECC(W). This shortfall in resources placed	The effectiveness of emergency responses will be impaired if sufficient volunteer resources are not made available to support the ECC(W).	**SIGNIFICANT** A new strategy for securing volunteer resources should be developed and implemented. The following should be considered:- • Increased level of on-going engagement (i.e. communications and training) with volunteers, line managers and functional heads. • Analysis of skills requirements and functional representation. • Identification of "super volunteers" who would receive a higher level of training and an increased level of management commitment.	**Accepted** We are already putting in place various initiatives to recruit and train volunteers. We've published a volunteer's on line bulletin 'Surge' to keep them up to date with developments. We are running 'hot-shot' sessions bringing in partner agencies to give presentations. We are developing an on-line training tool for volunteers. We are doing all this but we can never guarantee success as recruitment and training is on a voluntary basis. **Target Implementation Date** December 31st 2010 subject to resource issues identified above. **Responsible Officer** Name Redacted

additional pressures on staff working in the ECC(W).			

Control Objective 2: To ensure that key roles and responsibilities were identified.

Ref.	Finding / Observation	Risk / Impact	Recommendation	Management Response
2.1	**Emergency leads within the Welsh Assembly Government** Emergency leads (who typically perform a functional coordinating role and are a single point of contact) within Assembly Government business functions have not been identified. During the swine flu response there were regular Central Coordinating Group (CCG) meetings; this group consisted of senior business representatives who were responsible for considering strategic decisions and actions. In some cases, CCG members had not been involved in any emergency planning activities and were initially unsure of their role within the CCG.	Reduced effectiveness of emergency communications and emergency responsibilities within Assembly Government business functions.	**SIGNIFICANT** Management should identify emergency leads, of appropriate status, within Assembly Government business functions and provide appropriate training to allow them to provide functional coordinating roles during emergency situations.	**Accepted** We can use this to approach departments to provide lead officers for emergencies. We've tried this through the CCG previously with various levels of success. **Target Implementation Date** 31st December 2010 **Responsible Officer** Wyn Price

Control Objective 3: To ensure that key planning activities had been undertaken.

Ref.	Finding / Observation	Risk / Impact	Recommendation	Management Response
3.1	**Emergency Policies and Plans** Emergencies Branch have produced a number of different, yet related, plans and policies relating to emergency response. Whilst these are comprehensive it would appear that in some cases there is duplication of information.	Lack of effective time management if staff have to familiarise themselves with several similar documents. Increased management time maintaining several similar documents.	**MERITS ATTENTION** Management should review existing emergency plans and policies to determine whether they can be rationalised.	**Accepted** We've recently updated the ECC(W) activation arrangements which we can use as the base for consolidating all other internal plans. **Target Implementation Date** 31st December 2010 **Responsible Officer** Wyn Price
3.2	**Emergency Policies and Plans** Key documents are not subject to regular review, update and version control.	If not subject to regular review, key documents may become out of date and inaccurate.	**MERITS ATTENTION** Management should ensure that all key documents are subject to regular review, updated where necessary, and subject to version control.	**Accepted** We will build in a calendar of reviews as we have done for the Wales Resilience Forum Business Plan. **Target Implementation Date** December 1st 2010 **Responsible Officer**

				Wyn Price
3.3	**Emergency Exercises** Immediately prior to the swine flu emergency, 'Exercise Taliesin' had been held with the objective of testing influenza pandemic plans across Wales. This provided all participants with an improved level of preparedness for the "live" swine flu response that was required immediately following this exercise. Emergency exercises are generally initiated and funded by the Cabinet Office; these are known as Tier 1 exercises. Whilst these exercises are essential, we did not identify any separate, risk based planning process within the Welsh Assembly Government. This would support prioritisation of exercises and testing in line with the highest areas of emergency risk.	Failure to conduct risk based planning of emergency exercises could result in failure to prepare for emergencies with the highest levels of impact.	**MERITS ATTENTION** Management should develop a risk based approach to emergency planning that incorporates an assessment of impact and likelihood of occurrence.	**Accepted** We are generally driven by external needs on exercises either through Cabinet Office or the Wales Training and Exercising Group. Both use risk as a means for informing priorities. We have little opportunity between these commitments to instigate our own regime but we can try. We are already doing this with Exercise Watermark Restore in march 2011 where we are testing WAG's recovery support arrangements to a flooding incident; flooding featuring high on all risk registers. **Target Implementation Date** April 1st 2011 following liaison with Welsh Training and Exercising Group. **Responsible Officer** **Name Redacted**

Control Objective 4: To ensure that operational responses were effectively managed.

Ref.	Finding / Observation	Risk / Impact	Recommendation	Management Response
4.1	**SCG Actions Log** During the swine flu emergency an Action Log was maintained which recorded communications from the SCG's that required a response or action. Whilst all actions are recorded on the Action Log, it did not record the priority of requests. Difficulties were also experienced by SCGs in confirming the status of outstanding requests or details of action taken.	Failure to prioritise action log entries could result in inappropriate attention to low priority requests, at the expense of high priority issues. Lack of visibility of status, or action taken, may impact on the effectiveness of an emergency response.	**MERITS ATTENTION** Action Log entries should be allocated priority classifications together with the status of requests and details of action taken.	**Accepted** The Loggist training which we are sourcing at present will help inform the future direction of logging practices. We recognise that the SCG log needs refinement. **Target Implementation Date** April 1st 2011 **Responsible Officer** Name Redacted
4.2	**Lessons Learned** We found that there have been several reviews of the Assembly Government's swine flu response, including structured debriefs of SCG responses. Operation Taliesin, although pre-dating the swine flu response, also provided a number of lessons learned. There is currently no definitive list of agreed actions, responsibilities	Improvement actions may not be implemented unless responsibilities and timescales are agreed.	**MERITS ATTENTION** A programme should be initiated with the objective of addressing recommendations made to improve emergency responses. Actions should be agreed, together with responsibilities and timescales for completion.	**Accepted** We're in the process of doing this. **Target Implementation Date** April 1st 2011 following liaison with external partners. **Responsible Officer** Wyn Price

	and timescales.		

Control Objective 5: To ensure that an effective communications structure was in place.

We have not made any recommendations in this area.

Annex A

AUDIT OPINION

Opinion	Definition
Full Assurance	A sound system of internal control likely to achieve the system objectives, and which is operating effectively in practice - no "Fundamental" or "Significant" recommendations made
Substantial Assurance	A basically sound system of internal control but where there are a few weaknesses that may put the achievement of some system objectives at risk - no "Fundamental" recommendations and few "Significant" recommendations
Limited Assurance	A system of internal control that is satisfactory in part which contains a number of weaknesses that are likely to undermine the achievement of the system objectives and leave it vulnerable to material error/abuse or threatening risk – one or two "Fundamental" recommendations made and several "Significant" recommendations.
No Assurance	An unacceptable system of internal control, containing fundamental weaknesses creating serious doubts over the achievement of system objectives and leaving it vulnerable to significant error/abuse – many "Fundamental" recommendations made.

Recommendation Classification

Category	Definition
Fundamental	A weakness of control where there is a major risk of loss, fraud, impropriety, poor value for money or a failure to achieve Departmental objectives. Immediate remedial action required
Significant	A weakness of control which, though not fundamental, could expose the system to level of significant risk. Such a risk could impact on the operational objectives of the Department and should be a concern to senior management.– Requires remedial action as soon as possible
Merits Attention	Areas that individually have no major impact but where management would benefit from improved control and/or have the opportunity to achieve greater effectiveness and/or efficiency.

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