

**First Witness Statement of Chris Llewelyn
Chief Executive of the Welsh Local Government Association
12th December 2022**

**IN THE MATTER OF MODULE 1 OF
THE UK COVID-19 PUBLIC INQUIRY
REFERENCE FOR REQUEST - M2B-WLGA-01.**

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**WITNESS STATEMENT OF
CHRIS LLEWELYN
ON BEHALF OF
THE WELSH LOCAL GOVERNMENT ASSOCIATION**
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I, **Chris Llewelyn**, say as follows –

Part 1 - Introduction

1. I am the Chief Executive of the Welsh Local Government Association (WLGA) of One Canal Parade, Dumballs Road, Cardiff, CF10 5BF. I took up this office in January 2019 having joined the WLGA as Director of Lifelong Learning, Leisure and Information in 2002 and was also the Deputy Chief Executive since 2010. During my time at the WLGA, and I have covered a wide range of the Association's portfolio areas, including periods covering local government finance and economic development.
2. On the 3rd of November 2022, the Lead Solicitor for Module 1 of the UK Covid-19 Inquiry (the Inquiry), wrote on behalf of Baroness Heather Hallett, the Inquiry Chair, with a Request for Evidence under Rule 9 of the Inquiry Rules 2006 Reference for Request - M2B-WLGA-01. I am authorised by the WLGA to make this statement on its behalf in response to this request.
3. While I have broad oversight of the WLGA's work I do not have first-hand knowledge of everything that it does. Accordingly, in making this statement I have had to rely from time to time on information provided to me by officers of the WLGA. It is my belief that they have diligently and fairly undertaken this task. My statement should therefore be read as representing a statement concerning the collective understanding and knowledge of the LGA in relation to the period to which Module 1 refers.

Part 2 - WLGA's Structures, Roles, People and Processes

Introduction

4. The WLGA was established in 1996 as an unincorporated Association and the membership body for local authorities in Wales. Membership is voluntary and councils make their own decisions on whether or not to join. All 22 Welsh local authorities are members and all 3 fire and rescue authorities and the 3 national parks authorities are associate members.
5. The WLGA is politically-led and cross-party and works to give local government a strong, credible voice with national government. As the national membership body for

local authorities and the voice of local government, the WLGA's purpose is to promote, improve and support local government.

6. Among its core objectives, it seeks to:
 - represent and negotiate, wherever possible by consensus, the interests of member authorities to the Senedd Cymru/Welsh Parliament, Welsh Government, the Government and Parliament of the United Kingdom;
 - to formulate sound policies for the improvement and development of local governance, effective management in local authorities and the enhancement of local democracy in Wales and elsewhere, now and for future generations;
 - to provide forums for the discussion of matters of common concern to Member Councils and Associate Authorities, and as a means by which joint views may be formulated and expressed;

7. The WLGA is funded through a combination of membership subscriptions, top-slice funding and Welsh Government grants for the delivery of specific projects or programmes.

8. The WLGA Council includes 72 members from the 22 local authorities. These are appointed proportionately by reference to population size, together with 6 further non-voting members, one from each of the Associate Members. The Council considers constitutional and business issues and it has a deliberative role which can be used in furtherance of Association policy. The Council also sets the Budget of the Association.

9. At each Annual General Meeting the Council appoints the Association's senior office holders which include the Leader, Deputy Leader and Spokespersons. The leader of the largest political group is the Leader of the WLGA and has responsibility for promoting the policies of the WLGA supported by other Officer Holders. The WLGA is a cross-party organisation and seeks to operate on the basis of consensus where leaders and senior members from different political groups are involved in the business of the WLGA thereby representing the collective voice of local government.

10. The Deputy Leader supports the work of the Leader and other Group Leaders to provide collective advice and support and to represent the WLGA where necessary.

Spokespersons promote the policies and views of the WLGA in specified policy areas and undertake bilateral meetings with relevant Welsh Ministers and UK Government Ministers.

11. The WLGA's Executive Board comprises the 22 leaders of each Welsh local authority and is the main policy and deliberative forum of the Association that seeks to deal with issues at an all-Wales level.

The WLGA and civil emergencies

12. The WLGA does not have a formal or statutory role in civil emergencies, emergency preparedness or risk management, although its member authorities are Category 1 Responders (C1Rs) within the meaning of the Civil Contingencies Act 2004. Its role in the context of civil emergencies, emergency preparedness and risk management has been and remains to

- provide the views of our members to government on national policies, guidance, and legislation and regulations, related to emergency planning,
- suggest possible changes in them,
- inform government during the course of civil emergencies of the issues and concerns facing our member authorities, and
- share good practice among our member authorities in particular during an emergency.

13. The WLGA chief executive is a member of the national advisory Wales Resilience Forum and the WLGA's Regulatory and Frontline Services Policy Officer attends the Wales Resilience Partnership Team and Health Protection Advisory Group. The WLGA is also represented on the Welsh Government's 'Warning and Informing' group, where emergency planning communications and updates are shared with LRF and partners communications officers.

14. WLGA representatives attend these forums alongside representatives of C1Rs, including local authority or Local Resilience Fora representatives and any communication or co-production around guidance or plans is coordinated through the proper civil contingencies structures, led by Welsh Government, as outlined elsewhere in the witness statement.

15. Welsh Government may decide to establish the Emergency Coordination Centre (Wales) (ECC(W)) in response to an emergency situation.
16. The (ECC(W)) manages the Welsh Government's response to emergencies in Wales, gathers and disseminates information and briefs and updates Ministers. It is essential that the ECC(W) is always at the level of preparedness required to respond to any emergency. Key to this is a cohort of available staff, with the necessary knowledge, skills and experience to work and respond confidently in this pressured environment. The WLGA is requested to attend as a "partner" and assist in the collating and sharing of local government information.

Relations with other local authority bodies

17. Welsh local authorities are also members of the Local Government Association (LGA) of England and Wales through the WLGA's corporate membership of the LGA. The LGA leads on non-devolved matters on behalf of Welsh local government, including employment matters, in liaison with the WLGA. The WLGA is represented on some of the LGA's boards, including the Executive Advisory Board.
18. Both Northern Ireland Local Government Association (NILGA) and the Council of Scottish Local Authorities (COSLA) are independent membership bodies representing the interest of local government in Northern Ireland and Scotland, respectively. WLGA undertakes wider work with the LGA, COSLA and NILGA (particularly looking at the overall financial needs of local government and workforce planning), typically through the UK Forum. There is no joint formal work programme on emergency planning across the national associations. The WLGA does not have capacity for this function. Should there be an agreement that the associations work together in the future then resources will be needed for us to do so.

Part 3 - Government Structures

The Wales Resilience Forum

19. The Wales Resilience Forum is a national strategic partnership that coordinates intelligence sharing, partnership working across key agencies, and the sharing of good and consistent practice. The terms of reference say that its aims are “to promote good communication and the enhancement of resilience across agencies and services in Wales by providing a forum for Chief Officers to discuss with Welsh Ministers strategic issues of emergency preparedness.”

20. Chaired by the First Minister it has a broad membership of the public, emergency, military and voluntary sector services and is attended at a senior level. The Forum is thus a demonstration of partnership working which can give the Welsh Government confidence that there is strong and effective collective planning for preparedness, and readiness, for emergency situations. Representatives of the Local Resilience Fora (LRFs) are part of the membership. The Chief Executive of the WLGA is also a standing member, as is a representative member of the Society of Local Authority Chief Executives (Solace) Cymru.

21. The Forum gives strategic guidance and advice to the supporting structure of LRFs and public sectors. It is an advisory rather than an executive body. The terms of reference (CL/01 – INQ000082850) say that the role of the Forum is:

- To create a forum for strategic guidance on resilience issues affecting Wales
- To consider UK Government/Welsh Government policy guidance and to advise on the implementation in Wales where appropriate
- To facilitate mutual aid arrangements and joined up working
- To provide direction and strategic leadership to the Wales Resilience Partnership Team and its sub-groups
- To map resilience at the pan-Wales level, identify gaps and facilitate preparedness activity.
- To raise, consider and discuss issues of resilience in Wales with the UK Government.
- To support cross-boundary working and information sharing

22. The Forum also produces the Pan-Wales Response Plan (which is maintained by the maintained by the Wales Resilience Partnership Team) which –

“...sets out the arrangements for the pan-Wales level integration of the Welsh response to an emergency in or affecting Wales...The document primarily provides a framework for the management of an emergency affecting several or all areas of Wales.” (CL/02 - INQ000082844)

23. The Pan-Wales Response Plan covers the procedures for triggering emergency response and readiness arrangements at national and local levels in the eventuality of any type of major emergency, and is not specific to a pandemic,

24. Under the Wales Resilience Forum Structures, as illustrated in its business plan for the period 2016-19 (CL/03 – INQ000082830), arrangements for liaison with UK Government at a professional civil senior level are set out. Neither the WLGA nor Welsh local government has any direct involvement in these arrangements.

25. A sample agenda (CL/04 – INQ000082848) and minutes (CL/05 – INQ000082851) are available here (the Welsh Government provides the secretariat and will be able to provide archive material on request).

26. A ‘Wales Resilience Group Structure’ organogram from 2015 outlines how the various national and regional civil contingency structures inter-relate (the organogram refers to a ‘dormant’ Pandemic Flu Task and Finish Group – the WLGA does not hold details of this group) (CL/06 – INQ000082849).

Welsh Local Resilience Forums

27. At the regional/local level (see below for definitions) the Local Resilience Fora (LRFs) bring together the category one (C1R) and two responder (C2R) organisations who have a duty to co-operate under the CCA 2004 and a duty to respond to an emergency.

28. The fora operate on police force areas (Dyfed Powys, Gwent, North Wales and South Wales) and coordinate emergency planning and risk management across the challenges and risks of flooding, severe weather, pandemics, terrorist incidents, industrial incidents, loss of critical infrastructure, animal disease, pollution and transport incidents. In the case of a declared emergency of scale, an LRF will invoke

the formation of a Strategic Coordination Group (SCG) to oversee the collective response to and management of that emergency.

The Wales Risk Assessment Group

29. The WLGA is not aware of this Group. A group with this title is not referred to in the terms of reference of the Wales Resilience Forum, or in the Wales Response Plan.

The Wales Resilience Partnership Team

30. The Wales Resilience Partnership Team supports the Wales Resilience Forum through secretariat, coordination and policy services. According to the Wales Resilience Forum (WRF) Terms of Reference, the WRF provides “direction and strategic leadership to the Wales Resilience Partnership Team and its sub-groups.”

31. The Team has specific sub-groups to build and maintain resilience across Wales in areas including risk assessment and mass fatalities. Membership includes a number of statutory bodies and their representatives including

- the Welsh Government,
 - Joint Emergency Services Group Coordinator (JESG),
 - Fire and Rescue,
 - Ambulance Service,
 - Natural Resources Wales,
 - Health and Safety Executive,
 - Public Health Wales,
 - LRF Chairs,
 - LRF Coordinators
- and
- the WLGA.

32. The team also coordinates training programmes and exercises for senior professionals from Category 1 responders e.g. Gold and Silver Command level training. The Terms of Reference (CL/07 – INQ000082841) say that the Team will -

- “To assess the implications for Wales of the resilience work produced through the Resilience Capabilities Programme.
- To recommend to the Wales Resilience Forum appropriate actions to be taken in Wales on UK capabilities initiatives in the light of the assessments made. For example, taking action at an all-Wales level through the WRPT or ensuring that the Local Resilience Forums are advised where action is more appropriately taken forward at the local level.
- To take forward a programme of work to address priorities on a pan-Wales level. These priorities are based on those areas of work identified as of the highest concerns in which pan-Wales planning would add value.
- To establish, where appropriate, multi-agency Capability Sub-Groups with a specific remit (for example, CBRN) and short-term Task and Finish Groups to address identified risks or capability gaps.
- To establish and maintain pan-Wales response structures through the Pan-Wales Response Plan and to ensure effective and appropriate arrangements are in place for responding to the full range of emergency scenarios.
- To produce a core framework for capability development in Wales within a business plan of priority actions to be approved annually by the WRF.
- To advise on arrangements, where appropriate, for dealing with ‘mass impact’ challenges (i.e. incidents with the potential to overwhelm the capacity of responders in a single Local Resilience Forum area to respond effectively) and, with approval from the WRF, to issue guidance to planners.
- To horizon scan and risk assess possible threats to Wales and take action, with the approval of the WRF, to mitigate such risks.”

An example agenda is included as an (CL/08 – INQ000082832).

Joint Emergency Services Group

33. The Joint Emergency Services Group brings together all of the emergency services in Wales together with NHS Wales, Welsh Government and the armed forces at the most senior level. The Group coordinate their collective contribution to civil contingencies and counter-terrorism in Wales, and also address wider cross-service issues of joint interest.

Emergency Services Civil Contingencies Co-ordinator

34. The Welsh Government has a specialist team which provides policy advice and support and advises the Wales Resilience Forum.

Welsh Borders Resilience Group

35. The WLGA is not aware of this group. A group with this title is not referred to in the terms of reference of the Wales Resilience Forum, or in the Pan Wales Response Plan.

Outbreak Control Teams

36. There are also control teams which are over above the groups and bodies listed above. These are set up as necessary in accordance with the Communicable Disease Outbreak Plan for Wales which is discussed below.

Networking and similar relationships

36.1 There are no formal national bodies for local government in this field beyond the above. However, as part of our role the WLGA promotes networking amongst peer professionals to share practice and expertise in many professional fields. There is an informal network of professional emergency planning colleagues in operation. The WLGA has very limited capacity for this specialist field and is not active with this network which is self-supporting with the secretariat and chairing services being fulfilled by one or more of the member local authorities on a rotational basis.

36.2 The Welsh network and individual local authorities access national expertise and resources for training and development such as the UK-national Emergency Planning College and the Resilience Direct hub. Some of the information and support services offered by the Local Government Association may be extended to Wales, or accessed

directly by Welsh local authorities. Individual emergency planning officers might also be members of the UK national Emergency Planning Society.

37. Over and above the above, organised networks and associations of professionals in specific fields, will make their own specialist contributions to risk management and emergency planning at both national and local levels. An example of such a network making a specialist and significant contribution would be that of the network of Directors of Public Protection which makes contributions to plans for the eventuality of a Bird Flu or a Swine Flu pandemic.

Co-operation with the private sector

38. There are no formal national bodies for local government in this field beyond the above. LRFs and local authorities would mainly draw on C2R for this purpose. However, individual LRFs or local authorities may consult and involve representative organisations such as the Confederation of British Industry (CBI), the Federation of Small Businesses (FSB) and local Chambers of Commerce, or local representative business fora. Local authorities, through their local civil contingencies and emergency planning function, can offer support and advisory services to local businesses on resilience and business continuity, and extend their reach in this way. Local authorities have specified legal duties for engagement with certain types of businesses in higher risk sectors (see below). Local authorities also have a statutory duty to provide advice and assistance to local businesses under the CCA 2004.

Part 4 - Planning for a Pandemic

The Civil Contingencies Act 2004 legislative regime and associated policy framework in Wales

39. The Civil Contingencies Act 2004 (CCA 2004) applies equally to Wales as to England. The Act sets out the legal framework for preparing for, and responding to, civil emergencies. Civil emergencies are defined as an event or situation which threatens serious damage to human welfare or the environment of a place in the UK, or war or terrorism which threatens serious damage to the security of the UK.

40. The Act is underpinned by regulations and extensive government guidance. Specifically, the responsibilities of councils as Category 1 Responders (C1Rs), and LRFs, are set out in the following guidance documents:

- The role of Local Resilience Forums: A reference document (CCS, v2 July 2013) (CL/09 – INQ000082847)
- Emergency preparedness (CCS, originally published 2006, chapters updated differentially since then) (CL/10 – INQ000082827)
- Emergency response and recovery (CCS, 2013 version) (CL/11 – INQ000082839)

41. The Act is a piece of enabling legislation. Whilst there is extensive guidance to support it, the legislation provides considerable flexibility for local planning to meet the legal requirements.

42. C1Rs are defined in schedule to the Act. These are the principal responders to emergencies and they have prescribed duties and responsibilities. They include the emergency services, NHS bodies and local authorities. Category 2 Responders (C2Rs) work with and support the C1Rs and include utility companies, public transport providers and the voluntary sector.

43. The responders have duties and roles for readiness for responding to a civil emergency, and also to prevent emergencies from occurring through mitigating plans and actions as far as is possible. Specifically, as C1Rs, local authorities have the following broad responsibilities –

- Assessing the risk of emergencies occurring and using this information to inform contingency planning,
- Having emergency plans in place,
- Having business continuity management arrangements in place,
- Having communications arrangements in place to make information available to the public and to maintain arrangements to warn, inform and advise the public in the event of an emergency,
- Sharing information with other local responders to enable coordination amongst them,

- Cooperating with other local responders to enable coordination and effective planning and actions,
and
- Providing advice and assistance to businesses and voluntary organisations about business continuity management.

44. The local responders work together in partnership, sharing planning, data, intelligence and resources in LRFs. Whilst the term 'local' is used here, the fora are organised on a police force area footprint and are in effect regional bodies.

45. There are four fora in Wales –

- Dyfed Powys,
- Gwent,
- North Wales,
and
- South Wales.

46. The LRFs coordinate emergency planning and risk management across the risks and challenges of flooding, severe weather, pandemics, terrorist incidents, industrial incidents, loss of critical infrastructure, animal disease, pollution and transport incidents.

47. In the case of a declared emergency of scale and impact an LRF will invoke the formation of a Strategic Coordination Group (SCG) to oversee the collective response to and management of the emergency. Once an emergency has passed, the SCG may transfer the follow-through actions to restore normality to a Recovery Coordination Group (RCG) or one or more defined responders. The responders may exercise their powers and roles either jointly or severally in such partnership settings. I have discussed elsewhere in this statement how the process triggering arrangements for the standing-up of the SCGs in the event of an emergency situation under the Pan Wales Response Plan works.

48. The LRFs have a key role in the discharge of the collective statutory duties of the C1Rs, but there are also other partnerships in place which cover specific areas of public services which also mitigate risk, and plan for emergencies and loss of business

continuity in specialist fields e.g. the statutory Regional Partnership Boards for Health and Social Care. The WLGA is aware, as an illustration of this sector specific risk planning, that LRF coordinators were requested by Welsh Government officials to review plans for an influenza pandemic in October 2018 in what appears to be annual seasonal planning for the risks of high service demands in the health and social care fields as winter approaches.

49. C1Rs will also be members of these partnerships in different combinations according to their respective terms of reference. The Category 1 responders have the opportunity to refer or escalate any risk or emergent situation to their LRF at any time, whether these risks of situations become apparent in an internal organisational or a partnership setting. Risks and situations so escalated become a shared responsibility amongst LFR responders for monitoring, and mitigating actions and contingency planning, as necessary. The LRFs have a primacy for civil contingencies work in their areas of jurisdiction in this way.

50. All responders have responsibilities as part of good corporate governance to have organisation specific risk management plans and business continuity plans in place. Some of the plans may be exclusive to an individual organisation whereas other may rest on co-dependent planning with one or more of the other responders.

The local authority approach to emergency planning

51. A local authority will typically have a core and specialist emergency planning team/advisor or a shared emergency planning team with neighbouring authorities. They will have assigned senior officers within their authority for specific roles and responsibilities in the event of an emergency e.g. communications or human welfare, and a response and command structure. Periodic reporting to Cabinets, and Overview and Scrutiny and Audit and Governance Committees on the emergency planning function and business continuity will be built into forward work programmes for reporting, assurance and accountability.

52. Local authorities also have some specific risk management and civil contingency planning roles in the specific risk fields of: Pipeline Safety Regulations; the Control of Major Accident Hazard Regulations (COMAH); and the Radiation Regulations. These will involve liaison with local businesses in these higher-risk sectors and other responders. In the case of the COMAH regulations, there is a duty to work with the so

designated local businesses in developing and maintaining their own site-specific emergency plans.

Business continuity management

53. Individual responders will maintain business continuity plans for their respective organisations at both corporate and service levels. These plans are designed to enable immediate steps to be taken to ensure that essential services can continue to operate, at either full or a reduced and skeletal scale, in the event of an emergency or an unexpected and interruptive event such as a power failure, and until such time as systems and services can be fully restored.
54. At the corporate and whole-organisation level, plans will typically cover how the organisation can maintain key software systems, maintain communication channels, mobilise people resources, and maintain functioning facilities, plant and equipment.
55. Plans at the service level will cover maintenance of critical services e.g. care of the most vulnerable who are dependent on daily care at home, emergency repairs to social housing units, and highways safety management. Where two or more responders have a shared responsibility for a critical service e.g. nursing and social care to the most vulnerable who are dependent on daily care, then shared planning arrangements can be expected to be in place.

Public awareness: warning, informing and advising the public

56. C1Rs will issue approved and coordinated information to the public either at the point where the risk of an emergency occurring is high and immediate e.g. a severe weather incident with consequences of flooding, and/or during an ongoing emergency situation once it has been declared/begun. This information will typically cover situation updates, advice and support for personal health and well-being, and incident contact lines for information and reporting. The information aims to 'warn and inform', encourage public cooperation, and give public assurance.
57. In the case of an impending or 'live' emergency situation a Communications Cell, with expertise and resources, will be 'stood-up' to coordinate and quality assure all outgoing messaging. Messaging is routed through various media – both to the general public and to specific partners and stakeholders who can aid the response.

Cooperation and information sharing

58. Responders co-operate in planning for, and in responding to emergencies, as I have noted in several places in my statement. The strength and effectiveness of this co-operation in practice is tested in the course of actual emergencies, where the collective and the individual contributions are evaluated post-event, and in scenario and resilience testing exercises.
59. Under the CCA 2004 there are requirements to share information and to cooperate. During the course of planning for or responding to an actual emergency, responders are able to share with each other whatever protected data and intelligence is necessary to protect life etc under the cover of the legislation. Responders share data and intelligence, within the confines of their roles and with sensitivity and confidentiality, under legally-compliant protocols such as the Wales Accord on the Sharing of Personal Information (WASPI)¹.
60. WASPI, which predates the GDPR legislation, is a national protocol that enables the sharing of personal data amongst responders for the purposes of cooperation e.g. in civil contingencies planning work. Public bodies are signatories to WASPI. This initiative was borne out of a shared frustration that responders were being too guarded in opting not to share information, which was needed by others if joint planning was to be at its most effective, for fear of being in breach of the developing body of law on data protection and privacy rights. This is example of enhanced partnership working in Wales.

Subsidiarity

61. The principle of subsidiarity states that *'Decisions should be taken at the lowest appropriate level, with co-ordination at the highest necessary level. Local agencies are the building blocks of the response to and recovery from an emergency of any scale.'* This is explained in the key UK Government guidance documents *Emergency*

¹ The WASPI is a common set of principles and standards which support the sharing of personal information to deliver services to the people of Wales. Signing the Accord demonstrates a commitment to apply those principles. This has helped develop a consistent approach and improve confidence that information is shared lawfully, safely and effectively. The WASPI and resources are only available online at <http://www.waspi.org/framework-documentation>

Preparedness and Emergency Response and Recovery. The principle of subsidiarity has been reinforced by the most recent pre-implementation review of the CCA 2004.

62. The principle of subsidiarity is understood and followed in Wales in this field. Where a civil contingencies emergency or other event of scale is local or regional, the respective LRF takes charge of the situation through the standing-up of a Strategic Coordination Group (SCG) or a lower-level Incident Management Team (IMT) for a more localised emergency or event. The LRF may draw upon national bodies for specific advice or resourcing support. In the case of a nationally declared emergency then the LRFs are highly likely to be directed by governments (with COBRA at the head of the response at a UK level) and national government bodies on the priorities for action, the legal regulations for the management of the emergency and public compliance and social order, and the parameters for the exercise of local discretion.

63. Arrangements for the oversight of an emergency situation in Wales, under the direction of a UK level response, are illustrated in the Pan Wales Response Plan.

Welsh Government engagement with civil contingency planning at a local government level

64. The Welsh Government's main interface with civil contingency planning at a local government level is through the Wales Resilience Partnership Team which includes lead Welsh Government officials, LRF chairs and LRF coordinators and other public service representatives. Outside of this forum, civil servants, who have lead roles in national civil contingencies planning within and for Welsh Government, have limited and infrequent contact with LRFs and C1Rs at the local level. They provide occasional strategy and policy advice, and risk assessment updates, and can make requests for intelligence and data for national collation. They have a visible role in coordinating or promoting participation in themed scenario and resilience and readiness testing exercises across the four LRFs in Wales.

National Security Risk Assessment (NSRA) and the National Risk Register

65. Whilst the Forum reviews the National Security Risk Assessment (NSRA) and ensures that it is fully taken into account in the consideration of national and local risk planning in Wales it is not owned by the Forum. The NSRA is a UK Government product

maintained by the UK Cabinet Office' National Risk Team. The Welsh Government contributes to its development to ensure it is truly reflective of UK risks.

Developing risk assessments and risk registers at the local level

66. The maintenance of risk assessments/registers works on two levels.
67. First, individual local authorities and co-responders are responsible for internally maintaining comprehensive, accurate and timely risk registers to meet their statutory obligations, to protect business continuity, and to ensure good organisational governance. Risks are regularly assessed, and new and emergent risks added to registers, as standard practice. Assessments involve the definition and understanding of a risk; the likelihood of it occurring and, if so, the scale of its impact; mitigating actions required; reporting and escalation actions required e.g. to senior decision-makers within the local authority or to an external partnership where the risk should be shared and more collective action taken e.g. an LRF. Risks may also be shared with Welsh Government and/or with a statutory regulator as an early warning of a potential loss of business continuity or service failure. The responses from Welsh local authorities in Annex B will give explanation and assurance over such arrangements.
68. Secondly, risk registers are maintained by co-responders for significant risks where there is a shared responsibility, and co-dependence, for civil contingencies planning and, in case of emergencies, response. This is done at the LRF level. This work is not exclusive to the LRF and other partnerships which exist between co-responders and partners in other public service fields, whether statutory or non-statutory, may also maintain risk registers.
69. Risk registers will be maintained by LRFs for the types of emergencies listed above (note that this is not exhaustive). Risks within these and other types of emergencies, whether an existing risk where there is a change in its status or whether a new and emergent risk, are escalated by responders and partners for review and assessment as needed, and incorporation into the shared risk register. Risk assessments can be undertaken in the form of discussion at the LRF meetings, desk-top research and evaluations, and/or scenario and resilience testing.

70. Risks which are not specific to a locality, or might have a wider geographical impact, can be escalated to the national level. Risks which have been identified at a national level, through the Wales Resilience Forum, can be referred to the LRFs for local assessment and proportionate preventative action planning as necessary.

Local Resilience Forums in Wales

71. The LRFs will have a formal and legally compliant constitution, a set membership, protocols for information sharing and security, a forward work plan of new and repeat work, shared risk registers and protocols for 'standing-up' and 'standing-down' an emergency. LRFs will typically meet quarterly or more frequently as required. The LRFs are given strategic direction and guidance by the Wales Resilience Forum on emergent and ever-present risks, specialist areas of knowledge, intelligence, and strategy. Further information about LRF working will be available in the responses to the Annex B survey of local authorities as are all members of their respective LRF.

The process for developing emergency plans at the local level

72. As described elsewhere in my statement, emergency plans are developed at both organisational (the individual corporate body) and LRF (the collective and shared co-responder) levels. Plans are reviewed and updated periodically as standard practice. Maintenance of plans will either be an internalised organisational responsibility, or a collective respondent responsibility, respectively.

73. At the LRF level plans will typically developed and maintained for the types of emergency situations listed above. The Annex B survey of local authorities provides further information and perspective and gives assurance over the effective planning work at the LRF level.

74. At the local/individual local authority level more detailed corporate, operational and contingency plans will be developed and maintained which complement the LRF planning and enable that individual authority to be in a position of readiness to mobilise in response to a localised, regional or national emergency should one occur.

75. Emergency plans are primarily concerned with response, and then recovery, in the case of an emergency. They are complemented by plans to prevent an emergency e.g. COMAH designated industrial site-specific planning and plans to limit the impact

of an emergency e.g. flood defence schemes to limit the scale and reach of coastal and fluvial flooding at the time of a severe weather warning.

76. Emergency plans are practical in that they enable coordinated operational responses to an emergency. They will typically cover

- the definition of the specific emergency risk,
- the likelihood of the risk occurring and the scale of the impact should it occur,
- responder roles and responsibilities,
- incident command and co-ordination,
- communications and mobilisation of designated individuals and services, and
- warning and informing public communications.

77. In practice, the content of plans will be drawn from national recommended practice, best practice models, data and intelligence sharing, professional insight through training and development, and the experiences and recommendations from previous actual emergencies and scenario and resilience testing exercises. Plans are owned at a senior and corporate level of organisational responsibility. The Annex B survey of local authorities provides further information and perspective,

Ensuring readiness

78. Emergency plans held at both organisational and LRF levels are reviewed and updated periodically as standard practice. Maintenance of plans will either be an internalised organisational responsibility, or a collective respondent responsibility, respectively. Plans are also reviewed and updated as a consequence of (1) scenario and resilience testing exercises and (2) the recommendations adopted from the post-operational reviews of the experiences of the response to and recovery from actual emergency incidents.

79. The undertaking of post-operational reviews of the effectiveness of the response to actual emergencies under (2) above is standard practice amongst LRFs. It should be noted that there has not been an emergency of the type, scale, unpredictability and longevity of the Covid-19 pandemic, from which to draw experiential learning, since the introduction of the CCA 2004.

80. Plans are scheduled for scenario testing either by national direction, due to the changing status of a risk, and/or on a frequency basis to ensure that they do not go untested for long periods of time.

Vulnerabilities and protected characteristics

81. All councils will be aware of the Public Sector Equality Duty. The extent of recognition and specific inclusion of considerations concerning vulnerabilities and the protected characteristics in the Equality Act 2010 will vary according to the type of risk covered by an emergency plan.

82. For example, a plan to respond to a severe weather emergency will be more universal and less cognisant of particular groups with protected characteristics. A plan for responding to a terrorist incident where community cohesion and inter-racial harmony could be compromised by levels of public anxiety and reactive and emotive social media commentary would have to have sensitivity given to protected characteristics of ethnicity and religion. This is an area where there has been limited national guidance. Based on the Annex B survey of local authorities this is an area for further work.

83. Emergency plans and risk assessments consider people with vulnerabilities in this area e.g. the need for access routes to the registered clinically vulnerable by health and social care professionals to be kept open in severe weather such as heavy snow. The NHS and local authorities will share information on the residential locations of the clinically vulnerable to ensure road clearance, and possibly the provision of 4x4 vehicles which can cope with conditions, to enable medics to access their patients, Data sharing protocols such as WASPI enable safe and secure data exchange to underpin such plans.

Planning exercises

84. The WLGA is not normally involved directly in local planning exercises nor national exercises. Whilst we have some awareness of them taking place, we do not have a record or chronology of itemised exercises and reports.

85. We understand that pandemic influenza exercises such as Taliesin (2009) and Cygnus (2014) have been coordinated at a UK or Wales level with the involvement of the Welsh Government and/or Public Health Wales, and that there was some participation by the LRFs. We are aware that reference is made in the Wales Resilience Forum Business Plan 2016-19 to responding to the recommendations of Operation Cygnus, and to contributing to the work of a UK Plan Flu Pandemic Board. However, we have no records of specific follow-up action within Welsh Government or of the involvement of local authority representatives in any subsequent activity.

86. The WLGA does not have details of any local authority or LRF initiated pandemic influenza exercises outside of these national exercises. We have no detailed knowledge of the adoption, or otherwise, of recommendations from these exercises at a UK or a Wales level. We are not aware of any other exercises in the intervening period to 2020. The Pan Wales Response Plan (2017) (referred to in earlier answers) is generic for an emergency of any type, and is limited to the hierarchy of command, and the structures, processes and roles for triggering readiness for, and the response to, an emergency. It does not extend to specific readiness planning for a pandemic.

The Annex B survey of local authorities provides further information on local exercises and reviews, and national exercises in which they may have taken part.

Civil Contingencies Secretariat (CCS) and Resilience and Emergencies Directorate (RED): relationship to Welsh local responders

87. The Cabinet Office is represented on the Wales Resilience Forum, to ensure communication and/or escalation of respective developments, guidance or learning. There has been limited if any direct interaction between UK Central Government departments and Welsh local responders due to the Devolution Settlement. Local government, the NHS and fire and rescue services, all key C1R responders, fall under the remit and control of Welsh Government. Accordingly, local responders work within the Welsh structures for emergency planning and response as set earlier. Whilst there will be some inter-government co-working, the local responders in Wales are remote from UK Government.

88. Under the Wales Resilience Forum Structures, as illustrated in its business plan for the period 2016-19, arrangements for liaison with UK Government at a professional civil senior level are set out. Neither the WLGA nor Welsh local government had any direct involvement in these arrangements.

89. Specialist government agencies and Non-Governmental Bodies will, however, be active partners in resilience and emergency planning in Wales in their respective fields where pan-UK national security is at stake e.g. airports, rail networks, sea ports, and regulated energy sectors such as the nuclear industry.

90. During the pandemic, and outside of the date range specified in the Module 1 Rule 9 request, the Wales Office and Secretary of State for Wales engaged through political leaders in seeking views on any additional support required by local authorities.

Welsh Government relationship with Welsh Local responders

91. The advice and direction of senior civil servants will be cascaded down from the Wales Resilience Forum and Wales Resilience Partnership Team to local authorities and partners via the LRFs. There may be occasional contact direct for example to encourage participation in nationally coordinated exercises, to share UK national intelligence, or to prepare for/respond to a possible/actual risk situation or emergency e.g. the withdrawal from the European Union.

92. Direct regular contact, outside of a nationally declared emergency, will be infrequent. (Outside of the date range of this Rule 9 request, and during the Covid-19 pandemic declared emergency period, the Welsh Government convened regular meetings with the regional chairs of Strategic Coordination Groups (SCGs) to ensure effective two-way communication flow into and from Welsh Government. This is likely to be explained and explored in other modules.)

C1Rs and the voluntary community sector

93. C1Rs rely on the co-operation and support of some of the larger voluntary sector organisations for responding to emergency incidents of scale, and may indeed have standing contracts with them for specialist response support services e.g. the Red Cross for humanitarian support.

94. At both the LRF level and the organisational planning level, voluntary sector partners will be involved in the development of plans, and scenario and resilience testing exercises accordingly.
95. The voluntary sector representative bodies which exist for each county in Wales (known as the Local Councils for Voluntary Service) can also be involved in tactical and strategic planning at both local authority level and the LFR co-responder level, and may have a standing membership in some LRFs. The voluntary sector local councils are relied upon to bring expertise to emergency planning and to assist in mobilising support from their sector in an emergency incident. Local authorities also have a statutory duty to provide advice and assistance to local voluntary bodies businesses under the CCA 2004.

Part 5 - Assessing COVID – 19 preparedness

The Welsh Government

96. The state of readiness of Welsh Government, during the date range and at that specific date, will have been informed by, and limited to, the extent of the civil contingencies and emergency planning in place at (1) a devolved government level and (2) a UK government level (noting the role and responsibilities of the UK Government for declaring pan-UK emergencies and leading a response). The sufficiency and readiness of emergency plans is informed by scenario and resilience testing exercises.
97. The exercises undertaken in the date range will have been conducted at either a pan-UK or a devolved level. The readiness of any government for a pandemic of the scale, unpredictability and longevity of Covid-19 will to a high degree be dependent on the scope of such exercises and the adoption and application of learning and recommendations from them. The WLGA does not have a detailed knowledge of these exercises or their applicability to readiness for the Covid-19 pandemic.
98. The Pan Wales Response Plan (2017) (referred to elsewhere in the statement), which succeeds the major test exercises referred to elsewhere, is generic for an emergency of any type, and is limited to describing the hierarchy of command, and the structures,

processes and roles for triggering readiness for, and the response to, an emergency. It does not extend to specific readiness logistical planning for a pandemic.

99. Structures and systems were in place in Wales for planning and coordinating a response from respondents (as described above), and for passing emergency legislation within the Senedd and issuing guidance to inform and support actions in response, as with any other emergency.

100. The extent to which Welsh Government had the logistical capacity and plans, and the resources and supply chains (with their national partners such as NHS Wales and Public Health) for specific and large-scale interventions for Covid-19 including - emergency health services and facilities, the procurement and supply of personal protective equipment (PPE), mass testing, systems for tracing infected citizens to isolate and prevent contagious infection, and for mass vaccinations once vaccines became available - can only truly be evaluated against the response made from the point when a national emergency was declared (to be explored in other Inquiry Modules).

101. The response to logistical planning for Covid-19 in the above areas involved significant additional financial resourcing at the UK and Welsh Government levels, the redeployment and/or recruitment of workforces, and the construction/acquiring of facilities. All of these actions required for this Covid-19 pandemic were of scale greater than plans in place for readiness. Although Governments and C!Rs acted with great urgency, there were inevitable time delays in these key interventions as these new or significantly extended services and facilities were set up and resourced.

Category 1 Responders and the Welsh Government

102. Traditionally, C1Rs are expected to respond to controllable local or regional emergency within their own resources and by drawing on mutual aid from each other, and possibly peer organisations in neighbouring areas. Welsh Government has an Emergency Financial Aid Scheme (EFAS) to assist one of more responders in an emergency of a 'major and sudden impact'. EFAS, which is rarely called upon, is not designed for national emergencies of scale and length.

Constraints

103. Government reserves are limited and budgets of scale are not held in reserve for the eventuality of an emergency situation or incident. Resources have to be redirected or new resources allocated in the event of an emergency situation. Welsh Government would not have the financial resources in place for response to and recovery from a pandemic of the scale of Covid-19 (source – published Welsh Government budgets).

104. Some of the constraints placed on the Welsh Government's reserves are statutory and the WLGA has supported, over a long period, the position that the Welsh Government should have more freedom and flexibility in determining its own reserve levels for contingency planning purposes. Sufficiency in reserves held at Government levels is one of the areas for reflection listed below.

105. The reality, during the events that followed this specified date in response to the Covid-19 pandemic, is that new systems, facilities and supply chains of scale had to be created/constructed, at significant additional public cost, for the interventions listed above and other interventions, and that civil service personnel had to be redeployed to coordinate the governmental response.²

Planning for a speedy and effective of response

106. As with all emergency scenarios, the ultimate test of preparedness and readiness is the speed and effectiveness of the response to an actual emergency situation or incident. There has been no precedent for a pandemic of the scale, unpredictability and longevity of Covid-19, from which to apply experiential learning into planning, in modern times.

107. There is a Welsh arrangement in place to deal with an outbreak of a communicable disease, as set out in The Communicable Disease Outbreak Plan for Wales - ("the Wales Outbreak Plan.") (CL/12 – INQ000082837) The Plan, created in collaboration with local authorities and public health partners, describes arrangements to manage communicable disease outbreaks. In such circumstances the Outbreak Control Team (OCT) is created and becomes the decision-making body in controlling

² This comment is intended to provide some perspective on the state of readiness and is made without prejudice to the responses to be made in other modules.

the outbreak. The local authority has a key role which is discharged by the Director of Public Protection.

108. The primary objective in the management of an outbreak is to protect public health by identifying the source and/or main determinants of the outbreak and implementing necessary measures to prevent further spread or recurrence of the infection.

109. The secondary objective is to improve surveillance, refine outbreak management, add to the evidence collection, and learn lessons to improve communicable disease control for the future

110. The Wales Outbreak Plan provides that in rare occasions where an outbreak or incident may develop into an overwhelming communicable disease emergency or there is suspicion of a bioterrorism event, the Wales Resilience Emergency Planning structures may need to be invoked. In such a situation the Outbreak Control Team would need to consider escalation to involve the Local Resilience Forum (LRF) Chair. The Chair would advise on the need to invoke these structures and would convene a Strategic Coordination Group to command and oversee the response as necessary.

111. A separate planning document, the Wales Framework for Managing Major Infectious Disease Emergencies (the WLGA does not have a copy of this document, however, it is referred to in the Outbreak Plan), describes the overarching arrangements that will apply. For exceptional circumstances of a pan-UK or global outbreak, there are also specific UK plans for bioterrorism or other particular infectious disease threats which take precedence over this plan. Any such UK level plans take precedence over the Wales Plan.

The cross-border dimension to planning

112. Where an outbreak crosses a border and affects people living in one or more of the other UK countries, the OCT arrangements may differ, for example, the OCT may be chaired by a representative of an agency outside Wales. In either case the principles of this Plan should still apply and the Welsh response should be guided by the requirement to protect public health.

The Annex B survey of local authorities provides information on readiness from a local perspective.

Preparedness issues

113. Specific issues with the internal readiness of Welsh Government for the Covid-19 pandemic, at that date, would not have been known to Welsh local government beyond any disclosures of the adoption of recommendations from any national scenario and resilience testing on a global pandemic which might have been shared in fora such as the Wales Resilience Forum. The WLGA does not have a detailed knowledge of internal or inter-governmental planning of this type. The Annex B survey of local authorities provides more information on the state of readiness.

114. The WLGA is aware that the National Audit Office has reported on the UK Government's state of preparedness and has concluded "This pandemic has exposed the UK's vulnerability to whole-system emergencies, where the emergency is so broad that it engages all levels of government and society. Although government had plans for a flu pandemic, it was not prepared for a pandemic like Covid-19 and did not learn important lessons from the simulation exercises it carried out."

115. This applies equally to the UK Government in a pan-UK context. Welsh local government does not work closely with the UK Government on civil contingency planning as local government in Wales is a devolved function.

Dissemination of information and guidance in respect of emergency preparedness for Covid-19 as of 21 January 2020

116. The structures summarised above are used for information dissemination within Wales. These structures are generally effective for all civil contingencies and emergency planning. They are supplemented by other arrangements e.g. the dissemination of information by senior civil servants to their networks of accountable officers in the statutory public bodies e.g. chief executives, directors of education and directors of social services in local authorities.

117. Welsh local government largely relies on Welsh Government, and national bodies such as Public Health Wales, for the dissemination of specific and expert information and guidance, whether it originates at a UK level or a Wales level. Welsh

local government is not able to give a perspective on the inter-governmental liaison and co-operation between the Welsh and UK Governments on this specific subject at that specific date.

Risk assessments, emergency plans and forecasts at the Welsh Local Government level account for the possibility of a pandemic like Covid-19

118. The readiness of plans to account for the possibility of any pandemic would not have varied significantly between LRFs and their respective local authority members due to the lead and coordinating role that LRFs take amongst their respective C1Rs as set out already. Plans are co-produced and co-owned by the LRF members.

119. Equally, due to the degree of contact and coordination between LRFs, a fairly standardised level of planning across the four LRFs in Wales could reasonably be expected to be in place. The Annex B survey of local authorities provides further information on consistency of planning and the levels of confidence in the LRF/Category 1 responder partnership working.

Testing local emergency plans for a pandemic like Covid-19

120. The WLGA is not involved directly in national and local review exercises such as these. Whilst it has some awareness of them taking place, it does not have a record or chronology or itemised exercises and reports. It is understood that some exercises were coordinated at a pan-Wales level by the Welsh Government and/or Public Health Wales, and at a local level by the Local Resilience Forums. The Annex B survey of local authorities provides further information on local emergency plans. and their ability to adapt to responding to the pandemic.

Risk factors, potential impacts and specific needs of groups in a pandemic like Covid-19

121. Those with protected characteristics under the Equality Act 2010 and those in equality categories under the Northern Ireland Act 1998 - the extent to which specific account would have been taken of particular groups within society will have been consistent across contingency planning for all types of emergencies and not specifically/solely for the risk of a pandemic with an infectious disease.

122. People with vulnerabilities e.g. clinically vulnerable, victims of domestic abuse, those in prison and detention, the homeless and vulnerably housed and those with mental health issues - the extent to which specific account would have been taken of people with vulnerabilities within society would have been consistent across contingency planning for all types of emergencies and not specifically/solely for the risk of a pandemic.

The adequacy of local emergency plans to deal with a pandemic like Covid-19

123. A suite of emergency plans would have been in place at the LRF and individual local authority levels for all types of emergencies, including a pandemic. The sufficiency and readiness of emergency plans is informed by scenario and resilience testing exercises organised at a national or a local level. Local authorities and their co-responders would expect to be reliant on national direction for preparation for, and response to, any pan-UK or global pandemic which exceeded the geography and the population under their jurisdiction.

124. The emergency plans at the collective LRF level, and the individual local authority level, will have had some provision for interventions for an outbreak of an infectious disease within a region/local area e.g. the reprioritisation of health services; the management of places/communities with high infection rates; the testing, isolation and treatment of patients; temporary additional mortuary facilities. The emergency plans will have had limitations in their planning for a global pandemic of the scale, unpredictability and longevity of Covid-19. The Annex B survey of local authorities provides more information on the adequacy of local plans and their ability to adapt, individually and with their Category 1 responders, in response to the pandemic.

125. These plans will not have made provision for logistical and financial planning for additional emergency health services and facilities such as -

- 'Rainbow Hospitals',
 - The procurement and supply of personal protective equipment (PPE),
 - Mass testing,
 - Systems for tracing infected citizens to isolate and prevent contagious infection on a large scale,
- and

- Mass vaccinations once vaccines became available for the challenges of the scale and longevity of the Covid-19 pandemic which was to be experienced.

126. Such planning would be the beyond the collective planning of the C1Rs at the LRF level, including local authorities, without significant additional planning and resources from governments.

Funding

127. Local authorities do not hold specific budgets for responding to emergency situations and incidents and have to rely on (1) the (re) deployment of the workforce, facilities, plant and machinery, and budgets and (2) their financial reserves in the event of an emergency. Local authorities are dependent on Welsh Government for additional financial support in the event of an emergency of scale which is beyond their means.

Business continuity management on 21 January 2020 for Covid-19

128. The arrangements described above were in place at the LRF level for the eventuality of any emergency declaration including a Covid-19 pandemic. Such local business continuity plans are largely limited to the services provided by the respective local authority, and the public duties within their remit and control.

129. They will not have made provision for some of the significant new challenges posed by the emergency situation which followed this specific date, given that there was no precedent e.g. (1) closing schools to pupil and student access for an extended period of time and moving interactive teaching to remote/virtual platforms as opposed to closing schools and keeping pupils and students at home for a time-limited period and (2) enforcing lockdowns across large geographical areas and for an extended period of time. The Annex B survey of local authorities provides more information and perspective. Whilst local authorities comment on their resilience in having financial reserves in place for emergency situations, they also comment on the dependence on additional Government funding for a pandemic of this scale.

Inform, warn and advise local level arrangements on 21 January 2020 for Covid-19

130. The arrangements already described were in place at the LRF level for the eventuality of any emergency situation declaration including a Covid-19 pandemic.

Information sharing and cooperation with other responders as at 21 January 2020

131. The arrangements already described were in place at the LRF level for the eventuality of any emergency situation declaration including a Covid-19 pandemic.

Readiness across between localities

132. Readiness in/across localities would have been at a similar level given the consistency of emergency planning amongst and across LRFs (1) through their networking and practice sharing and (2) due to the strategic coordination and advisory role of the Wales Resilience Forum. The Annex B survey of local authorities provides more information on the consistency of local planning (The consistency of actions taken in response to the emergency, once declared, both in the range of actions taken and their urgency, to be explored in later modules, will be a demonstration of this.)

Factors impacting local authority readiness for Covid-19 pandemic at 21 January 2020

133. This has already been discussed but more specifically these were

- the extent of the adoption of and planning for the outcomes and recommendations of national pandemic scenario and resilience testing exercises,
- finance and resources,
- the effectiveness of inter-governmental planning,
and
- the role of UK government in having primacy for pan-UK civil contingencies and security.

134. Until the Covid-19 pandemic, the extent and the resilience of co-operative arrangements between the UK and Welsh Governments for planning for a pan-UK emergency/global pandemic since devolution had not been tested beyond the national scenario testing exercises referred to elsewhere. Local responders will not have foreseen an emergency situation where the UK and Welsh Government might have taken different positions on areas such as non-pharmaceutical interventions, including self-isolation duration, the wearing, of face-coverings, permitted public movements and

enforcement during lockdowns, and different testing and tracing regimes with separate governance arrangements. There were particular challenges for local authorities in Wales which bordered England in the event of deviations on Government positions, and readiness plans will not have taken account of this eventuality.

135. Equally, readiness in plans will not have taken account of the challenges of managing public communications where differing legal provision, and public information, was emanating from two Governments. This eventuality posed particular challenges for local authorities in Wales, particularly those which bordered England, given the consumption of UK-based news media in Wales and the different timing of UK Government and Welsh Government announcements. Public confusion was evident, and this added to the challenges of enforcement of public behaviours in cross-border movement.

136. Wales was reliant on the readiness of UK Government for pan-UK planning for interventions such as the procurement of specialist medical equipment e.g. ventilators and supplies, which is expected to feature in other Inquiry Modules e.g. PPE in the international market-place through secure and reliable supply chains. The readiness of Welsh Government, and thereby Category 1 responders, was limited by the readiness of UK Government itself.

Brexit and local government level emergency preparedness and resourcing

137. Whilst local authorities had to make preparations for the operational impacts of the decision to leave the European Union – e.g. securing supply chains for imported goods, managing the impacts on sea ports with sea crossing routes to and from Northern Ireland and Ireland – there is no evidence of any causal link between the decision and the preparedness and resourcing of local government for the pandemic. The statutory functions of local authorities, and the arrangements for them to be discharged, remained unchanged although concerns were expressed during 2019 about the emergency planning capacity and commitments planning for a No Deal Brexit. These concerns are outlined later in the statement in relation to public health.

138. Heightened emergency contingency national planning was in place within Welsh Government, and in liaison for LRFs, for the eventuality of a 'No Deal'

withdrawal from the European Union scenario. However, once the likelihood of this scenario had passed, these arrangements were stood down. There would have been no lasting impact on overall preparedness due to this activity.

139. It is worth noting that the Welsh Government sought to use the established Brexit communication and coordination arrangements (Local Government Preparedness (Brexit) group, which included senior civil servants, local authority chief executive representatives and WLGA officials. with local government) during the early months of the pandemic to seek views and provide information updates (however alternative, more regular arrangements were established soon afterwards).

WLGA interaction with the Welsh Government in respect of preparedness for Covid-19

140. During the Module 1 date range, and as at this particular date, the role of the WLGA in making any emergency preparations with Welsh Government would have largely been limited to contributing as a member of the Wales Resilience Forum. Welsh Government provides the secretariat to the Forum and holds all records of its meetings, communications and work.

141. The WLGA has, historically, had a limited role in advising and supporting local authorities in the field of emergency planning, and is not resourced to do so. It instead relies upon the structures described above. The WLGA became increasingly active in advisory and coordination roles subsequent to this date and from the early stages of response once a national emergency had been declared.

WLGA work with the LGA, COSLA, and NILGA for preparedness for Covid-19

142. The WLGA undertook wider work with the LGA, COSLA and NILGA - particularly on the overall financial needs of local government typically through the UK Forum. There was no joint formal work programme on emergency planning nor joint activity on preparedness for Covid-19. The WLGA would wish to engage with LGA, COSLA and NILGA on preparedness planning in future.

Part 6 - Public Health Services

General overview

143. The public health function is not allocated to local authorities in Wales as is the case in England. Public Health Wales (created in 2009) is a national health service organisation which leads on specialist public health and has responsibilities including the prevention and control of communicable diseases. Operational public health functions are embedded in each of the seven local health boards and are led by a nominated Director of Public Health (also created in 2009). The national and local public health functions are well established, have clear and inter-connected plans, and are resourced.
144. Local authorities have complementary but limited statutory public health functions in the environmental health and public protection fields discussed further below.

The structure of local public health services

145. The local public health services are the responsibility of the seven local health boards. The local health boards can cover large geographical areas and, typically, will have centralised expertise and management capacity under a Director of Public Health with public health leads/teams assigned to a more localised operational area such as a local authority area. The local leads liaise closely with local authority and other partners in local educational, preventative, and responsive public health activity.
146. The complementary statutory functions of local authorities are managed and discharged locally as further explained below.

Local authority functions in relation to public health services.

147. Local authorities have specific health protection functions and statutory powers under legislation including the Public Health (Control of Disease) Act 1984, the Health and Safety at Work Act 1974 and the Food Safety Act 1990.
148. Local authorities have statutory duties to work in partnership with the public health bodies in the discharge of their emergency planning and civil contingencies functions, and in responding to an outbreak of a communicable or other disease as C1Rs.

149. The WLGA has made the case for the return of public health functions to local government in Wales over a period of time. In the WLGA set out the case, following the experience in England, in June 2014 in response to the Welsh Government's Public Health Bill White Paper. (CL/13 – INQ000082828) This is an issue which should be reviewed with the benefit of the experience of the response to Covid-19, to be assured that the current arrangements in Wales are the most effective option.

Public health duties to monitor new and emerging infectious diseases.

150. The national and local NHS public health bodies have responsibilities for monitoring new and infectious diseases both domestically and as part of the global public health/ epidemiology professional and academic/research community. The public health bodies work to reduce the risks of outbreaks of infectious diseases through measures including public education and immunisation; advise partners of emergent or potential risks through the Wales Resilience Forum and LRFs to inform contingency planning arrangements including scenario planning and multi-partner training and preparedness exercises; coordinate communications with the public and the media as considered necessary.

Public Health and Civil Contingencies relationships

151. Local health emergency planning coordination groups are not common. Joint planning will be within the scope of the LRFs, specialist partnerships such as the Regional Partnership Boards (for health and social care) and localised operational planning arrangements e.g. arrangements for risk management of high levels of service demand in winter seasons and to offset capacity pressures on district hospitals.

152. The WLGA has no working knowledge of this all-Wales Health Emergency Planning Advisory Group mentioned in the request for evidence. Nor is there a Health Protection Agency in Wales. In Wales there is Public Health Wales, as described above, and Healthcare Inspectorate Wales as the independent inspector and regulator of healthcare. Public Health Wales' role in responding to emergencies is outlined in its 'Emergency Response Plan' (CL/14 – INQ000082845).

153. There is an advisory group called the Health Protection Advisory Group. This is a group set-up by the Chief Medical Officer “to secure wide integration and effective implementation of health protection policies and to drive forward the health protection agenda in Wales” (according to its Terms of Reference (CL/15 – INQ000082838). For example, it considered a paper on ‘Preparing for 2019/20 flu season’ on 8th July 2019 (CL/16 – INQ000082831). Local government is represented through the WLGA and a nominated Chief Executive and Director of Public Protection. It has been active in public health fields such as immunisation planning, winter seasonal planning for influenza, and sexual health.

154. Otherwise the Welsh NHS services, including Public Health Wales, play their roles as C1Rs as set out to the above.

Local public health structures and preparation pandemic influenza and new emerging infectious disease

155. Public Health Wales (PHW) will have been working at the UK and international levels, as an expert body, in monitoring developments in global health, including the risks of new and emergent infectious diseases. At this strategic level and given the strength of international networking under the guidance of the World Health Organisation, the level of awareness and preparedness in Wales could reasonably have been assumed to be similar to that for the other UK nations.

156. With the presence and seniority of the Wales Resilience Forum and given the ever-present risks in areas such as severe weather, industrial incidents, human and animal disease, and terrorist incidents and support of the Wales Resilience Partnership Team – emergency planning for all eventualities has had an increasingly high profile in Wales. The NHS bodies are standing members advising those in highest authority.

157. On a local level, under the guidance of the LRFs, plans and risk registers will have had been maintained for all emergency eventualities including new and emergent diseases. The NHS bodies are C1Rs in these fora.

Directors of Public Health and their role in emergency preparedness, resilience and response (EPRR)

158. The local Directors of Public Health in Wales are employed by the NHS and are based in each of the seven local health boards. They have oversight of the complete range of public health services for their area and can also have corporate executive roles within their respective health board. The Health Boards are C1Rs and so partners for civil contingencies and the Directors of Public Health contribute to emergency preparedness, resilience and response (EPRR) arrangements in the local resilience fora - specifically on horizon-scanning on new and emergent infectious diseases, scenario planning and testing, and preventative planning and response planning.

159. Public Health Wales (PHW) is an NHS body and advises, directs and supports the network of the local Directors of Public Health who are deployed in the operational health boards. PHW advises Welsh Government and national partners on EPRR arrangements through the Wales Resilience Forum and other partnership forums, and as part of the UK network contributes to arrangements at a macro-level. PHW is also active in the international field in contributing to global planning, information sharing and research. PHW provides policy and research advice direct to local authorities from time to time.

Operationalising EPRR at the local government level

160. Local authorities across Wales mobilised their arrangements for regional planning – with C1Rs in their Local Resilience Fora – only once a national emergency was declared – a declaration which was made outside of the date range specified in the Rule 9 request.

Resources and Readiness

161. The WLGA has no knowledge of any actual reductions in the funding of the NHS local public health structures in Wales during this period. There may have been some proportionate reduction for public health within the total budget for health boards as Welsh Government has continued to prioritise annual uplifts in NHS spend to cope with rising and changing demand for demand-led services. There is no evidence of any intent, or action, to deprioritise local public health services.

162. Local authorities have been setting reductive budgets, due to real-terms reductions in the financial block allocated to local government in Wales, for a number

of years. All services have had to re-prioritise their activities and make cost efficiencies although at various times, for various periods, some of the larger statutory services were protected.

163. Over the period from 2009-10 to 2019-20 core local government funding reduced by around £1bn in real terms. Many of the smaller local government services which play a role prevention or response, will have been subject to year-on-year cost pressures and reductions in budgets with a compound effect on overall capacity. This is the case in local environmental health and public protection services, where the statutory duties for public health sit, within the date range.

164. Whereas local authorities have to retain sufficient capacity to discharge their statutory duties their overall capacity in this field – both managerial and operational - will, in many cases, have been reduced. The effect is that there will have been less overall and expert capacity in preparedness for an emergency of scale outside of the scope of 'business as usual' operations, and beyond emergencies of a known and more routinely containable scale.

The Annex B survey of local authorities provides further information and perspective.

164.1 The resourcing and capacity of the NHS public health services bodies, both national and local in Wales as described above, to respond to and manage a global pandemic of scale and longevity will not have been tested with a real-time emergency during the proposed date range. Public Health partners will have played a full role in developing plans, and scenario testing, as national partners (at UK and Wales levels) and as part of the C1R group at the LRF level. These bodies have continuity of management expertise, workforce, and medium-term budgeting to support their planned activities, and have the knowledge that they can reasonably rely on governments for enhanced resourcing for major response interventions in the case of a declared emergency.

165. Whilst the expertise in public health for the control of outbreaks was in place, the readiness of the public health function for a pandemic of the scale and longevity of Covid-19 was limited as was the case with the other C1Rs. Significant additional financial resources were required from Governments for logistical planning and

delivery for mass testing, and test and trace. Major new/extended public services had to be set-up in this field with urgency and the redeployment/recruitment of workforces.

166. Local authorities, given their roles for emergency planning and civil contingencies and more limited role in public health, and as C1Rs, would have been prepared to a similar level.

167. It is not unreasonable to assume that emergency and risk planning within those NHS services and structures, and scenario planning and resilience testing with other C1Rs and partners, is unlikely to have extended to a global pandemic of the scale, unpredictability, and longevity of the Covid-19 pandemic. Levels of readiness would be similar to those for local authorities described above.

168. The expert capacity was present within the NHS to advise and guide Welsh Government on strategy, policy and legislation, and to work within LRFs to advise on local tactical planning and decision-making. The capacity to logistically plan and mobilise public health services across a nation in a pandemic of this scale, unpredictability and longevity, in fields such as mass testing, systems for tracing infected citizens to isolate and prevent contagious infection, providing bespoke advice and support to those isolated, and for mass vaccinations once vaccines became available, was not fully known to local government at that time.

169. The learnt experience of local authorities and category one responders, beyond scenario planning and resilience testing, was based on more contained and time limited emergency situations.

Brexit and resources

170. Brexit contingency planning required additional investment in and reprioritisation of resources by local government and the Welsh Government.

171. The preparedness of the UK and Welsh Governments to procure, at speed, critical medical equipment such as respirators, and essential supplies such as Personal Protection Equipment (PPE), to support the health and public health services, was not an issue on which local government was sighted in advance of the pandemic,

172. For the more specific roles that local government plays in public health and in protecting public health by preventing the transmission of Covid-19 in intimate settings such as residential care homes, there were significant concerns over the availability of PPE (in sufficient quantities and to the required specification), in the early months of the response once a national emergency had been declared. The supply of PPE for C1Rs was coordinated by Governments and, in Wales, Welsh Government took charge for supplying local responders, according to their detailed estimates of need, at no cost to the responders. Local authorities, in many cases, created new warehouses for PPE storage and also coordinated supply to independent residential care homes. Continuity planning in supply chains, and the ability to procure from within the European Union may or may not have been impacted by the Brexit Agreement.

173. Local authorities deployed resources in preparing for Brexit for a period. Some of the civil contingencies and public protection capacity was therefore diverted in planning for a range of eventualities, including a 'No-deal Brexit' and the implications that may have had on public services. This subject was discussed at the Partnership Council for Wales³ on 18th March 2019 and the minutes (CL/17 – INQ000082829) note:

“...concerns around sustainability of the approach due to it creating significant draw on time and effort, and it was agreed that it would be difficult to sustain beyond the medium term. There was significant concern amongst members that whilst Brexit no deal preparedness was taking up so much resource, this provides a major risk if there were another emergency situation of any sort. There was concern that resources are stretched too far to respond effectively. The adverse impact on business as usual could also cause longer term problems.”

174. Despite these concerns over the risks of being able to prepare for/respond to simultaneous emergency situations, local civil contingency arrangements remained adaptive and flexible, responding with immediacy to emergencies, such as Storm Dennis in early 2020, and latterly the Covid-19 pandemic itself

³ The Partnership Council is a statutory body, set up pursuant to sections 72 and 73 of the Government of Wales Act 2006, to promote joint working and co-operation between the Welsh Government and local government. The Partnership Council's members include Welsh Ministers, leaders of local authorities and wider public service representatives.

Part 7 - Economic Planning

Overview

175. Some aspects of local authority economics and finance have already been mentioned. The context is that local authorities are responsible for making local decisions on how to structure their functions, and how to prioritise the resourcing of all functions including civil contingencies. Arrangements will vary local authority to local authority.
176. It should be noted that emergency preparedness is a dispersed function across all senior management and service functions within a local authority, with the support of a core specialist and expert emergency planning advisor/team. Therefore, it is not possible to quantify the resourcing that it is allocated to civil contingencies and emergency planning work, beyond the defined staff complement/budget of the core specialist and expert emergency planning advisor/team, with any accuracy.
177. The following explanation is given to illustrate the complexity of quantifying resources for emergency planning in local authorities. The arrangements described in the above paragraph, provided that they are properly structured and resourced, are a strength. All C1Rs have to base their approach to any emergency on interconnected central command and operational action on the ground. The response to any emergency relies on the effectiveness and timeliness of collective action in command, dynamic strategic and tactical action decision-making, communication, co-ordination, and review and re-evaluation of the ongoing situation and the effectiveness of the response. The command and strategic planning come from a 'cell' of senior managers, advised and supported by their specialist emergency planning team. The tactical action planning takes place within the services where the expertise, and the ability to mobilise operational teams e.g. in social services or public protection, lies. Coordination and communication, underpinned by trusting relationships and the ability to cooperate within a clear command structure with assigned roles and responsibilities, are key.
178. The WLGA does not hold records of individual local authority budget allocations to civil contingencies functions. Some data is recorded in earlier central returns to Welsh Government but not after 2002-03. The absence of specific data in more recent years may be due to changes in the data fields and the way in which the data is collected.

179. Local authorities have been setting reductive budgets, due to real-terms reductions in the financial block allocated to local government in Wales, for a number of years. All services will have had to re-prioritise their activities and make cost efficiencies to some extent. Whereas local authorities have to retain sufficient capacity to discharge their statutory duties such as civil contingencies, some may have been forced to reduce their emergency planning team complement or introduce hybrid roles, with emergency planning officers taking on wider roles and thereby having less dedicated time for this specific function.

180. All local authorities have reduced the number of senior managers overseeing their range of functions as a necessary consequence of reductive budgets. Whilst all statutory duties have to be adequately serviced, the overall effect of budget reductions is that there is less overall management capacity, and possibly experience through the loss of experienced personnel, to both prepare for and respond to an emergency of the scale of Covid-19, for which there has been no precedent in modern times. A combination of reductions in operational capacity in services, and particularly those which went unprotected, and overall management capacity, will have increased risks of preparedness and readiness for an emergency of such a scale.

181. Given the above explanation on how emergency planning and response works in practice in a local authority, it is inevitable that ongoing reductions in real-terms budgets will increase the risks around the preparedness of local authorities to respond to emergencies of scale and longevity.

182. Local authorities do not have ready access to significant reserve budgets to plan for or respond to an emergency. As recommended good practice, and as advised by their external auditors, local authorities will aim to maintain a reserve equal to a minimum of 2% of their net revenue budget. This reserve is designed for the unforeseen such as an emergency situation. Over and above this reserve, local authorities may have additional unearmarked reserves which can be deployed to an unforeseen situation, earmarked reserves which are set aside for known risks e.g. potential insurance claims.

183. The reserves local government holds have reduced in recent years as they have been typically relied upon to balance annual budgets in a period of austerity. In the case of the Covid-19 pandemic, these reserves were not of the scale required, and

local authorities were heavily reliant on substantial additional financial support from Welsh Government e.g. to support schools with their additional costs of remote learning platforms and hygiene controls, and supporting vulnerable people with food parcels/vouchers Local authorities will have limitations on the extent to which they can redeploy the workforce in the case of a declared emergency given their leanness in structures and capacity.

184. This is particularly evident where local authorities are required to find resources to support entirely new services, set-up in partnership with other C1R partners, such as resourcing of the Test and Trace services.

The Annex B survey of local authorities provides more information and perspective.

Changes in finance

185. Again some aspects of this have been mentioned already. The overall financial context at the point of the start of the pandemic was one where funding to local government in Wales had just started to recover from multiple years of austerity. 2019-20 was the first year of a real terms funding increase, according to Cardiff University's Wales Fiscal Analysis. According to Welsh Government data, levels of earmarked reserves and unallocated reserves in local government had grown. Usable reserves for councils stood at £1.5bn at the end of the financial year 2019-20.

WLGA role concerning economic planning, resources and levels of funding

186. The WLGA represents all local authorities in Wales and, as a core part of this role, works closely with Welsh Government in making the evidential case for continuity and growth in the funding block allocated to local government in medium-term national financial planning and annual budget agreements.
187. Within this work the WLGA presents the funding risks and needs for local government service by service, and for overall corporate capacity. Whilst the core civil contingencies function - as a small-scale function with a lower profile than some large-scale services - will have, in the past, been covered in the general case for overall corporate capacity, the function can now be expected to have a much higher profile in budget-setting for future years.

188. It should be emphasised that the capacity for civil contingencies work – particularly in response to a large-scale and ongoing emergency such as Covid-19 – is shared across multiple services e.g. environmental health and public protection, social care, education, housing. This is supported by a central and specialist core civil contingencies team/advisor. This team is at the centre of coordinated and dispersed activity in multiple operational services. Therefore, any reduction in resourcing, whether at the corporate centre or in emergency critical services, could be at risk of limiting the overall preparedness of local government for a nationally declared emergency.

Part 8 - Planning for Future Pandemics

Overview

189. The WLGA has not undertaken any internal reviews or lessons learned exercises about the local government response or planning for civil contingencies. It is understood that exercises were coordinated at a pan-Wales level by the Welsh Government, and/or Public Health Wales and at a regional/local level by the Local Resilience Forums. Individual local authorities will also have evaluated their responses locally, and the need to adapt according to circumstances, as an ongoing activity. Further information about local lessons learned reviews are provided via councils' responses to the Annex B survey.

190. The WLGA, along with wider partners and C1Rs, has contributed to Welsh Government organised 'lessons learned' meetings. These included 'Exercise Seren City 2020 - Observations and recommendations from a strategic, table-top exercise, on lockdown measures in response to COVID-19', commissioned by the Chief Executive of Public Health Wales and the Chief Constable of South Wales Police on 3rd March 2020 (CL/18 – INQ000082840) and "Pan Wales Interim Operational Review" (3rd June 2020), which was an externally hosted online workshop which sought to review the effectiveness of the response to Covid-19 to date, and to make recommendations for future adaptation and resilience. (CL/19 – INQ000082842)

191. Consequently, the Welsh Government convened a “C19 Pan Wales Lessons Management Project Board” (from 16th July 2020) to which the WLGA was invited to be a member and met twice. The terms of reference are attached. (CL/20 – INQ000082843). This Board was set up ‘to provide multi-agency senior level co-ordination to ensure that lessons identified and notable practice that have emerged from debriefs into the response to Covid-19 are acted upon in a timely manner’ and the first meeting produced a suite of recommendations (in response to the “Pan Wales Interim Operational Review” (CL/21 – INQ000082846).

192. Although the WLGA has not conducted a formal review of civil contingency arrangements, council leaders have identified limitations in the civil contingency governance arrangements, and specifically that the Civil Contingencies legislation and guidance is designed to plan for respond to short-term, and often localised or regionalised, emergencies.

193. The extended duration, unpredictability and the national and global nature of this pandemic emergency meant that local and national democratic decision-making arrangements were impacted and disrupted for a prolonged period. Interim arrangements for the duration of this pandemic developed in an ad hoc and contingent way, both within councils and nationally through the WLGA with Welsh Ministers. These ad hoc arrangements, as outlined above, worked well and were effective

Process

194. The advice and direction of senior civil servants will be cascaded down from the Wales Resilience Forum to local authorities and partners via the LRFs. There may be occasional contact direct for example to encourage participation in nationally coordinated exercises, to share UK national intelligence, or to prepare for/respond to a possible/actual risk situation or emergency e.g. the withdrawal from the European Unions. Direct contact, outside of a nationally declared emergency, will be infrequent.

195. Outside of the date range, and during the COVID-19 pandemic declared emergency period, the Welsh Government convened regular meetings with the regional chairs of Strategic Coordination Groups (SCGs) to ensure effective two-way communication flow into and from Welsh Government. This is likely to be explained and explored in other modules.

196. There is limited guidance on the role of leaders (and wider elected memberships of councils) in civil contingencies which is applicable to Wales. The Coronavirus Control Plan for Wales, adopted later in 2020, says that:

“Each local authority will have its own governance arrangements set out in their constitution and Leader’s schemes of delegation and functional responsibilities. These set out how and by whom decisions are made. This may include key strategic decisions such as the temporary closure of public services in an emergency.”

197. Civil contingency and gold command arrangements for senior professionals within C1Rs are well-established and tried and tested. They necessarily rely on inter-agency decision-making from professional leaders. During the pandemic, successful communication, information sharing and involvement in any decision-making within/by a local authority was reliant on effective and trusting local professional and political relationships existing in the background, rather than clear and consistent statutory guidance or a legislative framework to ensure democratic leadership and oversight.

198. Senior professionals in local government were sensitive to the need to consult and advise their council leaders and senior elected members in the course of planning key decisions in both the response and recovery phases of the pandemic. This is an area that should be reviewed, and strengthened in guidance, with clear role descriptions and protocols for the co-management of a situation by senior professionals and elected members in local authorities, in preparing for any longer-term emergency or pandemic scenario.

199. The WLGA’s Executive Board considered papers on *Civil Contingencies: Update and Forward Look* on 24th September 2021. (CL/22 – INQ000082834) (Minutes of the meeting (CL/23 – INQ000082833) This report summarised the impact of the strain felt by the workforce and service managers from having to continue to juggle with the reintroduction of ‘routine activity’ whilst still engaged in on going response/recovery to the pandemic. Local authorities were dealing with significant back logs of work in some services, The report also reflected on the protection of the core civil contingencies capacity in local authorities and Welsh Government and the need for succession planning. The report noted the need for:

“...equal investment and commitment is given to local government to ensure a larger and more resilient civil contingencies workforce, provide additional training opportunities and be able to attract and retain the high calibre of employees required...(and)... that engagement and options are explored with Welsh Government apprenticeship sector to consider and deliver specific civil contingencies apprenticeships within local government to assist and ensure the necessary skilled workforce required for succession planning.”

200. The WLGA will continue to make this case for resourcing in this field as part of resource planning as we look to the future.

201. The WLGA Executive Board considered a paper on 28th January 2022 outlining the wider ‘Public Protection Pressures’, which included an appendix on ‘*Building for the Future*’ authored by the Directors of Public Protection in Wales. (CL/24 – INQ000082835).

202. On the 25th of February 2022, the WLGA wrote to the Minister for Finance and Local Government, following the Executive Board meeting (CL/25 – INQ000082836). The WLGA met with the Minister on 25th April 2022 and the Minister requested further evidence to be submitted for discussion. Directors of Public Protection are currently finalising this work.

Further reflections

203. The outcomes of local, regional and national evaluative exercises on the preparations for and response to the Covid-19 pandemic will include recommendations for future preparedness and resilience based on lived experience. The ongoing UK Government review of the National Resilience Strategy will be critical but will also need to take into account the conclusions and recommendations made by the Covid-19 Inquiry.

204. Based on the experience of Welsh local government as C1Rs, and as partners with other C1Rs, preparedness for a future pandemic scenario of a scale, unpredictability and longevity of Covid-19 will need to be far stronger than was the

case pre-2020, and contingency resilience will need to be far more extensive than before.

205. The WLGA recommends that the following actions are taken with commitment, and prioritisation, at the UK and Welsh Government levels:-

- Protocols and agreements for consistent inter-governmental planning and co-decision-making on a pan-UK scale;
- Contingency arrangements for the urgent deployment of (pre-trained and appropriately skilled) civil servants to emergency command and advisory roles, at both UK and Wales government levels;
- Contingency arrangements for the passing of immediate and comprehensive legislation and guidance, with draft modular laws and statutory instruments/guidance held in reserve, at both UK and Wales levels. Such modular guidance and legislation should be co-produced with local government and other C1Rs, to ensure that the tactical and operational expertise within local authorities and their Category 1 co-responders can make for legislation which is capable of purposeful and effective implementation in operational fields e.g. enforcement;
- Reserve stocks of scale, and robust supply chains, for the provision of specialist medical equipment and goods such as PPE (with specifications reviewed regularly to ensure compatibility for emerging viruses);
- Resilient emergency planning for the expansion of NHS facilities and services to be able to co-manage the demands of a pandemic alongside critical and life-saving NHS services not related to the pandemic;
- Reserve capacity, public sector workforce redeployment plans, and logistical support/call-on contracts to stand-up key support services such as mass testing, Test and Trace, and mass vaccinations;
- Plans, resources and flexibilities for the full recovery of public services which might not be able to resume in meeting their statutory/performance standards and targets for some time, due to the extent of service disruption, and workforce fatigue caused by the challenges of having to manage a pandemic of such scale and longevity; and national financial resourcing and workforce planning strategy for the above.

206. A post-implementation review of the Civil Contingencies Act 2004 is conducted by the UK Government on a five yearly cycle. Noting that the Act was only last reviewed in March 2022, it will be important that the Act is considered for immediate review , (ahead of the next scheduled review in 2027) following the Inquiry's conclusions, given that the Inquiry will have considered a wide-range of evidence and views. Secondary legislation and guidance should also be reviewed. Notwithstanding the above, the guidance which underpins the Act should be updated and extended and cover areas raised earlier in this response including the required frequency for the testing of all major emergency plans e.g. a maximum five yearly cycle; local democratic oversight of the response to a major emergency alongside local professional roles as C1Rs, and areas where current guidance is lacking e.g. provision for sections of the population with protected characteristics. A comprehensive review of guidance issued at the UK and Wales level is therefore recommended.

Future plans for resourcing and prioritising pandemic readiness at a local government level.

207. For any orchestrated national action plan for the future readiness and resilience of local government which will follow evaluative exercises on the response to the Covid-19 pandemic, undertaken at UK national or the devolved national Welsh government level, and indeed this Inquiry. The ability to resource those actions will sit with those who determine public sector budgets and specifically the UK and Welsh Governments.

208. Contingency planning for the scenario of a resurgence of the virus or the emergence of a new variant of Covid remains live at the national and local levels. Resources and planning remain in place to coordinate and manage a largescale vaccination programme, and to be ready to operate a test and trace system on a more limited /targeted scale. It should be noted that the Covid-19 pandemic/endemic itself is not yet closed, albeit that the status of the national emergency has been downgraded.

209. NHS providers will invariably apply strict hygiene practices to limit the risk of exposure to Covid-19 and other infectious diseases where risks are higher due to seasonal factors. Therefore, the current attention is on prevention and containment of Covid-19 transmission and on the prevention and control of influenza as a pandemic

due (1) to winter seasonal factors (2) the risks that there are lower than normal levels of immunity to influenza for reasons disclosed in public health warning information (3) the impact that influenza transmission on a large scale can have on public health and (4) the need to protect business continuity in the NHS services at a time of typically high seasonal demand.

210. Beyond this more immediate period, planning needs to be prioritised for resilience in the future. Papers such as *Building for the Future* identify some of the public sector workforce planning and succession challenges. This paper specifically covers the public protection field.

211. Recommendations of the type listed above will need to be followed through with commitment and prioritisation if we are to be assured of and preparedness and readiness for the future.

I, Chris Llewelyn, declare that the contents of this my statement are true and accurate to the best of my knowledge and belief,

Signed

Personal Data

Dated

20 April 2023