



Cabinet Office

UK Government Response to the Covid-19 Inquiry Module 2 Report

March 2026

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Government of the United Kingdom

Cabinet Office

UK Government Response to the Covid-19 Inquiry Module 2 Report

Presented to Parliament
by the Chief Secretary to the Prime Minister
by Command of His Majesty

March 2026



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Ministerial Foreword from the Chief Secretary to the Prime Minister

The Covid-19 pandemic was a traumatic chapter in our country's history. Families lost loved ones, businesses suffered or closed, people were left with life-long health impacts and we were all unexpectedly forced into isolation, cut off from the support of our friends and family when we needed it most.

Responding to the pandemic was the greatest challenge to our system of government in a generation. It tested our institutions, leadership, and decision-making processes. There are many lessons to learn from the mistakes, failures – and successes – where they were made.

Baroness Hallett's report is a sobering read. While acknowledging the unique scale and nature of the challenge that Covid-19 presented to governments all around the world, it exposes several failures of the government at the time. A failure to respond quickly enough; to treat the impact on vulnerable people and children seriously enough; to provide clear, unequivocal public health messaging; and to turn scientific advice into coherent policy in a transparent, methodical way.

Without effective governance, we cannot expect to respond to crises effectively. The Prime Minister, Cabinet and civil service must be structured, willing and able to make fast, evidence-based and compassionate decisions that will save lives and livelihoods, informed by the scientific evidence.

This government has already made significant changes to its crisis response structures in response to the Covid-19 Inquiry Module 1 report. In July 2025, we also published our Resilience Action Plan which explains this government's strategic approach to increasing the UK's resilience. This document sets out our further response to the Module 2 report.

In a time of crisis, we must put the people we represent before political divides. While the government of the time worked closely with the devolved governments to respond to the Covid-19 pandemic, this report found that intergovernmental collaboration did not work as well as it should. In response, we have worked with the devolved governments in Scotland, Wales and Northern Ireland to ensure that intergovernmental machinery will enable better coordination in future, while respecting the importance of local accountability.

We owe it to those who died, suffered and struggled during the Covid-19 pandemic to take these lessons seriously. I am grateful to Baroness Hallett and her team for their rigorous examination of what went wrong, on the basis of which we are acting, to make sure this and future governments can do better next time.

Introduction

The UK Covid-19 Inquiry (the Inquiry) was established in June 2022, with the aim of examining preparations and the response to the pandemic in England, Wales, Scotland and Northern Ireland, as well as learning lessons for the future. The Inquiry's chair, Baroness Heather Hallett, has been investigating a range of issues through the Inquiry's ten modules.

The Inquiry's Module 2 examined core political and administrative governance and decision-making in the UK and in Scotland, Wales, and Northern Ireland, between early January 2020 until February 2022. It assessed the initial response, central government decision making, political and civil service performance, and the effectiveness of relationships with governments in Scotland, Wales, and Northern Ireland, and local and voluntary sectors. Module 2 also assessed decision-making about non-pharmaceutical measures and the factors that contributed to their implementation. On 20 November 2025, the Inquiry published its Module 2 report.

This document sets out the UK government's response to the Module 2 report. It focuses on the 19 formal recommendations, but other findings and recommendations made in the full report have been passed on to policy teams for consideration. Our response sets out the ways in which the recommendations have been considered, acted on, and where further action will be taken. The government will drive the implementation of the commitments made in this response and ensure that progress is recorded and tracked using our [Covid-19 Inquiry dashboard](#).

The government agrees with Baroness Hallett that pandemics do not recognise borders and we have worked closely with the devolved governments in responding to the Module 2 report.

The government welcomes the Inquiry's findings and accepts that we must learn from past events and improve our decision-making processes to ensure informed and effective decisions are reached during a crisis. As such, the government broadly agrees with the Chair's recommendations and sets out actions to address all of them.

In a civil emergency, the integrity of the public response hinges on the government's ability to execute informed, effective, and timely decision-making under extreme pressure. We need to ensure that the right people with the requisite authority and technical expertise are positioned around the table with access to high-quality accurate data, technical advice, and a range of options to consider. With this in mind, the government has already made improvements to the decision-making landscape during emergencies, as well as how those decisions would be communicated to the public. For example, the government has updated the ['Managing crisis in central government' \(the Amber Book\)](#) to provide guidance on decision-making structures

during a whole-system emergency. This has informed the Concept of Operations that have been drafted for each catastrophic risk. The Concept of Operations for each risk sets out the structures that will be stood up in the case of that whole-system emergency and how decisions should be made.

The government's response to each individual recommendation is set out in the remainder of this document, with key improvements since the Covid-19 pandemic including:

- Guidance has been updated to ensure the three Chief Scientific Advisers (CSAs) from the devolved governments are invited to Scientific Advisory Group for Emergencies (SAGE) meetings from the outset of an emergency. Chief Medical Officers (CMOs) and Chief Veterinary Officers (CVOs) will also be invited for relevant public and animal health emergencies.
- The [Amber Book](#) was updated in April 2025 and more clearly sets out a national framework for crisis response, establishing clear roles and responsibilities and defining expectations across the lifecycle of a crisis. This includes recommending a default Cabinet governance model during a crisis made up of two Cabinet committees, focusing on Strategy and Operations. It also sets out the principles for establishing and running a Taskforce to oversee the enduring response to a significant and protracted crisis.
- The Cabinet Office has collaborated with other departments and the devolved governments to develop risk-specific operational plans for whole-system emergencies, such as pandemics, which define roles, structures, and decision-making processes during the emergency.
- The government is working towards commencing the socio-economic duty (Section 1 of the Equality Act 2010) in England, including drafting statutory guidance to clarify its effective application.
- The government has developed guidance in 2025 for Lead Government Departments and Local Resilience Forums on identifying and supporting vulnerable people during an emergency.
- The Government Communication Service (GCS) Crisis Communications Operating Model has been updated, creating more clarity on roles and responsibilities for departments and communication leaders before, during, and in the aftermath of a crisis.
- The government has issued new advice to help departments create robust crisis communication plans for their specific risks. The Crisis Comms Planning Guide (STOP model) mandates that all planning considers people with additional needs, making communications accessible and inclusive by default, in line with the Equality Act 2010, the Public Sector Equality Duty, and the British Sign Language (BSL) Act 2022.

The government is committed to actively engaging with the Inquiry and awaits Baroness Hallett's findings and recommendations in subsequent module reports as she continues her important work.

Recommendation 1: Chief Medical Officer for Northern Ireland

The Department of Health (Northern Ireland) should reconstitute the role of the Chief Medical Officer for Northern Ireland as an independent advisory role.

The Chief Medical Officer for Northern Ireland should not have managerial responsibilities within the Department of Health (Northern Ireland).

This recommendation is not for the UK government to respond to.

Recommendation 2: Attendance of the devolved administrations at SAGE meetings

The Government Office for Science (GO-Science) should invite the governments of Scotland, Wales and Northern Ireland to nominate a small number of representatives to attend meetings of the Scientific Advisory Group for Emergencies (SAGE) from the outset of any future emergency.

The status of those representatives as either 'participant' or 'observer' should depend upon their expertise and should be a matter for SAGE to determine.

GO-Science has already made the required changes to address this recommendation. The three Chief Scientific Advisers (CSAs) of the devolved governments remain the primary representatives of the Scottish, Welsh and Northern Irish governments at SAGE and will be invited from the outset of an emergency to observe. Participant status in SAGE will be extended subject to the nature of the emergency and the devolved government's role in the response. Additionally, individual CSAs may be invited to participate if they hold relevant subject matter expertise. The status as observer or participant will be decided by the Government Chief Scientific Adviser (GCSA) in consultation with the devolved government CSAs to ensure devolved government interests are properly considered.

In addition, for emergencies impacting public health, the Chief Medical Officers (CMOs) of the devolved governments will be invited to attend SAGE if (as is likely for a health emergency where powers are devolved) there is legitimate devolved government interest in the response. Their status as participant or observer will depend on the nature of the emergency and will be a matter for the GCSA to decide with advice from the CMO England as the UK government's Chief Medical Adviser and co-chair of SAGE in health emergencies. Continuation of the regular meetings of the CMOs of the four nations, separately to SAGE, also provides further opportunity for collaboration between the four nations.

For emergencies impacting animal health, the Chief Veterinary Officers (CVOs) of the devolved governments will also be invited to attend SAGE, with their status as participant or observer depending on the nature of the emergency and will be a matter for the GCSA to decide.

Attendees from the devolved governments may also request that additional officials from their organisations observe SAGE meetings or nominate a suitable deputy to attend on their behalf, if there is a legitimate reason to do so. As Chair of SAGE, the GCSA will have final approval of all attendees, ensuring that access to SAGE does not overwhelm its attendance.

This approach ensures that Scotland, Wales and Northern Ireland are represented at SAGE, and prioritises scientific and technical expertise that will produce the most relevant and high-quality advice for decision-makers during an emergency. In advance of an emergency, nominations of experts from across the four nations would also be welcomed, as part of the work to maintain a register of experts for SAGE (see recommendation 3).

Recommendation 3: Register of experts

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

The register should be regularly refreshed through open calls for applications.

GO-Science already maintains an expert register for SAGE and is committed to refreshing the register; improving selection processes to broaden participation across disciplines, institutions and backgrounds; and increasing our engagement with experts outside of emergencies. During 2026, GO-Science will refresh its processes for expert selection, drawing on lessons from both exercises and activations, and detailing practical steps to support greater diversity. GO-Science is also committed to working with the devolved governments to ensure a robust central register for SAGE.

As a longer-term ambition, GO-Science will explore options for using open calls within our expert identification process, from full open calls across all the risks and disciplines that SAGE covers, through to targeted open calls to address specific expertise gaps or improve diversity. There are potentially significant implications, however, for example the potential size of the applicant pool, the assessment of applications and the resources required to manage the process will need to be carefully considered. The size of the central register must enable it to be used operationally during a crisis and the processes for expert selection need to remain flexible enough when faced with the unexpected.

While the register provides a crucial foundation for convening expert groups in an emergency, it cannot be relied upon exclusively given the breadth of possible scenarios the UK may face. Therefore, as well as improving the register, GO-Science will continue to strengthen the more agile selection processes that work alongside it to identify additional expertise at pace in an emergency.

Recommendation 4: Publication of technical advice

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

The government agrees with the Inquiry that it is important to provide clear communications to the public during an emergency. The government has made significant progress on the provision of guidance to departments when dealing with whole system risks, as well as to the public on the steps that they can take to prepare for emergencies.

Progress has already been made to improve transparency during emergencies since the pandemic - for example, the UK CMOs have developed and published scripts containing health advice that would be given to the public in the event of a national power outage.

Information and guidance on how to prepare for and respond to emergencies is readily available for the public through the [GOV.UK/PREPARE](https://www.gov.uk/prepare) website. This provides simple and effective steps that people can take to be more prepared. It also encourages people to take action in advance so that it will be easier to manage an emergency if it does happen. The website will be updated in 2026, as part of efforts to improve public engagement on risk and resilience.

In addition to this, the [Amber Book](#), which was updated in April 2025, sets out a national framework for crisis response, establishing clear roles and responsibilities and defining expectations across the lifecycle of a crisis. The updated Amber Book represented a fundamental review and refresh of its predecessor, and was reflective of the lessons identified over the last 10 years. The update provided further details on the process for considering scientific and technical advice in a crisis, which could include public health, environmental, social or economic factors. The update also provides further clarity on the roles and responsibilities for communicating with the public, and the particular considerations that should be given to how the government communicates with and listens to vulnerable and at-risk groups in the response to an emergency.

Specifically in respect of scientific advice, the approach to publishing SAGE minutes is in the published SAGE guidance on [GOV.UK](https://www.gov.uk). As the Inquiry notes, SAGE advice was published from 29 May 2020 onwards. In 2024 GO-Science and the Cabinet

Office published updated SAGE guidance that stated in future emergencies SAGE papers and minutes will be published as and when appropriate. GO-Science will endeavour to publish as soon as practicably possible, noting the importance of transparency in emergencies. Some information may need to be omitted or redacted to protect sensitive information ahead of publication.

The government will continue to review and update guidance as appropriate, including clearly defining the roles and responsibilities of the UK government in regards to the publication of technical advice during a whole-system emergency, to aim to continue to improve transparency as much as possible.

As the Inquiry has highlighted, however, full disclosure may not always be appropriate depending on the specific circumstances of the emergency at hand - for example, where novel aspects of the emergency mean that sharing scientific or technical advice could drive unintended or harmful outcomes. Whilst this principle of sharing technical advice with the public is important, it would be for the government of the day to assess the risks associated with sharing certain information against factors such as, the nature of the emergency, the maturity of the technical advice and public opinion.

Recommendation 5: Support to participants in advisory groups

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

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

GO-Science already provides support to SAGE participants before, during and after any SAGE activation. All SAGE participants receive a guidance document outlining their roles, responsibilities and the support available to them when they are invited to join the SAGE register of experts or to participate in a SAGE meeting. This includes details of the SAGE wellbeing services and direction on how to access them. It also sets out protocols and key principles for media engagement and detailed advice on personal and online security.

GO-Science will review and update the terms, conditions and support for participants by 2027 to ensure they have access to clear, comprehensive and up-to-date information in all the areas listed in the recommendation. As part of this, GO-Science will also develop guidance on when compensation may be applicable for universities, other institutions and private companies whose staff contribute extensively to SAGE during extended activations, resulting in significant time away from their substantive roles. Any compensation mechanism must be transparent and designed to uphold the integrity and independence of SAGE.

Recommendation 6: Implementing a socio-economic duty

The UK government should bring into force in England section 1 of the Equality Act 2010, implementing the socio-economic duty.

The Northern Ireland Assembly and Northern Ireland Executive should consider an equivalent provision within section 75 of the Northern Ireland Act 1998.

This government is committed to ensuring that everyone, no matter their background, can thrive. The government therefore agrees with the Inquiry's recommendation, that commencement of the socio-economic duty could drive the routine consideration of the impact decisions might have on those most at risk in an emergency. The socio-economic duty will require specified public bodies to actively consider how their strategic decisions might help to reduce the inequalities of outcome associated with socio-economic disadvantage.

We are currently working toward commencement of the duty, which includes drafting statutory guidance that will clarify how the duty can be applied effectively. As part of this process, we are engaging with listed public bodies to understand their concerns and any potential barriers, as well as analysing responses to our Call for Evidence on Equality Law.

Recommendation 7: Placing child rights impact assessments on a statutory footing

The UK government should introduce legislation to place child rights impact assessments on a statutory footing in England.

The Northern Ireland Executive should consider an equivalent provision.

The government agrees with the importance of considering children's rights in policy making. Children's rights impact assessments (CRIAs) are used as a tool to identify how decisions taken, including those made during emergencies, could impact children. The Department for Education (DfE) will continue to build awareness and understanding of children's rights and the use of CRIAs across government.

The government does not intend to introduce legislation to make CRIAs a statutory requirement at this time. It is not evident that mandating CRIAs would necessarily lead to better outcomes for children. The risk of making CRIAs mandatory would be that it becomes a mechanical recitation of points, rather than a tool to ensure a meaningful focus on the interests of children and how to best support and mitigate negative impacts on them. The Module 2 report itself acknowledges the challenge of preparing a CRIA in a crisis response scenario, indicating that "many decision-makers might have felt there was insufficient time to conduct formal impact assessments".

With Module 8 hearings on the impact of the pandemic on children and young people now concluded, the government is considering how the voice of the child and the education and care sectors can be better incorporated into crisis planning and response. The government will consider the findings set out in the Module 8 report next year, as part of our work to strengthen this area.

In the meantime, DfE is working closely with the Cabinet Office and other government departments to better incorporate children and young people's interests into overall risk planning, including for pandemics. The government is also looking at how the impact of pandemic measures and other civil emergencies on children's education, childcare and safeguarding can be better considered in crisis prevention, preparedness, response, recovery and decision making.

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

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

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

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

The government agrees with the Inquiry that it is important to consider those most at risk in an emergency and to take specific steps to mitigate these risks as part of any future pandemic response.

The government has a number of guidance documents for identifying and supporting vulnerable people during a civil emergency. DHSC will undertake a review of the guidance to identify any gaps and establish a programme of work to better embed and consolidate the use of existing frameworks into decision-making.

Communicable disease outbreaks, including pandemics and emergencies, can amplify health, social, and economic inequities through disproportionate infection and illness rates and unequal impacts of response measures. This can result in income loss, job insecurity, education gaps and social isolation. Inequities can affect groups that have been identified as vulnerable or at risk before a pandemic, as well as groups that are more likely to be negatively impacted by decisions taken as part of a pandemic response (including health and care staff). This can also be particularly acute for children. It is also important to consider that different groups will be impacted variably in different emergencies, for example, Covid-19 and elderly people or HIV and gay, bisexual and other men who have sex with men (GBMSM) and people who inject drugs (PWID).

Since the Covid-19 pandemic, the government has significantly strengthened preparedness and planning for pandemic and emergency response and the protection of vulnerable groups. For example:

- The Department of Health and Social Care has published a Pandemic Preparedness Strategy on 25 March 2026. It reflects on lessons from the Covid-19 pandemic and other past disease outbreaks, the UK Covid-19 Inquiry and early findings from the national pandemic exercise, Exercise Pegasus¹, to improve our ability to mitigate the impacts of a pandemic, protect the vulnerable and save lives.
- Cabinet Office published updated guidance in April 2025, [Identifying and supporting persons who are vulnerable in an emergency: Supporting guidance for Local Resilience Forums in England](#). It sets out the responsibilities of Category 1 and 2 responders to plan for and meet the needs of those who may be vulnerable in emergencies.
- Cabinet Office and the GO Science circulated internal guidance to departments in November 2025, which sets out principles to help identify potentially vulnerable people during an emergency and how to assess disproportionate impacts on them for risk scenarios in the National Security Risk Assessment (NSRA).
- Cabinet Office published the UK government [Resilience Action Plan](#) in July 2025. This sets out the actions that the government will put in place to improve our understanding of risk for vulnerable people.
- NHS England has adopted [Core20PLUS5](#) which seeks to reduce healthcare inequalities at both national and local system level. The UK Health Security Agency (UKHSA) uses an adapted version of Core20PLUS.
- The National Situation Centre has created a Risk Vulnerability Tool (RVT) to estimate the number of people who are vulnerable to the negative impacts of NSRA risks.
- The NSRA update in 2025 for R78 for a pandemic has a more extensive assumption than before to be used for vulnerable groups for pandemic planning.

DHSC's review of the existing relevant guidance documents will identify any gaps and establish a programme of work to better embed and consolidate use of existing documents into decision-making, including the needs of vulnerable children. The review is set out at (Outcome 2) of the Pandemic Preparedness Strategy. This review will provide clarity on how central and local government will dynamically identify those most at risk during a pandemic response using surveillance, the latest clinical and scientific data and communications.

¹ In Autumn 2025, DHSC and UKHSA conducted Exercise Pegasus, a national exercise on the United Kingdom's preparedness for a pandemic. It aimed to test our ability to respond to a pandemic, involving government departments, the devolved governments, arm's-length bodies, and local resilience forums, and engaging businesses, academics and external stakeholders. Live participation in Exercise Pegasus has now concluded, although a fourth phase, centred around recovery, is planned to be exercised in 2026. The government has committed to communicating the findings and lessons of the exercise and aims to deliver a post-exercise report in winter 2026.

Outcome 5 of the Strategy commits to publishing health evidence reviews on the effectiveness of community protection measures including specific consideration of health inequalities. It also commits to developing understanding of the wider direct impacts (resulting from the pathogen) and indirect impacts (resulting from the response control measures and access to health services) on all sectors and communities, including healthcare staff, frontline workers, patients and population to build this into the development of a suite of policy options for community measures that could be used for future response, including mitigations for unequal impacts.

DHSC will also review how data, evidence, and analysis, including vulnerability assessments, inform decision-making and can evaluate the impacts of measures (Outcome 12). This will also include engagement with people with lived experience, as recommended by the CMO.

Health is a devolved matter in the UK and the government recognises that there are different approaches to identify and protect vulnerable groups across the four nations. However, the government is working with the devolved governments to ensure alignment of approaches and to identify gaps to ensure consistent and effective health outcomes across the UK.

Recommendation 9: Delegated powers in Northern Ireland in an emergency

The Northern Ireland Executive and UK government (in consultation with the Irish government where necessary) should review the structures and delegated powers of government in Northern Ireland to consider:

- the empowerment of the First Minister and deputy First Minister jointly to direct the work of other ministers and departments during an emergency;
- the empowerment of the Head of the Northern Ireland Civil Service in relation to the allocation of civil servants to departments or to civil contingency structures during an emergency; and how decisions that would usually be subject to ministerial approval would be taken should an emergency occur during the suspension of power-sharing arrangements.

We remain steadfastly committed to supporting devolution in Northern Ireland and to learning the lessons from the Inquiry, both to protect citizens and to help prepare us for the future.

The Module 2 report has clearly shown that improvements are required of all governments, including the Northern Ireland Executive, in how they respond to future crises. While we acknowledge that power-sharing has its challenges, we are clear that all governments must work in the best interests of everyone across the UK.

The UK Government notes the findings of the Inquiry that the Northern Ireland Executive's decision-making in response to the Covid-19 emergency was not as effective as it should have been. It is vital that ahead of any future crisis, appropriate arrangements are in place.

We understand the Northern Ireland Executive is considering how to respond to any future emergency. Given the Inquiry's findings, we believe that the Northern Ireland Executive and the Northern Ireland parties themselves should consider how any necessary changes should be made.

The Assembly and Executive Review Committee is currently considering whether the institutions require any wider reform. Our hope is that all parties will engage with it in good faith and closely consider its recommendations.

The UK Government will always stand ready to discuss any proposals for changes to the Strand One institutions which could attract the widest possible support and to help with their implementation on matters which may be reserved or excepted under the Northern Ireland Act 1998.

We maintain close and ongoing relations with the Irish Government as co-guarantors of the Good Friday Agreement and will liaise with them on any matter that may require their consultation.

Recommendation 10: Civil emergency decision-making structures

The UK government and devolved administrations should set out in future pandemic preparedness strategies (see the Inquiry's Module 1 Report, Recommendation 4) how decision-making will work in a future pandemic.

This should include provision for COBR to be used as the initial response structure and set out how the UK government and devolved administrations will transition from managing a pandemic through COBR to managing it through separate arrangements in each nation when it becomes clear that the emergency will be longer-term.

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

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

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

The strategy should make express provision for the involvement of the UK Cabinet in the decision-making of the strategy and operational groups.

It should also provide that longer-term decision-making should be conducted primarily by the UK, Scottish and Welsh Cabinets and the Northern Ireland Executive.

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

The government's strategic approach to pandemic preparedness is set out in the DHSC-led Pandemic Preparedness Strategy. This reinforces the commitment to working in partnership across government and with the devolved governments to effectively plan for and respond to pandemics. It outlines the principles and high level approach to further strengthen cross government and four nation collaboration, ensuring a whole-system response. It also recognises that devolved governments are responsible for making their own decisions in line with their devolved responsibilities.

In line with this, and in addition to the Amber Book, the Cabinet Office has collaborated with other UK government departments and the devolved governments to develop risk-specific operational plans for whole-system emergencies, such as pandemics, which define roles, structures, and decision-making processes. This includes a Concept of Operations for responding to a pandemic which sets out the practical arrangements to support decision-making in order to deliver the strategic response to a pandemic including considering cascading impacts beyond immediate health outcomes.

For the initial phase of a crisis, the UK government response would be managed through COBR. Consideration would then be given to transitioning to a taskforce model, with associated committee meetings for ministers and officials, for the enduring response.

The specific Cabinet committee structures supporting the response will be established by the Prime Minister of the day, upon the advice of the Cabinet Secretary. The Amber Book provides a default model recommending two Cabinet committees, focusing on Strategy and Operations, to respond to a future pandemic. Arrangements will be made at the time to ensure a seamless transition between COBR and any new Cabinet committee(s), with departments in the UK government and the devolved governments being engaged.

Operational planning includes the expectation that devolved governments would be invited to participate in pandemic COBR and taskforce meetings as appropriate. Devolved government officials will also be invited to serve as liaison officers within the taskforce, facilitating joined-up strategy and implementation at all levels.

The UK government is actively working to enhance its understanding of vulnerabilities during a pandemic, as set out in recommendation 8. This includes considering how equalities concerns and the impacts of response measures on vulnerable groups including children and young people can be most effectively represented at a ministerial level. The UK government will ensure that the Minister for Women and Equalities is engaged in decision-making in this area, alongside any lead Ministers.

Recommendation 11: Contingency arrangements for key individuals

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

The Government accepts the recommendation and the Prime Minister will put in place the appropriate arrangements.

Recommendation 12: Taskforces

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

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

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

The government has revised its crisis management governance processes. The Amber Book, which was updated and republished in April 2025, sets out the principles for establishing and running a taskforce to oversee the enduring response to a significant and protracted crisis. As a part of routine planning for large-scale risks, operational plans for a pandemic taskforce have been drafted and are included in the Cabinet Office Pandemic Concept of Operations.

The UK government taskforce would be situated within the Cabinet Office in order to support ministerial collective agreement, coordinate and oversee strategy and policy, and coordinate the data and analysis needed to support cross-government decision-making, including equalities-related data. Strong links will be maintained between the taskforce and UK government departmental response functions. As set out in the Amber Book, the Cabinet Secretary is expected to appoint a Senior Responsible Owner (SRO) for the taskforce.

The taskforce would incorporate liaison officers representing the devolved governments and the UK government. This structure is intended to facilitate alignment across the four nations and between all enduring response structures. The recent national pandemic exercise (Exercise Pegasus) tested key elements of a taskforce, and included participation of liaison officers from the devolved governments.

SAGE and its sub-groups would be activated to provide scientific and technical advice, with representation from all four nations.

A number of pre-existing four nations bodies, which provide advice to the government on the management of zoonotic disease, would be integrated into the pandemic response should the pathogen be zoonotic in nature. These bodies support the 'One Health' approach adopted by the UK government, which considers the interdependencies of human, animal, plant, and environmental health.

Recommendation 13: Amendment of the Ministerial Code in Northern Ireland

The Executive Office should amend the Ministerial Code to impose a duty of confidentiality on ministers that prohibits the disclosure of the individual views of ministers expressed during meetings of the Northern Ireland Executive Committee.

This recommendation is not for the UK government to respond to.

Recommendation 14: Plans for accessible communications

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

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

The government agrees that a core function of government communications is to describe and explain policy to the general public in a way that is clear, accurate, and accessible.

Using the learning from the pandemic, the government has already implemented a number of measures to improve the readiness of government communication to deliver advice to the public during major emergencies.

The Government Communication Service (GCS) [Crisis Communications Operating Model](#) was updated in 2023, creating more clarity on roles and responsibilities for departments and communication leaders before, during, and in the aftermath of a crisis. Building on this, the government issued new [advice](#) in 2024 to help departments create robust crisis communication plans for their specific risks. The STOP plan makes it clear that departments must consider vulnerable groups with additional needs: this might include children, the digitally excluded, and people with disabilities, for example. Departments must make communications accessible and inclusive by default, in line with the Equality Act 2010, the Public Sector Equality Duty, and the British Sign Language (BSL) Act 2022.

In accordance with the BSL Act 2022, the government has established a protocol ensuring BSL interpretation is available for public health or emergency announcements. This builds on the existing translation capabilities of the Cabinet Office, No10, and DHSC including for alternative formats, such as Easy Read and BSL.

The government has launched a central New Media Unit (NMU) within the Cabinet Office, to improve its capacity to communicate information directly to audiences during a crisis. GCS has also maintained its commitment to informing communications with behavioural science by embedding a team at the centre who advise on crisis communications and behaviour change campaigns. Building on pandemic experience, the government has established a standing network of trusted

digital influencers. Focusing on audience needs first, the NMU can recommend and facilitate content from a wide range of creators and influencers, this can include working with accessibility influencers and micro creators in specific demographics. This reflects a wider shift in government communications, as digital teams scale up their work with influencers to reach audiences on their preferred platforms, including younger and harder-to-reach demographics who may not engage with traditional government channels.

In addition to regular readiness reviews, communication teams across departments participated in Exercise Pegasus (across September and October 2025). As the largest-ever national pandemic response exercise, it tested our ability to manage a complex, emerging pandemic. The lessons from this exercise are currently being incorporated into planning for future risks. The government has committed to communicating the findings through the post-exercise report in Winter 2026.

The UK government is also working closely with devolved governments to improve coordination at every stage of the crisis response. This is critical to ensuring that information provided to the public remains clear and coherent. In line with the Welsh Language Act 1993, UK Government departments should comply with their Welsh Language Schemes. This means that the English and Welsh languages should be treated equally by departments when making announcements that apply in Wales.

We are confident that the changes outlined above—clearer governance, improved accessibility protocols, enhanced digital reach, stronger coordination with devolved governments, and the lessons from Exercise Pegasus—represent a significant strengthening of government communications capability and readiness. While no system can guarantee perfect outcomes in a fast-moving crisis, these reforms address the key weaknesses identified by the Inquiry and provide a stronger foundation for delivering clear, accessible, and coordinated public health messaging when it matters most.

Recommendation 15: Scrutiny of emergency powers

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

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

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

The government agrees that the legislative response to emergencies should be clear, well-defined and subject to the appropriate parliamentary oversight. Sunset clauses and duties to report can be useful mechanisms to ensure that this is the case. These have been successfully used with previous pieces of legislation to ensure a balance of appropriate scrutiny from parliaments alongside a need to respond in an appropriate manner to the situation at that time.

Since the Covid-19 pandemic, the government has continued to strengthen and refine the guidance on drafting and framing legislation. This includes the publication of the Delegated Powers Toolkit in the government's 2025 [Guide to making legislation](#) which sets out considerations for the balance between primary and secondary legislation and how to appropriately construct delegated powers.

The government recognises that different emergencies will require different legislative approaches and would need to be considered on a case-by-case basis to assess the most appropriate response, including the appropriate parliamentary procedures. This would be a matter for the governments at that time.

Recommendation 16: Review the applicability of the Civil Contingencies Act 2004 for future civil emergencies

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

The review should:

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

The government agrees with the Inquiry that the Civil Contingencies Act (CCA) 2004 should be reviewed to ensure that it continues to provide an appropriate legislative framework for the UK's preparedness to future emergencies.

Under Regulation 59 of the CCA 2004 (Contingency Planning) Regulations 2005, the government has a legal obligation to review the Regulations every five years with the next Post Implementation Review due to be laid in Parliament by March 2027. For this Post Implementation Review 2027, the government will take the opportunity to review the Act to ensure it continues to deliver its objectives and to make recommendations to strengthen the fulfilment of the Act's objectives and to support the UK's resilience to an increasingly volatile global risk picture.

As part of this review, the government will explore the areas set out by the Inquiry in relation to the applicability of Part 2 of the CCA 2004 (emergency powers) in regards to pandemics and other whole-of-system crises. This will include considering whether any adjustments should be made to the robust safeguards associated with the use of emergency powers. To ensure the Review considers the whole picture of UK resilience, we will work with devolved governments and stakeholders across the resilience system. Based on the findings of this review, the government will ensure that existing guidance on Part 2 powers is reviewed to increase the understanding of how emergency powers could be applied in major emergencies.

Recommendation 17: A central repository for restrictions and guidance

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

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

The government agrees with the Inquiry that it is important that there is a resource, or set of resources, that allows the public to easily access information on legal restrictions and associated guidance that applies in their area during a civil emergency. However, such a tool must account for the complex set of ownerships and responsibilities that apply to various sources of data and communication tools within the UK government and devolved governments, which places constraints on the form that this resource could take.

The government recognises that clarity and accessibility of information are crucial pillars of a crisis communications response, and have a significant impact on compliance with necessary restrictions. GCS has published new guidance to help departments prepare for crises: the [STOP model](#) stresses the importance of transparency and sharing accurate information with impacted groups on a regular basis.

There are already a number of existing tools and capabilities that have been developed to allow the government to quickly and effectively communicate guidance and advice to the public during a civil emergency. The [GOV.UK](#) website is a trusted and accessible source for all UK government information that is available for the public, including any guidance that has been published during an emergency, and any legal restrictions that may apply in local areas. There is also more specific information on simple and effective steps that the public can take to improve their preparedness for emergencies on the [GOV.UK/Prepare](#) website, which we keep under constant review, as well as on the [GOV.UK](#) resilience landing page, which brings together all current government advice and guidance on resilience, such as the Central Government Concept of Operations and the Amber Book. In addition to this, the Resilience Direct platform is a valuable tool which allows the government to send information to and coordinate with local responders during an emergency.

We are also working closely with devolved governments to improve coordination at every stage of the crisis response. In 2026, we will work with partners across the four nations to improve our crisis communications coordination, including by co-producing

shared principles for aligning communications during emergencies. This is critical to ensuring that information provided to the public remains clear and coherent.

Together, these platforms provide an easily accessible and straightforward way to signpost advice and guidance to the public during a civil emergency, and act as one tool amongst a wider range of options to do this. They can also be supplemented by alternative forms of information, such as media outlets and local fora, during an emergency, with the most appropriate form of providing guidance and advice depending on the specific circumstances of the emergency in question and the groups at risk. The government continues to build on these capabilities to ensure effective and appropriate distribution of information during an emergency, and will work with other agencies and the devolved governments to do so.

While the government agrees with the aim behind this recommendation, the proposed approach of developing a single online portal may not be the best approach in every emergency. One significant constraint is information ownership, as different communication channels and sources of information will be owned by different bodies. The devolved governments have specific responsibilities, so it would not be appropriate for the UK government to have ownership of crisis communications. Furthermore, there is also evidence that different groups of people trust different sets of resources. A broader set of resources with well-managed content is therefore likely to be a more appropriate way to signpost restrictions and advice during emergencies than a single, individually-owned portal.

Recommendation 18: Attendance at meetings of COBR by representatives of the devolved administrations

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

The government agrees that representatives from devolved governments should be invited to COBR meetings and associated Taskforce meetings where relevant.

The government is committed to ensuring a coordinated response to national crises. As set out in the Amber Book, devolved government ministers and officials are invited to relevant meetings, including COBR, whenever appropriate. This would typically occur when a crisis impacts, or has the potential to impact, the devolved governments. Devolved governments' response structures exist alongside this.

All decisions regarding the invitation and participation of external representatives outside of the UK government, including those from the devolved governments, are made on a case-by-case basis. This decision rests with the Chair of the respective meeting, whether that be the Chair of COBR or the Taskforce. This approach ensures that participation is tailored to the specific nature and impact of the crisis.

Recommendation 19: Intergovernmental structure and relations

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

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

The government agrees that a clear four-nations structure is needed during the transition away from COBR (acute crisis response) to an enduring pandemic response to ensure alignment in decision making across the four nations where appropriate.

A [review of intergovernmental relations](#), conducted jointly between the UK and devolved governments, was published in 2022. The agreed structures and ways of working arising from this review have been adopted by all four governments and provide the foundation for effective joint working, including during a crisis.

During the transition from COBR to enduring structures, there should be a discussion between the four nations, following the principles for intergovernmental working as set out in the 2022 Intergovernmental Relations review, to finalise the appropriate structures and ministerial representation, to ensure effective working across all four governments.

Since the Covid-19 pandemic and in preparation for Exercise PEGASUS, the Cabinet Office has collaborated with departments and the devolved governments on the operational planning for the transition of leadership coordination for a pandemic response from COBR (acute crisis) to a taskforce. Where appropriate, ministers and officials from the relevant devolved governments will be invited to attend COBR, and taskforce Cabinet Committee meetings once an enduring response is being coordinated by a taskforce. We will continue to work with the devolved governments to reflect lessons from Exercise PEGASUS in our operational planning.

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