SPOTLIGHT - UKHSA

Vaccine Taskforce continuity and the public interest in disclosure

The agency and the meaning of security

The UK Health Security Agency merits closer public scrutiny because its published responsibilities connect health protection with vaccine security, government intelligence relationships and responses to misinformation.

A later transfer of Vaccine Taskforce responsibilities adds a further question about institutional continuity.

Those connections justify a documented account of how the arrangements operated. They do not, by themselves, establish that UKHSA directed the policing or regulatory activity examined in Ethical Approach UK's wider investigation.

UKHSA was established on 1 April 2021 and became fully operational on 1 October 2021. It combined Public Health England's health-protection functions with NHS Test and Trace and the Joint Biosecurity Centre.

Other PHE responsibilities moved to different organisations. This was a redistribution of functions, rather than a straightforward renaming of PHE.

The word security has a stated policy meaning. The Government's March 2021 reform paper described an organisation dedicated to external health threats, including

infectious disease, and placed it within the country's critical national and security infrastructure.

The October launch announcement similarly connected public health with national security.

These descriptions encompass preparedness, surveillance and resilience against hazards.

There is an evident public interest in maintaining laboratories, detecting outbreaks and protecting essential supplies. The accountability question concerns how responsibilities are defined and exercised when the perceived threat involves information, public criticism or challenges to a government programme.

At that point, the assessment of the threat and the treatment of competing evidence require particular care.

A threat to a vaccination site, an interruption to supply, a disputed scientific assertion and a solicitor's legal challenge are different matters and any system assessing them needs to explain the distinctions it applies.

The public should be able to understand how those distinctions affect decisions, including any sharing of information with policing or professional regulators.

This paper examines the relevant chronology and identifies the records capable of resolving the outstanding questions.

Its argument is for candid institutional disclosure.

Where the documents establish a proper explanation, publication would assist public confidence. Where an assessment requires correction, the same openness would make correction possible.

What continuity with the Vaccine Taskforce meant

On 26 May 2021, Dominic Cummings gave evidence to the Commons Health and Social Care and Science and Technology Committees.

At question 1130, he attributed the Vaccine Taskforce's performance to clear leadership under Kate Bingham, a direct reporting relationship to the Prime Minister and freedom from conventional perceived departmental obstacles.

In recounting the instructions given to Bingham, he used the words ***"Ignore rules."*** He then said: ***"If lawyers get in your way, come to us and we'll find ways of bulldozing them out of your way."***

That is Parliamentary testimony about an operating approach. It does not identify a particular lawyer, prove that the words were acted upon, or establish what rules were intended.

An instruction to ignore rules cannot simply be, on its face, be equated with an instruction to break the law. Equally, the reference to lawyers warrants an explanation of what happened when legal advice or legal challenge did impede matters.

The subsequent UKHSA transition makes that point more specific.

A ministerial remit letter published on 12 August 2022 anticipated the transfer of relevant Vaccine Taskforce responsibilities from September. It proposed retaining elements of the Taskforce's *"structure, approach and culture"*, and praised its *"culture of delivering at pace"*.

The same letter assigned work concerning vaccine supply-chain security, risks affecting supply and demand and health disinformation.

It envisaged support through government security relationships and intelligence, together with work addressing misinformation considered a threat to public health.

These are published responsibilities, rather than inferences drawn from the agency's name.

The transition documents should therefore explain which methods were preserved and which safeguards governed them.

Retaining scientific expertise and effective procurement is readily distinguishable from treating legal scrutiny as an obstacle to overcome.

Evidence includes the transfer agreement, governance approvals and assurance arrangements.

These could establish whether legal challenge was considered in the design of the successor arrangements and who held responsibility for protecting independent assessment.

The question is practical:

What changed, what continued and how were those choices justified?

Chronology must remain exact. The August letter concerns April 2022 to March 2023 and envisages a later transfer. It cannot retrospectively establish actual UKHSA responsibility for decisions taken in January or February 2022.

The earlier vaccine security and regulatory chronology

Before the proposed Taskforce transfer, a related documentary history had already developed around vaccine-programme security, policing and professional regulation.

It requires examination alongside the later arrangements without making simple assumptions that the same personnel or instructions necessarily passed into UKHSA.

A communication authored by ACC Owen Weatherill on 18 January 2022, addressed to chief constables and Force Duty Gold Officers, discussed threats associated with vaccination sites. It also addressed attempts to report vaccination-related criminal allegations. It described close NPoCC working with NHS and DHSC teams responsible for vaccine-programme security.

That establishes a contemporaneous interface between those functions.

Concerning the Metropolitan Police allegations associated with CRN 6029679/21, Weatherill stated: ***"I can confirm that currently NO investigation has been initiated."*** His document also circulated agreed police communications distinguishing the review of submitted material from a criminal investigation.

In a report form dated 15 February 2022 concerning Philip Hyland and PJH Law, Paul Easter stated: ***"I work for the DHSC on behalf of HMG assessing risks to the UK Vaccine programme."***

He characterised anti-vaccination groups as a programme risk, alleged misinformation by the firm and sought urgent action by the Solicitors Regulation Authority.

The form also relied upon an alleged inability to distinguish a crime reference number from an open police investigation.

These were Easter's allegations.

The subsequent police record makes the factual foundation of that criticism important. A disclosed CRIS extract records screening in on 22 December 2021, transfer to CID and allocation to a detective on 29 December.

Its screening fields refer to further investigation and proportionate investigation.

PC Amanda Cousins subsequently stated, in complaint outcome PC/06389/26, that she had reviewed the report and could confirm that an investigation was opened.

Those records require reconciliation with the January assurance.

Administrative labels alone do not fix the legal character or commencement date of the activity. The tasking and assessment records should establish what happened and whether differing descriptions affected later institutional judgments.

For UKHSA, the question is whether it received relevant personnel, records or assessments from this earlier environment. No verified record examined for this paper establishes Paul Easter's personal employment, secondment or contractual engagement with UKHSA.

His documented DHSC role provides a reason to enquire about an interface; it does not establish one at the date of this paper.

Nor does the chronology demonstrate that Cummings' remarks concerned Philip Hyland, that Easter acted on those remarks, or that UKHSA directed the SRA complaint.

Such propositions require evidence which proximity in time or subject matter cannot presently supply.

The procurement connection and the questions it permits

There is a further public record relevant to possible institutional connections.

An official contract award notice published on 10 October 2023 concerns the Conflict, Stability and Security Fund Framework Agreement 2023 - 2027.

It lists UKHSA among the contracting authorities and Harquebus Ltd among the successful contractors.

Companies House records identify Paul Liam Easter as a director of Harquebus Ltd and Harquebus International Ltd.

The company identity matters:

The award notice names Harquebus Ltd.

The framework's subject matter includes security, defence, peace-building and stabilisation.

Its existence supplies a specific procurement route to examine.

A call-off contract, statement of work or purchase order could answer a narrower question.

If no engagement occurred, confirmation would remove a possible connection from the investigation. If work was commissioned, the records could establish its dates, purpose, personnel and reporting arrangements.

Evidential answers would be more useful than assumptions based on names appearing in the same notice.

The chronology now spans three settings which should be kept distinct.

- Cummings described Taskforce arrangements to Parliament in May 2021.
- The police and DHSC regulatory documents arose in early 2022.
- The UKHSA remit later addressed Taskforce continuity, whilst the framework award followed in October 2023.

A later relationship cannot establish an earlier one without the relevant records tracing it.

There is nevertheless a legitimate cumulative enquiry.

- Did responsibilities move between organisations?
- Were earlier assessments retained and relied upon after a transfer?
- Did any contractors continue under changed arrangements?
- Which organisation holds the records now?

These are questions about identifiable transactions and custody of information, capable of answer without speculation about motives.

The same precision should govern scrutiny of misinformation work.

Public-health bodies can reasonably correct demonstrably false claims. Confidence in that work depends upon how claims are selected, how evidence is tested and how errors are corrected. A challenge to policy or a request for criminal assessment should not be treated as false merely because it is unwelcome. Conversely, describing an assertion as dissent cannot establish its accuracy.

The relevant safeguard is an assessment which can withstand examination, including when the evidence challenges a programme's existing account.

Publication of the standards used would perhaps serve to assist the public understand that distinction.

The disclosure which would settle the questions

UKHSA and DHSC should provide a coordinated account of the relevant responsibilities and their transfer.

Each should identify what it knows, what records it holds and where responsibility passed to another body.

Separate institutional remits should help locate the answer rather than leave a gap between organisations.

Firstly, the transition record should identify the Vaccine Taskforce functions which moved, the actual transfer dates and any accompanying teams, contractors or information holdings. The business case and governance approvals should explain what preserving approach and culture meant, including the arrangements for legal advice, independent challenge and correction of error.

Secondly, the agencies should clarify the ownership of vaccine-programme security functions during December 2021 to February 2022 and subsequently. The account should distinguish protection of sites and supply chains from assessment of public communications or legal activity. Relevant meeting terms, reporting lines and information-sharing arrangements would establish the interface with policing.

Thirdly, records should establish whether Paul Easter undertook work for, supplied material to or attended relevant meetings with UKHSA or its predecessor teams. The enquiry should include any engagement through an employer, consultancy or subcontractor. Confirmation of no relevant relationship would be a substantive answer and should be recorded as such.

Fourthly, the agencies should identify whether they received, retained or used assessments concerning Philip Hyland, PJH

Law or CRN 6029679/21. Where a factual proposition about police activity informed an assessment, its source and any subsequent correction should be identified. This is an enquiry into the accuracy and use of information, rather than an assumption that its use was improper.

Finally, UKHSA should clarify whether any Harquebus services were commissioned and identify the relevant contracts and deliverables where disclosure is possible. Potentially relevant records should be preserved. Where particular information cannot lawfully be released, the institution should explain the restriction and consider redaction or a meaningful factual account.

These requests do not presume a general entitlement to every document. They articulate the public interest in resolving defined questions.

A proper explanation should be capable of identifying the decisions and evidence upon which it rests. Personal responsibility and institutional responsibility can then be assessed fairly.

The present record establishes a health-security remit, an express intention to preserve aspects of the Vaccine Taskforce's working culture, an earlier DHSC-policing interface and a later shared procurement framework.

It leaves the personal and operational connections between those settings unresolved.

The justified conclusion is that disclosure is necessary to test them, not that the missing links are already conclusively proved.

Protecting public health carries a responsibility to remain answerable for the methods used and UKHSA can assist that

accountability by explaining what it inherited, what it commissioned and how it ensured that scrutiny remained possible.

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