

Submission to All Party Parliamentary Group on Coronavirus

My main concerns and recommendations (some of which are more fully set out in the [paper I have co-authored](#) in the British Medical Journal) may be summarised as follows:

- (1) England's established system of local communicable disease control has been eroded over several decades, especially following abolition of the Public Health Laboratory Service Board in 2003, and has become too centralised – the legal duty to take steps to protect the population from disease is with the Secretary of State under s.2A of the NHS Act 2006, not with local authorities;
- (2) In response to covid-19 the government, rather than build public health capacity, created an ad hoc parallel system which steers patients away from GPs, thereby preventing local authorities from being notified of suspected cases as required by the legal notification system, and which relies on commercial companies for testing and contact tracing;
- (3) NHS 111 covid-19 call centres and the covid-19 clinical assessment service should be reintegrated immediately into primary care and practices resourced to resume care;
- (4) Contact tracing and testing should be led by local authorities and coordinated, supported and funded nationally – the Secretary of State has the legal power under s.6C of the NHS Act 2006, which he should exercise, to make regulations to pass on his disease protection duty to local authorities;
- (5) the inquiry should try to ascertain (a) why the legal notification system in England (but not in Wales) was changed in 2010 to remove the right of local authorities to be notified of confirmed cases; (b) the extent to which the practice of local authorities appointing Public Health England (PHE) staff as their proper officers for notification purposes has led to local authorities not receiving even the limited information (i.e., of suspected cases) to which they are entitled under the regulations; and (c) whether the Secretary of State was advised by PHE to increase capacity to carry out contact tracing before the COBRA decision to abandon contact tracing on 12 March 2020; and
- (6) England must rebuild and reintegrate its local communicable disease. (cf. the German system – see the editorial in the British Medical Journal by Professor Ralf Reintjes, entitled '[Lessons in contact tracing from Germany](#)').

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