

18 June 2026

The Hazards Campaign calls for binding reform, not more recommendations

The Inquiry Must Convert COVID-19 IPC Findings into Law.

The UK *Covid-19 Inquiry Module 3 Report* has confirmed five systemic failures in infection control that left healthcare workers exposed to preventable harm. The Greater Manchester Hazards Centre and the Hazards Campaign are calling on the Government to respond with enforceable legal standards — not guidance, not recommendations, but law.

The *Module 3 Report*, published 19 March 2026, documents the full extent of failures in the United Kingdom's Infection Prevention and Control (IPC) regime during the Covid-19 pandemic. Official guidance was built on the assumption that COVID-19 spread primarily through large respiratory droplets. That assumption was incorrect. It remained embedded in official guidance for more than fifteen months despite a growing body of international scientific evidence confirming airborne aerosol transmission. Healthcare workers were placed at six times the infection risk of the general population. They were given surgical masks that offered insufficient protection against airborne pathogens. Warnings from nursing unions, professional bodies, and independent scientists were dismissed by the IPC Cell, which operated with no public transparency and whose minutes were never released. The Health and Safety Executive failed to challenge the guidance or enforce the duties that employers owe to their staff.

"Healthcare workers raised the alarm, they were ignored, and some of them died. The Inquiry has now confirmed every one of those concerns. The Hazards campaign will not accept warm words. We are calling for legal standards with real enforcement behind them, and we are calling for them now."

The Greater Manchester Hazards Centre and the Hazards Campaign has engaged with these issues throughout the pandemic and in the years since. The Hazards Campaign wrote to the Health and Safety Executive in March 2020 urging rigorous enforcement of workplace health and safety law.

Evidence was submitted to the Inquiry.

The SafeAir4All petition, coordinated by the Hazards Campaign and submitted to Downing Street in 2025 called for statutory air quality standards across all health and social care settings. The Government has yet to act.

Four demands from the Hazards campaign

1. Formally recognise Covid-19 as airborne and update all IPC guidance accordingly. The fifteen-month delay in revising guidance to reflect aerosol transmission must be acknowledged as a systemic failure. All future IPC guidance must incorporate the current scientific consensus from the outset, with mandatory review and revision triggers when new evidence emerges.

2. Set legally binding ventilation and clean air standards in all healthcare and care settings. Statutory minimum air quality requirements — covering adequate fresh-air ventilation rates and HEPA filtration — must be introduced for all NHS and social care premises. These must be backed by enforceable inspection and compliance regimes. Voluntary guidance has failed.
3. Mandate fit-tested FFP2 or FFP3 respirators as the baseline PPE for healthcare workers treating patients with infectious respiratory conditions. Surgical masks are not adequate protection against airborne pathogens. Employers must be required by law to supply appropriate respiratory protection, and the HSE must be required to challenge any guidance that falls below that standard.
4. Embed frontline workers, trade unions, and independent scientists in the development of all IPC guidance, with full transparency. The IPC Cell excluded those who had to implement its guidance and routinely dismissed expert dissent. All future guidance bodies must include frontline representation, publish their minutes, and operate clear escalation routes when concerns are raised and not addressed.

"Workers' organisations identified these failures in real time. The science was available. The warnings were given. What was absent was the political will to act on them. The Inquiry now has the opportunity — and the responsibility — to make that inaction impossible in any future public health emergency."

The Greater Manchester Hazards Centre and the Hazards Campaign calls on the Government to respond to the *Module 3 Report* by, introducing legislation to enshrine these four demands. They also would like to see the establishment of an independent body with statutory powers to oversee IPC guidance development and enforcement in any future public health emergency.

Greater Manchester Hazards Centre is based at The Wesley Centre, Royce Road, Manchester M15 5BP. It coordinates the UK Hazards Campaign, a UK-wide network of resource centres, trade unions, and campaigners established in 1988.

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