

Coronavirus Restrictions Review - March 11th 2021

SUMMARY IMPACT ASSESSMENT

Introduction

A Summary Impact Assessment (SIA) was produced in December 2020 following the introduction of a system of Alert Levels in Wales, which can be viewed [here](#). A further SIA was produced following the February 21 Day review which can be viewed [here](#).

The Alert Level guidance and the February addendum can be seen on the Welsh Government website [here](#).

This document aims to capture an assessment of the impact of the easements made in the 11th March review on different demographics in Welsh society.

The emergence in December of the now dominant and more infectious ‘Kent variant’ of the virus led to a need for tightened restrictions at Alert Level 4 (e.g. preventing face to face learning for the vast majority of learners in education). Since then, the health position in Wales has improved enabling some modest easements to be made in the February restrictions review, the improvements have continued and have been sustained enabling further easements in the 11th March review as we continue the cautious and gradual transition to Alert 3 restrictions.

The primary easements made at the 21 day review on March 11th 2021 are as follows:

- To remove the restrictions providing for school premises closures from 15 March;
- To replace the ‘stay at home’ restrictions with ‘stay local’ rules from 13 March;
- To allow for up to four people from two different households (or an extended household if more than four people) to meet outside, including in gardens and private outdoor spaces, from 13 March;
- To allow for outdoor sporting facilities (tennis courts, bowling greens, golf courses, outdoor gyms etc.) to reopen from 13 March;
- To include visits to residents of care homes (adults and children), as a reasonable excuse for gathering indoors with someone outside of a person’s household or extended household from 13 March;
- To provide for hairdressers and barbers to reopen from 15 March;
- To provide for supermarkets and mixed retailers to sell non-essential items from 22 March;
- To provide for garden centres to be allowed to reopen from 22 March;
- Remove the need for Ministers to specifically authorise individual elite sporting events from 13 March;

- To allow the use of Theatres for the purposes of rehearsals, irrespective of whether they are linked to a broadcast from 13 March;

Legislative background

The Health Protection (Coronavirus Restrictions) (Wales) Regulations 2020 came into force on 26 March 2020, and were subsequently replaced by The Health Protection (Coronavirus Restrictions) (No. 2) (No 3) and (No 4) (Wales) Regulations 2020. A consolidated version of the most recent Regulations can be found [here](#).

This Summary Impact Assessment relates to the amendments made to The Health Protection (Coronavirus Restrictions) (No. 5) (Wales) Regulations 2020 as a result of the March 11th Restriction Review.

Review of restrictions regulations

The Regulations are reviewed every three weeks in line with the latest evidence and intelligence.

Impact Assessments

The following impact assessments relating to the easements made can be found in the remainder of this document:

- i. 'Stay local' and meeting others outdoors
- ii. Hairdressers and barbers
- iii. Outdoor sports facilities
- iv. Indoor care home visits

In addition, a children's rights impact assessment and an equality impact assessment will be published separately on the Welsh Government website in relation to the phased reopening of schools.

STAY LOCAL AND MEETING OTHERS OUTDOORS EASEMENT ASSESSMENT

Wellbeing impacts

There are significant negative impacts associated with restricting the movement of people, in particular as this prevents them seeing family and friends outside of their local area.

The PHW survey on health and wellbeing (1 to 7 March 2021) showed that when asked how they have felt in the last week 22% of people reported feeling lonely occasionally whilst 16% felt lonely always or often. Some 24% of people felt isolated

occasionally with 25% reporting feeling this way always or often. Over this period the proportion reporting being worried about their mental health and wellbeing was 58%.

The data highlighted in yellow was used during the easement from Stay home to Stay local in 2020. The survey which contained the data has not been updated since November 2020. It is likely that the key messages below are relevant to this easement due to the environment in June 2020 looking relatively similar to present day.

A combined analysis by PHW of the same survey between 13 April and 7 June 2020 identified specific concerns of those classed as clinically vulnerable, including 25% of vulnerable individuals worrying a lot about their mental health and wellbeing (compared with 14% of those with no vulnerabilities).

Previous analysis by Public Health Wales¹ of the data from its weekly wellbeing surveys (covering the period of 13 April – 10 May) identified key demographic findings for people living in the most deprived areas of Wales who are more likely to be: self-isolating (45% of the most deprived fifth of the population compared with 31% of the most affluent fifth of the population); very worried about their mental health (30% vs 17%); feeling very anxious (28% vs 20%); and feeling isolated (29% vs 18%).

In terms of gender, females are more likely to be: self-isolating (40% vs 33%); very worried about their mental health (25% vs 20%); feeling very anxious (28% vs 20%); and feeling isolated (29% vs 18%). More females say their sleeping is negatively affected during lockdown. Whilst they report increases in snacking more and using social media more than males during the coronavirus restrictions, females are also spending more time outdoors and have been talking to friends and family more than they usually would.

The ONS report 'Coronavirus and loneliness'² (3 April – 3 May) considers how the coronavirus has impacted people living with loneliness. While this is now dated, it highlighted the chronically lonely and the lockdown lonely were most worried about the impact of Covid-19 on their wellbeing over other concerns. They were more likely than average to report feeling stressed or anxious; spending too much time alone; feeling bored; impacts on their mental health; strain on personal relationships and having no-one to talk to about their problems.

ONS also produced analysis in December 2020 looking at the impact of Coronavirus on depression in adults. This indicated that around a fifth of adults were likely to experiencing some form of depression in November 2020, almost double the rates reported prior to the pandemic. It also showed that younger adults, women, those

¹ <https://phw.nhs.wales/news/public-health-survey-reveals-bigger-impacts-of-novel-coronavirus-covid-19-and-restriction-measures-on-wellbeing-of-those-in-poorer-communities/>

² <https://www.ons.gov.uk/peoplepopulationandcommunity/wellbeing/bulletins/coronavirusandloneliness/greatbritain/3aprilto3may2020>

unable to afford an unexpected expense or disabled people were most likely to be experiencing depression.³

Additional evidence:

- Hafal's survey of 300 adults in Wales⁴ suggest that 73% of participants say their mental health has been negatively affected as a result of the coronavirus outbreak
- Mental Health Foundation's longitudinal study⁵ suggests that 24% of UK adults have felt loneliness because of coronavirus and feelings of loneliness have more than doubled since lockdown⁶.

Insights from geographic analysis of sequence data within Wales

- Examining transmission patterns across Wales we find that cases in areas of high population density (e.g. cities) are more likely to result from local chains of transmission, whereas those in less urban areas are more likely to be imports from elsewhere and rarely lead to local onward transmission

Insights on imports from England into Wales and the impact of lockdown rules

- We have been analysing evidence for importation of lineages into Wales, particularly from England. Using phylogenetics, we have inferred the likely origin of a phylotype (subtree) from sequence data, and from this identified the fraction of samples in an epi week that are from a new import. This shows that early on in the pandemic a high proportion of cases could be linked to imports, with the number decreasing considerably following lockdown.
- This analysis shows that the proportion of cases that could be related back to new introductions began to rise again during July and August, coinciding with UK-wide lockdown relaxations. This observation/analysis also supports the conclusions from the analysis of outbreak cases.
- When looking at the situation during the first wave, it is clear that the lockdown restrictions had a considerable effect in reducing imports from England/outside Wales. It is also clear that there has been an increase in imports into Wales over the course of the summer
- Collectively the import and geographic analyses point towards the fact that, both during the full lockdown and when limits on movement remained in Wales, these measures helped reduce long distance transmission within/into

³<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandwellbeing/bulletins/coronavirusandthesocialimpactsongreatbritain/11december2020#loneliness-of-adults-experiencing-some-form-of-depression-or-anxiety>

⁴ <https://www.hafal.org/2020/04/survey-raises-concerns-about-the-provision-of-mental-health-services-in-wales-during-the-covid-19-outbreak/>

⁵ <https://www.mentalhealth.org.uk/our-work/research/coronavirus-mental-health-pandemic>

⁶ <https://www.cogconsortium.uk/wp-content/uploads/2020/12/9th-December-2020-COG-UK-Report-Wales-SARS-CoV-2-Genomic-Insights-SAGE.pdf>

Wales. Within our data, over the summer months, we also observe increased signatures of importation, which coincide with lockdown restriction easing. Other analyses (such as the analysis covering outbreaks, below) collectively suggest that travel has played a role in seeding new cases/lineages into Wales, which in some cases have gone on to transmit extensively within the community.

- The genomics data make clear that the current structure of the population of circulating SARS-CoV-2 in Wales is different to that which was observed in March/April. The data point towards a number of insights relating to the impact of the lockdown and potential impact of restrictions such as the 5 mile rule. What seems clear from this and other data is that the easing of lockdown rules from July/August has corresponded with an increase in cases, with the genomic data suggesting that increases in Wales may partly be driven by imports from other parts of the UK and wider world.

Economic impacts

The Office for National Statistics surveyed businesses in the UK to understand the impact of COVID-19 on sectors⁷. Responses from 276 arts, entertainment, and recreation businesses are included in the last wave prior to divergence in approaches across the UK (20 April – 3 May 2020). Of those businesses surveyed, 43% reported a decrease in turnover of more than 50% in the last two weeks. 20% of businesses in the sector reported their turnover remained unaffected and 100% of businesses cited coronavirus as the reason for their turnover being outside its normal range. This data should be viewed with caution as responses are currently unweighted and the data is not available at a Wales-only level.

For those businesses able to operate, the change from stay home to stay local would potentially see a marginal positive impact as a result of more people being able to access their services.

In general terms the specific restriction for people to 'stay local' will be having a constraining effect on the economic impact of those businesses currently operating. These restrictions will also be preventing a number of other businesses from reopening as they would face severely constrained supply of customers. While these restrictions have a direct public health benefit in preventing the wider transmission of the virus between communities, it also has the indirect effect of forcing a natural phased reopening. This has public health benefits in terms of ensuring businesses are able to adapt, it places constraints on economic activity.

When stay local restrictions are removed in future, this will have a positive economic impact as it will allow for a wider pool of customers to visit different businesses. This will be further supported as wider economic opening of other sectors such as tourism and visitor sectors takes place over future reviews.

Environmental impacts

⁷<https://www.ons.gov.uk/economy/economicoutputandproductivity/output/datasets/businessimpactofcovid19surveybicsresults>

The potential increased movement of people could have an impact on air quality as people begin to travel longer distances within and to Wales. The current health situation and constrained public transport capacity will lead to a greater use of private vehicles and limited use of car sharing. Active travel is being actively promoted, but this is unlikely to be viable for longer distances. Officials in Environment and Rural Affairs are monitoring the impacts on air quality that have arisen since lockdown measures were introduced, with wide media reporting of apparently improved air quality. External consultants have been commissioned to analyse the impacts and this work will inform future policy with a view to retaining air quality improvements for the future, as far as possible.

Increased use of outdoor spaces could also have a positive impact in terms of peoples' attitudes and perceptions of environmental public goods. This could help reinforce the benefits of environmental protection as we move out of lockdown over time. There is also a risk of negative environmental impacts from overcrowding and littering, which has been seen recently in places in Wales and many popular tourist areas across England. This is exacerbated by the shift to provision of takeaway food and drink given ongoing restrictions on pubs, cafes and restaurants. Public messaging on the need to act responsibly to protect the environment and avoid crowded places could help mitigate this further. There is likely to be a continued issue with increased waste from take-away food and drink until restrictions on related premises are relaxed.

Equality impact assessment

An assessment of impacts by protected characteristics is set out below. In general terms the proposal promotes equality as it removes restrictions on 'Stay at Home' moving to 'Stay Local' and allowing up to 4 people from 2 households to meet for any reason outdoors, including private garden that will have affected different groups in different ways.

<i>Protected characteristic or group</i>	<i>What are the positive or negative impacts of the proposal?</i>	<i>Reasons for your decision (including evidence)</i>	<i>How will you mitigate Impacts?</i>
<i>Age (think about different age groups)</i>	<i>Positive: Lifting the 'Stay at Home' restrictions to move to 'stay local' with the added easement of allowing 4 people from two households to meet for any reason (not just exercise will benefit those cut-off from family and friends, mitigating effects of loneliness</i>	A range of survey data suggests younger people (18-29) are most likely to be worried about their mental health, and a more likely than other age groups to feel isolated. People over 70 are more likely to be worried about their	Guidance will be issued to outline increased risks of people travelling within their local area and meeting for any reason, including meeting in private gardens (up to 4 people from 2 households), and how to best protect against

	<p>and isolation or digital exclusion.</p> <p><i>Negative:</i> People of all ages may be concerned about increased risks to them from a greater movement of people within the local areas and increase in people meeting outdoors</p>	<p>health and the risks of contracting COVID-19, however the majority of this age group have received at least the first dose of the vaccine, so could alleviate some of the concerns.</p>	<p>transmission (social distancing).</p> <p>Continued guidance for those shielding to ensure additional risks are considered when outdoors.</p>
<p><i>Disability (think about different types of disability)</i></p>	<p>Positive: for disabled people who have not need to access provision under support and care will be able to travel within their local area and meet socially with friends and family</p> <p>Negative: Access to accessible areas to meet others in a local area may be an issue for some disabled people</p>	<p>Our rules already allow for disabled people (including disabled children) to access support and care from friends and family. Therefore, disabled people could already meet.</p> <p>Our rules already allow disabled people or people with a physical or mental illness or impairment to travel from their home in order to be able to exercise. For example, some wheelchair users may not be able to start to exercise immediately outside their homes for practical access reasons, and may need to drive to a suitable flat location, such as a park, for this purpose.</p> <p>In these circumstances the journey should be to the nearest convenient accessible</p>	<p>No specific additional mitigations are proposed</p>

		location and no long journeys should be undertaken unless absolutely necessary.	
<i>Gender Reassignment (the act of transitioning and Transgender people)</i>	<i>Positive:</i> The ability to access support networks may have been constrained by restrictions on travel and meeting up with other households affecting wellbeing disproportionately.	<i>No specific evidence identified</i>	<i>N/A</i>
<i>Pregnancy and maternity</i>	<i>Positive:</i> Issues of loneliness, isolation or access to support networks may have been constrained by restrictions on travel and meeting with other households	<i>No specific evidence identified</i>	<i>N/A</i>
<i>Race (include different ethnic minorities, Gypsies and Travellers and Migrants, Asylum seekers and Refugees)</i>	<i>Positive:</i> No specific benefits other than those for everyone to be able to see family and friends and undertake activity within the local area. <i>Negative:</i> BAME individuals are known to be at higher risk from the effects of coronavirus and may have heightened concerns about easing restrictions.	Range of different evidence on the disproportionate impact on BAME community (e.g. ONS, BAME advisory group for WG)	General communication activity on the risks for different groups and ongoing need for everyone to continue to follow guidance such as social distancing and good hygiene.
<i>Religion, belief and non-belief</i>	No specific differential impacts identified	<i>N/A</i>	<i>N/A</i>
<i>Sex / Gender</i>	<i>Positive:</i> The restrictions appear to affect different sexes in different ways, which could be	Surveys indicate females are more likely to be self-isolating, very worried about their mental	No specific additional mitigations are proposed

	mitigated by relaxation.	health, feeling anxious and feeling isolated. More females say their sleeping is negatively affected during lockdown	
<i>Sexual orientation (Lesbian, Gay and Bisexual)</i>	No specific differential impacts identified	N/A	N/A
<i>Marriage and civil partnership</i>	No specific differential impacts identified.	People who were married or cohabiting were less likely than average to feel lonely (chronic and 'lockdown' loneliness) (ONS opinions and lifestyle survey, May 20)	N/A
<i>Children and young people up to the age of 18</i>	<i>Positive:</i> Children will be able to meet with family and friends beyond within their local area.	The top two issues for children (12-18) relating to restrictions are 'not being able to spend time with friends' (72%) and 'not being able to visit family members' (59%) (Coronavirus and Me survey)	N/A
<i>Low-income households</i>	<i>Positive:</i> May be some benefits to travelling to see family and friends outdoors to mitigate effects of loneliness and isolation where this is not possible locally.	<i>PHW Wellbeing survey:</i> those living in the most deprived areas of Wales are more likely to be self-isolating, be feeling anxious and isolated during coronavirus restrictions, and report greater worries about their mental health	N/A

Human Rights and UN Conventions

The overriding purpose of the restrictions and requirements associated with lockdown have been to protect everyone's right to life. This has led to constraints on rights such as on private and family life and the freedom of assembly and association on justifiable health grounds. Public health is described as an acceptable reason to curtail these rights, as long as it is necessary and proportionate.

Notwithstanding the ongoing constraints from lockdown in the round, this proposal in affects the following:

Human Rights	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate negative Impacts?
The right to enjoy family relationships without interference from government (e.g. right to live with your family and to regular contact)	<i>Positive:</i> removing stay at home and meeting other people outdoors restrictions will facilitate family relationships by limiting restrictions placed by the government. Remaining restrictions on indoors and numbers of households continues to be proportionate on public health grounds.	The restrictions were based on public health grounds and the assessment and review process seeks to lift these as soon as they are no longer proportionate. This process has led to the proposal to lift this restriction.	No specific negative impacts from the proposal.

United Nations Convention on the Rights of the Child

The convention has been considered in this assessment. The restrictions on movement and gatherings conflicts with the following Articles:

- Article 15 – Children have the right to meet together and to join groups and organisations, as long as this does not stop other people from enjoying their rights.
- Article 31 – All children have a right to relax and play, and to join in a wide range of activities.

The relaxation to allow for meeting outdoors beyond the local area will mitigate the significant restrictions on children meeting and being able to relax and play. These rights will still be constrained by the need to contain the spread of the virus and protect public health (eg. continued physical distancing, only two households meeting outdoors, and continued closure of playgrounds).

The Coronavirus and Me survey of 23,700 children in Wales ensures the views of children inform policy choices (Article 12 – Children have the right to say what they think should happen, when adults are making decisions that affect them, and to have their opinions taken into account). This survey finds the top two stay at home rules that have impacted young people (12-18) the most on how they feel are ‘not being able to spend time with friends’ (72%) and ‘not being able to visit family members’ (59%). For many there has been a pleasure in spending more time with their family, learning new skills and enjoying the outdoors in gardens and during daily exercise.

For some, this period has also brought relief from previous social and health pressures such as mental health difficulties or bullying.

Welsh Language impacts

The proposal does not have any identified negative impact on the Welsh language. In general terms the ability to meet with another household outdoors beyond the local area could have a positive effect on the use of the Welsh language. This will enable Welsh speakers to meet with other Welsh speakers across Wales and beyond. Welsh medium education is not affected by this proposal. Welsh speakers may be able to travel further to access services available in Welsh if not available in their local area, which may have been prevented under the 'stay local' provisions.

HAIRDRESSERS AND BARBERS EASEMENT ASSESSMENT

Wellbeing impacts

Survey evidence provides a snapshot of mental wellbeing across Wales as restrictions remain in place. Public Health Wales' *Public Engagement Survey on Health and Wellbeing during Coronavirus Measures*, for the week 15 to 21 February, showed that compared to a year ago, 33% said their mental health was a bit worse, while a further 15% said it was much worse. The mental health charity Mind recently published survey evidence suggesting that more than half of adults and young people in the UK had experienced a deterioration in their mental health as restrictions have remained in place, with young adults being worse affected.⁸

It is well-established that unemployment is associated with low levels of wellbeing and worsening health. Increasingly, adverse effects will also be felt by new entrants to the labour market should they enter the labour market during an economic downturn. There is academic evidence that adverse labour market experiences in recession can have life-long effects on the economic, health, wellbeing and even life-expectancy of young people.⁹

Economic impacts

General economic impacts

In 2018 the whole of the *Other Personal Services* sector was worth £800million of gross value added (GVA) to the Welsh economy, equivalent to 1.2% total GVA for the same year.

Unfortunately data from the ONS' Business Impacts of Covid-19 Survey (BICS) is not broken down at a level that allows us to see the approximate impacts on close contact services. However, given the restrictions on the sector and its characteristics

⁸ Mind (2020) The mental health emergency: How has the coronavirus pandemic impacted our mental health?

⁹ See: <https://voxeu.org/article/impact-covid-19-chronic-health-uk>

(whereby close personal contact is necessary to provide the service) it is likely to be amongst the worst affected, along with the *hospitality and arts, entertainment, and recreation* sectors. In wave 6 of the BICS survey for the UK as a whole,¹⁰ approximately a third of businesses from those two sectors reported that they were continuing to trade; for every other sector recorded at least 4 in 5 firms reported that they were continuing to trade. As expected these two sectors also reported having the most significant drops in business turnover, with two thirds of businesses in both sectors reporting that their turnover had decreased by more than 50%.

The nature of many of the businesses operating in the close contact services sector is that much of the demand (and associated revenues) lost since restrictions were put in place is unlikely to be meaningfully recovered. Forgone consumption in this sector is unlikely to build up and be released (pent-up demand) in ways that are conceivable for other sectors that sell goods and/or services.

Employment and Income Effects

Many companies are utilising the UK Government Coronavirus Job Retention Scheme to furlough staff or other forms of support. The CJRS ensures that should workers be furloughed that the UK Government will guarantee 80% of their normal salaried income (with employers allowed to top up at their discretion). The UK Government plans to continue the scheme until 30 September.

Survey data from 26 February to 1 March shows that more than a fifth of those in work in Wales reported having had their working hours cut, with a similar share stating that their salaries had been reduced. Additional survey evidence suggests that 23% of people are in a worse financial situation as a result of the coronavirus, while 15% report being better off.¹¹ Concerns have been raised that the coronavirus is having a detrimental impact on the finances of poorer households, particularly those whose members work in shutdown sectors. These households are less likely to be able to reduce their spending significantly as a result of coronavirus in the same way that richer households will be able to, meaning they are more likely to be financing their spending during restrictions using savings (which may be limited) and accumulating debt.¹²

The closure of close contact services is expected to have had negative distributional effects due to the sector being one which employs larger proportions of women, the young, and individuals from Black, Asian, and minority ethnic groups. Many of the workers in this sector are amongst the lowest paid in Wales with the median salary estimated to be approximately £9 (see equality impacts section below for more

¹⁰ Covering the period 18 May to 31 May. The percentage of businesses in the UK reporting that they were continuing to trade was 34% for the Accommodation and Food Services sector and 30% for the Arts, Entertainment, and Recreation sector.

¹¹ Public Health Wales (2020) Public Engagement Survey on Health and Wellbeing during Coronavirus Measures: Week 46; 15th to 21st February 2020.

¹² Bangham & Leslie (2020) Rainy days: An audit of household wealth and the initial effects of the coronavirus crisis on saving and spending in Great Britain. Resolution Foundation.

detail). For those furloughed it is likely that their income has therefore been reduced to levels effectively below the UK national living and national minimum wage.¹³

Consumer confidence

In the event that close contact services are able to resume, the sector is still expected to experience a severe contraction in demand compared to the levels it saw before the crisis.

Environmental impacts

While the Welsh Government continues to promote active travel as an alternative to other forms of travel throughout the coronavirus pandemic and beyond, opening up the sector will likely expand the reasons for members of the public to travel by private vehicle (especially so given restraints to effective public transport capacity). While no forecasts are available as to what the knock on effect will be to air quality, it can be expected to have a negative impact when compared to recent months, in which air quality is believed to have improved. For this reason, officials in Environment and Rural Affairs are monitoring the impacts on air quality that have arisen since lockdown measures were introduced. External consultants have been commissioned to analyse the impacts and this work will inform future policy with a view to retaining air quality improvements for the future, as far as possible.

Equality impact assessments

An assessment of impacts by protected characteristics is set out below. Lockdown restrictions on this sector have had a disproportionate impact on young, female, and BAME members of the workforce who are more represented within the close contact services industry.

¹³ The UK National Living Wage as of April 2020 is £8.72 for those aged over 25. UK National Minimum Wage is £8.20 for those aged 21 to 24, £6.45 for those aged 18 to 20, £4.55 for those aged under 18, and £4.15 for apprentices.

Protected characteristic or group	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate Impacts?
<i>Age (think about different age groups)</i>	<p><i>Positive: Evidence suggests that the very youngest members of the workforce are disproportionately represented in the sector and thus more likely to be affected by current restrictions. Allowing businesses within this sector to reopen will therefore likely have positive equity effects, especially given that many within this group are amongst the worst affected by economic downturns historically.</i></p> <p><i>Negative: The risk of negative health outcomes associated with contracting Covid-19 increases with age, which should be considered for both staff and customers of the sector.</i></p>	<i>Analysis by Welsh Government of Annual Population Survey (APS) data for 2019 shows that 21% of workers in close contact services in Wales are under the age of 25 (while this age group only represents 12% of workforce). Those aged 25 to 34 represent 35% of those employed in sector (again larger than this age cohort's workforce representation share of 22%).</i>	<p><i>Mitigations that the sector have been asked to implement and limited reopening in first instance are aimed at reducing the risk of transmission for all groups; customers and staff.</i></p> <p><i>Risk assessments that businesses are asked to conduct should be used to identify disproportionate risks to certain groups.</i></p>
<i>Disability (think about different types of disability)</i>	No specific differential impacts identified.	<i>Analysis of APS data for 2019 suggests that disabled people are not disproportionately represented in this sector in Wales, with 15% of the workforce being classified as disabled (which is equal to their representation in the wider workforce).</i>	N/A

Protected characteristic or group	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate Impacts?
<i>Gender Reassignment (the act of transitioning and Transgender people)</i>	No specific differential impacts identified.	N/A	N/A
<i>Pregnancy and maternity</i>	No specific differential impacts identified.	N/A	N/A
<i>Race (include different ethnic minorities, Gypsies and Travellers and Migrants, Asylum seekers and Refugees)</i>	<p><i>Positive: Evidence suggests that BAME members of the workforce are disproportionately represented in the sector and thus more likely to be affected by current restrictions. Allowing businesses within this sector to reopen will therefore likely have positive equity effects.</i></p> <p><i>Negative: BAME groups may be disproportionately at risk of negative health outcomes should they contract Covid-19, which should be considered for both staff and customers of the sector.</i></p>	<i>Analysis of APS data for 2019 estimates that 13% of workers in close contact services in Wales are BAME (while this group only represents 5% of the Welsh workforce).</i>	<p><i>Mitigations that the sector have been asked to implement and limited reopening in first instance are aimed at reducing the risk of transmission for all groups; customers and staff.</i></p> <p><i>Risk assessments that businesses are asked to conduct should be used to identify disproportionate risks to certain groups.</i></p>
<i>Religion, belief and non-belief</i>	No specific differential impacts identified.	N/A	N/A

Protected characteristic or group	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate Impacts?
<i>Sex / Gender</i>	<i>Positive: Evidence suggests that women are disproportionately represented in the sector and thus more likely to be affected by current restrictions. Allowing businesses within this sector to reopen will therefore likely have positive equity effects.</i>	<i>Analysis of APS data for 2019 estimates that 79% of workers in Wales within close contact services are female, this is despite women only representing 47% of the total Welsh workforce.</i>	<i>No negative impact identified.</i>
<i>Sexual orientation (Lesbian, Gay and Bisexual)</i>	<i>No specific differential impacts identified.</i>	<i>N/A</i>	<i>N/A</i>
<i>Marriage and civil partnership</i>	<i>No specific differential impacts identified.</i>	<i>N/A</i>	<i>N/A</i>
<i>Children and young people up to the age of 18</i>	<i>Negative: Adults employed within the Close Contact Services sector could have childcare responsibilities with the sector due to open 5 days before schools shut for the summer holidays (although an extension is available at Local Authorities discretion). Traditional forms of childcare may have been disrupted by current lockdown restrictions.</i>	<i>Welsh Government analysis of 2018 Annual Population Survey data suggests that 4,600 adults employed working within the Close Contact Services sector have children under the age of 16.</i>	<i>The Welsh Government has eased restrictions on childcare sector with a view to easing the pressures on families who may have adults who need to return to physical premises to work.</i>

Protected characteristic or group	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate Impacts?
<i>Low-income households</i>	<i>Positive: Allowing members of this sector to return to work has the capacity to mitigate job losses and increase household incomes for those from the poorest households.</i>	<p><i>Provisional data from the Annual Survey of Hours and Earnings provides estimates for hourly and weekly gross pay by 2-digit SIC codes in Wales (2020). For Other Personal Services (SIC code 96) median gross hourly pay was £8.76 - £3.66 lower than the Welsh median for all employee jobs of £12.42. For weekly gross pay in this sector the median is £246, approximately £194 lower than the Welsh median.</i></p> <p><i>Using the same data at least 70% of employees in Other Personal Services are estimated to have lower gross hourly pay than the Welsh median.</i></p>	<i>No negative impacts identified.</i>

Human Rights and UN Conventions

The overriding purpose of the restrictions and requirements associated with lockdown have been to protect everyone's right to life. This has led to constraints on rights such as on private and family life and the freedom of assembly and association on justifiable health grounds. Public health is described as an acceptable reason to curtail these rights, as long as it is necessary and proportionate. Notwithstanding the ongoing constraints from lockdown in the round, this proposal could affect the following:

Human Rights	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate negative impacts?
<p>Article 11 of the International Covenant on Economic, Social and Cultural Rights (ICESCR) recognises the right of everyone to an adequate standard of living for himself and his family, including adequate food, clothing and housing, and to the continuous improvement of living conditions.</p>	<p><i>Positive: allowing close contact services to reopen will facilitate the return to work of many employees within the sector who currently could be earning below the National Living and Minimum Wages due to receiving 80% of their pre-crisis income.</i></p>	<p><i>Income data from Annual Survey of Hours and Earnings shows that workers in this sector earn significantly below the average (median) Welsh wage and many are likely to be earning less than the National Living/Minimum wage as a result of being furloughed.</i></p>	<p><i>No specific negative impacts from the proposal.</i></p>

United Nations Convention on the Rights of the Child

The convention has been considered in this assessment. Opening up the sector should have a general positive impact linked to parental income:

- **Article 18** – Both parents share responsibility for bringing up their children, and should always consider what is best for each child. Governments should help parents by providing services to support them, especially if both parents work.
- **Article 27** – Children have a right to a standard of living that is good enough to meet their physical and mental needs. The Government should help families who cannot afford to provide this

Welsh Language

The proposal does not have any identifiable negative impact on the Welsh Government's commitment to preserve and promote the Welsh Language. Within the Welsh Government's own plans to reach a million Welsh Speakers by 2050, which is set out in 'Cymraeg 2050: A million Welsh speakers', it stresses the importance of promoting the use of the Welsh language as well as increasing the population that can speak Welsh. The second theme of Cymraeg 2050 is on Increasing the Use of Welsh, it states: "*People need opportunities to use Welsh in a variety of situations which reflect the diversity of their lifestyles. These include opportunities within the family, in the workplace, in local activities, or in wider interest networks and communities which can span continents*". Opening up this sector could provide additional opportunities to use Welsh.

OUTDOOR SPORTS FACILITIES EASEMENT ASSESSMENT

Wellbeing impacts

Children and adults will benefit from increased access to outdoor sports facilities, in particular those without access to gardens or larger spaces to play or exercise. Outdoor sports facilities are a valuable community asset and making them available provides important physical and mental health benefits.

The reopening of attractions will contribute directly or indirectly to wellbeing with positive impacts on the economy, cultural and social enrichment and health.

Economic impacts

Physical activity participation yields a generous return on investment in terms of the consequential benefits of a healthy and active lifestyle. Children playing and people exercising regularly in the outdoors reduces their reliance on health and social services, reduces sickness levels, and increases productivity. Outdoor sport and exercise within the local community contributes to a greener Wales.

Environmental impacts

The environmental impacts of allowing people to engage in outdoor physical activity is likely to be extremely low given that most activities are not associated with emission contributing technology. Facilities will be predominantly used locally, with no significant expected increase in emissions associated with travelling to use facilities.

Equality impact assessment

Easing restrictions on outdoor sports facilities could be beneficial to children and adults from lower socio-economic backgrounds who are estimated to be engaging in

less exercise since restrictions began. The re-opening of outdoor sports facilities will provide increased opportunities to engage in a range of different activities.

<i>Protected characteristic or group</i>	<i>What are the positive or negative impacts of the proposal?</i>	<i>Reasons for your decision (including evidence)</i>	<i>How will you mitigate Impacts?</i>
<i>Age (think about different age groups)</i>	Positive: Re-opening more outdoor facilities will offer a greater range of opportunities for people of all ages to exercise.	Evidence set out above on wellbeing and economic impacts highlights the estimated representation of this group.	Welsh Government has adopted a collaborative approach to developing guidance on re-opening sectors/services/facilities with stakeholders and industry. Therefore, comprehensive guidance to support safe implementation of measures is available for those areas where restrictions have been eased and for other premises/activities as preparations are made for them to re-open.
<i>Disability (think about different types of disability)</i>	Positive: As more facilities re-open, disabled people should benefit from being able to access a greater range of opportunities for sport and exercise. This will help to reduce loneliness and isolation, and generally promote wellbeing.		The Welsh Government's "Sport, Recreation and Leisure: guidance for a safe return" notes that organisations should consider the rights of those with protected characteristics in terms of accessing venues or services.
<i>Gender Reassignment (the act of transitioning and</i>	Unlikely to have an impact.	Insufficient data available to form a proper assessment As more premises open, people should	n/a

<i>Transgender people)</i>		generally benefit from more opportunities for safe social interaction and opportunities to access services, which will help to reduce loneliness and isolation; provide more access to support; and generally promote wellbeing.	
<i>Pregnancy and maternity</i>	Positive: Re-opening more businesses such as indoor tourist attractions will also provide a greater range of activities which mothers/carers may be able to take young children to enjoy	As more premises open, they will generally benefit from more opportunities for safe social interaction and opportunities to access services, which will help to reduce loneliness and isolation; provide more access to support; and generally promote wellbeing.	<p>The Welsh Government’s “Sport, Recreation and Leisure: guidance for a safe return” notes that organisations should consider the rights of those with protected characteristics in terms of accessing venues or services.</p> <p>The guidance suggests organisations communicate clearly and regularly with members and participants, setting out what they are doing to manage risk and what advice they are giving to individuals to do likewise. Organisations are advised to publish an action plan detailing their plans to re-open safely and the steps they are taking to avoid and reduce the potential of transmission. They are encouraged to consider inclusive guidance for people who need support to be active.</p> <p>The guidance reminds organisations of the legal requirement that all</p>

			<p>reasonable actions will have been taken in order to minimise transmission of Coronavirus in the workplace, and refers to Welsh Government guidance for employers and employees on keeping safe in the workplace.</p> <p>For example, the guidance advises organisations they must display the appropriate signage that complies with the Equality Act 2010, and have other appropriate measures in place for people with protected characteristics, to facilitate physical distancing at all points throughout the facility and car park.</p>
<p><i>Race (include different ethnic minorities, Gypsies and Travellers and Migrants, Asylum seekers and Refugees)</i></p>	<p>Positive: As more facilities re-open, everyone should benefit from being able to access a greater range of opportunities for sport and exercise. This will help to reduce loneliness and isolation, and generally promote wellbeing.</p>	<p>As more premises open, they will generally benefit from more opportunities for safe social interaction and opportunities to access services, which will help to reduce loneliness and isolation; provide more access to support; and generally promote wellbeing.</p>	<p>The Welsh Government’s “Sport, Recreation and Leisure: guidance for a safe return” notes that organisations should consider the rights of those with protected characteristics in terms of accessing venues or services.</p> <p>The guidance suggests organisations communicate clearly and regularly with members and participants, setting out what they are doing to manage risk and what advice they are giving to individuals to do</p>

			<p>likewise. Organisations are advised to publish an action plan detailing their plans to re-open safely and the steps they are taking to avoid and reduce the potential of transmission. They are encouraged to consider inclusive guidance for people who need support to be active.</p> <p>The guidance reminds organisations of the legal requirement that all reasonable actions will have been taken in order to minimise transmission of Coronavirus in the workplace, and refers to Welsh Government guidance for employers and employees on keeping safe in the workplace.</p> <p>For example, the guidance advises organisations they must have appropriate measures in place for people with protected characteristics, to facilitate physical distancing at all points throughout the facility and car park</p>
<i>Religion, belief and non-belief</i>	Unlikely to have an impact.	Data on religion of sports participants is not collected via official surveys.	n/a

<i>Sex / Gender</i>	<p>Typically, more boys/men participate in sport than girls/women.</p> <p>As more facilities are allowed to re-open, there will be a greater range of opportunities for all genders to play sport and exercise.</p>	<p>More opportunities to play sport and exercise outdoors will help mitigate the impact on people's mental and physical wellbeing.</p>	<p>Recent announcements by Welsh Government to support childcare facilities to re-open; re-opening schools, enabling people to exercise with one other household; and the intention to lift the 'stay at home' restrictions will all serve to provide access to more opportunities for women to exercise.</p>
<i>Sexual orientation (Lesbian, Gay and Bisexual)</i>	<p>No specific differential impacts identified.</p>	<p>Recent changes to the regulations that allow people to exercise with people from another household, the intention to lift the 'stay at home' restrictions and the reopening of sports courts will serve to provide access to more opportunities for people of every sexual orientation.</p>	<p>n/a</p>
<i>Marriage and civil partnership</i>	<p>No differential impact identified</p>	<p>As more facilities open, couples should generally benefit from more opportunities for safe social interaction, which should promote wellbeing.</p>	<p>n/a</p>
<i>Children and young people up to the age of 18</i>	<p>Positive: Will provide increased opportunities to engage in a range of different activities and provide opportunities for more social interaction.</p> <p>Positive: Exercise and sport is an important</p>	<p>Children's rights have been considered as part of this assessment (see above); and the measures providing opportunities to undertake more activity will be positive for children and supports compliance with UNCRC articles (Article 12, 14, 15, 27, 31)</p>	<p>No mitigation required.</p>

	<p>contributor to the healthy physical, psychological well-being and social development of children. Evidence suggests that children are doing less exercise in Wales now than before the pandemic. Re-enabling activity in this area will widen the scope for children and young people to engage in physical exercise</p>	<p>The survey ‘Coronavirus and Me’ of approx. 23,000 children and young people in Wales provides some insight into their experiences of the coronavirus pandemic and their reactions, hopes and concerns for the future (Article 12, UNCRC).</p> <p><i>Sport Wales survey conducted by Savanta ComRes from 8-12 May 2020:</i></p> <p><i>“26% report that their children are doing more activity since the COVID-19 restrictions, while 35% report that their children are doing less. Overall this suggests a net reduction of 9 percentage points.”</i></p>	
<p>Low-income households</p>	<p>Positive: Outdoor sports facilities are usually located in walking distance from people’s houses and are particularly important to people in low income households.</p>	<p><i>Sport Wales survey conducted by Savanta ComRes from 8-12 May 2020:</i></p> <p><i>“There are however significant variations within certain demographic groups. There is a net increase in activity levels amongst those from higher socioeconomic backgrounds (+7 percentage points), however there is a net decrease amongst those from lower socioeconomic backgrounds (-4 percentage points).”</i></p>	<p>Outdoor sports facilities that are local and free to use, such as small-sided football and basketball courts, will be more accessible to low income households who may be unable to travel far from their home.</p> <p>Welsh Government guidance on reopening sports facilities advises making provision to allow bookings from people who do not have access to the Internet.</p>

		<p><i>“Those children from lower socio economic backgrounds appear to be experiencing the greatest reductions (LOW SES: More 23% Less 36% = -13 percentage points HIGH SES: More 28% Less 35% = -7 percentage points)”</i></p>	
--	--	--	--

Human Rights Act

The overriding purpose of the restrictions in the round is the protection of the right to life and any changes must be considered in this context. The changes proposed make a contribution to the right to live your life privately without government interference, by removing restrictions that could interfere with a person’s private and family life.

United Nations Convention on the Rights of the Child

The convention has been considered in this assessment. The restrictions on outdoor sports facilities could conflict principally with the following Article:

- **Article 31** – All children have a right to relax and play, and to join in a wide range of activities.

Easing related restrictions would enable the Welsh Government to meet its obligations under this article in particular. There may also be some benefits under Article 15 (the right to meet together), but these will be constrained until further easements are made to gatherings outdoors, which should be a priority for future easements.

Welsh Language

Sport and leisure is integral to creating the social conditions where people can use, develop and learn the Welsh language. Welsh speaking communities and Welsh speakers generally, will benefit from the ability to socialise through the greater number of opportunities that will be afforded to them from the opening of outdoor sports facilities, especially if the ‘stay home’ requirement is eased to ‘stay local’.

The Welsh Government Guidance “[Sport, Recreation and Leisure: guidance for a safe return](#)” advises that organisations consider how they will continue to comply with Welsh language duties when implementing any changes in their activities / service.

INDOOR CARE HOME VISITS EASEMENT ASSESSMENT

Wellbeing impacts

There is evidence to suggest that the decision to restrict care home visits in Wales, initially on 23 March 2020 and at various points since during local lockdowns, the firebreak and the move into alert level 4 restrictions has led to negative impacts on the well-being of those in care homes who have been unable to see loved ones in person. Of particular concern is the impact that visitor restrictions may be having on those with Alzheimer's and other forms of dementia, whereby the lack of interpersonal contact may be leading to a deterioration of cognitive symptoms and increased levels of agitation, apathy, and depression.^{14,15}

Outdoor visits and visits within visiting pods or similar structures have partly addressed the wellbeing issues cited in the above evidence. However the easement to enable more routine indoor visits is expected to have a positive impact on well-being, in particular for those who are unable to participate in outdoor visits for health reasons. In addition, outdoor visits are often weather-dependent, therefore can be potentially called off at short notice, causing additional upset, both to residents and loved ones. Enabling indoor visits will remove this barrier.

The PHW survey on health and wellbeing (1 to 7 March 2021) showed that when asked how they have felt in the last week 22% of people reported feeling lonely occasionally whilst 16% felt lonely always or often. Some 24% of people felt isolated occasionally with 25% reporting feeling this way always or often. Over this period the proportion reporting being worried about their mental health and wellbeing was 58%.

Economic impacts

We do not consider there to be significant economic impact for care homes as a result of the reintroduction of indoor visits. There may be some resource implications for care homes in revising their impact assessments and staffing required to facilitate more routine visiting.

Care home services have reported increases in costs across a numbers of areas as a result of increased PPE and IP&C requirements and the decision to limit visitors. These include additional staff costs, increased infection control, higher food prices and greater use of ICT to keep families in touch with their loved ones. Some care homes have also faced a loss of income as a result of increased vacancies in their homes due to the need to restrict new admissions in some cases to contain the virus. This impact is evidenced by the Welsh Government funding given to help adult social care providers meet the additional costs associated with the pandemic. £88m

¹⁴ Alzheimer's Society (5 June 2020). *Thousands of people with dementia dying or deteriorating – not just from coronavirus as isolation takes its toll.* [[Online article](#)]

¹⁵ Suarez-Gonzalez, A (2020). *Detrimental effects of confinement and isolation in the cognitive and psychological health of people living with dementia during COVID-19: emerging evidence.* LTCcovid, International Long-Term Care Policy Network, CPEC-LSE, 23 June 2020.

of support has been distributed to date, with existing provisions extending to the end of the financial year.

The Welsh Government's final budget for 2021-22 confirms continuing support for social care providers through the Local Authority Hardship Fund during the first six months of the new financial year in order to help meet costs arising as a result of the pandemic.

No significant economic impact is expected as a result of the planned easement to allow indoor visits. There may be a small increase in staff time required to safely organise and facilitate indoor visits, however this is not expected to have a significant impact.

Environmental impacts

No significant environmental impacts have been identified as a result of restrictions in this area, and none are anticipated as a result of the proposed easement.

Equality Impact Assessment

An assessment of impacts by protected characteristics is set out below. The proposed easement has been identified as having possible positive impacts on older individuals, those with disabilities, and children.

<i>Protected characteristic or group</i>	<i>What are the positive or negative impacts of the proposal?</i>	<i>Reasons for your decision (including evidence)</i>	<i>How will you mitigate Impacts?</i>
<i>Age (think about different age groups)</i>	Positive: Given the majority of residents within care homes in Wales are older people, the proposed easement to enable indoor visits will have a particularly positive impact on this group.	The Older People's Commissioner (OPC) has been a member of the stakeholder group for care home visits, and has supported the proposed easement.	N/A
<i>Disability (think about different types of disability)</i>	Positive: Some care home residents have been unable to participate in outdoor care home visits or visits within visiting pods due to severe disabilities, therefore the proposed easement will have a positive impact on those with severe disabilities as it will enable some to reconnect with loved ones.	The Welsh Government has engaged with both the OPC and Care Forum Wales (who represents the views of care home providers).	

<i>Gender Reassignment (the act of transitioning and Transgender people)</i>	No differential impact expected.	N/A	N/A
<i>Pregnancy and maternity</i>	No differential impact expected.	N/A	N/A
<i>Race (include different ethnic minorities, Gypsies and Travellers and Migrants, Asylum seekers and Refugees)</i>	No differential impact expected.	N/A	N/A
<i>Religion, belief and non-belief</i>	No differential impact expected.	N/A	N/A
<i>Sex / Gender</i>	No differential impact expected.	N/A	N/A
<i>Sexual orientation (Lesbian, Gay and Bisexual)</i>	No differential impact expected.	N/A	N/A
<i>Marriage and civil partnership</i>	No differential impact expected.	N/A	N/A
<i>Children and young people up to the age of 18</i>	Positive: The proposed easement will have a positive impact on children and young people living in children's homes, as the resumption of more routine indoor visits will benefit their well-being, by enabling them to more easily reconnect with loved ones.		
<i>Low-income households</i>	No differential impact expected	N/A	N/A

Human Rights and UN Conventions

The overriding purpose of the restrictions and requirements associated with lockdown have been to protect everyone’s right to life. This has led to constraints on rights such as on private and family life and the freedom of assembly and association on justifiable health grounds. Public health is described as an acceptable reason to curtail these rights, as long as it is necessary and proportionate. Notwithstanding the ongoing constraints from lockdown in the round, this proposal in affects the following:

<i>Human Rights</i>	<i>What are the positive or negative impacts of the proposal?</i>	<i>Reasons for your decision (including evidence)</i>	<i>How will you mitigate negative Impacts?</i>
Article 8 of the Human Rights Act 1998: Respect for private and family life, home and correspondence	Positive: Current restrictions clearly impede the ability for those in care to “enjoy family relationships without interference from government”. The proposed easement represents a partial relaxing on that impediment.	Reference has been made to Human Rights Act 1998.	N/A

United Nations Convention on the Rights of the Child

The convention has been considered in this assessment. Current restrictions on allowing indoor visits to residents in care homes, hospices, and secure accommodation could conflict with following article, should the restriction no longer be proportionate:

- **Article 3:** All organisations concerned with children should work towards what is best for each child.
- **Article 23:** A child with a disability has the right to live a full and decent life with dignity and, as far as possible, independence and to play an active part in

the community. Governments must do all they can to support disabled children and their families.

- **Article 27:** Children have a right to a standard of living that is good enough to meet their physical and mental needs. The Government should help families who cannot afford to provide this.

The proposed easement could therefore allow us to better meet our obligations under the UNCRC.

Welsh Language

The measures described above do not have any identifiable negative impacts on the Welsh Government's commitment to preserve and promote the Welsh Language.