

Updated Alert Level 4 Restrictions as at February 18th 2021

SUMMARY IMPACT ASSESSMENT

Introduction

1. 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](#). This SIA focuses on the identified impacts of the updated Alert Level 4 restrictions arising from the February 21 day review.
2. The Alert Level guidance and the February addendum can be seen on the Welsh Government website [here](#).
3. This document aims to capture an assessment of the impact of the measures imposed by the revised restrictions at Alert Level 4 on different demographics in Welsh society.
4. 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 from the tightened Level 4. Welsh Ministers expressed the need for a cautious and gradual easing of restrictions from Level 4 to 3 in order to keep infections at a manageable level and to continue on the path towards re-opening the country through the alert levels.
5. The primary easements made at the 21 day review on February 18th 2021 are as follows:
 - i) Return of foundation phase and some vocational learners to face to face learning from 22 February
 - ii) four people from two households to meet outdoors, socially distanced, in a public space (not in a private garden)
 - iii) Guidance will be reviewed to make it clear that disabled people can access care and support if required within the rules.

Legislative background

6. 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](#).
7. 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 February 18th Restriction Review.

Review of restrictions regulations

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

Equality impact assessment of the measures

9. Evidence shows that Coronavirus itself has disproportionate equality impacts. It has more serious health impacts and a greater likelihood of death for older people, men, people living in more deprived areas, and the Black, Asian and minority ethnic population. Welsh Ministers recognise that controlling the virus and reducing transmission will have positive equality impacts for these groups. Ministers are equally conscious that measures to control the spread of the virus will inevitably have disproportionate impacts on equality, older people and children, for example. Therefore, minimising the impact on groups such as these should be intrinsic to the approach adopted for the ongoing management of the pandemic.
10. The easement allowing four people from two households to meet outdoors, socially distanced, in a public space (not in a private garden) will provide some modest benefit for most people, noting that there may be an increased benefit for some groups who have felt more impacted by restrictions.
11. Updating our guidance to enable disabled people to access the care and support they require will benefit this cohort and lessen the impact of the virus on their lives.
12. We are forced to tolerate some adverse impacts on the basis of the risk to public health and the need to control transmission of the virus but having Non Pharmaceutical Interventions (NPIs) in place over time – and as they are periodically made more restrictive and then lessened – mean that the adverse impacts are compounded over time.
13. There is scope to mitigate the most significant adverse impacts in the selection of measures (within Alert levels) with financial support packages, for example, but it will not be possible to address all of the disproportionate and adverse impacts. Some of those impacts are short term but many are likely to have longer term effects and exacerbate existing disadvantage.
14. Working from home (where possible) remains the message in the February revision to Alert Level 4. Working from home is more likely to be an option for those working in an office and in higher paid occupations. It will not be available to all and many lower paid occupations – retail, care work, close contact services and hospitality and those in accommodation where room to work from home is impossible, it would not be an option. So the scope to work in an environment which is ‘safer’ and supported by good Health and Safety practice, is not available to all. This is likely to impact women to a greater extent given the likelihood that more women are in part time or low paid roles than men. Home working is also not a universal ‘good’ and is much more challenging for those

facing socio-economic disadvantage. The disparities include: lack of space to work at home either because of the size of home or having to share with others; cost and reliability of broadband; additional heating and lighting bills, and the negative impact of isolation of mental health and wellbeing, particularly over the winter period. Some commuting costs may be offset but that would depend on individual circumstances.

15. The Stay at Home message also remains in the February revision to Alert Level 4. The Black, Asian and minority ethnic COVID-19 Socio Economic Sub Group report highlighted issues of overcrowding in homes for Black, Asian and minority ethnic people. Half of the Black, Asian and minority ethnic population in Wales live in rented properties, compared to just under a third of the white population. Black, Asian and minority ethnic people who rent are more likely to live in privately rented properties than socially rented properties (compared to broadly similar proportions of white people who live in privately rented properties and socially rented properties). We know from the Welsh Housing Condition Survey (2017-18) that the private rented sector generally has the oldest housing stock and a higher proportion of poor quality housing (e.g. containing damp or other hazards). People from a number of Black, Asian or Minority Ethnic groups are more likely to live in overcrowded housing than White British people. Only 4.9% of White British people lived in overcrowded housing (that is, they had fewer bedrooms than they needed to avoid undesirable sharing), compared to 28.7% of Gypsy or Irish Travellers and 27% of Bangladeshi's; whilst 19.4% of Black people and 18.5% of Arabs did. This means, in addition to barriers arising from the economic sectors Black, Asian and minority ethnic people are more likely to work in, home working is not necessarily a viable option for many Black, Asian and minority ethnic people due to greater Alert levels of overcrowding at home, compared to White people.
16. Travel restrictions in Alert level 4 apply; advice is to stay at home unless traveling with a permissible, reasonable excuse. Travel will not be permitted to and from areas of high prevalence in the UK (Tier 3 in England, Level 3 and above in Scotland, all of Northern Ireland) without a reasonable excuse in any of the Alert levels. Our guidance strongly advises against all non-essential travel in the UK). Whilst this will have a positive impact on well-being for many (unless they are working very long hours) by removing commuting time from the working week, restrictions on travel will continue to have negative equality impacts. These arise from constraining the locations where people access services and recreation and in many instances it will mean restricting people from meeting family and friends if they live in other parts of the UK or abroad, which can lead to increased loneliness and isolation. It is anticipated this may have an adverse impact on Black, Asian and minority ethnic people, who have close family and extended family living in other parts of the UK and overseas.
17. Alert level 4 restrictions will continue to have significant impacts on businesses and services, which is disproportionately impacting of certain groups: younger workers (pubs and restaurants), women (non-essential retail) and Black, Asian and minority ethnic people (pubs and restaurants). In terms of socio-economic impact, local authorities and other partners report an increase in referrals to food banks and the proportion of people who are new users of these services. It has

also been reported that 24% of Black, Asian and minority ethnic mothers reported that they were struggling to feed their children. Additionally, there is good evidence from the earlier part of the pandemic that the additional caring responsibilities arising from the pandemic, including childcare, fell disproportionately on women. It will continue to be the case that children will be asked to self-isolate when there are cases in education or childcare settings and based on the first lockdown, looking after children and supporting them to learn, if there is remote learning taking place, will fall more to women than to men. This will impact on some women's ability to work and their health and wellbeing. There is concern this will also have a longer term impact on women's careers and job progression. Businesses in Wales will be able to continue to access the Job Retention Scheme, which will offer some support but throughout this period it is likely that more people will be made redundant or not be able to access contracted work or have their hours cut. This will increase socio-economic disadvantage and increase the number of people facing significant challenges.

18. In all Alert levels, where at all possible, childcare settings, schools and further education institutions will be open to all learners for face to face teaching on the school site. The emergence of a new variant and high rates of infection meant that this was not possible and we were forced to require remote learning for a period. Face to face learning is crucial to avoid generating further adverse impacts for children from lower socio-economic backgrounds, disabled children and children with additional learning needs, and some Black, Asian and minority ethnic children. There is strong evidence for a range of socio-economic harms to children and young people as a result of education premises remaining closed over both the short and long term. There is also evidence that harms disproportionately affect children from disadvantaged areas, and also children from many minority groups. Amongst the conclusions made in SAGE's report '*COVID-19: Benefits of remaining in education - evidence and considerations*' are that "school closures put educational outcomes at risk, especially for disadvantaged students"¹. From the Coronavirus and Me children's survey and other evidence it is more likely that Black, Asian and minority ethnic children (e.g. children with additional learning needs, and some Black, Asian and minority ethnic children including refugee and asylum seeking children and those from Gypsy, Roma and Traveller communities) will have less space and quiet at home to work due to overcrowding. During week commencing 14 December, the Welsh Government set precedent and legislated to ensure that, if primary schools were to take the decision to close (as was to be the case), they will continue to offer education provision for vulnerable learners and critical worker's children - the option to invoke this directive again, in the future, will be retained.

19. Harms are likely to include an increase in 'adverse childhood experiences' which research indicates can result in trauma and attachment issues, which could be severe over the long-term leading to poor outcomes and higher levels of poor health across the life course. We also know that remote learning is difficult for our youngest learners. For older learners studying vocational qualifications, online

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/935192/spi-b-dfe-benefits-remaining-education-s0861-041120.pdf

learning may not be possible as learners need access to college or workplace facilities to learn practical skills. We need to ensure that learners undertaking qualifications have the structured learning and support they need to prepare for assessments, and to have a successful transition to their next stage of learning or employment.

20. Community centres, public facilities, such as libraries and sports courts and skate parks will remain open in all but Alert level 4 restrictions. This will support all children and young people but specifically Black, Asian and minority ethnic 7-11 year olds who were significantly more likely to say the closure of community centres and not being able to go outside affected their learning (Coronavirus and me survey). Black, Asian and minority ethnic children and young people across all the age ranges of the survey were also more likely to say they felt the closure of libraries had affected their learning. As a result, under Alert level 4 restrictions, the operation of a click and collect service will be permissible by libraries in Wales. Certain essential public services will still be undertaken from community centres in Alert level 4, including the provision of childcare.
21. Whilst the phased return of learners to face to face settings will have a positive impact on groups of learners that may be adversely impacted by restricting school operations, we acknowledge that is also likely to require greater number of staff to work on school sites. ONS analysis of deaths involving COVID-19 by different occupations shows that rates of death involving COVID-19 for teaching and education professionals aged 20 to 64 were statistically significantly lower than the rate of death involving COVID-19 among those in the wider population of the same age and sex. We have however put in place mitigations to ensure schools are as safe as possible for both learners and staff. This includes updates to the operational guidance published to support this phased return of learners to include additional measures regarding the use of face coverings by staff in all areas of the school or setting where social distancing cannot be maintained. Twice weekly lateral flow tests are being introduced in order to quickly identify asymptomatic adults. Guidance on risk assessments has also been updated to recognise the importance of reviewing risk assessments to suit the current circumstances. An all-Wales COVID-19 workforce risk assessment tool has been developed for use in the education sector. This is intended to be used to assess if staff are at higher risk of developing more serious symptoms from COVID-19, and takes into account factors such as ethnicity, age, sex, and existing health conditions.
22. The continuing restrictions on hospitality and the entertainment sector (e.g. cinemas, bowling alleys) requiring closures at Alert Level 4 are likely to have a negative impact on women, young people and people from Black, Asian and minority ethnic communities who are disproportionately represented in the sector. The economic harm is also likely to be felt by the wider family, including children. More generally, evidence from the Citizens Advice Bureau and Resolution Foundation shows that equality impacts are not falling equally and that disabled people, carers, people that are clinically vulnerable and people on low incomes are at a higher risk of redundancy.

23. Enabling places of worship to remain open in all Alert levels – which requires an exception from the rules on gatherings - is considered critical to the mitigation of negative impacts in this area.
24. An Equality Impact Assessment presented against restrictive measures at the revised Alert Level 4 can be seen at Annex A.

Additional considerations and other impact assessments

European Convention on Human Rights (ECHR)

25. The following ECHR articles are likely to be engaged as a result of the imposition of restrictions and requirements as set out in the various Alert Levels: article 2 (right to life), 5 (rights to liberty); 8 (right to respect for home); 9 (freedom of religion); 11 (rights to assemble); 14 (prohibition from discrimination), A1P1 (enjoyment of possessions) A2P1 (right to education). These are all qualified rights and interference with these rights can be lawful where that interference is necessary in pursuit of a legitimate aim and is proportionate to that aim.
26. The restrictions and requirements also balance interference with the above rights to the right to life (Article 2 of the ECHR) which imposes positive obligations upon the state to protect life. Whilst the package of measures in Alert level 4 will infringe on many of the ECHR articles, this is considered proportionate in the interests of providing a public health response to the coronavirus pandemic. Alert level 4 measures, with the most severe restrictions on movement and gatherings and closures of businesses and premises, strikes a balance between protecting public health and the social, financial, economic and well-being harms caused by the restrictions. It is considered that the greater the length of time these measures are in place would cause greater harms to people's lives and livelihoods. With enhanced Alert Level 4 extended for a further three weeks, which will total at least 11 consecutive weeks, Welsh Ministers considered that a slight easing of restrictions in relation to gatherings outdoors was appropriate to mitigate some well-being harms. This will provide for up to four people from two household to meet outdoors, but not in a private garden.
27. It should also be noted that many of the restrictions, particularly on movement and gatherings, are subject to reasonable excuses – at all Alert levels – which will enable people to gather indoors and travel for certain purposes. Additionally requirements, for example to wear face coverings, are subject to exemptions, which are intended to mitigate against some of the disproportionate impacts on people with protected characteristics. For example, the ability to access childcare (all Alert levels) – or for single parents to form an extended household (all Alert levels) - seeks to mitigate against the disproportionate impact on women of the requirement to stay at home. Similarly, the exemption in relation to providing care

(all Alert levels) seeks to mitigate against mental and physical health harms that might be suffered by vulnerable groups as a result of this requirement.

International Covenant on Economic, Social and Cultural Rights (ICESCR)

28. The implications of the International Covenant on Economic, Social and Cultural Rights (ICESCR) has also been considered. An assessment of impact is outlined below:

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><i>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.</i></p>	<p>The return of face to face learning for foundation years and some vocational learners will lessen the impact of the virus on this aspect of these people's lives, but many other restrictive measures still remain. For all other learners remote learning is set to continue for a further three weeks, extending the period in which harms are accumulated.</p>	<p>Protecting the NHS and saving lives is the Welsh Government's primary objective. In terms of restrictive measures, Welsh Government has prioritised education – being clear that it will be the last to be restricted and the first to emerge. In adopting a phased approach to the return to face to face learning to education settings, the Welsh Government hopes to guard against a resultant surge in infections.</p>	<p>Through interim remote learning provision, which includes support to disadvantaged families to ensure they can access the technology and hardware to facilitate learning in this way.</p>

United Nations Convention on the Rights of the Child (UNCRC)

29. The United Nations Convention on the Rights of the Child (UNCRC) has been considered in the development of an Alert Level for Wales. The package of measures agreed at each Alert level will have implications for the following Articles:

- Article 3: All organisations concerned with children should work towards what is best for each child.

- Article 6: All children have the right of life, Governments should ensure that children survive and develop.
- 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.
- Article 13: Children have the right to get and share information as long as the information is not damaging to them or to others.
- Article 14: Children have the right to think and believe what they choose and also to practise their religion.
- Article 17: Children have the right to reliable information from the mass media, Television, radio and newspapers should provide information that children can understand, and should not promote materials that could harm children.
- 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 26: The Government should provide extra money for the children of families in need.
- 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.
- Article 28: Children have a right to an education. Discipline in schools should respect children’s human dignity. Primary education should be free. Wealthy countries should help poorer countries achieve this.
- Article 29: Education should develop each child’s personality and talents to the full. It should encourage children to respect their parents, and their own and others cultures.
- Article 31: Children have the right to relax and play, and to join in a wide range of activities

30. In January 2021 Children’s Commissioner for Wales asked children and young people in Wales to share their views and experiences of the latest Coronavirus lockdown through the ‘Coronavirus and me’ survey. Almost 20,000 took part between the ages of 3 -18. The report was published on 12 February and the key findings of this survey, as published on the Children’s Commissioner for Wales website, are summarised on the following paragraphs.

31. Strong negative feelings were expressed by many children and young people; they expressed frustration, and sometimes anger, about the impact of the pandemic on their lives. 3 – 7 year olds spoke about missing friends, family

members and experiences. From mid-teens on, there were signs of additional distress, potentially compounded by worries about exams and their futures. 30% of 17 and 18 year olds who took part report that they are worried 'most of the time'.

32. Loneliness rates are high and not being able to see friends is having the biggest impact on children's lives, followed by not being able to see other family members and the impact of school and college closures. 14% of children aged 7-11 report that they feel lonely 'most of the time', and feelings of loneliness increase with age, peaking at 40% of 17 year olds reporting that they feel lonely 'most of the time'. The easing of rules to outdoor gatherings has potential to impact positively on the lives of children by reducing feelings of loneliness and enabling them to see friends from one other household in an outdoor setting.
33. Over half of young people aged 12-18 enjoy learning at their own pace from home, but many are worried about falling behind with learning – levels of confidence and motivation with education are seen to decrease with age. A large majority of 15-18 year olds are concerned about falling behind, their qualifications and 69% report low motivation to do school work.
34. Children who often face more barriers (inequalities) to accessing their rights even when there is no global pandemic, have also faced more struggles on average than their peers. For example, disabled children and young people are more likely to be worried about coronavirus, more likely to feel sad, more likely to feel unsafe. Whilst children and young people of Black, Asian and other ethnic minority groups are more likely to feel lonely and less likely to say they feel safe than their peers. Some children reported that they do not have access to a printer, the books they need, a quiet space, a table/desk or chair and/or paper or stationary
35. Despite the worries and concerns that children and young people are reporting, many are also reporting positive experiences - as they did in the last nationwide survey in May 2020 - including enjoying spending time at home and receiving good support from schools and youth workers.
36. The return of face to face learning for Foundation Phase learners and some vocational learners will help to lessen the adverse impacts such as those listed above. Foundation Phase learners specifically have been prioritised because we know they find it difficult to learn remotely.
37. Alert level 4 restricts parental services to online and virtual support only with face to face time limited to urgent support or where a child is at risk. Maternity and perinatal services continue, with access to health visitors and wider support services in place via virtual means. The ability for four people from two households to meet outside, socially distanced, could benefit parents, and their children, in terms of social, emotional, mental and physical wellbeing.
38. Indoor and outdoor leisure facilities, including sporting facilities used by clubs and organisations that organise sporting activities, all remain closed in Alert Level 4. This affects the viability of most if not all organised community sporting activity,

including but not limited to that which would usually be provided for children. Outdoor playgrounds and parks should remain open at all Alert levels to mitigate the impact of restricted indoor services, and to ensure that children retain the opportunity to play. This is particularly important for children from households with no access to outdoor space and / or limited indoor space.

39. Organised indoor activities such as parent and child groups play an important role in a child's development – social, emotional, physical and cognitive. We know from the recent Ofsted report that children are suffering regression coming to school in nappies, with reduced speech and language skills etc. While Welsh Government has some mitigation in place in the financial year 2020/21 via the Child Development Fund this will have the greatest effect if these types of groups are able to meet in all but Alert level 4. It is important to emphasise that restrictions under Alert level 4 carry an ongoing risk of regression to a child's development, therefore any time spent in Alert level 4 should be as short as possible. Alert level 4 restrictions may only serve to compound negative impacts for some, although for some children time spent at home has been a more positive experience.
40. To redress some of the impacts from the initial lockdown a £3.5m scheme to tackle developmental delay was launched in October following concerns around children missing milestones for both physical development and speech, language and communication development. This scheme will begin to mitigate some of the harms described.
41. In relation to the economic well-being of children, the Welsh Government has prioritised families who are in poverty through the Discretionary Assistance Fund (DAF), Free School Meals (FSM) and foodbanks, ensuring that support is in place so that no child should go hungry. Additional funding has been made available to support these measures and therefore help to mitigate against feelings of food insecurity, particularly experienced by Black, Asian and minority ethnic children. However, in Alert level 4, in particular, it is acknowledged this is unlikely to be sufficient to redress the impact of a loss of earnings for those workers on zero hours contracts, agency workers or those who will only take home two thirds of their wages, if they are in a position where their employer can access the UK Job Support Scheme fund.
42. To support communication with children and parents, the Welsh Government will utilise existing campaigns and networks to distribute information and advice to parents, for example the Parenting: Give it Time campaign; the Flying Start Facebook page; the Parenting Expert Action Group, Childcare, Flying Start and Families First Networks. This work will seek to reassure children, explain what is happening and help parents to support their children to continue to enjoy some of their critical rights, e.g. right to enjoy relaxation and play. We will also speak directly to a number of young people through 'Children in Wales' to establish how best to provide communication with those of secondary school age. We will look at whether and how, general messaging applies to this age group, the channels used to relay messages, and/or whether we need to develop specific products and messaging with young people. Keep Wales Safe, as part of the pre-Christmas campaign has commissioned advertisements on social media

channels such as TikTok and developed a digital advertisement for TV and digital channels, which includes messaging for families and children.

Wider economic, social and wellbeing impacts

43. Despite the support offered to businesses most severely affected by the Covid-19 pandemic, the impact on people's livelihoods has been significant. Amongst those hardest hit have been those receiving lower wage levels, younger people, those with low skills / qualifications levels, people with poor health and disabilities and those from Black, Asian and minority ethnic communities.
44. Broadly, the estimated impact on GVA as a result of Level 4 restrictions is considered to be £100m per week. Therefore, 14 weeks of Level 4 restrictions would be associated with an impact of £1.4bn.
45. Specific short-term economic harms will take the form of increased unemployment, proportional to length of closure. In turn, these impacts will have adverse effects on health and well-being. As the duration of restrictions increases, these harms become more severe and it is important to consider whether the reduction of direct harms from Covid-19 remain proportionate to the indirect harms caused by restrictions.
46. The risk of people becoming unemployed is that their skills tend to atrophy, their labour market attachment may diminish, and – given the well-established association between unemployment and wellbeing – their mental and physical health may suffer. These effects increased progressively as the length of the period spent unemployed increases. All of these effects reduce future employment and wage prospects.
47. Considering 'Alert level 4 – Very High risk' impacts, in 2020 in Wales there were 3,465 businesses in non-essential retail; 8,900 in Hospitality; 1,905 in other Tourism related activities; and 5,120 in other categories such as gyms, personal care and libraries². Under claims made until 30 June when most of hospitality was closed, according to data published by HMRC on the 15th July 2020, 73% of eligible employments in the industry in Wales had been supported through the CJRS. Across all industries this was 29% of eligible employments (378,400). Across these sectors, the majority are SMEs - with a high concentration in the micro size band. Some smaller businesses may find it particularly hard to survive.
48. People will generally be worse off when businesses are required to close, as the extended UK Government support schemes do not cover people's previous full income. A surge in unemployment levels is predicted and there are clear signs that there will be long-term scarring effects. The latest ONS labour market data shows that in Wales the unemployment rate was 4.6% between September to November 2020, compared to 3.2% between January and March 2020. This increase is in spite of Government support schemes continuing which are putting significant pressure on public finances.

² Based on a list of SIC industries collated for analytical purposes which are detailed in **Annex B**. This may differ slightly to [guidance](#) issued on which businesses must close.

49. There is a wealth of survey evidence pointing to the social harms from lockdown measures, including significant negative impacts on mental health and wellbeing. These harms are particularly acute for the young (previous waves found a greater proportion of young people coped badly with restrictions than older people), and those less able to understand the necessity of a change in routine such as young children or people with autism. The latest indicators from the ONS Opinions and Lifestyle survey found that between 10 – 14 February, personal well-being measures for life satisfaction (6.4), feeling that things done in life are worthwhile (7.0) and happiness (6.5) remained at some of the lowest levels recorded since March 2020; however, the level of anxiety (4.1) improved slightly this week compared with last week (4.2). These wellbeing indicators were already significantly worse compared to those reported before the pandemic, particularly for those reporting feelings of loneliness.

Environmental impacts

50. Under the most severe Alert level 4 restrictions we can expect to experience some positive environmental impacts, with restrictions and guidance issued to limit international travel and the tightening of border controls. There is likely to be an overall positive environmental impact as fewer people travel longer distances to visit friends and family, attractions and hospitality premises. However, those that do travel are likely to increasingly use their own cars to do so where they are able. IPSOS Mori survey data for November shows that around three quarters (75% in 20-23 November figures) agree with the statement 'I will avoid public transport and use my car more than I did before'.

51. The requirement for individuals to work from home, where possible, will also contribute to positive environmental impacts. A study³ by the Global Carbon Project team in December, showed that carbon emissions in the UK fell by 13% in 2020.

Welsh Language

52. Alert level 4 restrictions are considered to have the greatest negative impact on the Welsh Language, and the impact is considered to be broadly proportionate to the length of the restrictions. The impacts of restrictions are likely to differ substantially based on the linguistic background of Welsh speakers. For children who are the sole Welsh speaker within their household unit (which is the case for some children who attend Welsh speaking schools) the opportunities to speak Welsh could be severely reduced by restrictions on gatherings indoors and outdoors, especially when coupled with wider restrictions on education and economic sectors. The exact impact of this is difficult to fully understand however, as many speakers will use digital resources as a means to overcome physical barriers to socialise. However, the ability to do so with ease will also be affected by locality (difference in urban/rural broadband connectivity) and age (with older

³ <https://essd.copernicus.org/articles/12/3269/2020/>

cohorts of the population having lower levels of digital literacy than their younger counterparts).

53. Welsh language community groups play a key role in enabling people to speak Welsh regularly with each other. A recent survey looking at the [impact of coronavirus pandemic on Welsh language community groups](#), revealed that only 20% of those groups had managed to adapt their activities to operate in some way since the first lockdown began at the end of March. The other 80% may have kept in touch with their group, but had not continued to operate. Of those who had been able to operate in some way, overall, they felt that they were less effective, met less often and that fewer people participated in their activities. When asked about their expectations for the future, 62% of the groups thought that they would continue to exist as a group in a year's time, if the social distancing rules continued to apply.

Rural impacts

54. The restrictions on hospitality at Alert 4 coupled with travel restrictions will have an adverse impact on the tourism industry in rural areas. The trade of public houses in rural areas tends to be focused heavily on evenings in rural communities, and so the hospitality restrictions will have a negative socio-economic impact on these businesses.
55. In Wales roughly 20% of people live in settlements of under 2,000 people. A further 20% live in settlements of between 2,000 and 9,999 people. This is a little less than the share of people living in settlements of at least 100,000 people (Cardiff, Swansea and Newport). The smaller settlements thus make up a significant share of the Welsh population. The small settlement size and travel distances involved may have implications for service delivery (of permissible services) in these areas.
56. Rural areas tend to have higher share of elderly people than the rest of Wales. In 2019 people over 65 made up 21% of the Welsh population. All of the 9 broadly rural local authorities (Isle of Anglesey, Gwynedd, Conwy, Denbighshire, Powys, Ceredigion, Pembrokeshire, Carmarthenshire and Monmouthshire) have higher share of people aged over 65.

Annex A: Equality Impact Assessment in line with February revised Alert Level 4 restrictions

Alert level 4 – Very High risk			
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>Positive: Given the health impacts of Coronavirus are more serious for older people, reducing transmission rates will have a positive impact.</p> <p>Negative: Young people are disproportionately represented in the pubs and restaurants sector and will be negatively impacted by the restrictions in the short term and any medium and long term consequences that they have on businesses in the sector. This cohort currently represents the age group most at risk from an economic downturn. Younger people have also received disproportionate numbers of fixed penalty notices (FPNs) issued to date.</p> <p>Negative: The requirement to stay at home – even for a short time – is likely to impact on the mental health of all age groups: older people are most likely to be worried contracting the virus, while people aged 18-29 are most likely to feel isolated.</p>	<p>The Resolution Foundation reported In February 2021 that the employment effects of Covid-19 have been felt most by those working in sectors subject to social distancing measures, and by the young, the low paid, and those on insecure contracts</p> <p>Up to 22 September, 61% of the FPNs issued in Wales were to people under 35. It is not clear what has driven the disparities with regard to FPNs or whether there are additional disparities we do not know about, given the limited data</p> <p>Analysis by Welsh Government of Annual Population Survey (APS) data for 2019 shows that 46% of all in employment in pubs and restaurants in Wales are aged 16 to 24 (while this age group only represents 12% of all in employment).</p> <p>Survey responses highlight younger people (18-29) are most likely age group</p>	<p>The Welsh Government support package and UK Government extension of furlough will help mitigate some the adverse impacts of this measure in the short term.</p> <p>Keeping the levels of FPNs relatively low, keeping them under regular review and the Police continuing to take a “4Es approach” where enforcement is a last resort will all help to mitigate the age equality impacts</p> <p>Exemptions and reasonable excuses to form extended households if you are living alone, and to meet indoors to provide care, should mitigate against the worst impacts of the measures.</p> <p>Physical activity and being outdoors can have a significant impact on reducing loneliness, therefore the reasonable excuse to enable exercise should mitigate to help to mitigate the impact of the measures to some extent.</p>

	<p>Positive: The return to face to face learning from 22 February for foundation years and vocational learners will benefit these groups. The foundation years are recognised as the most challenging group to benefit from remote learning. In addition, returning children will be able to benefit from seeing their friends.</p>	<p>to be worried about their mental health and to feel isolated.</p> <p>People over 70 are more likely to be worried about their health and the risks of contracting COVID-19.</p> <p>The ONS lifestyle survey (May 20) found rates of loneliness were highest among working-age adults living alone (eg. 13% of those aged 16-64 living alone reported chronic loneliness compared to 5% in households with two working age adults). Older people were no more likely to be report being lonely, the highest proportions found for young adults.</p> <p>Older adults are more likely to be self-isolating and are more worried about getting the virus and becoming seriously ill (PHW wellbeing survey)</p>	
<p><i>Disability (think about different types disabled people)</i></p>	<p>Positive: COVID-19 has a significant disproportionate impact on the health of some disabled people and some people with chronic health conditions. Strengthened measures to reduce transmission will have some positive impacts for disabled people. Allowing close contact services to remain open will also assist to minimise adverse impacts on disables</p>	<p>Citizen’s Advice’s report: An Unequal Crisis (England & Wales) found that a higher proportion of disabled people (1 in 4) are facing redundancy than the general population (1 in 6).</p> <p>Analysis by Welsh Government of APS data for 2019 suggests that disabled people have a higher representation in pubs and restaurants in</p>	<p>The Welsh Government support package and UK Government extension of furlough will help mitigate some the adverse impacts of this measure in the short term.</p> <p>Exemptions and reasonable excuses to form extended households if you are living alone, and to meet indoors to provide care and support, should</p>

	<p>people.</p> <p>Positive: As a result of the February review, we will update our guidance to make clear that disabled people will be able to access the care and support they require.</p> <p>Negative: In the earlier stages of the pandemic, disabled people were more likely to be furloughed and this pattern may be repeated. For disabled people, the isolation and negative impacts on their health due to mental health problems may be heightened.</p> <p>Negative: In the earlier phase of the pandemic, some disabled people saw a reduction in their care package from local authorities or other changes in the support available. This impacted on people’s quality of life and wellbeing.</p> <p>For some disabled people their home may not be a safe space. A stay home requirement may expose them to other harms and may provide a reasonable excuse for others to keep services away.</p> <p>Stay home requirements and other restrictions may impact on some disabled people more severely than</p>	<p>Wales, with 19% of those in employment being classified as disabled (this group represents 15% of the all in employment).</p> <p>Feedback from carers illustrates a lack of specialist provision for certain groups, such as those caring for some with a learning disability, autism, or dementia, who are less able to understand and cope with disruption to routines.</p> <p>Coronavirus and Me reported disabled children and young people were more likely to report a negative impact on their mental health and that the closure of services was having a big impact on how they felt.</p> <p>Restrictions of movement may disproportionately impact on disabled people. There may be limited safe, appropriate space at home or in their immediate vicinity and travel to a more distant location may be necessary. Any limitation of the frequency of outside visits will impact on some disabled people more significantly. In its report into inequalities and the impact of Covid-19^[1], the ELGC Committee noted that disabled people are particularly affected by</p>	<p>mitigate against the worst impacts of the measures.</p>
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	<p>others. This may be because of the role of routine in helping managing their wellbeing or because of difficulty in communicating or understanding the need for certain restrictions.</p> <p>The closure of ‘personal contact services’ also impacted on disabled people – particularly therapeutic services, having a negative impact on physical and mental wellbeing.</p>	<p>social distancing and the changes to our built environment.</p>	
<p><i>Gender Reassignment (the act of transitioning and Transgender people)</i></p>	<p>Negative: There is some evidence from earlier in the pandemic about the impact of being required to stay home for some people whose families were negative about or hostile to the individual’s gender identity. A requirement to stay home may reintroduce these issues.</p> <p>Positive: The easing of rules to extended household meetings, outdoors, may have a positive impact by enabling individuals to access support networks</p>		
<p><i>Pregnancy and maternity</i></p>	<p>Negative: A range of issues have been identified for pregnancy and maternity as a result of lockdown. These have ranged from influencing the decisions of women whether to have natural births if their</p>	<p>The babies in lockdown survey reported that just over a quarter (28%) of those breastfeeding feel they have not had the support they required. Over half of respondents were breastfeeding (55%),</p>	<p>Mitigation: Critical public services and childcare (including Flying Start) will remain open during Alert level 4 restrictions and will assist in providing support to this group.</p>

	<p>partner is not present, to difficulties with breastfeeding. These negative impacts could be felt again during sustained periods of the harshest restrictions at Alert level 4.</p>	<p>but over half of those using formula had not planned to do so (53%).</p> <p>The babies in lockdown report noted almost half (47%) of parents reported that their baby had become more clingy. One quarter (26%) reported their baby crying more than usual. The numbers of those reporting increases in babies crying, having tantrums and being more clingy than usual was twice as high amongst those on the lowest incomes compared to those on the highest.</p> <p>This report also reported that 6 in 10 parents shared significant concerns about their mental health.</p>	
<p><i>Race (include different ethnic minorities, Gypsies and Travellers and Migrants, Asylum seekers and Refugees)</i></p>	<p>Positive: COVID-19 has been shown to have a disproportionate impact Black, Asian and minority ethnic people, therefore measures to bring the virus under control will be of particular benefit to this group.</p> <p>Positive: The return of face to face learning for foundation years and some vocational learners will have a positive impact on the lives of Black, Asian and minority ethnic</p>	<p>Range of different evidence on the disproportionate impact on Black, Asian and minority ethnic community (e.g. ONS, Black, Asian and minority ethnic advisory group for WG). Coronavirus and Me reported:</p> <p>Black, Asian and minority ethnic children and young people reported that the restrictions affected their ability to keep a healthy body and mind, and how limited space or living in</p>	<p>The Welsh Government support package and UK Government extension of furlough will help mitigate some the adverse impacts of this measure in the short term. The Welsh Government package is specifically targeted at the hospitality and tourism sector.</p> <p>Keeping the levels of FPNs relatively low, keeping them under regular review and the Police continuing to take a “4Es approach” where enforcement is a last resort will all help to</p>

	<p>families with young children.</p> <p>Negative: The Black, Asian and minority ethnic COVID-19 Socio Economic Sub Group report highlighted issues of overcrowding in homes for Black, Asian and minority ethnic people. A requirement to stay home will disproportionately impact on people living in overcrowded conditions.</p> <p>Negative: Black, Asian and minority ethnic population more likely to work within the pubs and restaurants sector in Wales than white population.</p> <p>Negative: the closure of certain sectors will have a disproportionate impact on Black, Asian and minority ethnic people. There may also be particular adverse impact on Black, Asian and minority ethnic businesses that sell specialised cultural foods – such as ethnic cuisine who already struggle to maintain customers because of the scarcity of food products.</p> <p>Negative: The closure will also adversely impact on Windrush and Black, Asian and minority ethnic Elders who have reported isolation and advancing anxiety, depression and</p>	<p>over-crowded housing had made this harder.</p> <p>Black Asian and minority ethnic people comprise 12% of those in employment in pubs and restaurants.</p> <p>The Resolution Foundation reported on 27 October that 9 per cent of those previously furloughed had lost their jobs. This rate was highest for 18-24-year-olds, Black, Asian and minority ethnic workers, and the low paid.</p> <p>In February 2021 The Resolution Foundation reported that workers who were employed at the start of the crisis from a Black or minority ethnic background are 5 percentage points more likely than White workers to have either stopped working or been furloughed in January 2021</p> <p>It has been reported that 24% of Black, Asian and minority ethnic mothers reported that they were struggling to feed their children.</p> <p>10% of FPNs in Wales up to 22 September were issued to people identifying as Asian or Chinese, who represent around 2% of the population. It is not clear what has driven the</p>	<p>mitigate the racial equality impacts</p> <p>Exemptions and reasonable excuses to form extended households if you are living alone, and to meet indoors to provide care, should mitigate against the worst impacts of the short term measures.</p>
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	<p>mental health difficulties linked to being locked down and isolated in homes away from their community members or family.</p> <p>Negative: There has been some evidence of disproportionate numbers of fixed penalty notices issued to Black, Asian and minority ethnic people. The creation of new offences which may result in fixed penalty notices being issued may have adverse impacts on Black, Asian and minority ethnic communities. The restrictions on travel may have an adverse impact on Black, Asian and minority ethnic people who have family elsewhere in the UK or overseas.</p>	<p>disparities with regard to FPNs or whether there are additional disparities we do not know about, given the limited data.</p> <p>Welsh Government analysis of APS data for 2019 estimates that 12% of those in employment in pubs and restaurants in Wales are Black, Asian and minority ethnic (while this group only represents 5% of the all those in employment in Wales).</p>	
<i>Religion, belief and non-belief</i>	<p>Positive: Places of worship will remain open and be allowed to operate in a Covid secure way. This will have a positive impact on faith groups.</p>		
<i>Sex / Gender</i>	<p>Positive: There is clear evidence that COVID-19 has a disproportionate impact on the health of men. Therefore measures to bring the virus back under control and reduce transmission will have positive impacts for men.</p> <p>Negative: Women will be impacted by the restrictions on hospitality sector as they are disproportionately represented in the sector.</p>	<p>76% of FPNs issued to 22 September have been to men. It is not clear what has driven the disparities with regard to gender and FPNs given the limited data.</p> <p>Welsh Government analysis of APS data for 2019 estimates that 50% of those in employment in Wales within pubs and restaurants are female, while females represent</p>	<p>The Welsh Government support package and UK Government extension of furlough will help mitigate some the adverse impacts of this measure in the short term.</p> <p>Keeping the levels of FPNs relatively low, keeping them under regular review and the Police continuing to take a “4Es approach” where enforcement is a last resort will all help to</p>

	<p>They are also more likely to be impacted if their child has to self-isolate as tend to do more childcare.</p> <p>Negative: There is good evidence from the earlier part of the pandemic that the additional caring responsibilities arising from the pandemic, including childcare, fall disproportionately on women. This will impact on some women’s ability to work and their health and wellbeing. There is concern this will also have a longer term impact on women’s careers and job progression.</p> <p>Positive: The return to face to face learning for foundation years will impact positively on women whom often bear the brunt of childcare</p> <p>Negative: There is evidence of increased demand for support with VAWDASV following the national lockdown. Any measures telling people to stay home and limiting the places where they could go and potentially make a disclosure will increase those risk and limit the scope to access help or support.</p> <p>Negative: Men have received a disproportionate number of FPNs issued.</p>	<p>47% of all in employment in Wales.</p> <p>Survey findings suggest women may benefit from resuming ‘normal’ social interaction such as a meal with friends or family/extended family, which may promote psychological wellbeing.</p> <p>Women are the majority of those providing care, paid and unpaid and the majority of health workers and are more likely than men to deliver unpaid care at home (Women’s Budget Group, Covid-19: Gender and Equality Issues)</p> <p>Working carers, who will have to balance local services returning and caring for a vulnerable person. (<i>Carers UK</i>)</p>	<p>mitigate the gender equality impacts</p> <p>The ability to access childcare – or for single parents to form an extended household - seeks to mitigate against the disproportionate impact on women of the requirement to stay at home.</p> <p>The Welsh Government will ensure key services can continue to operate, including on a face to face basis during Level 4 restrictions (for example, social services, VAWDASV services and Flying Start).</p>
<p><i>Sexual orientation</i></p>	<p>Negative: There is some evidence from earlier in</p>		

<p><i>(Lesbian, Gay and Bisexual)</i></p>	<p>the pandemic about the impact of being required to stay home for some people whose families were negative about or hostile to the individual's sexual orientation. A requirement to stay home may reintroduce these issues.</p> <p>Positive: The ability to meet up to four people (two households) outdoors, for exercise, will benefit individuals who will be able to access their support networks having have felt isolated in lockdown if they are living with others who do not recognise/aren't supportive of their sexual orientation.</p>		
<p><i>Marriage and civil partnership</i></p>	<p>Negative: Alert level 4 measures restrict the number of guests which can attend a marriage ceremony or civil partnership (including humanist weddings).</p>	<p>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).</p>	
<p><i>Children and young people up to the age of 18</i></p>	<p>Positive: Keeping schools, and colleges open (even if this has to be via distance learning from home) will have a positive impact on children and young people especially those that are vulnerable or from disadvantaged backgrounds. However, the prospect of children working from home is not considered to be as positive, and certainly not in the medium or long term.</p>	<p>The evidence from the first lockdown shows that the impact on vulnerable and disadvantaged children has been particularly acute.</p> <p>Not being able to see friends was cited as the single thing which had an impact on how children and young people felt in the Coronavirus and Me survey.</p> <p>Black, Asian and minority ethnic children reported in the Coronavirus and me</p>	<p>The Welsh Government has prioritised families who are in poverty through for example the Discretionary Assistance Fund and the Child development Fund for children at risk of development delay.</p> <p>During week commencing 14 December, the Welsh Government set precedent and legislated to ensure that, if primary schools were to take the decision to close, they will continue</p>

	<p>Positive: The return to face to face learning from 22 February for foundation years and vocational learners will benefit these groups. The foundation years are recognised as the most challenging group to benefit from remote learning. In addition, returning children will be able to benefit from seeing their friends.</p> <p>Negative: In a situation where distance or blended learning is required to occur, children from lower income families could be disadvantaged by the (potentially) restrictive prices of ICT to facilitate learning for children.</p> <p>Negative: Alert level 4 restrictions risk damaging the mental health of children, particularly in terms of increasing feelings of loneliness or isolation during the most severe restrictions.</p> <p>Negative: Children will be affected by negative economic impacts experienced by the family.</p> <p>Negative: The closure of entertainment and sport venues (cinemas, bowling arcades, indoor play and all outdoor organised activities) decreases the leisure options available to children and young people.</p>	<p>survey that were more likely to say they needed help making sure their family had enough food. They are more likely to report indications of food insecurity. This has also been reported by stakeholders who work directly with the Black, Asian and minority ethnic community</p>	<p>to offer education provision for vulnerable learners and critical worker’s children - the option to invoke this directive again, in the future, will be retained. Guidance is in development to communicate the flexibility of the restrictions to adapt to the needs of specific groups i.e. the reasonable excuses that can be applied including the ability to go outside.</p> <p>Communication directly with children and young people will be enhanced via advertisements and influencers which will target social media channels most utilised by young people (for example, TikTok) and will be used to relay messaging from ‘Keep Wales Safe’</p> <p>The restrictions at Alert level 4 relating to organised outdoor activities, normally involve children and their parents/guardians travelling and potentially mixing with other households. The increased risk of transmission is what the Alert level 4 restrictions are trying to avoid.</p>
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<p><i>Low-income households</i></p>	<p>Negative: The nature of employment in the most affected sectors means that effects will tend to worsen inequalities – the most affected tend to be low paid, in insecure employment, and young people.</p>	<p>See for example, provisional data for 2020- from the Annual Survey of Hours and Earnings provides estimates for hourly and weekly gross pay by 2-digit SIC codes in Wales. For Food and Beverage Service Activities (SIC code 56) median gross hourly pay was £8.20 which was £4.22 lower than the Welsh median for all employee jobs of £12.42. For weekly gross pay in this sector the median is £140.40, approximately £299.60 lower than the Welsh median.</p> <p>Using the same data at least 80% of employees in Food and Beverage Service Activities are estimated to have lower gross hourly pay than the Welsh median.</p> <p>The Resolution Foundation reported on 27 October that 9 per cent of those previously furloughed had lost their jobs. This rate was highest for 18-24-year-olds, Black, Asian and minority ethnic workers, and the low paid.</p> <p><i>Public Health Wales 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</p>	<p>The Welsh Government support package and UK Government extension of furlough will help mitigate the adverse impacts of this measure in the short term though we recognise that many will have to manage on less money than normal with furlough providing 80% of an individual's wages. It is also particularly difficult for some categories of workers such as those on zero hours contracts, agency workers and other work placement schemes.</p>
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		greater worries about their mental health	
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Annex B: SIC industries used for level 4 analysis

SIC definitions of Non-essential Retail, Hospitality and other related Tourism are below. Note that although Hospitality is defined as Accommodation and Food, much of this actually sits within Tourism.

List is purely for analytical purposes and may differ slightly from official [guidance](#).

Non-essential retail

- 9200 : Gambling and betting activities
- 4719 : Other retail sale in non-specialised stores
- 4741 : Retail sale of computers, peripheral units and software in specialised stores
- 4742 : Retail sale of telecommunications equipment in specialised stores
- 4743 : Retail sale of audio and video equipment in specialised stores
- 4751 : Retail sale of textiles in specialised stores
- 4752 : Retail sale of hardware, paints and glass in specialised stores
- 4753 : Retail sale of carpets, rugs, wall and floor coverings in specialised stores
- 4754 : Retail sale of electrical household appliances in specialised stores
- 4759 : Retail sale of furniture, lighting equipment and other household articles in specialised stores
- 4761 : Retail sale of books in specialised stores
- 4762 : Retail sale of newspapers and stationery in specialised stores
- 4763 : Retail sale of music and video recordings in specialised stores
- 4765 : Retail sale of games and toys in specialised stores
- 4771 : Retail sale of clothing in specialised stores
- 4772 : Retail sale of footwear and leather goods in specialised stores
- 4774 : Retail sale of medical and orthopaedic goods in specialised stores
- 4775 : Retail sale of cosmetic and toilet articles in specialised stores
- 4777 : Retail sale of watches and jewellery in specialised stores
- 4778 : Other retail sale of new goods in specialised stores
- 4779 : Retail sale of second-hand goods in stores
- 4781 : Retail sale via stalls and markets of food, beverages and tobacco products
- 4782 : Retail sale via stalls and markets of textiles, clothing and footwear
- 4789 : Retail sale via stalls and markets of other goods

Hospitality

- 55: Accommodation
- 56: Food and beverage service activities

Other tourism

- 7911 : Travel agency activities
- 7912 : Tour operator activities
- 7990 : Other reservation service and related activities
- 9001 : Performing arts
- 9002 : Support activities to performing arts
- 9003 : Artistic creation
- 9004 : Operation of arts facilities
- 9102 : Museum activities
- 9103 : Operation of historical sites and buildings and similar visitor attractions
- 9104 : Botanical and zoological gardens and nature reserve activities
- 9311 : Operation of sports facilities
- 9319 : Other sports activities
- 9321 : Activities of amusement parks and theme parks
- 9329 : Other amusement and recreation activities

Remaining industries

- 5914 : Motion picture projection activities

7420 : Photographic activities
8551 : Sports and recreation education
9001 : Performing arts
9002 : Support activities to performing arts
9101 : Library and archive activities
9312 : Activities of sport clubs
9313 : Fitness facilities
9491 : Activities of religious organisations
9511 : Repair of computers and peripheral equipment
9512 : Repair of communication equipment
9521 : Repair of consumer electronics
9522 : Repair of household appliances and home and garden equipment
9523 : Repair of footwear and leather goods
9524 : Repair of furniture and home furnishings
9525 : Repair of watches, clocks and jewellery
9529 : Repair of other personal and household goods
9601 : Washing and (dry-)cleaning of textile and fur products
9602 : Hairdressing and other beauty treatment
9604 : Physical well-being activities
9609 : Other personal service activities n.e.c.