

Alert Levels in Wales: A guide to restrictions

SUMMARY IMPACT ASSESSMENT

Introduction

1. Welsh Ministers concluded that there was a need for an approach to regulatory restrictions in Wales that would allow for the tightening or easing of measures to be communicated in a simpler and clearer way. In addition, alignment with the rules in Scotland and England was considered beneficial, focusing particularly on what has worked (where known).
2. As a result, Cabinet elected to adopt and implement a tiered approach to Coronavirus alert levels in Wales. The Alert Level guidance can be seen on the Welsh Government website [here](#).
3. The introduction of an Alert Level system to manage the transmission of the virus circulating in Wales was designed to have a positive impact on all of our Nation's citizens and businesses. The Alert Level guidance provides increased transparency, clarity and certainty around the Levels; the restrictive measures within each Level; and the indicators under consideration in taking decisions on escalating or de-escalating between Levels. The approach responds directly to calls from businesses in Wales seeking a tiered approach which is easy for businesses and the general public to understand and follow.
4. The first Coronavirus Control Plan was published on August 2020. In light of emerging evidence of impacts, Welsh Government has continually revised and updated the plan to ensure the proportionately of the restrictions at each level, taking into consideration the change in the balance of harms. The latest 'Coronavirus Control Plan: Alert Level 0' was published on 14 July 2021 which sets out how we will move beyond alert level one to a set of baseline restrictions.
5. Alert level zero focuses on retaining those restrictions which help to keep people safe but have the smallest detrimental effects on their wider physical and emotional health. We will continue to ensure employers protect their employees and all those accessing their businesses.

Legislative background

6. The principal Regulations made on 18 December 2020 set out restrictions and requirements which will apply to four different alert levels with the determination of applicable alert levels as set out in the [Coronavirus Control Plan](#). This plan was updated on 14 July 2021. A consolidated version of the most recent Regulations can be found [here](#).
7. This Integrated Impact Assessment relates to the revision of the Coronavirus Control plan that includes the baseline measures for the introduction of alert level 0.

Review of restrictions regulations

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

Alert level 0

The coronavirus and related restrictions generate strongly held opinions. Concerns not only focus on the direct health issues, but also on the social, economic and other wellbeing impacts of the pandemic on wider society, as well as the longer terms implications as a result of COVID-19 and the resulting lockdowns and restrictions.

How the five ways of working in the Well-being of Future Generations (Wales) Act 2015 are being applied:

Long-term – Principles for baseline measures

The proposed measures have been designed on the basis of the following proposed principles, for simplicity and clarity:

- a. The baseline should provide the maximum degree of easement possible, recognising the wider harms of restrictions, whilst keeping the virus at manageable levels.
- b. Reconstruction of the economy, a return to financial viability for businesses and more normal operation of public services will be a key goal.
- c. Remaining restrictions on individual freedoms should as far as possible be those which have a relatively small detrimental effect and do not contribute to accumulation of inequalities or wider harms.

Measures should help embed long-term positive behaviours and trends linked to wider Welsh Government policy goals.

Prevention

Preventing the spread of the virus will be focussed on several aspects. These will include ensuring reasonable measures are in place for businesses and others, and employers continuing making allowances for staff to continue to work from home where practical.

Reasonable measures linked to risk assessment in workplaces, retail, hospitality and public services.

- Legal requirement on businesses and others to undertake a Covid-19 risk assessment in consultation with those working on the premises and their representatives.

- Legal requirement on persons responsible for premises to take reasonable measures to minimise the risk of spread of coronavirus and risk to staff (but less specific about individual mitigations in regulations).
- A legal requirement to wear face coverings on public transport and potentially some other indoor public settings, unless exempt or where the context makes this impossible e.g. eating and drinking in a restaurant.
- Co-production and use of sector frameworks to manage the escalation and de-escalation of public health measures, such as for face coverings in schools.
- Guidance around;
 - keeping physical distance where possible,
 - maintaining adequate ventilation in premises,
 - avoiding crowded places,
 - respiratory and hand hygiene, and
 - responsible choices about crowded places
- Wide availability of LFD test kits, either provided free-of-charge through schools or potentially commercially supplied and encouragement for people to use them.

Work from home and avoid going to work when unwell

- Guidance to encourage people to work from home if they can and for businesses to enable people to work from home, combined with more remote working hubs to give people and businesses more flexibility and choice
- Public health guidance reinforcing the importance of staying at home when unwell.

Integration

The Coronavirus Control plan outlines Welsh Government's response to the pandemic, moving through the alert levels when safe to do so, guided by the latest scientific data available. It sets out the strategic direction of the Welsh Government to tackling the virus to support the more normal operation of public services

These all-Wales measures have been designed to be as simple, fair and clear as possible. They also reflect the advice we have had from our own Technical Advisory Group (TAG), which coordinates scientific and technical advice to support Welsh Government decision-makers during emergencies. TAG indicated that a national approach to restrictions is most likely to be understood and effective.

Throughout the pandemic, the balance of harms has changed considerably. The plan has continually been updated and tailored to ensure the relevance of the plan as we move through the alert levels unlocking all parts of society in Wales.

The plan has been developed with a wide range of key internal and external stakeholders views integrated into the policy making of the document. 21 day review, considered carefully. This ensures wider harms affecting all parts of society

in Wales such as socioeconomic harms not just public health concerns have been considered.

Difference between Alert Level 1 and the suggested baseline measures

- Nightclubs and adult entertainment venues would be allowed to open provided they can risk assess and mitigate any transmission risk.
- There would be no limits on numbers allowed to meet indoors or outdoors, but for regulated premises and events, the numbers permitted would be determined by a risk assessment when taking reasonable measure required to minimise exposure to and spread of coronavirus into account.
- The requirement to wear face coverings in some settings could be relaxed, and for settings like schools could be determined via site specific risk assessments linked to a co-produced framework for de-escalation of measures.
- The detailed requirements for reasonable measures, including the special status given to 2m physical distance and the very specific measures for retail and hospitality would be moved to guidance but would continue to be advised and considered alongside other measures when risk assessments are carried out.

Collaboration and Involvement

Policy officials have engaged with relevant key stakeholders throughout the pandemic and as such ensure that any possible mitigations are considered and implemented when restrictions are imposed or eased.

Due to the nature of the pandemic, the development of the control plan and policy generally in relation to restrictions have been undertaken at pace. As a result the Welsh Government has not been able to consult with citizens in the development of the control plan in the way it normally would.

However, Ministers and policy officials have been informed via regular surveys undertaken by both the Welsh Government and Public Health Wales. These surveys have indicated people's views of the pandemic including views on the Welsh Government's approach to Keep Wales Safe.

Long-Covid Impacts

Equality impact assessment of the measures

9. Evidence shows that Coronavirus itself has disproportionate equality impacts. An ONS study, published on 1 July shows that as a proportion of the UK population prevalence of self-reported long COVID was greatest in people aged 35 to 69 years, females, people living in the most deprived areas, those working in health or social care, and those with another activity-limiting health condition or disability. It has more serious health impacts and a greater likelihood of death for older people, disabled 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 across the whole of society but affecting certain groups such as, young adults 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. The reduction of controls to baseline control measures are likely to have ongoing impacts for people who are at risk of contracting Covid-19 and having adverse impacts from it these (include older people, disabled people (particularly those with compromised immune systems), men, people living in more deprived areas, and the Black, Asian and Minority Ethnic population). The reduction of protective measures may mean that these particular groups experience and feel a heightened risk of exposure to the virus and as a result of this will limit their opportunities to go out/engage in activities etc. in order to try to protect themselves. There are people who, for various reasons, either cannot be vaccinated or even when double vaccinated will have little or no immunity to the virus. This means that these people may experience increased necessary (self-imposed) restrictions and increased stress and worry at the same time that others experience increased freedoms.
10. As a result of the successful vaccination programme, the balance of harms has changed significantly which has resulted in certain restrictions being lifted due to being disproportionate to the public health impact. 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.
11. 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 disadvantages. There is a risk to those with compromised immune systems, where the vaccine is not effective, there would be a very real risk of hospitalisation and dying. Throughout the pandemic 68% of deaths reported were by disabled people.

12. The approach to extended households in Alert levels 1 – 3 are considered to impact positively (in relative terms) on the social wellbeing of people who may be isolated and do not have family or close friends nearby with whom to form an extended household, as they allow for up to four (Alert level 2 & 3) and six (Alert level 1) people to meet in a Regulated setting or outdoors. However, people on lower incomes will be less able to afford to go out to a café, restaurant or pub, so the impact of the policy will be regressive and may mean the flexibilities provided for will be less available to them. In addition, while hospitality businesses will not be able to sell alcohol (Alert level 3) this could lead to some people drinking less alcohol which could have a beneficial impact on that person's health and to the wider family. However, for some individuals this could encourage greater drinking at home with a range of potential negative effects e.g. increased domestic violence.
13. Working from home (required at all alert levels 1 - 4, where possible) is more likely to be an option for those working in an office and in higher paid occupations. There are concerns that it will more likely be men and non-disabled people who return to office working which may raise further issues such as diversity in the workplace, invisibility of women and disabled people and the impact this has on equality of work, perceived performance and promotion. Impacts for women and disabled people will be kept under review and we will endeavour to identify suitable mitigations should such issues arise. 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.
14. There might also be an additional risk of direct or indirect discrimination or people losing their jobs as furlough end or employers needing to make adjustments to accommodate people's return to their place of work. People most likely to be disproportionately and adversely impacted are disabled people and women. There is also an increased risk for some workers such as those who may have compromised immune systems, on returning to the workplace. Robust Risk assessments will need to be carried out to ensure the safety of employees.
15. 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 lower paid roles, and those in impacted occupations, 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 on mental health and wellbeing, particularly over the winter period. Some commuting costs may be offset but that would depend on individual circumstances. Some commuters, using public transport may increase anxiety as a result of the inability to socially distance and have no other means of transport. To mitigate this negative impact, it will be ensured that other mitigations are in place, such as face masks.

16. 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.
17. There will be no travel restrictions inside Wales, except in Alert level 4 where advice is to stay at home unless traveling with a permissible, reasonable excuse. However, 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, and depending on protective measures in place some will feel unsafe travelling on public transport. 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. As restrictions on activities, spending time with other people and travel to do these things ease, increased public transport use, increasing virus rates and any easing of protective measures (like wearing face masks) may leave those who are at greater risk from Covid feeling unable to use public transport; for those without other forms of travel, this could preclude travel, causing a marked differential impact on this cohort.
18. In sectors which have seen significant impacts due to restrictions on businesses and services, and will continue to do so (particularly at Alert level 4 & 3) we will see a disproportionate impact of certain groups: younger workers (especially in hospitality), women (especially in non-essential retail and close contact services), disabled people and Black, Asian and Minority Ethnic people (especially in parts of the hospitality sector, cleaning jobs and in transport services including taxis.) Men are disproportionately represented in sectors which will be impacted by the proposed control measures including transport and security, especially associated with the night-time economy. 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.

19. 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. This 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. Any decision to move to blended learning, under the most severe restrictions, will have adverse impacts, for example, for lower income families which may be restricted by the availability of ICT to facilitate children's learning. We have clear evidence that closing schools or limiting contact time at a school site, face to face with a teacher will have a disproportionate impact on children from lower socio-economic backgrounds, disabled children and children with additional learning needs and some Black, Asian and Minority Ethnic children. From the Coronavirus and Me children's survey and other evidence it is more likely that Black, Asian and Minority Ethnic children 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, 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.
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. Keeping close contact services, leisure and retail open in all but Level 4 restrictions will impact positively on women and young people who are disproportionately represented in these sectors. Allowing exercise classes to continue under all but Alert level 4 restrictions should be positive for people on low incomes as they can be more affordable than gym membership. This should also be positive for women who are more likely than men to take exercise classes. However, the restrictions on hospitality (in particular at Alert levels 3 & 4) and requirements for the entertainment sector (cinemas, bowling alleys) to close (Alert levels 3 & 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, carers, people that are clinically vulnerable and people on low incomes are at a higher risk of redundancy.
22. 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.

Alert level 0

23. Vaccination has changed our relationship with the virus and we are moving into new phase of the pandemic. Thanks to the hard work of the thousands of people who have worked tirelessly on our successful vaccination programme, we can be hopeful of a future with fewer restrictions.
24. We are confident having two doses of the vaccine weakens the link between infections, serious illness, hospitalisations and deaths.
25. This means the higher case rates, which we are currently seeing as a result of the delta variant, are not leading to the same levels of serious illness which we saw in the first two waves of the pandemic. The other harms from the pandemic, including those associated with restrictions, are now beginning to outweigh the direct harms from the virus and we need to reflect that in our approach to managing coronavirus.
26. The updated version of the *Coronavirus Control Plan* sets out how we can move beyond the current alert level one measures to a new “alert level zero”, which will see us gradually move away from complex legal restrictions.
27. An Equality Impact Assessment presented against restrictive measures at each alert level can be seen at Annex A and a Children’s Rights Impact Assessment can be seen at Annex B.

Additional considerations and other impact assessments

European Convention on Human Rights (ECHR)

28. 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.

29. 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.
30. 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 (alert levels 1 - 4) – or for single parents to form an extended household (alert levels 1 - 4) - 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 1 - 4) 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)

31. 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?
<i>Article 11 of the International Covenant on Economic, Social and Cultural Rights (ICESCR) recognises the</i>	<u>Negative</u> : The package of measures at each Alert Level will impact negatively on businesses operating within affected sectors, and their employments, this is particularly acute at alert levels 3 & 4 in the hospitality sectors and is particularly significant as many workers	Employees able to benefit from the extended UK Government furlough scheme will lose 20% of their wage and most (if not all) of any tips that they would have expected to receive.	The negative impact will be mitigated to an extent by the Welsh Government's financial support package and the UK Government's

Human Rights	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate negative impacts?
<i>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>tend to be from low income households.</p> <p>An estimate of the broad economic impacts expected for businesses operating in restricted sectors is considered in this Summary Impact Assessment.</p> <p><u>Positive:</u> The introduction of a tiered alert level system is designed to have a positive impact on all citizens and businesses in Wales by providing increased transparency, clarity and certainty on the levels, the measures within each level and the indicators for consideration in escalating of de-escalating between levels.</p>	<p>There is also the threat of future unemployment if businesses become unviable.</p> <p>The introduction of a tiered alert level system responds directly to calls from businesses in Wales seeking this approach which should be “easy for businesses and the general public to understand and follow”. It is hoped that this approach will enable businesses to plan with some greater degree of certainty.</p>	furlough scheme.

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

32. The United Nations Convention on the Rights of the Child (UNCRC) has been considered in the development of an alert level for Wales and the development of alert level 0.
- 33.
34. An impact assessment on the COVID-19 alert levels and restrictions and their effects on children's rights was published on 21 December 2020 for alert levels 1 – 4.

Alert level 0 – Children’s Rights Impact Assessment

Wider economic, social and wellbeing impacts

35. 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.

36. 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 now predicted and there are clear signs that there will be long-term scarring effects.
37. 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^[2].
38. Some of the potential macroeconomic and sector impacts and risks from the introduction of an Alert Level system in Wales are described in this section. The key socio-economic costs from proposed levels of restrictions in Wales are summarised at a very high level. The data and estimations should be considered indicative only.
39. Total employment in 'Alert level 1 - Low risk' sectors¹ (i.e. those which would close under this tier) is estimated to be around 8,000², representing 0.6% of total employment in Wales. Although official Gross Value Added (GVA) is not available for these sectors, using sectoral employment shares, we can estimate that 'Green' annual GVA in 2018 was approximately £153m⁶, 0.2% of Welsh GVA. Broadly, the estimated impact on GVA as a result of Level 1 restrictions is considered likely to be minimal. There are just over 800 enterprises in this tier³.
40. Alert level 1 and 2 definitions specifically exclude pubs and restaurants. Assessing the effect on sectors that remain open but with restrictions (for example limits on the number of customers and closure of premises selling alcohol by 10.20pm) is challenging and at present there is little available information.
41. Even though assessing the impact on sectors which remain open but with restrictions is challenging, there is some indication that they would struggle under such restrictions. For example, Emma McClarkin, chief executive of the British Beer & Pub Association, has said the rule of six would have an "immediate cooling impact" on the public's confidence to visit pubs. "It will also have a direct impact on trade that will be felt hard across an industry that is already struggling to get back on its feet," she added.

¹ Sectors included in Level 1 are 56301 Licensed Clubs, 9001 Performing arts, 9002 Support activities to performing arts, 9004 Operation of arts facilities – although some activity could continue.

² Source: 2019 Business Register and Employment Survey; NOMIS

³ Source: 2020 UK Business Counts; ONS

42. Total employment in 'Alert level 2 – Medium risk' sectors⁴ is estimated to be around 17,000⁵, representing 1.3% of total employment in Wales. Although official GVA is not available for these sectors, using sectoral employment shares, we can estimate that 'Amber' annual GVA in 2018 was approximately £367m⁶, 0.6% of Welsh GVA. Broadly, the estimated impact on GVA as a result of Alert level 2 restrictions is considered to be £20m per week. There are almost 1,400 enterprises in this tier⁷.
43. Considering 'Alert level 3 – High risk' impacts, in 2019 there were 123,000 employments in hospitality (accommodation and food services) in Wales, making up 9.2% of total employment. While we would expect fewer staff on the whole to be working when pubs and restaurants which are normally open for sit-in customers are only offering takeaway services, it is difficult to determine the extent of this. However, 13,000 employments in 2019 were in businesses classified as 'takeaway food shops and mobile food stands'. 'Other tourism'⁸ which includes industries such as performing arts, museums and zoos was responsible for 20,000 employments in Wales in 2019, and would be impacted negatively by restrictions in Alert level 3. Broadly, the estimated impact on GVA as a result of Alert level 3 restrictions is considered to be £50m per week.
44. A one-week closure of hospitality (excluding takeaway, which can remain open), arts and recreation might result in the loss of GDP in the order of £70 million which provides some indication of the weekly GDP impact of adopting English "tier 3" restrictions in Wales. The figure is likely to be reduced under Level 3 restrictions, when hospitality services can remain open until 6pm though many will chose not to stay open as they will not be able to sell alcohol.
45. If we assume employment of 110,000⁹ in the accommodation and food services sector or 8.3% of the workforce when discounting those already working in takeaways etc.¹⁰, this would mean if 50% of those in the industry stopped working as a result, this would be 55,000 employments, or over 4% of the Welsh workforce not working who otherwise would be. If 75% stopped working, it would be 82,500 employments, or over 6% of the Welsh workforce not working who otherwise would be. If they all received 80% of their wages, this could potentially

⁴ Sectors included in Alert level 2 are 56301 Licensed Clubs, 9001 Performing arts, 9002 Support activities to performing arts, 9004 Operation of arts facilities, 9311 Operation of sports facilities and 9319 Other sports activities

⁵ Source: 2019 Business Register and Employment Survey; NOMIS

⁶ Based on ONS Regional Accounts for 2018. Calculation assumes that GVA in divisional subsectors is allocated according to employment share.

⁷ Source: 2020 UK Business Counts; ONS

⁸ Includes the industries: travel agency activities, tour operator activities, other reservation service and related activities, performing arts, support activities to performing arts, artistic creation, operation of arts facilities, museum activities, operation of historical sites and buildings and similar visitor attractions, botanical and zoological gardens and nature reserve activities, operation of sports facilities, other sports activities, activities of amusement and theme parks, other amusement and recreation activities.

⁹ Latest available data (2019) shows employment of 123,000 in the sector. 110,000 is an illustrative example to reflect expected redundancies in 2020.

¹⁰ There were 13,000 employments in businesses classified as 'takeaway food shops and mobile food stands' in Wales in 2019.

equate to around £70 million in lost earnings if 50% are not working and £100 million if 75% are not working.

46. 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 4,800 in other categories such as gyms, personal care and libraries¹¹. 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. Funding packages are under way to support these in the third phase of ERF and proposed renewal of the first phase of ERF across all size bands. Large firms are supported within this also – and they tend to support many smaller businesses through the supply chain.
47. The closure of hospitality will also have a negative impact on people who socialise in hospitality venues and this may lead to increased feelings of isolation and affect people's well-being. This is particularly the case for people who work in the day and are not able to meet others before 6pm on weekdays (or in some cases at weekends).
48. In total, there were 223,000¹² people employed in these selected sectors (above) in 2019. Broadly, the estimated impact on GVA as a result of Alert level 4 restrictions is considered to be £100m per week.
49. 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. A significant negative economic impact is expected as a result of the requirement to close all hospitality at 6pm and to prohibit the sale of alcohol (Alert level 3), which especially impactful in the usually busy pre-Christmas time of the year. The travel restrictions will also impact negatively on the tourism sector, although there is scope for some travel to and from non-Level 3 (or higher) equivalent areas in the UK.
50. The Welsh Government has put in place a package of support worth £340 million, directed primarily at the hospitality and tourism sectors, for deployment in December 2020-January 2021 which complements the UK Government schemes.

Wellbeing Impacts

51. There are significant negative impacts associated with restricting people socialising and gathering outdoors. Social distancing requirements and limits on capacity outdoors have a large impact on the events sector in particular. The What Works Centre for Wellbeing identifies strong evidence that participatory arts, sport, and cultural activities can improve wellbeing when they bring together participants in the same physical space¹³. Attending or participating in events and

¹¹ 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.

¹² Based on the sum of rounded figures

¹³ https://whatworkswellbeing.org/blog/places-spaces-and-loneliness-what-matters-for-participatory-art-and-sport/?mc_cid=c975bde8f8&mc_eid=e4236b0dbe

particularly sport and physical activity, plays a part in reducing loneliness and isolation, supporting a healthy and active nation, and is an integral part of the wider preventative agenda across a range of cross-government portfolio areas.

52. The Public Health Wales (PHW) survey on health and wellbeing (21 to 27 June 2021) showed that when asked how they have felt in the last week 25% of people reported feeling lonely occasionally whilst 11% felt lonely always or often. Some 27% of people felt isolated occasionally with 10% reporting feeling this way always or often. Over this period the proportion reporting being worried about their mental health and wellbeing a lot was 14%. This is despite current restrictions allowing extended households and the rule of six in regulated settings. Allowing the rule of six indoors should help the wellbeing of those that may feel lonely or isolated, by allowing further opportunities for socialisation.
53. Separately, in the same survey, 41% of respondents reported that they had been worrying 'a little' about going out in public places and 13% reported that they had been worrying about it 'a lot'. This suggests that there is a significant minority of the Welsh population that are anxious about catching coronavirus, even after having had the vaccine.
54. A previous wave of the PHW survey (10 to 16 May 2021) analysed the trends of selected questions about people's wellbeing over the course of the pandemic. 42% of respondents said that their mental health was worse at the time of the survey compared to before the pandemic, equivalent to over 1 million adults. Females and younger people were more likely to report that their mental health had worsened over the course of the pandemic.¹⁴
55. ONS also produced analysis in May 2021 looking at the impact of Coronavirus on depression in adults in the UK. This indicated that around a fifth of adults were likely to be 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 unable to afford an unexpected expense, disabled people or those living in deprived areas were most likely to be experiencing depression.¹⁵

Socio-economic Duty Assessment

56. As social distancing places capacity limits on venues and working environments, it is the hospitality, arts, entertainment and recreation, and travel/transport industries that have been hardest hit. These are also the sectors where it is hardest to work from home.
57. As at 31 May Accommodation and food services and Arts, entertainment and recreation remain the two sectors with the highest furlough take-up rates in Wales with 34% and 31% respectively, much higher than the total Welsh take-up rate of 7%.

¹⁴ <https://phw.nhs.wales/topics/latest-information-on-novel-coronavirus-covid-19/how-are-you-doing/how-are-we-doing-in-wales-reports/week-58-report-how-are-we-doing-in-wales1/>

¹⁵ [Coronavirus and depression in adults, Great Britain - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/mentalhealth/articles/coronavirusanddepressioninadultsgreatbritain/2021-05-14)

58. Relaxing social distancing restrictions would ease financial pressures on businesses in these sectors, though there is variation within and between sectors. Social distancing restricts capacity, which means that many businesses must limit or, in some cases, suspend their activities until social distancing is withdrawn. Sectors that are reliant on social interaction, for example arts, recreation, and entertainment are most affected, with businesses reporting a reduction in capacity of around 70-80% for some sport venues, 50-70% for most theatres and 40-60% for some cinemas.³⁴ At the lowest point in June 2020 less than a quarter of arts, entertainment and recreation businesses were trading.
59. Re-imposing social distancing would carry significant costs, especially if measures were repeatedly lifted and re-imposed, for example in response to seasonal fluctuations in transmission. Businesses have expressed a preference for irreversibility over speed which gives more certainty to plan and invest, and would rather see measures retained if they reduce risk of a future lockdown or re-imposition of more stringent restrictions. For some sectors (for example large events), the need to have longer lead-in times to organise events exacerbates the costs of re-implementing measures. Local authorities have also made significant investment in social distancing measures which would be costly to reintroduce once removed.
60. It should be noted that easing of social distancing and other restrictions might be the point where those businesses that were being kept in hibernation by WG and UKG funding decide they are unable to re-open, having lost staff or do not hold sufficient reserves to be able to confidentially re-start.
61. Total employment in 'Alert level one' sectors (i.e. those which would be restricted under this tier) is estimated to be around 8,000, representing 0.6% of total employment in Wales. There are just over 800 enterprises in this tier.
62. Lifting these restrictions and moving to 'alert level 0' means that economic activity could resume in these sectors. Once businesses start operating again, a large share of workers is likely to return to their workplaces. If the effect of a cautious move between alert level 1 and alert level 0 restrictions is to constrain the spread of the virus (and in particular, the Delta variant), businesses may be subject to fewer restrictions in future. Of course, adherence to the restrictions by both business and the public will have a considerable bearing on this.
63. Separately, in the latest results from Public Health Wales's public engagement survey, 41% of respondents reported that they had been worrying 'a little' about going out in public places and 13% reported that they had been worrying about it 'a lot'. This suggests that there is a significant minority of the Welsh population that are anxious about catching coronavirus, even after having had the vaccine. As a result, it is reasonable to expect that this will affect their behaviour once restrictions are eased further, and this will, in turn, affect demand in some industries. Under the current restrictions, 67% of respondents reported that on no occasion in the past 7 days had they left home to eat at a café, pub or restaurant and 17% had not left home to shop.

Economic Impacts

64. As social distancing places capacity limits on venues and working environments, it is the hospitality, arts, entertainment and recreation, and travel/transport industries that have been hardest hit. These are also the sectors where it is hardest to work from home.
65. As at 31 May Accommodation and food services and Arts, entertainment and recreation remain the two sectors with the highest furlough take-up rates in Wales with 34% and 31% respectively, much higher than the total Welsh take-up rate of 7%. Within this, remaining social distancing requirements and limits on capacity outdoors are likely to have the biggest impact on the events sector. While some events are currently able to operate, the current restrictions mean that for many, revenues are lower than they would be without restrictions, while many other events are unviable while restrictions remain.
66. A survey of the events industry in November 2020¹⁶, found that 75% of respondents who employ staff, have needed to put staff on furlough. About half (52%) who employ staff have either made redundancies, issued notice of or intend to make redundancies, or anticipate having to make redundancies. The median loss per business responding to the survey from the crisis is between £50,001 and £100,000. The median loss per business differs by size of business. The median loss for those who employ 1 to 5 staff is within the range of £100,000 to £250,000, whilst the median loss for those who employ more than 50 staff is more than £1,000,000¹⁷.
67. Removing social distancing restrictions outside would ease financial pressures on businesses in these sectors, though there is variation within and between sectors. Social distancing restricts capacity, which means that many businesses must limit or, in some cases, suspend their activities until social distancing is withdrawn. Sectors that are reliant on social interaction, for example arts, recreation, and entertainment are most affected, with businesses reporting a reduction in capacity of around 70-80% for some sport venues, 50-70% for most theatres and 40-60% for some cinemas.³⁴ At the lowest point in June 2020 less than a quarter of arts, entertainment and recreation businesses were trading.
68. Removing all outdoor restrictions will facilitate the return to work of many employees within these sectors who currently could be earning below the National Living and Minimum Wages due to receiving 80% of their pre-crisis income. For many in Wales the Covid-19 pandemic has had a detrimental impact on their household incomes. Survey evidence suggests that the 20% of people are in a worse financial situation as a result of the coronavirus, while 16% report being better off.¹⁸ 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

¹⁶ <https://gov.wales/events-industry-and-supply-chain-business-covid-19-impact-survey-12-november-8-december-2020.html>

¹⁷ There is a small sample size when reporting results by size of business, and, therefore, an element of caution needs to be applied when interpreting these findings.

¹⁸ Public Health Wales (2021) Public Engagement Survey on Health and Wellbeing during Coronavirus Measures: Week 48: 1 – 7 March 2021.

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.¹⁹ Those with lower incomes have been more likely to see their income reduced, and lower-paid workers have been more likely than those on higher pay to have been furloughed or lost their jobs.²⁰

69. Reimposing social distancing would carry significant costs, especially if measures were repeatedly lifted and reimposed, for example in response to seasonal fluctuations in transmission. Businesses have expressed a preference for irreversibility over speed which gives more certainty to plan and invest, and would rather see measures retained if they reduce risk of a future lockdown or reimposition of more stringent restrictions. For some sectors (for example large events), the need to have longer lead-in times to organise events exacerbates the costs of re-implementing measures. Local authorities have also made significant investment in social distancing measures which would be costly to reintroduce once removed.
70. It should be noted that easing of social distancing and other restrictions might be the point where those businesses that were being kept in hibernation by WG and UKG funding decide they are unable to re-open, having lost staff or do not hold sufficient reserves to be able to confidentially re-start.
71. In the PHW survey on health and wellbeing (21 to 27 June 2021), 41% of respondents reported that they had been worrying 'a little' about going out in public places and 13% reported that they had been worrying about it 'a lot'. This suggests that there is a significant minority of the Welsh population that are anxious about catching coronavirus, even after having had the vaccine. As a result, it is reasonable to expect that this will affect their behaviour once restrictions are eased further, and this will, in turn, affect demand in some industries.

Environmental impacts

72. Under the most severe restrictions (Alert level 4) we will experience positive environmental impacts, with restrictions and guidance issued to limit international travel. 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'.

¹⁹ 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.

²⁰ Resolution Foundation: [Incomes, savings and spending through the coronavirus crisis](#) November 2020

73. The requirement for individuals to work from home, where possible, will also lead to positive environmental impacts. A study²¹ by the Global Carbon Project team in December, showed that carbon emissions in the UK fell by 13% in 2020.
74. The extent of the positive impact on the environment of these restrictive measures is likely to reduce the lower the Alert level, with the lowest level of environmental benefits anticipated at Alert level 0.

Welsh Language

75. Alert level 4 restrictions are likely 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 cohorts of the population having lower levels of digital literacy than their younger counterparts).
76. 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

77. The restrictions on hospitality (particularly at Alert level 3 & 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.
78. 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

²¹ <https://essd.copernicus.org/articles/12/3269/2020/>

(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 in these areas.

79. The interaction between rural and urban areas is complex. People living in rural areas will need to visit urban areas from time to time. For shopping, education, health and social reasons. Conversely people from urban areas will pass through or visit rural areas. The two categories cannot be seen as somehow separate.
80. 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 have higher share of people aged over 65.

Third Sector Impacts

81. Community centres have played a vital role in providing support to communities throughout the pandemic and will continue to play a significant role in our ambitions to achieve a fair, green and just recovery. The lifting of restrictions on indoor and outdoor gatherings will provide more opportunities for the most vulnerable in our society to meet and more third sector led services to be provided.
82. Whilst most community centres are now open, some have remained closed and anecdotal evidence suggests that this tends to be community centres which are managed by retirees. Feedback from our external stakeholder groups has identified two primary reasons a) economic viability and b) uncertainty with regard to regulations, particularly numbers able to attend. Further easements will remove any lingering uncertainty. With regard to economic viability, some community centres have remained closed as in order to comply with social distancing the numbers able to attend make opening the centre or premise unviable.
83. In addition, the proposed retention of risk assessments will provide users, especially those who were asked to shield, with a degree of assurance that the premises have in place appropriate measure to reduce the transmission of Covid.
84. Volunteers in Wales play their part in in many facets of life in Wales – in sport and the arts, in education and health, in faith, in the private and public sectors, the Welsh language and Welsh speaking communities, and in the environment. With volunteers contributing enormously to community resilience and cohesion, and to making the villages, towns and cities of Wales better places to be. Evidence from the publics' response to the pandemic shows grassroots willingness to support the most vulnerable, with Volunteering Wales seeing over 25,200 individuals registering since March 2020.
85. Of particular relevance, as we recover from the pandemic, is the role volunteers play in supporting public sector health and social care services. Volunteering opportunities in health and social care are vast, attracting volunteers of all ages. They span caring for friends, primary and secondary care settings, and after care and end of life care. In Wales, 10.44% of all third sector organisations focus on health and social care. Volunteering in the 'Health and Social Care' sector is not specifically captured via the National Survey for Wales. However, supporting evidence shows it draws in high numbers of volunteers via the

organisations/charities working in these sectors. In 2015, an Omnibus survey analysed by WCVA showed that health, disability and social welfare organisations had over 154,000 volunteers among them - 6% of adults in Wales.

86. In addition further easements, which increases both opportunities and the number who can take part, will support community cohesion and resilience. These are specific benefits where communities or groups mobilise constructively around issues, projects or local needs.

Data Protection/Privacy Impacts

87. Information on individuals is collected as part of the Test, trace and Protect (TTP) scheme.
88. The NHS Wales Test, Trace, Protect service will securely handle data in the same way as other health data in Wales. All data is sent by NHS Wales Digital Health and Care Wales (DHCW) to SAIL (the databank assisting the Government and NHS in tackling the pandemic). An overarching Wales Accord on the Sharing of Personal Information (WASPI) agreement has been made in respect of the introduction of the mass contact tracing arrangements in Wales.
89. TTP works to minimise spread of COVID-19 by requiring those who either have the virus or those who have the highest risk of having the virus to self-isolate for ten days. This has been vital in the Government's approach to helping slow and prevent the transmission of COVID-19 being passed onto others. During the period of high transmission and prevalence this winter (outside of firebreak), TAG estimated TTP reduced R from approximately 1.7 to 1.3. Using recent R values and improvements to case ascertainment and test and trace times, the effect may be a reduction from approximately 1.3 to 0.83.
90. As well as the contact tracing call, the TTP service relies on the information collected by certain businesses. This means that where transmission does occur TTP can quickly react and contain known clusters. This has placed burdens on businesses to collect this information, however it enables an effective public health response through identification of hotspots and chains of transmission.
91. Easements of restrictions means people are meeting more often in different and multiple contexts. Where positive cases are present, this could result in more opportunities for transmission, which may result in more positive cases and contacts. Since moving to lower alert levels, the number of contacts has doubled compared to that in earlier waves. This means that more people might need to self-isolate and become impacted by the associated harms.
92. Throughout the COVID-19 pandemic, the harms associated with self-isolation and infringement on people's liberties have been widely documented and have included negative impacts on physical and mental health^[1]; incomes and business^[2] and children and young people^[3]. The Protect element is designed to

^[1] [https://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(20\)30460-8/fulltext](https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(20)30460-8/fulltext)

^[2] <https://phw.nhs.wales/news/staying-at-home-policy-has-reduced-spread-of-coronavirus-but-has-also-had-other-positive-and-negative-impacts-on-the-well-being-of-welsh-society/a-health-impact-assessment-of-the-staying-at-home-and-social-distancing-policy-in-wales-in-response-to-th/>

^[3] https://www.childcomwales.org.uk/wp-content/uploads/2020/06/FINAL_formattedCVRep_EN.pdf

mitigate such impacts. Protect identifies any support which may be required to help and enable people to engage in testing and successfully self-isolate to prevent the spread of COVID-19. Local Authorities co-ordinate this support to a wide range of specific groups at a local level, working with the public, County Voluntary Councils and third sector organisations to deliver services and referring to other agencies, where appropriate.

TTP in relation to the Updated Baseline Measures

Principles for baseline measures.

The proposed measures have been designed on the basis of the following proposed principles, for simplicity and clarity:

- b. The baseline should provide the maximum degree of easement possible, recognising the wider harms of restrictions, whilst keeping the virus at manageable levels.
- c. Reconstruction of the economy, a return to financial viability for businesses and more normal operation of public services will be a key goal.
- d. Remaining restrictions on individual freedoms should as far as possible be those which have a relatively small detrimental effect and do not contribute to accumulation of inequalities or wider harms.
- d. Measures should help embed long-term positive behaviours and trends linked to wider Welsh Government policy goals.

Summary of potential measures to be in place at a baseline level

Final set of restrictions lifted.

- No limits on number of people that can gather indoors or outdoors
- No limits on numbers of people at indoor or outdoor events, with caps determined by risk assessment (with greater controls expected indoors such as ventilation, contact tracing and mitigation of risks to staff)
- All remaining businesses can open (further discussion with nightclubs and the adult entertainment sector will be required to consider the application of these measures within those settings).

Easements of restrictions means people are meeting more often in different and multiple contexts. Where positive cases are present, this could result in more opportunities for transmission, which may result in more positive cases and contacts. Since moving to lower alert levels, the number of contacts has doubled compared to that in earlier waves. This means that more people might need to self-isolate and become impacted by the associated harms.

Throughout the COVID-19 pandemic, the harms associated with self-isolation and infringement on people's liberties have been widely documented and have included

negative impacts on physical and mental health^[1]; incomes and business^[2] and children and young people^[3]. The Protect element is designed to mitigate such impacts. Protect identifies any support which may be required to help and enable people to engage in testing and successfully self-isolate to prevent the spread of COVID-19. Local Authorities co-ordinate this support to a wide range of specific groups at a local level, working with the public, County Voluntary Councils and third sector organisations to deliver services and referring to other agencies, where appropriate.

Test Trace, Protect central to remaining measures, supported by continuing the following existing legal duties.

- Retain the TTP system, including the contact tracing App, and keep the legal duty to self-isolate when requested to do so by a contact tracer
 - No additional impact, however the harms associated with self-isolation have been widely documented and have included negative impacts on physical and mental health; incomes and business and children and young people. TTP works to minimise spread of COVID-19 by only requiring those who either have the virus or those who have the highest risk of having the virus to self-isolate for the minimum period only.
- Retain the specific offence of providing false information to contact tracers.
 - No additional impact - TTP provides real time intelligence across the whole of Wales on the coverage of the disease, how quickly it is spreading, and where there are hotspots of infection. Evidence demonstrates that TTP helps to control the spread of the virus, preventing onwards transmission and saving lives. Learning from places where there have been outbreaks informs further policy development and delivery. This includes learning from around Wales on the best ways to support vulnerable people and who is best placed, usually at the local level, to provide help and advice to meet a range of needs which arise when people self-isolate.
- Duty on employers not to enable or encourage anyone to fail to self-isolate
 - No further impacts, however in the current third wave, we are seeing signs that staff abstraction levels as a result of self-isolation are presenting challenges within vital public services and critical and major infrastructure, including health and social care. Nevertheless, it is vital self-isolation is not discouraged - during the period of high transmission and prevalence this winter (outside of firebreak), TAG estimated TTP reduced R from approximately 1.7 to 1.3. Using recent R values and improvements to case ascertainment and test and trace times, the effect may be a reduction from approximately 1.3 to 0.83 (4).

^[1] [https://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(20\)30460-8/fulltext](https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(20)30460-8/fulltext)

^[2] <https://phw.nhs.wales/news/staying-at-home-policy-has-reduced-spread-of-coronavirus-but-has-also-had-other-positive-and-negative-impacts-on-the-well-being-of-welsh-society/a-health-impact-assessment-of-the-staying-at-home-and-social-distancing-policy-in-wales-in-response-to-th/>

^[3] https://www.childcomwales.org.uk/wp-content/uploads/2020/06/FINAL_formattedCVRep_EN.pdf

- Duty on certain businesses to collect contact details to inform TTP
- No further impacts. TTP service rely on the information collected by certain businesses. This means that where transmission does occur we can quickly react to and contain known clusters. This has placed burdens on businesses to collect this information however it enables an effective public health response through the identification of hotspots and chains of transmission.

- Restrictions on international travellers returning to Wales, consistent with UK approach and linked to TTP – I think this is more for the int. travel team
- A free-to-use digital vaccine certification solution to enable people to travel internationally. [Optional use of certification for domestic purposes.]

Work from home and avoid going to work when unwell

- Guidance to encourage people to work from home if they can and for businesses to enable people to work from home, combined with more remote working hubs to give people and businesses more flexibility and choice

- Public health guidance reinforcing the importance of staying at home when unwell.
 - Impact on TTP would be that if people are working from home – there would be less mixing, less opportunities for Covid-19 to spread which would hopefully result in less cases and contacts than what there would be if it wasn't introduced. Reinforcing messaging will enable understanding and what they must do to stop virus spreading and would mean less potential contacts.

Reasonable measures linked to risk assessment in workplaces, retail, hospitality and public services.

- Legal requirement on businesses and others to undertake a Covid-19 risk assessment in consultation with those working on the premises and their representatives.
 - Controls and risk assessments means less risks of transmission and should mean less cases and contacts if they weren't in place. This should also mean less staff absence.

- Legal requirement on persons responsible for premises to take reasonable measures to minimise the risk of spread of coronavirus and risk to staff (but less specific about individual mitigations in regulations).
 - Controls and risk assessments means less risks of transmission and should mean less cases and contacts if they weren't in place. This should also mean less absences of staff.

- A legal requirement to wear face coverings on public transport and potentially some other indoor public settings, unless exempt or where the context makes this impossible e.g. eating and drinking in a restaurant.

- Controls and risk assessments means less risks of transmission and should mean less cases and contacts if they weren't in place. This should also mean less absences of staff.
- Co-production and use of sector frameworks to manage the escalation and de-escalation of public health measures, such as for face coverings in schools.
- Guidance around;
 - keeping physical distance where possible,
 - maintaining adequate ventilation in premises,
 - avoiding crowded places,
 - respiratory and hand hygiene, and
 - responsible choices about crowded places
- Wide availability of LFD test kits, either provided free-of-charge through schools or potentially commercially supplied and encouragement for people to use them.

Difference between Alert Level 1 and the suggested baseline measures.

- Nightclubs and sexual entertainment venues would be allowed to open provided they can risk assess and mitigate any transmission risk.
 - There would be no limits on numbers allowed to meet, but for regulated premises and events the numbers permitted would be determined by a risk assessment.
- Controls and risk assessments means less risks of transmission and should mean less cases and contacts if they weren't in place.

However easements of restrictions mean people are meeting more people and doing more things in different and multiple sectors. Where positive cases are present, this could result in more opportunities for transmission, which may result in more positive cases and contacts. Since moving to lower alert levels the number of contacts has doubled to that in earlier waves. This means that more people might need to self-isolate and become impacted by the associated harms. Self-isolation can result in a wide range of negative impacts for the individuals and households affected. The Protect element is designed to mitigate such impacts.

- The requirement to wear face coverings in some settings could be relaxed, and for settings like schools could be determined via site specific risk assessments linked to a co-produced framework for de-escalation of measures.
 - Controls and risk assessments means less risks of transmission and should mean less cases and contacts if they weren't in place.

However easements of restrictions and removal of mask wearing could result in more opportunities for transmission, which may result in more positive

cases and contacts. This means that more people might need to self-isolate and become impacted by the associated harms. This might also result in more staff absences.

This might also impact those most vulnerable who might feel at risk going into settings where wearing of face masks has been relaxed.

- The detailed requirements for reasonable measures, including the special status given to 2m physical distance and the very specific measures for retail and hospitality would be moved to guidance but would continue to be advised and considered alongside other measures when risk assessments are carried out.
 - Easements of restrictions and removal of 2m physical distance to guidance could result in more opportunities for transmission, which may result in more positive cases and contacts. This means that more people might need to self-isolate and become impacted by the associated harms. This might also result in more staff absences.

Annex A: Equality Impact Assessment

Alert level 0 – Baseline Measures			
Protected characteristic or group	Assessment of impact: positive or negative	Summary of assessment	(Proposed) mitigating action
<i>Age (think about different age groups)</i>	<p><i>Positive: Allowing any number of people from different households to meet for any reason in all indoor and outdoor settings will benefit those cut-off from family and friends, mitigating effects of loneliness and isolation or digital exclusion.</i></p> <p><i>Negative: People of all ages, but particularly older people, may be concerned about increased risks from an increase in people meeting indoors</i></p>	<p>Survey responses highlight younger people (18-29) are most likely age group 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, but are also more likely to be digitally excluded.</p> <p>An ONS survey showed that more respondents between 16-29 years are reporting feeling lonely often, always, or some of the time. The UCL Covid Social Study also shows similar results: in weeks 36-37 (published 3rd Dec), loneliness levels were very stable in the past fortnight but are still very slightly higher (2%) than they were over the summer before new restrictions were brought in. The greatest increase in recent weeks has occurred in people living alone. Levels are still highest in younger adults, women, Black, Asian and Minority Ethnic people, people with lower household income, people living with</p>	<p>Communications and guidance should emphasise the risks associated with forming extended households so them forming them are able to make an informed decision to form them.</p> <p>The concept should be communicated as being about care and support so that extended households should be formed with those that are in most need. This has been shown in New Zealand to mitigate the negative effects of being excluded from an extended household if it is understood others may have greater needs.</p> <p>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</p>

		<p>children, people living in urban areas, and people with a diagnosed mental or physical health condition.</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>In terms of employees the share of employment in tourism is substantially higher for people aged 16-24. Years. Whilst data is not specifically available for funfairs, reopening them could have beneficial distributional consequences for the young should it aid in the preservation of jobs and increasing household incomes for those who work in the sector (i.e. by receiving their full salary as they are transferred off furlough).</p>	<p>those areas where restrictions have been eased and will be prepared as appropriate for other premises as preparations are made for them to re-open.</p>
<p>Disability (consider the social model of disability²² and the way in which your proposal could inadvertently cause, or could be used to proactively</p>	<p>Positive: for disabled people who have not needed to access provisions under support and care will be able to meet socially with additional friends and family indoors <i>in private dwellings and in holiday accommodation</i></p> <p>Positive: reduction in wearing of opaque face-masks will</p>	<p>Feedback from carers illustrates a lack of specialist provision for certain groups, such as those caring for some with a learning impairment, autism, or dementia, who are less able to understand and cope with disruption to routines.</p>	<p>Guidance issued on the safe re-opening of the hospitality sector, together with advice on additional mitigations to reduce the risk of transmission where maintaining a 2 metre distance is not possible</p> <p>Local Government will consider equality</p>

²² Welsh Government uses the social model of disability. We understand that disabled people are not disabled by their impairments but by barriers that they encounter in society. Ensuring that your proposal removes barriers, rather than creating them, is the best way to improve equality for disabled people. For more information, go to the intranet and search 'social model'.

<p>remove, the barriers that disable people with different types of impairments)</p>	<p>help those who rely on lip-reading as a key part of their communication methods.</p> <ul style="list-style-type: none"> Negative: Statistics show that disabled people have made up a large and disproportionate percentage (68%) of deaths relating to Covid-19. In addition to increased risk of death, for some people with impairments, there may be a risk of Covid causing complications with or exacerbation of existing conditions. As well as and because of increased health risks, disabled people, particularly those with compromised immune systems, may be justifiably concerned about increased risks to them from a greater mixing of people and choose not to socialise when mandatory restrictions are further lifted in level 0, resulting in isolation and self-restriction, especially if protective measures such as distancing 	<p>Analysis of APS data for 2019 suggests that disabled people are more represented in pubs cafes and restaurants in Wales, with 19% of the workforce being classified as disabled (this group represents 15% of the wider workforce).</p> <p>As more premises re-open, disabled people should benefit from being able to access a greater range of services and other opportunities. This will help to reduce loneliness and isolation; provide more access to support; and generally promote wellbeing. This potential positive benefit will not, of course, apply for disabled people who feel they need to impose additional restrictions on themselves because they feel at risk from Covid in a context of reduced restrictions and protections.</p>	<p>impacts when considering extensions into the public realm.</p> <p>Risk assessments that businesses are asked to conduct should be used to identify disproportionate impacts on certain groups.</p> <p>The Welsh Government's "Guidance for tourism and hospitality businesses for a phased and safe re-opening" provided to tourism and hospitality businesses notes that organisations should consider the rights of those with protected characteristics in terms of accessing venues or services. This is also included in the checklist for tourism businesses, e.g. to inform them of any changes to booking procedures or how the destination will assist disabled people so that they can continue to access the venue in a safe way. Another example is providing additional information to visually impaired visitors in advance of visits regarding changed access to buildings or sites and new and more complex visitor routes and generally by making all visitor information accessible</p>
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	<p>and mask wearing are removed..</p> <ul style="list-style-type: none"> • Vaccinations— notable number of people still not vaccinated for various reasons such as medical ones or have been double vaccinated but still have no immunity. • There is a risk of a two tier system for the workforce dependent on whether home working or not and impact on careers and career development. Clear guidance will be needed to support employers and workers and the situation kept under close review. • There is also increased risk for some workers, who may have compromised immune systems, on returning to the workplace. Really robust risk assessments will be critical. • There is the additional risk of direct or indirect discrimination or people losing their jobs as furlough ends or employers needing to make 		<p>The guidance also states that employers have statutory obligations towards disabled workers and must make reasonable adjustments to ensure that they are not put at a disadvantage.</p>
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	<p>adjustments to accommodate people's return to their place of work.</p> <p>Public transport and inability to social distance remains an ongoing issue of concern. Many people who are disproportionately more vulnerable to the virus cannot socially distance effectively on public transport yet have no other option than to use it.</p>		
<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 the restrictions which would negatively affect wellbeing.	<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 exacerbated by restrictions on 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>	<p><i>Positive:</i> No specific differential impacts households</p> <p><i>Negative:</i> Black Asian and minority ethnic individuals are known to be at higher risk from the effects of coronavirus and may have</p>		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.

	<p>heightened concerns about easing restrictions.</p> <ul style="list-style-type: none"> • There is a risk of a two tier system for the workforce dependent on whether home working or not and impact on careers and career development. Clear guidance will be needed to support employers and workers and the situation kept under close review. • There is also increased risk for some workers, who may have compromised immune systems, on returning to the workplace. Really robust risk assessments will be critical. • There is the additional risk of direct or indirect discrimination or people losing their jobs as furlough ends or employers needing to make adjustments to accommodate people's return to their place of work. • Vaccination Programme – notable number of people still not 		
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	<p>vaccinated for various reasons. There are those who wish to be vaccinated but do not have any identification or documentation and/or are not registered with a Doctor.</p> <p>Positive: Evidence from BAWSO shows that, from March 2020 to January 2021, they supported 49 victims of honour-based violence and forced marriage compared with 151 victims in the year to March 2020. According to UK government figures, the number of forced marriage protection orders issued in Wales has plummeted since the start of the pandemic, going from 60 in 2019 to fewer than five in 2020.</p> <p>Negative: Relaxation on restrictions on international travellers returning to Wales, consistent with UK approach and linked to TTP, may mean that there is an increase in those being taken out of the UK for the purposes of forced marriage.</p>		
<p><i>Religion, belief and non-belief</i></p>	<p><i>Positive:</i> Places of Worship have been able to be open for some time and most worship activities have been able to take place including things like congregational singing, baptism, and Langar (providing charitable meals in Sikhism). However, many of these things have been</p>	<p>Data on the religion of visitors to tourist attractions is not collected via official surveys. A short evidence search was undertaken and there is no available, relevant secondary evidence or proxy data on the travel experiences</p>	<p>Guidance issued on the safe re-opening of the sector, together with advice on additional mitigations to reduce the risk of transmission where maintaining a 2 metre distance is not possible.</p>

	<p>restricted in nature because of the implications of physical distancing and mask-wearing. The removal of these barriers would be likely to improve the experience of worship and bring it closer to the manifestation of faith (as a Human Right) that worshippers had been used to.</p> <p>As capacities would increase faith communities would benefit where congregations have been too large to fit in available worship spaces. This would have a particular impact for Muslim and similar communities.</p> <p>Retaining a duty to risk assess for organisers of places of worship is likely to have little negative impact as groups are used to this responsibility from recent experience.</p> <p><i>Negative:</i> There is a chance that some worshippers who are, or might feel, particularly vulnerable to Covid might feel less able to worship in an environment where practises are less Covid-safe. This could have a particular equality impact in relation to age and disability. At present we naturally have no evidence to validate this concern.</p>	<p>and behaviour of this group.</p>	<p>Provisions for risk assessments and reasonable measure to minimise exposure to and spread of coronavirus will remain to mitigate these risks.</p>
<p><i>Sex / Gender</i></p>	<p><i>Positive:</i> The restrictions appear to affect different sexes in different ways, which could be mitigated by relaxation.</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</p>	<p>Guidance issued on the safe re-opening of the sector, together with advice on additional mitigations to reduce the risk of transmission where maintaining a 2</p>

	<p>Positive: proportion of <u>hospitality sector</u> employees who are women is slightly higher than for Welsh workforce as a whole, so could have positive distributional impacts if it prevents potential job losses and increases household incomes by transferring individuals off the UK's Job Retention Scheme.</p> <p>Positive: Women also more likely to have reported reduced levels of mental wellbeing as a result of not being able to continue normal social interaction. Eased restrictions in the <u>hospitality sector</u> could assist in addressing feelings of reduced wellbeing.</p> <p>Positive: Although information is not available specifically for funfairs, typically tourism employs more women than men. Therefore, as more relevant businesses are allowed to re-open they should help the preservation of jobs and increase household incomes for those who work in the sector (i.e. by receiving their full salary as they are transferred off furlough).</p> <p>Positive: Women tend to be primary care-givers, including for children during the school holidays. Access to more amenities should improve the experience of children and the well-being of care-givers.</p> <p><i>Positive:</i> The lifting of restrictions on indoor and</p>	<p>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>Analysis of APS data for 2019 estimates that 50% of workers in Wales within pubs, cafes, and restaurants are female, while women represent 47% of the total Welsh workforce.</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>Opportunities to return to employment will help reduce anxieties associated with lockdown including financial worries.</p> <p>Surveys indicate females are more likely to be self-isolating, very worried about their mental health, feeling anxious and feeling isolated. More females say their sleeping is negatively affected during lockdown</p>	<p>metre distance is not possible.</p> <p>The package of (relatively eased) measures in Tier 1 will all serve to provide access to more forms of support to women who require it.</p>
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	<p>outdoor gatherings as well as on remaining businesses will provide more opportunities for victims of VAWDASV to disclose abuse.</p> <p>Evidence shows that reports to the police of sexual violence incidents have decreased during the pandemic consistent with other police reported violent crime.</p> <p><i>Negative:</i> The lifting of restrictions on general movement, events and the night time economy may increase incidents of VAWASV</p> <ul style="list-style-type: none"> • There is a risk of a two tier system for the workforce dependent on whether home working or not and impact on careers and career development. Clear guidance will be needed to support employers and workers and the situation kept under close review. • Important to keep staff in the care and retail sectors, which employ mainly women, safe through the next phase of regulations. • 		
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<p><i>Sexual orientation (Lesbian, Gay and Bisexual)</i></p>	<p>Positive: The restrictions appear to affect different sexes in different ways, which could be mitigated by relaxation.</p> <p>Positive: proportion of hospitality sector employees who are women is slightly higher than for Welsh workforce as a whole, so could have positive distributional impacts if it prevents potential job losses and increases household incomes by transferring individuals off the UK's Job Retention Scheme.</p> <p>Positive: Women also more likely to have reported reduced levels of mental wellbeing as a result of not being able to continue normal social interaction. Eased restrictions in the hospitality sector could assist in addressing feelings of reduced wellbeing.</p> <p>Positive: Although information is not available specifically for funfairs, typically tourism employs more women than men. Therefore, as more relevant businesses are allowed to re-open they should help the preservation of jobs and increase household incomes for those who work in the sector (i.e. by receiving their full salary as they are transferred off furlough).</p> <p>Positive: Women tend to be primary care-givers, including for children during the school holidays. Access to more</p>	<p>May benefit from being able to undertake 'normal' activities, including safe and responsible socialising with friends and peer support networks, particularly if having been 'locked-down' in isolation or in an unsupportive home environment.</p>	
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	<p>amenities should improve the experience of children and the well-being of care-givers.</p> <p>Positive: The lifting of restrictions on indoor and outdoor gatherings as well as on remaining businesses will provide more opportunities for victims of VAWDASV to disclose abuse.</p> <p>Evidence shows that reports to the police of sexual violence incidents have decreased during the pandemic consistent with other police reported violent crime.</p> <p>Negative The relaxing of restrictions and increase in mixing could lead to a general increase in the transmission of sexual diseases and infections. This is likely to have an impact particularly among the LGBTQ+ community.</p> <p>Negative: The lifting of restrictions on general movement, events and the night time economy may increase incidents of VAWASV</p>		
<p><i>Marriage and civil partnership</i></p>	<p><i>Positive:</i> Evidence from BAWSO shows that, from March 2020 to January 2021, they supported 49 victims of honour-based violence and forced marriage compared with 151 victims in the year to March 2020. According to UK government figures, the number of forced marriage protection orders issued in Wales has plummeted since</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>No specific evidence, however, as more premises open, couples should generally benefit</p>	<p>N/A</p>

	<p>the start of the pandemic, going from 60 in 2019 to fewer than five in 2020.</p> <p><i>Negative:</i> Relaxation on restrictions on international travellers returning to Wales, consistent with UK approach and linked to TTP, may mean that there is an increase in those being taken out of the UK for the purposes of forced marriage.</p>	<p>from more opportunities for safe social interaction and opportunities to access services, which will should promote wellbeing.</p>	
<p><i>Children and young people up to the age of 18</i></p>	<p><i>Positive:</i> Children under the age of 11 are excluded from the six people meeting restriction.</p> <p>Positive: parents returning to work could signal a return to 'normal' life and enable parents to better provide for the children</p> <p>Negative: parents returning to work could cause feelings of anxiety where there has been significant contact as a result of lockdown.</p>	<p>The survey '<u>Coronavirus and Me</u>' 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>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%)</p>	N/A

Alert level 1 - Low risk			
Protected characteristic or group	Assessment of impact: positive or negative	Summary of assessment	(Proposed) mitigating action
<p><i>Age (think about different age groups)</i></p>	<p>Positive: An ability to form <u>larger extended households</u> will benefit all age groups, mitigating</p>	<p>Survey responses highlight younger people (18-29) are most likely age group to be worried about their</p>	<p>Communications and guidance should emphasise the risks associated with forming</p>

	<p>effects of loneliness and isolation (a particular issue for younger people) or digital exclusion (for older people).</p> <p>Negative: People over 70 may be concerned about increased risks to them from a greater mixing of people.</p> <p>Negative: those at higher risk might feel pressure to join extended households to provide care and support (e.g. elderly grandparents)</p> <p>Positive: Younger cohorts of the population are significantly more likely to work within the <u>hospitality sector</u> in Wales than older cohorts, therefore opening sector could have positive distributional impacts if it prevents potential job losses and increases household incomes by transferring individuals off the UK's Job Retention Scheme. This cohort currently represents the age group most at risk from an economic downturn.</p> <p>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. Analysis by Welsh Government of Annual Population Survey (APS) data for 2019 shows</p>	<p>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, but are also more likely to be digitally excluded.</p> <p>An ONS survey showed that more respondents between 16-29 years are reporting feeling lonely often, always, or some of the time. The UCL Covid Social Study also shows similar results: in weeks 36-37 (published 3rd Dec), loneliness levels were very stable in the past fortnight but are still very slightly higher (2%) than they were over the summer before new restrictions were brought in. The greatest increase in recent weeks has occurred in people living alone. Levels are still highest in younger adults, women, Black, Asian and Minority Ethnic people, people with lower household income, people living with children, people living in urban areas, and people with a diagnosed mental or physical health condition.</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>In terms of employees the share of employment in</p>	<p>extended households so them forming them are able to make an informed decision to form them.</p> <p>The concept should be communicated as being about care and support so that extended households should be formed with those that are in most need. This has been shown in New Zealand to mitigate the negative effects of being excluded from an extended household if it is understood others may have greater needs.</p> <p>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 will be prepared as appropriate for other premises as preparations are made for them to re-open.</p>
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	<p>that 46% of workers in pubs, cafes, and restaurants in Wales are under the age of 25 (while this age group only represents 12% of workforce). Guidance issued on the safe re-opening of the sector, together with advice on additional mitigations to reduce the risk of transmission where maintaining a 2 metre distance is not possible.</p> <p>Positive: Re-opening more premises providing a greater range of services and attractions will be of benefit to all age groups. The opening of playgrounds and funfairs is particularly likely to benefit children and younger people, both in terms of improving health, including mental health and economic well-being.</p>	<p>tourism is substantially higher for people aged 16-24. Years. Whilst data is not specifically available for funfairs, reopening them could have beneficial distributional consequences for the young should it aid in the preservation of jobs and increasing household incomes for those who work in the sector (i.e. by receiving their full salary as they are transferred off furlough).</p>	
<p>Disability (consider the social model of disability²³ and the way in which your proposal could inadvertently cause, or could be used to proactively remove, the barriers that</p>	<p>Positive: Care and support for those living alone could help individuals facing isolation, those with care needs and those currently providing care. Increasing the size of <u>extended households</u> will likely mean more disabled people can benefit from being part of an extended household.</p>	<p>Feedback from carers illustrates a lack of specialist provision for certain groups, such as those caring for some with a learning impairment, autism, or dementia, who are less able to understand and cope with disruption to routines.</p> <p>Analysis of APS data for 2019 suggests that disabled people are more</p>	<p>Guidance issued on the safe re-opening of the hospitality sector, together with advice on additional mitigations to reduce the risk of transmission where maintaining a 2 metre distance is not possible</p> <p>Local Government will consider equality impacts when considering extensions into the public realm.</p>

²³ Welsh Government uses the social model of disability. We understand that disabled people are not disabled by their impairments but by barriers that they encounter in society. Ensuring that your proposal removes barriers, rather than creating them, is the best way to improve equality for disabled people. For more information, go to the intranet and search 'social model'.

<p>disable people with different types of impairments)</p>	<p>Positive: Disabled employees are slightly more likely to work in tourism in Wales than non-disabled employees, therefore opening sector could have positive distributional impacts if it prevents potential job losses and increases household incomes by transferring individuals off the UK’s Job Retention Scheme.</p> <p>Negative: Extending licenses following reopening of the <u>hospitality sector</u> may result in public space being used to increase effective outdoor capacity. It will be important to ensure that this does not create hazardous environments for those with mobility issues or visual impairments.</p> <p>Positive: In terms of employees the share of <u>employment in tourism</u> is slightly higher for disabled people so re-opening more businesses in the tourism sector could aid in the preservation of jobs and increasing household incomes for those who work in the <u>hospitality sector</u> (i.e. by receiving their full salary as they are transferred off furlough).</p>	<p>represented in pubs cafes and restaurants in Wales, with 19% of the workforce being classified as disabled (this group represents 15% of the wider workforce).</p> <p>As more premises re-open, disabled people should benefit from being able to access a greater range of services and other opportunities. This will help to reduce loneliness and isolation; provide more access to support; and generally promote wellbeing.</p>	<p>Risk assessments that businesses are asked to conduct should be used to identify disproportionate impacts on certain groups.</p> <p>The Welsh Government’s “Guidance for tourism and hospitality businesses for a phased and safe re-opening” provided to tourism and hospitality businesses notes that organisations should consider the rights of those with protected characteristics in terms of accessing venues or services. This is also included in the checklist for tourism businesses, e.g. to inform them of any changes to booking procedures or how the destination will assist disabled people so that they can continue to access the venue in a safe way. Another example is providing additional information to visually impaired visitors in advance of visits regarding changed access to buildings or sites and new and more complex visitor routes and generally by making all visitor information accessible</p> <p>The guidance also states that employers have statutory obligations towards disabled workers and must make reasonable adjustments to ensure that they are not put at a disadvantage.</p>
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<p><i>Gender Reassignment (the act of transitioning and Transgender people)</i></p>	<p>Positive: Increasing the size of <u>extended households</u> will potentially allow people with this protected characteristic to access support networks more easily.</p> <p>Planned reopening of the sector may result in public space being used to increase effective outdoor capacity. It will be important to ensure that this does not create hazardous environments for parents with young children or pushchairs.</p>	<p>May benefit from being able to resume ‘normal’ activities, including safe and responsible socialising with friends and peer support networks, particularly if having been ‘locked-down’ in isolation or in an unsupportive home environment</p> <p>As more premises open, people should 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>Guidance issued on the safe re-opening of the hospitality sector, together with advice on additional mitigations to reduce the risk of transmission where maintaining a 2 metre distance is not possible</p> <p>The Welsh Government’s “Guidance for tourism and hospitality businesses for a phased and safe re-opening” advises that organisations consider the rights of those with protected characteristics and how they will be able to continue to access your venue / services safely.</p> <p>The tourism guidance states that to treat employees fairly steps should be taken to understand, involve and take into account the particular circumstances of those with protected characteristics. This is also included in the associated checklist.</p>
<p><i>Pregnancy and maternity</i></p>	<p>Positive: Increasing the size of <u>extended households</u> will potentially allow people with this protected characteristic to access support networks more easily.</p> <p>Positive: Opening the <u>hospitality sector</u> may result in public space being used to increase effective outdoor capacity. It will be important to ensure that this does not create hazardous environments</p>	<p>Opening the hospitality sector for outdoor service could make navigating public realm with young children more challenging, whilst trying to maintain appropriate social distance.</p> <p>Could also benefit from resuming ‘normal’ pre-lockdown activities such as a meal with friends or family/extended family, which may be promote psychological well-being.</p>	<p>Guidance issued on the safe re-opening of the sector, together with advice on additional mitigations to reduce the risk of transmission where maintaining a 2 metre distance is not possible.</p> <p>The Guidance for tourism and hospitality business highlights that risk assessments are a legal requirement for pregnant women, no matter the size of the business and that employers have a</p>

	<p>for parents with young children or pushchairs.</p> <p>Positive: Re-opening playgrounds and funfairs will provide a greater range of activities which <u>mothers/carers</u> may be able to take young children to enjoy.</p>	<p>As more premises open, mothers/carers 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>statutory duty towards new or expectant mothers.</p>
<p><i>Race (include different ethnic minorities, Gypsies and Travellers and Migrants, Asylum seekers and Refugees)</i></p>	<p>Negative: There are additional risks associated with creating <u>extended households</u> for different ethnic groups given the disproportionate impact of covid-19 on Black, Asian and Minority Ethnic individuals.</p> <p>Positive: Employees from a black, Asian and minority ethnic background are more likely to work in tourism in Wales than the white population, therefore opening sector could have positive distributional impacts if it prevents potential job losses and increases household incomes by transferring individuals off the UK's Job Retention Scheme.</p> <p>Negative: Black, Asian and Minority Ethnic groups may be disproportionately at risk of negative health outcomes should they contract Covid-19, which should be considered for both staff and customers working in the <u>hospitality sector</u>.</p>	<p>Range of different evidence on the disproportionate impact on the Black, Asian and Minority Ethnic community (e.g. ONS, Black, Asian and Minority Ethnic advisory group for WG).</p> <p>Analysis of APS data for 2019 estimates that 12% of workers in pubs, cafes, and restaurants in Wales are Black, Asian and Minority Ethnic (while this group only represents 5% of the Welsh workforce).</p> <p>Data was pooled from 2016-2018 from the GBTS and GBDVS surveys to understand any differences in motivations between white and Black, Asian and Minority Ethnic visitors to Wales from within Great Britain. For overnight visitors, the main motivations to travel followed a similar pattern with white and Black, Asian and Minority Ethnic visitors mainly travelling for holiday/pleasure/leisure (63% compared to 54%)</p>	<p>Risks should be communicated and considered when individuals decide to form an extended household. This is particularly the case where an extended household might contain individuals at more risk of spreading the virus, including asymptotically (e.g. children returning to school or childcare, or healthcare workers).</p> <p>Guidance issued on the safe re-opening of the sector, together with advice on additional mitigations to reduce the risk of transmission where maintaining a 2 metre distance is not possible. Consistent and clear messaging is being maintained, reminding Black, Asian and Minority Ethnic people of the risks that COVID-19 poses.</p> <p>The Welsh Government's "Guidance for tourism and hospitality businesses for a phased and safe re-opening" guidance advises the use of simple, clear and accessible</p>

	<p>Positive: In terms of employees, the share of employment in tourism is substantially higher for people with Black, Asian and Minority Ethnic backgrounds and therefore, as more relevant businesses are allowed to re-open they should help the preservation of jobs and increase household incomes for those who work in the sector (i.e. by receiving their full salary as they are transferred off furlough).</p> <p>Positive: Information on travelling funfairs is limited and most seem not to be based in Wales. However providing for the reopening of funfairs would likely be of benefit to the community of showmen. We understand the Travellers Times have previously written to the Chancellor to set out the negative impact the closure of funfairs is having.</p>	<p>followed by visiting family and relatives (26% compared to 28%) and then business travel (8% compared to 12%). The most frequent reason for day visits for both white and Black, Asian and Minority Ethnic visitors were visiting friends and family (23% compared to 19%).</p>	<p>messaging to explain guidelines, with consideration of groups whose first language may not be Welsh or English.</p> <p>Tourism guidance requires that the risk assessments pay particular regard to whether the people doing the work are especially vulnerable to COVID19 and to put in place steps to protect them.</p> <p>Specific advice is provided in the guidance on places of worship for the Black, Asian and Minority Ethnic community on who should attend and the precautions they should take.</p>
<i>Religion, belief and non-belief</i>	<p>No specific differential impacts identified.</p>	<p>Data on the religion of visitors to tourist attractions is not collected via official surveys. A short evidence search was undertaken and there is no available, relevant secondary evidence or proxy data on the travel experiences and behaviour of this group.</p>	<p>Guidance issued on the safe re-opening of the sector, together with advice on additional mitigations to reduce the risk of transmission where maintaining a 2 metre distance is not possible.</p>

<p><i>Sex / Gender</i></p>	<p>Both positive and negative impacts: Women are more likely to be providing care at home. Increasing the size of <u>extended households</u> could have positive effects in opening up opportunities for support, but could have negative effects if it increases the burden of care by extending it to another household.</p> <p>Positive: proportion of <u>hospitality sector</u> employees who are women is slightly higher than for Welsh workforce as a whole, so could have positive distributional impacts if it prevents potential job losses and increases household incomes by transferring individuals off the UK’s Job Retention Scheme.</p> <p>Positive: Women also more likely to have reported reduced levels of mental wellbeing as a result of not being able to continue normal social interaction. Eased restrictions in the <u>hospitality sector</u> could assist in addressing feelings of reduced wellbeing.</p> <p>Positive: Although information is not available specifically for funfairs, typically tourism employs more women than men. Therefore, as more relevant businesses are allowed to re-open they</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>Analysis of APS data for 2019 estimates that 50% of workers in Wales within pubs, cafes, and restaurants are female, while women represent 47% of the total Welsh workforce.</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>Opportunities to return to employment will help reduce anxieties associated with lockdown including financial worries.</p>	<p>Guidance issued on the safe re-opening of the sector, together with advice on additional mitigations to reduce the risk of transmission where maintaining a 2 metre distance is not possible.</p> <p>The package of (relatively eased) measures in Tier 1 will all serve to provide access to more forms of support to women who require it.</p>
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	<p>should help the preservation of jobs and increase household incomes for those who work in the sector (i.e. by receiving their full salary as they are transferred off furlough).</p> <p>Positive: Women tend to be primary care-givers, including for children during the school holidays. Access to more amenities should improve the experience of children and the well-being of care-givers.</p>		
<i>Sexual orientation (Lesbian, Gay and Bisexual)</i>	No specific differential impacts identified.	May benefit from being able to undertake 'normal' activities, including safe and responsible socialising with friends and peer support networks, particularly if having been 'locked-down' in isolation or in an unsupportive home environment.	
<i>Marriage and civil partnership</i>	No specific differential impacts identified.	<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>No specific evidence, however, as more premises open, couples should generally benefit from more opportunities for safe social interaction and opportunities to access services, which will should promote wellbeing.</p>	N/A

<p><i>Children and young people up to the age of 18</i></p>	<p>Positive: Children will be able to be part of larger <u>extended households</u> with family and friends, mitigating the negative impacts of separation.</p> <p>Positive: parents returning to work could signal a return to 'normal' life and enable parents to better provide for the children</p> <p>Negative: parents returning to work could cause feelings of anxiety where there has been significant contact as a result of lockdown.</p>	<p>The survey '<u>Coronavirus and Me</u>' 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). 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%)</p> <p>Welsh Government analysis of 2018 Annual Population Survey data suggests that 11,400 adults employed within the pubs and restaurants sector have children under the age of 16.</p> <p>Children's rights have been considered as part of this assessment (see above); and the measures providing opportunities to undertake more activity, including organised group activities (e.g. dance classes) will be positive for children and supports compliance with UNCRC articles (Article 18, 27).</p>	<p>Welsh Government has prioritised eased restrictions on the childcare sector and enabled people to access informal care and support, with a view to easing the pressures on families who may have adults who need to return to physical premises to work.</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>
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Alert level 2 - Medium 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?
<p><i>Age (think about different age groups)</i></p>	<p>Positive: Given the health impacts of Coronavirus are more serious for older people, reducing transmission rates will have a positive impact.</p> <p>The ability to form extended households will positively impact all age groups, and will mitigate the effects of loneliness and isolation (for younger people) and digital exclusion (for older people).</p> <p>Negative: Young people are disproportionately represented in the hospitality 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.</p> <p>Younger people have also received disproportionate numbers of fixed penalty notices (FPNs) issued to date.</p> <p>People over 70 may be concerned about increased risks to them from a greater mixing of people and those at higher risk might feel pressure to join extended households to provide care and support.</p> <p>There will be negative impacts on young people as a result of the medium and longer term economic consequences of efforts to control the virus in</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>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>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. Previous experience also suggests far fewer FPNs are issued at Alert level 2.</p> <p>Under all the Alert levels of restriction, including Alert level 2, keeping schools open is a priority. This decision has been taken to mitigate the risk over the longer term to people entering adulthood who may otherwise experience long term-scarring effects from the pandemic.</p>

	<p>terms of their employment and earning opportunities.</p> <p>For pupils required to self-isolate, blended learning (a combination of on line learning and face to face teaching) is not regarded as a comparable substitute for face to face teaching and would impact disproportionately on more vulnerable and disadvantaged learners</p>		
<p>Disability (consider the social model of disability²⁴ and the way in which your proposal could inadvertently cause, or could be used to proactively remove, the barriers that disable people with different types of impairments)</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 disabled people.</p> <p>A shift towards more remote working may open up new employment or other opportunities for people who have been disabled by lack of accessible travel services or by societal attitudes or discrimination.</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</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>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>The extended household provision and the ability to meet up to four people outside or in a regulated setting and provisions for indoor organised activity may help mitigate feelings of loneliness and isolation.</p>

²⁴ Welsh Government uses the social model of disability. We understand that disabled people are not disabled by their impairments but by barriers that they encounter in society. Ensuring that your proposal removes barriers, rather than creating them, is the best way to improve equality for disabled people. For more information, go to the intranet and search ‘social model’.

	health due to mental health problems may be heightened.		
<i>Gender Reassignment (the act of transitioning and Transgender people)</i>	No specific differential impact identified.		
<i>Pregnancy and maternity</i>	<p>Positive: Maternity and perinatal services will continue, with access to health visitors and wider support services in place. This will include running breastfeeding classes and parent and child classes, both to support maternal perinatal mental health and ensure young children are seen and their development assessed to enable early intervention as required.</p> <p>Negative: Some women have also reported post-natal concerns around mental health support, breast feeding etc.</p>		We are maintaining the provision which enables groups like parent and baby / toddler to operate in community facilities of various sorts which will help in addressing these issues.
<i>Race (include different ethnic minorities, Gypsies and Travellers and Migrants, Asylum seekers and Refugees)</i>	<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>Under the duty to self-isolate the use of Black, Asian and</p>	<p>Black Asian and Minority ethnic people comprise 12% of workers in pubs, cafes, 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>It has been reported that 24% of Black,</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 mitigate the racial equality</p>

	<p>Minority Ethnic peoples' information to check compliance is an important issue of trust and confidence in public authorities.</p>	<p>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 disparities with regard to FPNs or whether there are additional disparities we do not know about, given the limited data</p>	<p>impacts. Previous experience also suggests far fewer FPNs are issued at Alert level 2.</p> <p>The Welsh Government is engaging with the Information Commissioner's Office to ensure this is undertaken appropriately and fairly. Welsh Government will ensure that enforcement bodies see the minimum amount of data required to carry out their functions, and this will be shared in line with data protection legislation including GDPR.</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.</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>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>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</p>

	<p>Extended households will provide valuable additional care and support and this could be positive for women in particular, who often take up a disproportionate burden in terms of caring</p> <p>Negative: Women will be impacted by the restrictions on hospitality sector as they are disproportionately represented in the sector.</p> <p>They are also more likely to be impacted if their child has to self-isolate as they tend to be more responsible for childcare.</p> <p>Men have received a disproportionate number of FPNs issued.</p> <p>Men are more likely to critically impacted by COVID-19 from a health perspective, if restrictions are loosened this puts them at greater risk.</p> <p>Negative impacts from the 'stay at home' measures in respect of women and children experiencing abuse</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 report)</p> <p>Analysis of APS data for 2019 estimates that 50% of workers in Wales within pubs, cafes, and restaurants are female, while women represent 47% of the total Welsh workforce.</p>	<p>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 gender equality impacts. Previous experience also suggests far fewer FPNs are issued at Alert level 2.</p>
<p><i>Sexual orientation (Lesbian, Gay and Bisexual)</i></p>	<p>Positive: The continued ability to meet up to four people in regulated settings or take part in organised activity would provide some additional flexibility which would be important in addressing adverse impacts for those whose household was negative or hostile to the individual's sexual orientation.</p>	<p>There is some evidence from earlier in the pandemic about the negative impact of being required to stay home for some people whose families were negative about or hostile to the individual's sexual orientation.</p>	

<i>Marriage and civil partnership</i>	No differential impact expected		
<i>Children and young people up to the age of 18</i>	<p>Positive: Keeping schools, public play facilities and colleges open will have a positive impact on children and young people especially those that are vulnerable or from disadvantaged backgrounds. The decision to allow sport and other organised activities to continue will also have a positive impact on children’s health and well-being as will the provision to meet outdoors or in regulated settings. This is particularly important for teenagers who will welcome the chance to meet their friends.</p> <p>Positive: Extra-curricular and organised activities will be allowed to operate. This includes sporting activities, but also a wide range of cultural, educational and development activities. Examples include attendance at dance, drama and sports clubs, as well as support groups for young carers and children with additional needs, learning impairments or complex health needs.</p> <p>Positive: Play facilities, including outdoor playgrounds and indoor play areas, will remain open and accessible, in line with the child’s right to play set out in the UNCRC and enshrined in Welsh law.</p> <p>Negative: Children will be affected by negative economic</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 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>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>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>

	impacts experienced by the family.		
<i>Low-income households</i>	<p>Positive: Reducing the amount for failing to self-isolate is likely to have a small positive impact for disadvantaged groups.</p> <p>Negative: People from lower income households may be less able to meet in a regulated setting.</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	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 as furlough is 80% of 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.

Alert level 3 - 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 hospitality 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. Younger people have also received disproportionate numbers of fixed penalty notices (FPNs) issued to date.</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>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>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>Disability (consider the social model of disability²⁵ and the way in which your proposal could inadvertently cause, or could be used to proactively remove, the barriers that disable people with different</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 disabled people.</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>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>The extended household provision and the ability to meet up to four people outside or in a regulated setting and provisions for indoor organised activity may help mitigate feelings of loneliness and isolation.</p>

²⁵ Welsh Government uses the social model of disability. We understand that disabled people are not disabled by their impairments but by barriers that they encounter in society. Ensuring that your proposal removes barriers, rather than creating them, is the best way to improve equality for disabled people. For more information, go to the intranet and search ‘social model’.

types of impairments)	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.		
<i>Gender Reassignment (the act of transitioning and Transgender people)</i>	No specific differential impact identified.		
<i>Pregnancy and maternity</i>	Negative: Some women have reported post-natal concerns around mental health support, breast feeding etc.		We are maintaining the provision which enables groups like parent and baby / toddler to operate in community facilities of various sorts which will help in addressing these issues.
<i>Race (include different ethnic minorities, Gypsies and Travellers and Migrants, Asylum seekers and Refugees)</i>	Negative: people from Black, Asian and Minority Ethnic communities are disproportionately represented in the hospitality sector and will be negatively impacted by the requirement to close at 6pm People from Black, Asian and Minority Ethnic communities are also disproportionately likely to be taxi drivers who will be impacted significantly by the 6pm closure of hospitality. Negative: There has been some evidence of disproportionate numbers of fixed penalty notices issued to Black, Asian and	Black Asian and Minority ethnic people comprise 12% of workers in pubs, cafes, and restaurants 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. It has been reported that 24% of Black, Asian and Minority Ethnic mothers reported that they were struggling to feed their children.	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. 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 racial equality impacts

	<p>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>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 disparities with regard to FPNs or whether there are additional disparities we do not know about, given the limited data</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. Negative: Women will be impacted by the restrictions on hospitality sector as they are disproportionately represented in the sector. They are also more likely to be impacted if their child has to self-isolate as tend to do more childcare. Negative: Men have received a disproportionate number of FPNs issued.</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>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 gender equality impacts</p>
<i>Sexual orientation (Lesbian, Gay and Bisexual)</i>	<p>Positive: The continued ability to meet up to four people in regulated settings or take part in</p>	<p>There is some evidence from earlier in the pandemic about the negative impact of being</p>	

	organised activity would provide some additional flexibility which would be important in addressing adverse impacts for those whose household was negative or hostile to the individual's sexual orientation.	required to stay home for some people whose families were negative about or hostile to the individual's sexual orientation.	
<i>Marriage and civil partnership</i>	No differential impact expected		
<i>Children and young people up to the age of 18</i>	<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>Negative: In a situation where distance or blended learning is required to occur at this Alert level, children from lower income families could be disadvantaged by the (potentially) restrictive prices of ICT to facilitate learning for children.</p> <p>Positive: Keeping schools, public play facilities and colleges open will have a positive impact on children and young people especially those that are vulnerable or from disadvantaged</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 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>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 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.</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) will be used to relay messaging from 'Keep Wales Safe'</p>

	<p>backgrounds. The decision to allow sport and other organised activities to continue will also have a positive impact on children’s health and well-being as will the provision to meet outdoors or in regulated settings. This is particularly important for teenagers who will welcome the chance to meet their friends.</p> <p>Negative: Children will be affected by negative economic impacts experienced by the family.</p> <p>Negative: The closure of entertainment venues (cinemas, bowling arcades, indoor play) decreases the leisure options available to children and young people.</p>		
<p><i>Low-income households</i></p>	<p>Negative: People on low incomes are disproportionately represented in the hospitality sector and will be negatively impacted by the requirement to close at 6m. People from lower income households may be less able to meet in a regulated setting, Positive: Reducing the amount for failing to self-isolate is likely to have a small positive impact for disadvantaged groups.</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>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 as furlough is 80% of 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>

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?
<p><i>Age (think about different age groups)</i></p>	<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 hospitality 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 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>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 under the age of 25 (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 to be worried about their mental health and to feel isolated.</p> <p>People over 70 are more likely to be worried about</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>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 (e.g. 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>Disability (consider the social model of disability²⁶ and the way in which your proposal could inadvertently cause, or could be used to proactively remove, the barriers that disable people with different</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 disabled people.</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, restaurants and cafes in Wales, with 19% of those in employment</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, should mitigate against the worst impacts of the measures.</p>

²⁶ Welsh Government uses the social model of disability. We understand that disabled people are not disabled by their impairments but by barriers that they encounter in society. Ensuring that your proposal removes barriers, rather than creating them, is the best way to improve equality for disabled people. For more information, go to the intranet and search ‘social model’.

<p>types of impairments)</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 independence, equality, 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 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>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 impairment, 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 social distancing and the</p>	
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	The closure of ‘personal contact services’ also impacted on disabled people – particularly therapeutic services, having a negative impact on physical and mental wellbeing.	changes to our built environment.	
<i>Gender Reassignment (the act of transitioning and Transgender people)</i>	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.		
<i>Pregnancy and maternity</i>	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 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.	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%), but over half of those using formula had not planned to do so (53%). 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	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>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>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 hospitality 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</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 over-crowded housing had made this harder.</p> <p>Black Asian and Minority ethnic people comprise 12% of workers in pubs, cafes, 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>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 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>

	<p>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 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>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 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>	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.		
<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. 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>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</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 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>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 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>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>		
<i>Sexual orientation (Lesbian, Gay and Bisexual)</i>	<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 sexual orientation. A requirement to stay home may reintroduce these issues.</p>		
<i>Marriage and civil partnership</i>	<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>	
<i>Children and young people up to the age of 18</i>	<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>Negative: In a situation where distance or blended</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 survey that were more likely to say they needed</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 to offer education provision for vulnerable</p>

	<p>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>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>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>
<p><i>Low-income households</i></p>	<p>Negative: The nature of employment in the most affected sectors means that effects will tend to</p>	<p>See for example, provisional data for 2020- from the Annual Survey of</p>	<p>The Welsh Government support package and UK Government extension of furlough will help mitigate</p>

	<p>worsen inequalities – the most affected tend to be low paid, in insecure employment, and young people.</p>	<p>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 greater worries about their mental health</p>	<p>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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Annex B: Children's Rights Impact Assessment

Alert level 0 baseline measures - Children's rights

Definition of a Child

Article 1 of the UNCRC defines a child as being a person under the age of 18 unless, in relation to a law applicable to a child, majority is attained earlier.

Consequently in considering the impacts of any changes to alert levels and restrictions in Wales underpinned by The Health Protection (Coronavirus Restrictions) (Wales) Regulations 2020 on children we must consider the way in which those impacts vary by age, as well as by gender, ethnicity, socio-economic status and geography.

The Rights of Children and Young Persons (Wales) Measure 2011 states that Ministers must pay due regard to the United Nations Convention on the Rights of the Child (UNCRC). Article 12 of the UNCRC states that 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.

The cumulative impact of restrictions on children and young people

The Health Protection (Coronavirus Restrictions) (Wales) Regulations 2020 came into force on 26 March. These were replaced by The Health Protection (Coronavirus Restrictions) (No. 2) (No 3) and (No 4) (Wales) Regulations 2020.

There is a wealth of emerging evidence on the negative impact of the Covid-19 restrictions on children and young people in Wales, but it is fragmented and of varying quality.

The consistent pattern in the available evidence is that the harm arising from the Covid-19 restrictions on children and young people:

- Is high and impacts on all aspects of their life and development;
- Is felt differently across different age groups and development stages; and
- Is unevenly distributed.

Of significance is that those children and young people already disadvantaged before the restrictions came in are more likely to have been disproportionately affected (e.g. children and young people in low income households, with impairments and additional learning needs, in local authority care, care leavers, young carers, Black, Asian and minority ethnic people).

There has also been an emergence of a group of 'newly vulnerable' children and young people living in households that have been disproportionately affected by income loss, school closures, closure of community and leisure facilities, self-isolation, stay-at-home and stay-local orders (e.g. children and young people living in households that depend on incomes from jobs considered non-essential and/or that had no financial margin or reserve at the start of the first national lockdown, children and young people in suboptimal home environments who depend on schools, community and leisure facilities as a refuge or for their social and emotional

development, children of critical workers, education leavers, learners in further education who have children).

The negative impacts associated with the pandemic restrictions have been tolerated by children and young people themselves and those that advocate on behalf of children and young people on the basis of the risk to public health. With the majority of people having received both doses of the vaccination by 9th August, the balance of harms considerations shifts away from those caused by Coronavirus to the wider harms associated with the Coronavirus restrictions.

Moving to baseline measures of Alert Level 0

Central to our decision to move to Alert Level 0 is our understanding that for every child in Wales – this is their childhood and **this is the only childhood they will have**. A return to a more normal childhood experience is desirable now that the vaccine has been offered to all eligible adults with a 90% uptake (as at 9/7/21). All adults will have been offered their second dose by September at the latest. And to reflect the current levels of transmissibility and capacity in the NHS.

Coronavirus has not however gone away. The move to baseline Alert Level 0 measures will be dependent on continued protective measures and behaviours.

Our decision to move to Alert Level 0 has been informed by feedback from our stakeholders, parents and children and young people themselves which has highlighted a range of children's rights issues as a result of lockdown that we have learned from to ensure, as far as is practically possible, that mitigations were put in place and the impact on children and young people was continuously considered and analysed.

Overarching principles in our decision making

1. Children and young people should be safe, seen, heard, nurtured and developing
2. Children should be able to go to school and childcare (including Flying Start)
3. Children should be able to go out to play and exercise
4. Younger children, under the age of 12, should be allowed to mix freely
5. Services that support families should continue to operate and be able to offer face to face services where the child/family need warrants it. Disadvantaged families may need support to access online services – including IT kit and/or 'data'.
6. Children with additional needs should receive the assessments and support they need – this may include a wider family/services support bubble to ensure no family is left to struggle on their own – it may mean a larger group going out to exercise to support the child
7. No child should go hungry
8. Support for parents should be available through a range of mechanisms, including new mothers/parents
9. Routine early years development assessments should be undertaken (where needed face to face with Covid-19 protections in place) and interventions put in place (e.g. speech and language, sight and hearing)

10. All of the above should be communicated clearly, including with children and young people

Baseline measures affecting children and young people

Impacts on the baseline measures have been considered within the context of continued good behaviours around social distancing, handwashing and the wearing of face coverings when required to do so and with the expectation that localised risk assessments may require other mitigation measures.

It should be noted that there are some groups of children and young people who have health conditions that put them at greater risk from Covid-19. For these groups of children and young people they may not be able to take advantage of further removal of restrictions. Where positive impacts are identified for most children for the individual restrictions below, these impacts are not experienced equally by all children and young people, for some because of the disproportionate health impacts of the virus there will be neutral or negative impacts.

Removal of restrictions of numbers meeting in private dwellings, meeting indoors and outdoors and extended households

Positive impacts on children and young people being able to visit and spend time with extended family and friends, including overnight stays. This will have a benefit to children and young people who have not been able to see all members of their families as a result of the restrictions. There may also be positive implications for wider family members who can provide informal childcare arrangements.

Positive impacts on children and young people being able to visit and stay overnight at friends' houses and/or meet with friends to play or socialise.

Child abuse and neglect as well as witnessing domestic violence as a child are recognised Adverse Childhood Experiences (ACEs). Exposure to ACEs can alter how children's brains develop as well as change the development of their immunological and hormonal systems.

Some children will have had experiences of ACEs during the pandemic. We have evidence from some childcare providers that they had made more referrals to social services for neglect and an increase in domestic violence in the home. School leaders also noted that pre-existing safeguarding cases had been exacerbated by the national lockdowns, due to difficult family situations deteriorating further. For example, some leaders reported an increase in cases of domestic violence since the first national lockdown. Some said that they had become aware of increased alcohol and drug misuse by parents at home. Many primary school leaders reported pupils' struggles over this period, including domestic violence, trauma or general lack of structure and routine.

We do not have any data to show a correlation between an increase in Domestic Abuse reports and an increase in social services referrals. We have continued to receive data from all local authorities to show the number of safeguarding contacts received for all children in Wales. Until the end of June, this data has been captured on a weekly basis (moving to fortnightly since 23006.21) from early in the pandemic. Throughout the pandemic, referral rates have fluctuated.

Concern by Heads of Children's Services was expressed in the early pandemic with a reduction in referral rates. This was as a direct impact of the closure of schools and lockdown. Regular monitoring has been undertaken to assess referral numbers. These have fluctuated throughout the year, with further lockdowns, however, these reductions have been similar to those experienced during school holiday periods. Officials continue to engage with Heads of Children's Services and Chairs of Regional Safeguarding Boards and referral numbers are frequently discussed as part of these discussions. The reopening of schools has alleviated professional concerns with the fact that children are seen. A suite of guidance was produced in readiness for the return to schools in September 2020 to support practitioners, parents, carers, grandparents and children to prepare the appropriate conditions for disclosure. It is true that the impact of the pandemic may take some time to be understood, with children and young people needing to feel comfortable to disclose. Practitioners remain ready to respond when required.

Extending the homes that children and young people can visit and stay overnight at may give them some respite from abusive home environments, or it may expose them to wider harms.

Articles 15, 18 and 19 apply

Organised indoor and outdoor events

Positive benefits to children and young people of being able to participate in organised indoor and outdoor events that may have been cancelled or postponed due to the restrictions.

Articles 15 and 31 apply

Stadiums and events

Positive benefits to children and young people of being able to participate in events that may have been cancelled or postponed due to the restrictions.

Articles 15 and 31 apply

Sports and exercise and Leisure and fitness facilities (gyms, swimming pools, spas, fitness studios) and Sports courts, golf courses, enclosed pitches

Positive benefits to children and young people of being able to participate in sports teams or exercise classes that may have been cancelled or postponed due to the restrictions. The lifting of these restrictions will have positive effects on children and young peoples' mental and physical health.

Articles 15 and 31 apply

Supervised children's activities

Positive benefits to children and young people of being able to participate in sports teams or exercise classes that may have been cancelled or postponed due to the restrictions.

Articles 15 and 31 apply

Non-essential retail

Broadly a neutral impact on children and young people of non-essential retail reopening. There will be some positive impacts on young people employed in non-essential retail in terms of job security and income. There will be similar less direct impacts for children and young people whose parents/carers work in non-essential retail roles.

Article 32 applies

Close contact services (hairdressers, nail and beauty salons, tattoo and massage parlours, etc.)

A positive impact for those children and young people who wish to use age appropriate close contact services facilities.

There will be indirect impacts for children and young people whose parents/carers work in close contact services in terms of job security and income.

Article 32 applies

Hospitality (pubs, restaurants, cafes, bars, members clubs)

Overall a general positive impact of children and young people being able to experience hospitality services.

Articles 15 and 31 apply

Holiday accommodation

Overall positive benefits for children and young people and for families using holiday accommodation to have a family holiday.

Article 31 applies

Entertainment venues (cinemas, bingo halls, bowling alleys, indoor play centres and areas, casinos, amusement arcades, theatres and concert halls) and Indoor Visitor attractions (including museums, galleries, educational and heritage attractions, and heritage sites such as stately homes) and Outdoor attractions and outdoor spaces at attractions (including historic parks, gardens, drive-ins, outdoor museums, farm attractions, zoos) and Ice skating rinks (public leisure use) and Funfairs and theme parks

Positive benefits to children and young people of being able to participate in age appropriate social activities that may have been cancelled or postponed due to the restrictions. The lifting of these restrictions will have positive effects on children and young peoples' mental and physical health from participating in activities they enjoy and the ability to spend time with friends.

Articles 15 and 31 apply

Nightclubs and late night entertainment venues

Limited impact as predominantly aimed at over 18s, some positive impact for venues that run under 18s events in terms of young people being able to participate and socialise with their friends.

Article 15 applies

Places of worship

Positive impact on children and young people who will be able to practice their faith.

Article 14 applies

Community facilities

Positive impact for children and young people of being able to use community facilities and participate in activities run from community facilities.

Article 15 applies

Libraries

Positive impacts for children and young people related to being able to use free library services. This will include positive impacts on children and young people reading, being able to access a wide range of books and other resources and access to the internet.

Positive benefits will also be seen by participation in library activities or events that promote reading and/or encourage opportunities to meet with other members of the community.

Articles 15 and 17 apply

Playgrounds, public parks

Positive impacts for children and young people for access to play facilities. The removal of restrictions relating to playgrounds and public parks will have benefits to children and young people's mental and physical health and to their opportunities to play with friends.

Articles 15 and 31 apply

Weddings (including humanist), civil partnerships and funerals

Minimal impact on children and young people, other than the opportunity to participate in happy family occasions.

Specifically for funerals children and young people may be able to experience and process grief more appropriately if they are able to attend funerals.

Article 14 applies

Other life events (including bar mitzvahs, baptisms, or others)

Positive impacts on children and young people being able to express their faith through significant religious events.

Article 14 applies

Driving lessons and tests

Positive impact on young people taking driving lessons and tests including freedom, flexibility driving gives to young people. Positive impacts are also identified through being able to access work and leisure opportunities.

No articles apply

Travel

Positive impact on children and young people being able to travel and benefit from the experiences of travel.

Evidence from BAWSO shows that, from March 2020 to January 2021, they supported 49 victims of honour-based violence and forced marriage compared with 151 victims in the year to March 2020. According to UK government figures, the number of forced marriage protection orders issued in Wales has plummeted since the start of the pandemic, going from 60 in 2019 to fewer than five in 2020. Relaxation on restrictions on international travellers returning to Wales, consistent with UK approach and linked to TTP, may mean that there is an increase in those being taken out of the UK for the purposes of forced marriage and FGM.

No articles apply

Childcare providers and Informal childcare

Positive impacts on young children benefiting from childcare providers services and informal childcare including childcare, learning, speech, language and communication development. Positive implications for parents of using childcare providers to provide childcare.

Positive impacts identified for parents of utilising childcare services and informal childcare in order to work.

Articles 28, 29 and 31 apply

Primary schools and Secondary schools

Positive impacts on children and young people of schooling returning to pre-pandemic provisions in terms of routine and structure. There are positive benefits relating to consistent learning and testing. There are also positive benefits of schooling related to spending time with friends.

There will be positive impacts on returning to pre-pandemic activities in schools around after school clubs, sports teams, breakfast clubs and school trips which broadly benefit all children who participate in them.

For some children and young people a return to pre-pandemic provision in schools will have a negative impact, specifically those children who struggle with school learning, those who are being bullied or those that are unable to tolerate that more formal education system. This may apply to some (but not all) autistic children, children with some types of additional learning needs or children with social or behavioural difficulties (others in these groups may benefit significantly from a return to 'normal' – the impacts will vary as much as individuals vary).

One of the most important lessons from the evidence is that school closures do not only lead to learning loss; they also deprive children and young people of the most important resilience mechanism that mitigates negative effects on physical and mental health and wellbeing, and provides play, interaction with peers, access to a trusted adult, development and life opportunities for those whose home environment is suboptimal, with significant lifelong impact.

We will need to be mindful of the cumulative impact of school closures and periods of enforced self-isolation on learners' attainment levels and how much they have missed since March. For some learners there will need to be more targeted work to mitigate against these gaps.

- We will provide focused support for these learners and their families to ensure that the gains made in recent years in addressing the attainment gap are not lost.
- develop a cross-government plan to address attainment and wider educational outcomes in a systematic, joined-up and collaborative way, making the most of available resources and levers. This will be learner-focused, encompassing the whole 'school journey'
- progress work in relation to our manifesto commitment to community-focused schools, with a focus on how this can support improved attainment, aspirations, wellbeing and educational outcomes for all our learners

Success will look like;

- Improved educational attainment, as all learners, particularly in target cohorts, feel supported to develop and progress towards the four purposes of the Curriculum for Wales, moving towards improved educational standards and attainment and underpinned by high-quality teaching
- greater equity between learners from economically or otherwise disadvantaged families and their peers, helping to close gaps in attainment between different groups of learners and support social mobility. All of our children and young people should receive the help and support they need no matter where they receive their learning and development opportunities
- We will also keep track of specific issues that have arisen due to the pandemic, for example a widening attainment gap, changes to the relationship between

schools and their local communities, and impacts on learners' mental wellbeing and physical health.

The evidence suggests that the pandemic has affected some groups of learners more than others. The nature of our support needs to reflect that, recognising and supporting different groups of learners in the appropriate way. In particular:

- Vulnerable or disadvantaged learners, and learners with ALN have not necessarily had access to the support they need; some may have faced challenges with distance learning, and some with readjusting to face-to-face learning. We need also to support those learners whose circumstances have changed during the pandemic, who may not have previously fallen into this category
- Learners in early years are in a critical window for language, social, emotional, physical and cognitive development. They risk missing key development milestones, which could impact on their emotional wellbeing, communication and learning development. They may have specific challenges in finding a sense of belonging in their schools or settings, or in being away from their families
- Learners in post-16 and transition and those moving into post-16 provision will be concerned with progressing to their next steps, as well as their longer-term employability and skills. These learners will have experienced particular pressures and uncertainty, and their confidence will have been affected
- There will also have been specific challenges for Welsh immersion learners in English-speaking households, and learners transitioning from Year 6 to Year 7.

Many learners in all these groups have valued the personalised support they have received from their families and progressed on their own learning pathway. A 'one-size-fits-all' approach will not allow learners to make the progress they need; our plan recognises that practitioners know what their learners need and are best placed to decide how to support them. In practice, this means ensuring that our support recognises different learners' experiences of the pandemic and subsequent needs – with specific target cohorts – and giving schools and other learning providers the flexibility to draw on that support in the way that is best for their learners.

Another area of potential negative impact is related to the use of face coverings in secondary schools. The current guidance says if social distancing cannot be maintained, face coverings should be worn anywhere on the school estate, including in the classroom by staff at primary schools, and by staff and learners in secondary schools. Use of face coverings is having a disproportionately negative impact on children and young people who currently remain an unvaccinated group.

We must also consider whether we are treating children and young people differently from adults where there is an expectation children wear face coverings in school all day.

Consideration will need to be given to the impact of children and young people being required to self-isolate (if a member of their class tests positive). These incidences

should be considered as a cumulative total in terms of impact on learning as well as social and wellbeing disruption and missing out on lots of other things.

Articles 28, 29 and 31 apply

Colleges, FE institutions

Positive impacts for college and FE learners to a return to pre-pandemic provision.

Articles 28 and 29 apply

Pupil Referral Units, Special Schools and Education Otherwise than at School (ETOAS)

Positive impacts for learners from Pupil Referral Units, Special School and ETOAS learners to a return to pre-pandemic provision.

Articles 28 and 29 apply

United Nations Convention on the Rights of the Child articles

In addition to the specific articles relating to the baseline measures there are other broader children's rights which have been considered. These include

Article 1: **Everyone under the age of 18** has all the rights in the Convention.

Article 2: The convention applies to **every child without discrimination**, whatever their ethnicity, sex, religion, language, abilities or any other status, whatever they think or say, whatever their family background.

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

Article 6: All children have the **right to life**, Governments should ensure that children survive and develop healthily

- The right to life is more than being safe from the virus. It is about developing socially, emotionally, physically, mentally and spiritually.
- Being able to play and exercise are essential to a child's physical development and their mental health and well-being.

- Younger children, should be able to socialise – this is important for babies and toddlers as well as for children of primary school age.
- 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%), but over half of those using formula had not planned to do so (53%).

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.

- The ‘Coronavirus and Me’ surveys provided an insight of the views of the 23,700 children aged 3-18 who chose to respond in May/June 2020 and a further nearly 20,000 who responded in January 2021. Some of the findings are set out below. Children said
 - They had worries about how long the situation would last and fears that they or those they love will catch the virus. Some felt they were being kept safe at a time when daily numbers of deaths were decreasing and children were less affected. They may feel differently now that infection rates are increasing and their lives will be disrupted again.
 - Disabled children were more likely to be feeling worried about the virus and were concerned about catching it.
 - The top three things young people (12-18) said the stay at home rules which impacted on the most were how they feel are ‘not being able to spend time with friends’ (72%), ‘not being able to visit family members’ (59%) and ‘school or college closing’ (42%)
 - 12-18 year olds are reporting worries about their education: only 11% of respondents in this age group stated they did not feel worried about their education, with the main concern being worried about falling behind (54%). Black, Asian and minority ethnic respondents were more likely to say they were worried about getting behind with their learning.
 - The main barriers to home learning were access to electronic devices and pressures in the home environment. There are also specific challenges raised for children with additional learning needs.
 - Only 17% of young people felt happy that exams were cancelled. Young people were more likely to feel uncertain (51%) or worried (18%). Young people also report feeling angry (6%) and sad (5%).
 - The majority of children report playing more than usual (53%) with a wide range of online and offline play described including outdoor play, imaginary play, playing with toys or games, sports, and creative play. This was during the time when the regulations had changed to allow children to go out to play and exercise more often. Black, Asian

and minority ethnic children were more likely to say they were playing less.

- It is important that we continue to listen to children and young people. That is why we have, through our arrangement with Children in Wales, recently held specific consultation events with children and young people on the use of face coverings and their experience of accessing health services during the pandemic.
- We will be holding engagement sessions with young people via Children in Wales and Children's Commissioner for Wales to seek young peoples' views on operational arrangements in schools.

Article 13: Children have the right to **express their thoughts and opinions** and to **get and share information** as long as the information is not damaging to them or to others.

- Young people have said they want more information that is relevant to them regardless of their background.
- We need to ensure that messaging is appropriate for different age ranges and levels of understanding.
- Ministers should speak directly with children and young people to hear their views and concerns. Young people advised the First Minister that they rarely watched television. They asked whether the Welsh Government used social media. They commented that press events tended to be held at lunchtime when they were in school.

Article 14: Children have the right to **think and believe** what they choose and also to practise their religion, as long as they are not stopping other people from enjoying their rights.

Article 15: Children have the right to **meet with other children and to join groups and organisations**, as long as this does not stop other people enjoying their rights.

Community centres, public facilities, such as libraries and sports courts and skate parks 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.

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.

- Young people have said they want more information that is relevant to them regardless of their background.

- We need to ensure that our messaging is appropriate for different age ranges and levels of understanding.
- We should seek to reach children and young people through a range of media and ask for their feedback.

Article 18: Governments must support parents by **creating support services for children and giving parents the help they need** to raise their children.

- Families who would not normally contact Social Services for help have made contact because they have struggled with the impact of lockdown and wider pandemic arrangements on family life. Sources of support include -
 - Parenting Give it Time where parents can find information, advice and support
 - Families First
 - VAWDASV – support services, refuges. Anyone concerned about their own or their children’s welfare/safety can continue to access support through Live Fear Free 24 hour helpline and Website.
 - Children’s Social Services remain operational to provide care and support for children and parents in greatest need.

Article 19: Governments must do all they can to **ensure that children are protected from all forms of violence, abuse, neglect and bad treatment** by their parents or anyone else who looks after them.

- Children’s Social Services rely on universal and preventative services to spot the signs of risk of harm or abuse and report them. The initial lockdown arrangements reduced the number of safeguarding referrals about children.
 - Levels of safeguarding referrals have recovered but when schools returned to full operation the cases that were referred were more complex. Recent trend reported of increased anonymous referrals by neighbours/community members worried about children.
 - Children’s Social Services remain operational and have kept in contact with children at risk and their families. The nature and frequency of that contact informed by regularly reviewed risk assessment.
 - Children’s Social Services need the support of partner agencies to retain sight on children and respond to pressure on services still in operation throughout the period since March in order to keep children safe.
 - Information to support the identification of child abuse and disclosure has been developed and promoted to the public, practitioners and to children and young people themselves.
 - Work to deliver actions under the National Action Plan on preventing and responding to child sexual abuse reactivated and progressing well.

Article 21: the process of adoption should be **safe, lawful and prioritise children's best interests**.

- Safeguarding children and ensuring that children in care and care leavers are supported is our top priority therefore, we are not considering amending regulations at this time as some other nations have done. Feedback from local authority partners supports this position.
- However Volume 7 of Working Together to Safeguard People, under Part 7 of the Social Services and Well-being (Wales) Act 2014, was published in March 2021 <https://gov.wales/written-statement-working-together-safeguard-people-volume-7-safeguarding-children-child-sexual>
- Welsh Government has produced guidance to support local authorities' delivery of children's services. This includes direction on ensuring that children in care and care leavers continue to get the support they need and arrangements for them to have continued contact with families wherever this can be safely maintained.
- There is one exception. Following dialogue with Heads of Children's Services, the Children's Commissioner for Wales and Third Sector stakeholders, interim flexibilities to certain procedural requirements and timescales associated with the Stages in the Regulations were granted, to ensure the consistent delivery of services within the adoption sector could continue.
- To support local authorities plan for a phased restoration of routine children's services Welsh Government has worked with Heads of Children's Services and stakeholders to develop a Recovery Framework. The Framework sets out a realistic and consistent roadmap for the recovery of children's social services; adapting to new ways of working and learning from the positive experiences that lockdown has brought about. It sets out principles of working to help local authorities plan in a consistent way and at a pace determined by individual local authorities. These principles are focussed on supporting the prioritisation of work and services, maintaining the wellbeing of the workforce, delivery of placements, contact with children and families and engagement with the Judiciary.

Article 23: **Children who have any kind of disability²⁷ should have special care and support** so that they can lead full and independent lives.

- Parents of children with additional needs have reported feeling abandoned, uncertain of where to get help and support.
- Disabled children and young people were more likely to be about the negative impact on their mental health in their response to the Coronavirus and me survey.

²⁷ The word "disability" is used here to mean impairment. The Welsh Government is committed to the social model of disability which recognises that disabled people are disabled not by their impairments but by barriers which they encounter in society'.

- Concerns have been raised about the initial blanket approach to not being able to go outside more than once a day – some parents decided to break the law to ensure the ‘best care’ for their child.
- Clear and simple messaging about potential dispensations would help families with ALN children and young people.

Article 24: Every child has the right to **the best possible health**.

Mental health impact and mitigating work

- Mental health has been a real concern for children and young people during the pandemic as identified through various surveys and research including the Coronavirus and me survey, and the discussions held with young people. Welsh Government continue to monitor national and international surveys on children and young people’s mental health to ensure we use the most valid and up to date information in our decision making.
- There are many ways that, as a nation, we are trying to manage the risk of transmission of the coronavirus including through specific guidance to the general population about the important measures each person can take personally; guidance for childcare, schools and colleges; self-isolation requirements and the latest alert levels plan. While all of these things are important to reduce transmission the other harms that the effects of these actions could have on children and young people need to be taken into account. This includes disproportional impacts on some communities including the most disadvantaged, Black, Asian and Minority Ethnic families and the digitally excluded.

Covid-19 vaccinations

- All adults, and clinically vulnerable children from 16yrs, have now been offered their first vaccine with 90% choosing to take up the offer. 66% have had both doses and we are aiming to offer all adults their second dose by September. This means the majority of parents/carers and professionals who children rely on such as teachers, social workers, youth workers etc, have been vaccinated. They are less likely to have the virus and less likely to transmit it.
- The Joint Committee on Vaccination and Immunisation (JCVI) has been considering the potential for vaccinating children and young people aged 12 – 17 years over the past few months. Specifically to consider if children should be offered vaccination, which ages, to what timeframe, and with which COVID-19 vaccine? If vaccination is advised are there certain groups who should be prioritised? And, should 16-17 year olds be treated differently to younger age groups?
- As well as considering this from a clinical harms point of view (to avoid hospitalisations and deaths) they were also asked to consider from the point of view of wider harms, specifically to reduce ‘days off-school’ and the impact on attendance.

- They have taken evidence and asked for presentations from a wide range of health and education experts, vaccine providers, modellers, haematologists and paediatricians to ensure they gave consideration to wider issues other than direct health benefits. They will advise within the coming weeks.
- In the meantime, consideration has been given to the wider harms as set out in this paper and what role, if any, vaccinations should play in mitigating them. It is vitally important that all non-pharmaceutical interventions be considered alongside COVID-19 vaccinations. There is also a need to consider the other essential immunisation programmes and protecting these from further disruption.

Immunisation

- Routine vaccination of children is essential to ensure other childhood diseases do not spread throughout the population. These immunisation programmes have continued.
- Maintaining immunisation programmes is a key priority to protect public health from preventable infections. Childhood immunisation programmes have continued as essential services during the coronavirus pandemic, with appropriate assurance to parents and infection control measures in place.
- The Chief Medical Officer wrote to all general practitioners and health boards in March to emphasise the importance of continuing childhood immunisation programmes during the response to Covid-19 to protect public health not only during the outbreak but in the future.
- In September, a joint letter was sent to all schools (via WLGA) from the Chief Medical Officer, Chief Nursing Officer and Director of Education, Welsh Government stressing the importance of maintaining all immunisation programmes, including flu, at this time and encouraging head teachers to support these sessions by allowing access to schools in line with safety protocols.
- Public Health Wales has developed monthly enhanced immunisation uptake reports to monitor the impact of Covid-19 on uptake of routine childhood immunisations across Wales. Current data shows uptake in young children and infants due their immunisations over the last seven months remains similar to before the pandemic. Uptake in one year olds has remained above 95% for all vaccinations (with the exception of rotavirus at 94.0%, which can only be given up to 24 weeks of age).
- School immunisation sessions for older children were suspended after the closure of schools on 20 March 2020. A phased return to schools began on 29 June 2020, with full reopening on 1 September 2020. Current uptake of vaccinations due in 2019-20 are lower compared to 2018-19 at the same time last year due to further interruptions to the school timetable. 'Catch-up' sessions are being scheduled to offer immunisations as soon as possible.

- The Welsh Government will monitor uptake of all national immunisation programmes closely with key NHS stakeholders to encourage uptake and enable people to continue to have immunisations safely.

Article 25: If a child has been placed away from home for the purpose of care or protection (for example, with a foster family or in hospital), they have the right **to a regular review of their treatment**, the way they are cared for and their wider circumstances.

- Lockdown arrangements had an obvious impact on the arrangements for children in care to have contact with their families. However we published operational guidance for Children's Social Services to set out our expectations on the ways in which support to children in care and care leavers should continue to happen in a safe way. Children's Social Services have continued to operate throughout 2020.
- The Operational Guidance has been updated a number of times to reflect changing arrangements in response to Covid-19. This includes advice on family time (contact arrangements for children and their families)

Article 26: **The Government should provide extra money for the children of families in need.**

- Welsh Government has prioritised families who are in poverty through the DAF, FSM, foodbanks etc. – this needs to continue so that no child goes hungry.
- Black, Asian and minority ethnic children reported in the 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.
- VAWDASV has provided additional funding for children and young people services across Wales, including trauma informed counselling and children's workers in refuge.
- Welsh Government has provided local authorities with funding for inter-parental relationship support

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.

- Black, Asian and minority ethnic children and young people are more likely to be living in overcrowded and poorer housing which makes staying at home and learning at home more difficult.
- 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 over-crowded housing had made this harder.
- 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.

- 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 than those on the highest.
- This report also reported that 6 in 10 parents shared significant concerns about their mental health.

In response Welsh Government has prioritised

- Families who are in poverty through the DAF, FSM, foodbanks etc. – this needs to continue so that no child goes hungry.
- Children at risk of development delay through the Child Development Fund
- Black, Asian and minority ethnic children and young people are more likely to be living in overcrowded and poorer housing which makes staying at home and learning at home more difficult.
- 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 over-crowded housing had made this harder.
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- This report also reported that 6 in 10 parents shared significant concerns about their mental health.

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.

- Young people were more likely to say that they enjoyed not going to school or preferred learning at home if they were disabled.
- 7-11 year old Black Welsh or British respondents were significantly more likely to say they felt confident or very confident about their education than White Welsh or British respondents.
- Black, Asian and minority ethnic respondents were significantly more likely to say they were worried about getting behind with their learning, worried about starting a new school year or new school in September.
- Black, Asian and minority ethnic children and young people were significantly more likely to say the closure of libraries has affected their learning, across age ranges. 7-11 year olds were significantly more likely to say the closure of community centres and not being able to go outside affected their learning.
- Digital needs have made it difficult for some children to access help and support – this could be due to not having IT kit or because they do not have enough 'data' to access online learning or relevant support services. This was

true for some families who needed additional support in Flying Start areas. We need to ensure that families are not disadvantaged due to poverty and/or a lack of IT and data. Young people advised the First Minister that they were constantly being tested and assessed in school and that the pressure was too much. They also advised that those who were home-schooled felt left behind.

Children and young people are, in the main, supportive of being able to continue their education and to go to school and college. In a recent discussion with the First Minister and then Deputy Minister Health and Social Services young people were asked about their views of education during the firebreak, they said:

- Online sessions should be seen as a last resort as some young people feel less confident to email and ask for help, much easier in the classroom face to face.
- If online is used properly with the right support it can work really well but there are cases of young people just being sent PowerPoints or bulk work and not checked on.
- They felt they had a lot less time to get to know their teachers so don't always feel comfortable to ask for help – some may have only been in school for part of the first half of term due to self-isolation requirements so had not built a relationship with new teachers.
- Some have been facing digital poverty issues – not just devices but access to decent Wi-Fi connections
- There were not as many well-being checks this time, a mindfulness PowerPoint had been sent out.
- Feel like it's seen as a send it out and it's done. They expressed concerns for those in unhealthy households and felt maybe they should be called on as well
- Special school open all through and using flexibility to do the best we can, adapted quite a bit.

Over the longer term, consequences associated with an interrupted or limited access to education and/or developmental assessment and support are persistent and scarring:

- Reduced ability or appetite to access further or higher education;
- Reduced employment possibilities;
- Increased poverty levels, and an exacerbation of the attainment gap;
- Increased adverse childhood experiences;
- Increased gender inequality;
- Poor health.

Developmental delay even in one area can have a significant impact on an individual's life course.

- Over 50% of children in socially deprived areas may start school with impoverished speech, language and communication skills²⁸.

²⁸ Locke et al, 2002

- One in four children who struggled with language at age five did not reach the expected standard in English at the end of primary school, compared with one in 25 children who had good language skills at age five²⁹.
- After controlling for a range of other factors that might have played a part (mother's educational level, overcrowding, low birth weight, parent a poor reader, etc.), children who had normal non-verbal skills but a poor vocabulary at age 5 were, at age 34, one and a half times more likely to be poor readers or have mental health problems and more than twice as likely to be unemployed as children who had normally developing language at age 5³⁰.
- Vocabulary at age 5 is found to be the best predictor (from a range of measures at age 5 and 10) of whether children who experienced social deprivation in childhood were able to 'buck the trend' and escape poverty in later adult life³¹.

Adverse childhood experiences (ACEs) are stressful events occurring in childhood, such as being a victim of abuse, neglect, or growing up in a household in which alcohol or substance misuse, mental ill health, domestic violence or criminal behaviour resulting in incarceration are present³². Other experiences can also have a detrimental impact on a child's life such as poverty and experiences such as a global pandemic.

- ACEs are common, with approximately half of the adult population (aged 18-69 years) in Wales reporting having experienced at least one ACE, and 14% reporting four or more³³.
- ACEs can have a detrimental impact on health across the life course, contributing to a wide range of poorer outcomes, including poorer educational outcomes, increased health inequality and morbidity. In Wales, those who suffer four or more ACEs are six times more likely to be a smoker, four times more likely to drink alcohol at harmful levels³⁴, twice as likely to suffer from a chronic disease (e.g. asthma, cancer, obesity, heart and respiratory disease;³⁵, and six times more likely to have ever received treatment for mental illness (e.g. depression or anxiety)³⁶.

A history of exposure to ACEs has also been associated with an increased demand on health services³⁷. ACEs and their negative effects can extend beyond a single generation, with their replication driven by complex interactions between personal and social environmental factors, leading to their intergenerational transmission³⁸.

While access to education is not a panacea for all socio-economic impacts, it is clear that access to high quality education helps redress a range of longer term factors.

²⁹ Save the Children, 2016

³⁰ Law, 2010

³¹ Blanden, 2006

³² (Felitti et al., 1998).

³³ (Hughes et al., 2018)

³⁴ (Bellis et al., 2015a

³⁵ Ashton et al., 2016

³⁶ Hughes et al., 2018

³⁷ Bellis et al., 2017a; Chartier et al., 2010.

³⁸ Larkin et al., 2012; Leitch, 2017; Lomanowska et al., 2017

This is recognised in Taking Wales Forward. Furthermore maintaining time in schools would help address some of the concerns regarding socialisation, isolation and mental health. It would enable children and young people to have contact with trusted adults outside of the home environment which is one of the key resilience factors in terms of ACEs.

Welsh Government has set aside funding of £29m over 2 years to support children and young people to 'catch up' however it is not yet known how successful this will be especially for those who are most disengaged and those who are not attending school.

The child development fund of some £3.5m in 2020/21 has been developed to focus specifically on children under the age of 5. It will enable support to be provided in all local authorities in Wales where there is delay or potential delay especially in speech, language and development; fine and gross motor skills and social and emotional development. In addition programmes such as Flying Start and Families First alongside the childcare offer continue to support children and young people and their families.

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.

- Young people have reported concerns for their own futures in terms of employment and education opportunities
- Black, Asian and minority ethnic respondents were significantly less likely to say they have been learning new skills than White Welsh or British respondents, among the 7-11 age group), but were significantly more likely to say this than White Welsh or British respondents in the 12-18 age group.
- Black, Asian and minority ethnic respondents were significantly more likely to say they have been reading and writing (among 12-18 year olds), and cooking (among 7-11 year olds), during lockdown.

Article 31: Children have the right to relax and play, and to join in a wide range of activities.

- Black, Asian and minority ethnic respondents were significantly less likely to say they had been exercising outdoors, across the age groups.
- Black, Asian and minority ethnic 7-11 year olds were significantly less likely to say they were playing more often than before. Young people advised the First Minister that they wanted more opportunities to play organised sports.
- They also advised that they wanted to attend organised youth projects
- Black, Asian and minority ethnic respondents were significantly less likely to say they had been exercising outdoors, across the age groups.
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- Young people advised the First Minister that they wanted more opportunities to play organised sports.
- They also advised that they wanted to attend organised youth projects

Play facilities are a vital part of the child's right to play. Outdoor playgrounds and parks have mitigated the impact of restricted indoor services, and 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. For older children Youth Services provide safe spaces for children and older young people to meet, socialise and gain support as needed in all but the highest level.

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.

For young people it is important to them that they can meet up with friends outside of the school environment. A regulated setting probably provides a safer place to meet for those that can afford to purchase drinks in a café for example. For the most disadvantaged young people they may not be able to take advantage of this opportunity.

Article 35: children **should be protected** from being abducted, sold or moved illegally to a different place in or outside their country for the purpose of exploitation

- Organised criminal networks have adapted their operations throughout the pandemic so that they can continue to secure financial gain through the exploitation of children.
- The third sector have reported that children and young people have been at increased risk of on-line grooming and exploitation.
- Information to support the identification of child abuse and disclosure has been developed and promoted to the public, practitioners and to children and young people themselves.
- We continue to liaise with safeguarding partners including the police on this issue and regular meetings with the Home Office established.
- Independent Child Trafficking Guardian Service continues to operate across Wales.
- We have continued to fund MEIC, an information, advice and advocacy helpline for children and young people in Wales and have provided further funding of £27,500.00 (excluding VAT) to Pro-Mo Cymru to support the delivery of MEIC provision in response to the Covid-19 outbreak, to ensure that the MEIC service is able to fully meet the needs of young people in Wales for the immediate response to Covid-19. The MEIC service is available 7 days a week between 8 a.m. and 12 midnight) and has remained open throughout the Covid-19 outbreak to ensure continued provision offered to children and young people. The service has adapted its products to enable it to respond to the emerging and changing priorities and concerns experienced by children and young people as a result of the pandemic.

What Welsh Government can do to reassure children?

Children have been and remain anxious and they have questions about how restrictions have affected them, their families and their futures. Direct communication with children and young people has been well received. Young people appreciated the time the First Minister has taken to explain why these decisions are being made. In order to be compliant with the UNCRC we must continue to ask for their views as we work through the Coronavirus Control plan.

We can utilise existing comms campaigns, and networks, to distribute information and advice to parents, for example the Parenting. Give it Time campaign which can be used to get messages out to parents; the Flying Start Facebook page; and our Parenting Expert Action Group, Childcare, Flying Start and Families First Networks.

Future children's rights considerations

Other considerations going forward as we deliver the Coronavirus Control plan should include:

- Understanding the implications for children and young people where family members are experiencing log Covid-19 symptoms;
- Decisions about the vaccination of children and young people (we are currently consulting with 16 and 17 year olds about vaccinations);
- Understanding the implications of expectations of working from home in the longer term;
- Long term implications of the effect of poor mental and physical health for children and young people;
- Implications for continued instances of self-isolation on learning and mental and physical health (we are in the process of seeking the views of CYP who have experienced continued instances of self-isolation through testing positive for Coronavirus, or through being part of a contact bubble); and
- Longer term impacts on the economy and implications for children and young people and their families.