

Summary impact Assessment

Baseline measures – Alert Level 0

Introduction

[A Summary Impact Assessment \(SIA\) was produced in December 2020](#) following the introduction of a system of alert levels in Wales. The [latest SIA was produced following the 21 Day Review on 15 July](#).

The [revised Coronavirus Control Plan](#) can be seen on the Welsh Government website. The SIA for the Control Plan will be published shortly.

This document aims to capture an assessment of the impact of the easements that will potentially be made or signalled during the 21 Day Review on 5 August 2021 on different demographics in Welsh society. The potential easements would come into force on the 7 August and would formally move Wales into Alert Level Zero. The easements to the restrictions are as follows;

- 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).

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

The differences between Alert Level 1 and the suggested baseline measures are below.

- 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.

Legislative Background

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

This Summary Impact Assessment relates to the possible amendments made to The Health Protection (Coronavirus Restrictions) (No. 5) (Wales) Regulations 2020 as a result of the 21 Day Review on 05 August 2021

Review of the restrictions regulations

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

Impact Assessments

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

- i. Meeting any number of people indoors for any reason including private, hospitality and holiday accommodation places. This also includes meeting for activities and events
- ii. Nightclub and adult entertainment venues

I. Meeting any number of people indoors for any reason including private, hospitality and holiday accommodation places. This also includes meeting for activities and events

WELLBEING IMPACTS

There are significant negative impacts associated with restricting people socialising.

The 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.

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.¹

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 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.²

ECONOMIC IMPACTS

¹ <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/>

² [Coronavirus and depression in adults, Great Britain - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/healthandlife/articles/coronavirus-and-depression-in-adults-great-britain-2021)

As these changes are focussed on the ability for more than 6 people to meet in private homes, it is unlikely to have a significant impact on the economy. It could lead to people travelling further and more frequently to meet in other people's homes. This may have a marginal positive impact if it encourages people to spend more on goods and service as a result of increased socialisation. Conversely if people choose to do more activities at home rather than going out, this could have a marginal negative impact if people spend less. It is likely that both these effects will be very small and have minimal impact on economic output.

However, there could be an impact in removing restrictions on numbers allowed to stay in holiday accommodation. In 2018 the whole of the Accommodation sector was worth £820 million of gross value added (GVA) to the Welsh economy, equivalent to 1.3% total GVA for the same year. In 2019 the sector employed approximately 32,000 across Wales and there were 1,855 branches of accommodation business across Wales.

In terms of patterns of trips taken by different party sizes, this is stable over time but it is not possible to ascertain what proportion are from mixed household groups. 2019 overnight domestic visitors to Wales:

- 18% solo traveller
- 36% party of 2
- 15% party of 3
- 15% party of 4
- 8% party of 5
- 7% party of 6-9

Therefore, as the proportion of trips taken by large party groups is small, the easement is likely to have minimal economic impact. However, this impact will be larger for certain sub sectors that can accommodate large/mixed groups. For examples, hostels in Wales, which over the last few years have reported steady, strong bed occupancy rates and reported 54% occupancy in 2019 saw an average of only 10% bedspace occupancy in 2020 which would have been heavily impacted upon by this easement and social distancing regulations.

The easement is also likely to have an impact on the value of spending that is made on trips that involve a stay in friends and relative's home. In 2019 the volume and value of this trips were:

- £165.9m
- 2.256m trips
- 7.227m nights

ENVIRONMENTAL IMPACTS

The potential increased movement of people could have an impact on air quality as people begin to travel longer distances within and to Wales. The current health situation and constrained public transport capacity will lead to a greater use of private vehicles and limited use of car sharing. Active travel is being actively promoted, but this is unlikely to be viable for longer distances.

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

Impact Assessments

Equality impacts

An assessment of impacts by protected characteristics is set out below. In general terms the proposal promotes equality as it allows any number of people from any number of households to meet for any reason indoors in private settings and in holiday accommodation that will have affected different groups in different ways.

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>	<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>	Survey responses highlight younger people (18-29) are most likely age group to be worried about their mental health and to feel isolated. People over 70 are more likely to be worried about their health and the risks of contracting COVID-19, but	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.

Protected characteristic or group	Assessment of impact: positive or negative	Summary of assessment	(Proposed) mitigating action
	<p><i>Negative:</i> People of all ages, but particularly older people, may be concerned about increased risks from an increase in people meeting indoors</p>	<p>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 tourism is substantially higher for people aged 16-24. Years. Whilst data is not specifically available for</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>

Protected characteristic or group	Assessment of impact: positive or negative	Summary of assessment	(Proposed) mitigating action
		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>Disability (consider the social model of disability³ 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: 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.</p> <p>Positive: reduction in wearing of face-masks will help those who rely on lip-reading as a key part of their communication methods.</p> <p>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</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 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</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> <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</p>

³ 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’.

Protected characteristic or group	Assessment of impact: positive or negative	Summary of assessment	(Proposed) mitigating action
	<p>because of increased health risks, disabled people may be 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 and mask wearing are removed..</p>	<p>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>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>
<p><i>Gender Reassignment (the act of</i></p>	<p><i>Positive:</i> The ability to access support networks may have been constrained</p>	<p><i>No specific evidence identified</i></p>	<p><i>N/A</i></p>

Protected characteristic or group	Assessment of impact: positive or negative	Summary of assessment	(Proposed) mitigating action
<i>transitioning and Transgender people)</i>	by the restrictions which would negatively affect wellbeing.		
<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>	N/A
<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 heightened concerns about easing restrictions.</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</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.

Protected characteristic or group	Assessment of impact: positive or negative	Summary of assessment	(Proposed) mitigating action
	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.		
<i>Religion, belief and non-belief</i>	<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 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</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>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>Provisions for risk assessments and reasonable measure to minimise exposure to and spread of coronavirus will remain to mitigate these risks.</p>

Protected characteristic or group	Assessment of impact: positive or negative	Summary of assessment	(Proposed) mitigating action
	<p>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>		
<i>Sex / Gender</i>	<p><i>Positive:</i> The restrictions appear to affect different sexes in different ways, which could be mitigated by relaxation.</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</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>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>

Protected characteristic or group	Assessment of impact: positive or negative	Summary of assessment	(Proposed) mitigating action
	<p>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 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</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>	

Protected characteristic or group	Assessment of impact: positive or negative	Summary of assessment	(Proposed) mitigating action
	<p>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>		
<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>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>	

Protected characteristic or group	Assessment of impact: positive or negative	Summary of assessment	(Proposed) mitigating action
	<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>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>		

Protected characteristic or group	Assessment of impact: positive or negative	Summary of assessment	(Proposed) mitigating action
	<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 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>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>	<p>N/A</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>The survey 'Coronavirus and Me' of approx. 23,000 children and young people in Wales provides some insight into their experiences of the coronavirus pandemic and their reactions, hopes and concerns for the future (Article 12, UNCRC).</p>	<p>N/A</p>

Protected characteristic or group	Assessment of impact: positive or negative	Summary of assessment	(Proposed) mitigating action
	Negative: parents returning to work could cause feelings of anxiety where there has been significant contact as a result of lockdown.	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%)	

Human Rights and UN Conventions

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

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

United Nations Convention on the Rights of the Child

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

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

Children under 11 are excluded from the restrictions on meeting outdoors. This easement will mitigate the restrictions on older children and allow them to meet with more of their friends at the same time. These rights will still be constrained by the need to contain the spread of the virus and protect public health (e.g. continued physical distancing).

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

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

Welsh Language

The proposal does not have any identified negative impact on the Welsh language. In general terms the ability to meet with people from up to five other households outdoors could have a positive effect on the use of the Welsh language. This will enable Welsh speakers to meet with other Welsh speakers across Wales and beyond. Welsh medium education is not affected by this proposal.

II. Nightclubs and Adult entertainment Venues

Ministers need to take account the considerations below in making a final decision. These assessments consider the extent to which a restriction may be disproportionate due to its wider impact on social, economic and environmental wellbeing and reflect the public sector equality duty.

WELLBEING IMPACTS

Survey evidence provides a snapshot of mental wellbeing across Wales as restrictions remain in place. Public Health Wales' *Public Engagement Survey on Health and Wellbeing during Coronavirus Measures*, for the week 21 to 27 June, showed that 14% were worrying about their mental health a lot (36% a little), and 33% said their mental health was worse than before the pandemic.⁴ The mental health charity Mind published survey evidence last year suggesting that more than half of adults and young people in the UK had experienced a deterioration in their mental health as restrictions have remained in place, with young adults being worse affected.⁵

It is well-established that unemployment is associated with low levels of wellbeing and worsening health. Increasingly, adverse effects will also be felt by new entrants to the labour market should they enter the labour market during an economic downturn. There is academic evidence that adverse labour market experiences in recession can have life-long effects on the economic, health, wellbeing and even life-expectancy of young people.⁶

ECONOMIC IMPACTS

Economic significance of sector

According to ONS data, the whole of the *Food and Beverage Service* sector contributed £1.3billion of gross value added (GVA) to the Welsh economy in 2018, equivalent to 2% total GVA for the same year. In 2019 using Business Register and Employment Survey (BRES) data, there were an estimated 85,500 people directly

⁴ PHW [Public Engagement Survey on Health and Wellbeing During Coronavirus measures](#) 21-27 June

⁵ Mind (2020) The mental health emergency: How has the coronavirus pandemic impacted our mental health?

⁶ See: <https://voxeu.org/article/impact-covid-19-chronic-health-uk>

employed in the 'Hospitality - Pubs, Cafes and Restaurants' sector in Wales, 6.7% of total employment.⁷ 6,000 of these jobs were in licenced clubs.⁸

The hospitality sector is also fundamental to the foundation economy. Local companies often source food and drink from local suppliers. There is a clear knock on impact of the closure of the hospitality sector on the food and drink supply sector – for example, 50% of milk that is supplied by farmers generally goes to the hospitality sector. Although there has been a 15% uplift in the domestic consumption this does not make up for the drop from hospitality. Welsh Government has had to step in to support farmers as a result.

In 2019 22% of domestic leisure trips of 3+ hours involved going out for a meal, and for 9% of all visits (13.5 million trips out, with associated spend of £500m) this was the main reason for the trip. 19% involved going on a night out to a pub or club, and for 10% of all visits (15.2 million trips out, with associated spend of £449m) this was the main reason for the trip. Associated spending includes all parts of the leisure trip, and data for expenditure on eating and drinking in particular is not available. For overnight trips to Wales, direct spending on eating and drinking out during 2019 was £428m, 28% of the total trip cost, on average.⁹

General economic impacts

Annual UK Gross Domestic Product (GDP) fell by 9.9% in 2020 Arts Entertainment and Recreation saw a 26% fall, though food and beverage service activities showed a strong bounce-back during August 2020.

The ONS' Business Insights and Conditions Survey (BICS) provides insights to the effects of restrictions across the UK on the broad *Accommodation and Food Service Activities* sector.¹⁰ Along with *Arts, Entertainment, and Recreation* it is one of the areas of the UK economy that has been most severely impacted by the health pandemic and associated restrictions; as of mid June 9 in 10 UK accommodation and food service businesses were trading, in line with the average for UK

⁷ Defined 2-digit SIC2007 code (56) Food and Beverage service activities i.e. restaurants, cafes, takeaway food, pubs / bars, clubs, and event catering

⁸ Defined as SIC2007 code 56301 Licenced Clubs (includes nightclubs and social clubs)

⁹ Source: GBTS, 2019. Internal analysis

¹⁰ Covering the period 18 May to 31 May.

businesses overall¹¹. As expected these two sectors continue to report the most significant drops in business turnover, with half of UK accommodation and food service businesses saying their turnover had decreased, compared with 3 in 10 UK businesses overall.

The nature of pubs, cafes, and restaurants is that much of the demand (and associated revenues) lost since restrictions were put in place may potentially be lost and not recovered once restrictions are eased. Forgone consumption in this sector is unlikely to build up and be released (pent-up demand) in ways that are conceivable for other sectors that may sell goods and/or services.

Employment and Income Effects

Many companies are utilising the UK Government Coronavirus Job Retention Scheme to furlough staff or other forms of support. Up to 31 June 2021 The CJRS ensured that should workers be furloughed the UK Government guaranteed 80% of their normal salaried income (with employers allowed to top up at their discretion). In the BICS survey for 5-18 April, 6% of UK workers were on furlough, compared with 13% of Accommodation and food services workers and 18% of Arts, entertainment and recreation workers (the worst impacted industry reported). . From 1 July the level of CJRS grant has been reduced to fund 70% of workers normal salaried income and from 1 August will be reduced to 60%.

For many in Wales the COVID-19 pandemic has had a detrimental impact on their household incomes. Survey evidence suggests that 14% of people are in a worse financial situation as a result of the coronavirus, while 21% report being better off.¹² Concerns have been raised that the coronavirus is having a detrimental impact on the finances of poorer households, particularly those whose members work in shutdown sectors. These households are less likely to be able to reduce their spending significantly as a result of coronavirus in the same way that richer households will be able to, meaning they are more likely to be financing their spending during restrictions using savings (which may be limited) and accumulating debt.¹³ Those with lower incomes have been more likely to see their income

¹¹ The percentage of businesses in the UK reporting that they were continuing to trade was 91% for the Accommodation and Food Services sector and 93% for the Arts, Entertainment, and Recreation sector. The UK all-sector average was 88%.

¹² Public Health Wales (2021) [Public Engagement Survey on Health and Wellbeing during Coronavirus Measures](#): Week 64: 21-27 June 2021.

¹³ 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.

reduced, and lower-paid workers have been more likely than those on higher pay to have been furloughed or lost their jobs.¹⁴

Workforce

The workforces for tourism and hospitality both areas of the economy tend to be disproportionately lower educated, younger, Black, Asian and Minority Ethnic workers, and command salaries significantly below the Welsh average (median) – many of these are groups that typically experience the worst persistent impacts on their health, earnings, and employment potential as a result of economic downturns.

Supply chain / value of hospitality to Welsh economy

In 2018 the whole of the food and beverage service sector was worth £1.3billion of gross value added (GVA) to the Welsh economy. This was equivalent to 2% and 1.2% respectively of all GVA for that same year. While internal UK market goods flow statistics are not available, Welsh hospitality will in many instances be buying produce and manufactured goods directly from Welsh firms, so there are likely to be supply chain benefits to increased levels of economic activity being permitted in the sector – however quantifying that impact is not possible.

ENVIRONMENTAL IMPACTS

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

ENABLER INTERDEPENDENCIES

¹⁴ Resolution Foundation: [Incomes, savings and spending through the coronavirus crisis](#) November 2020

Childcare

Welsh Government analysis suggests that there are 11,400 adults employed within the pubs and restaurants sector – which includes nightclubs and SEVs? who have children aged 16 and under. At present we do not have any analysis which allows us to understand how many of these may need formal childcare arrangements in place in order to return to work.

Transport

Data from the 2014/15 National Survey of Wales records the mode of transport people used to travel to pubs, cafes, etc. It showed that (non-exclusively) 47% of people used a car as a usual form of travel to pubs, cafes, and restaurants, 43% walked, and 8% used buses, and 9% used taxis. This raises a potential issue that needs consideration, which is around the potential risk of an increase in drink driving offenses should people refrain or not be permitted to use taxis (due to distancing rules) after drinking alcohol. There is also potential for increased anti-social behaviour and public order issues from excessive alcohol consumption presenting issues for train/bus staff and taxi/PHV drivers.

IMPACT ASSESSMENTS

Equality impacts

An assessment of impacts by protected characteristics is set out below. In general terms the proposal promotes equality as it removes restrictions on travel that will have affected different groups in different ways. Potential negative impacts relate to the risks of adaptations being made to outdoor places not fully taking into account the needs of different groups. These are primarily about equality of access.

<i>Protected characteristic or group</i>	<i>What are the positive or negative impacts of the proposal?</i>	<i>Reasons for your decision (including evidence)</i>	<i>How will you mitigate Impacts?</i>
<i>Age (think about different age groups)</i>	Positive: Younger cohorts of the population are significantly more likely to work within nightclubs in Wales than older cohorts,	Analysis by Welsh Government of Annual Population Survey (APS) data for 2019 shows that 46% of workers in pubs, cafes, and restaurants in	Mitigations that the sector have been asked to implement and limited reopening in first instance are aimed at reducing the risk of transmission

<i>Protected characteristic or group</i>	<i>What are the positive or negative impacts of the proposal?</i>	<i>Reasons for your decision (including evidence)</i>	<i>How will you mitigate Impacts?</i>
	<p>therefore opening them 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.</p>	<p>Wales are under the age of 25 (while this age group only represents 12% of workforce).</p>	<p>for all groups; customers and staff.</p> <p>Risk assessments that businesses need to conduct should be used to identify disproportionate risks to certain groups.</p>
<i>Disability (think about different types of disability)</i>	<p>Positive: Disabled population in Wales represent a higher share of employees within the pubs and restaurants sector than they do in the workforce as a whole, therefore opening sector could have positive distributional impacts if it prevents potential job losses and increases household incomes by transferring individuals off the</p>	<p>Analysis of APS data for 2019 suggests that the proportion of disabled people working in pubs and restaurants in Wales, is higher than average with 19% of the workforce being classified as disabled (this group represents 15% of the wider workforce).</p>	<p>Welsh Government are aware of potential issues and are engaging with appropriate groups in preparation of completing an Integrated Impact Assessment.</p> <p>Risk assessments that businesses need to conduct should be used to identify disproportionate impacts on certain groups.</p>

<i>Protected characteristic or group</i>	<i>What are the positive or negative impacts of the proposal?</i>	<i>Reasons for your decision (including evidence)</i>	<i>How will you mitigate Impacts?</i>
	UK's Job Retention Scheme.		
<i>Gender Reassignment (the act of transitioning and Transgender people)</i>	No specific differential impacts identified.	N/A	N/A
<i>Pregnancy and maternity</i>	Negative: Planned reopening of the sector may result in 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.	N/A	Welsh Government are aware of potential issues and are engaging with appropriate groups in preparation of completing an Integrated Impact Assessment.
<i>Race (include different ethnic minorities, Gypsies and Travellers and Migrants, Asylum seekers and Refugees)</i>	Positive: Black, Asian and Minority Ethnic populations are more likely to work within the hospitality sector in Wales than 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.	Analysis of APS data for 2019 estimates that 12% of workers in pubs and restaurants in Wales are Black, Asian and Minority Ethnic (while this group only represents 5% of the Welsh workforce).	Mitigations that the sector have been asked to implement and limited reopening in first instance are aimed at reducing the risk of transmission for all groups; customers and staff. Risk assessments that businesses will need to conduct should be used to identify disproportionate risks to certain groups.

<i>Protected characteristic or group</i>	<i>What are the positive or negative impacts of the proposal?</i>	<i>Reasons for your decision (including evidence)</i>	<i>How will you mitigate Impacts?</i>
	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 of the sector.		
<i>Religion, belief and non-belief</i>	No specific differential impact identified.	N/A	N/A
<i>Sex / Gender</i>	Positive: proportion of sector employees who are women slightly higher than for Welsh workforce as a whole.	Analysis of APS data for 2019 estimates that 50% of workers in Wales within pubs and restaurants are female, while women represent 47% of the total Welsh workforce.	No specific negative impacts from the proposal.
<i>Sexual orientation (Lesbian, Gay and Bisexual)</i>	No specific differential impact identified.	N/A	N/A
<i>Marriage and civil partnership</i>	No specific differential impact identified.	N/A	N/A
<i>Children and young people up to the age of 18</i>	Negative: Adults employed within pubs, cafes, nightclubs and restaurants could have childcare responsibilities. Traditional forms of childcare may have been disrupted by current lockdown restrictions.	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.	The Welsh Government has eased restrictions on childcare sector with a view to easing the pressures on families who may have adults who need to return to physical premises to work.

<i>Protected characteristic or group</i>	<i>What are the positive or negative impacts of the proposal?</i>	<i>Reasons for your decision (including evidence)</i>	<i>How will you mitigate Impacts?</i>
<i>Low-income households</i>	Positive: Allowing members of this sector to return to work has the capacity to mitigate job losses	<p>Provisional data from the Annual Survey of Hours and Earnings provides estimates for hourly and weekly gross pay by 2-digit SIC codes in Wales. For Food and Beverage Service Activities (SIC code 56) median gross hourly pay was £8.28 - £3.91 lower than the Welsh median for all employee jobs of £12.19. For weekly gross pay in this sector the median is £197.30, approximately £243.50 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>	No specific negative impacts from proposal.

Human Rights and UN Conventions

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

reason to curtail these rights, as long as it is necessary and proportionate. Notwithstanding the ongoing constraints from lockdown in the round, this proposal in affects the following:

<i>Human Rights</i>	<i>What are the positive or negative impacts of the proposal?</i>	<i>Reasons for your decision (including evidence)</i>	<i>How will you mitigate negative Impacts?</i>
The right to enjoy family relationships without interference from government (e.g. right to live with your family and to regular contact)	Positive: allowing nightclubs and SEVs to reopen will facilitate the return to work of many employees within the sector who currently could be earning below the National Living and Minimum Wages due to receiving 80% of their pre-crisis income.	Income data from Annual Survey of Hours and Earnings shows that workers in this sector earn significantly below the average (median) Welsh wage and many are likely to be earning less than the National Living/Minimum wage as a result of being furloughed.	No specific negative impacts from the proposal.

United Nations Convention on the Rights of the Child

The opening of indoor hospitality supports the requirement that all children and young people have a right to relax, play and to join in a wide range of activities. Indoor hospitality form part of the provision of experiences and facilities that will be family-orientated that will maximise the outcomes that can be delivered for children and young people.

Welsh Language

There are 150,000 people directly employed in the visitor economy - around 12% of the workforce. The economy is integral to creating the social conditions where Welsh speakers can stay in Welsh-speaking communities, or return to those communities. Many predominantly Welsh-speaking areas are highly dependent on tourism for income and employment.

Welsh speaking communities will benefit from the continuing operation of hospitality businesses which in turn will help create and safeguard employment, potentially encouraging Welsh speakers to stay and work there, and thus maintain the viability of the language.