



Llywodraeth Cymru
Welsh Government

MA/L/VG/0809/20

From: Neil Surman, Name Redacted
Public Health Division
I&S
Cleared by: Neil Surman
Date: 6 March 2020

MINISTERIAL ADVICE

For decision by: Minister for Health and Social Services, Minister for Education, Deputy Minister for Health and Social Services, Minister for Housing and Local Government.

Copied to: Minister for Economy Transport and North Wales, Minister for Environment, Energy and Rural Affairs, Minister for Finance and Trefnydd, Counsel General and Minister for European Transition and the First Minister.

Subject	Draft UK Coronavirus (Emergency) Bill
100 word summary	Ministers are asked to note the instructions issued to the UK government in relation to the Coronavirus Bill and to indicate whether they are content with the approach taken.
Timing	<p>URGENT, the OPC deadline was COP Thursday 5 March for policy / legal instructions from Devolved Administrations to include Welsh clauses to be included in the UK draft Bill.</p> <p>If on consideration Ministers wish to instruct differently, notice will need to be given to the UK Government by Monday, 9 March at the latest.</p>
Recommendation	<p>The Minister for Health and Social Services, Minister for Education, Deputy Minister for Health and Social Services and Minister for Housing and Local Government are asked to:</p> <ul style="list-style-type: none">• Note that with the prior agreement of the FM, officials and LS have submitted initial instructions to DHSC and the Office of Parliamentary Counsel (OPC) on the provisions set out in Annex 1;• Agree that the instructions submitted so far to OPC are appropriate and consistent with Ministers' policy intentions for Wales;• Note that, subject to your agreement, officials will continue to work with DHSC (as UKG co-ordinator for the Bill) and Cabinet Office for the Wales provisions to be inserted into the draft Coronavirus Bill; and• Note that further advice will follow concerning the Legislative Consent Motion to allow Wales clauses to be included in the UK Bill.

	<p>The Minister for Environment, Energy and Rural Affairs, Minister for Economy, Transport and North Wales, Counsel General and Minister for European Transition and First Minister are asked to:</p> <ul style="list-style-type: none"> • Note the advice on instructions to OPC outlined in the MA and annex 1; • Note that officials will continue to work with DHSC and Cabinet Office for the relevant Welsh provisions to be inserted into the draft Coronavirus Bill; and • Note that further advice will follow concerning the Legislative Consent Motion to allow Wales clauses to be included in the UK Bill. <p>The Minister Finance and Trefnydd is asked to:</p> <ul style="list-style-type: none"> • Note the proposed approach outlined in the MA and annex 1; • Note that officials will continue to work with DHSC and Cabinet Office for the Welsh provisions to be inserted into the draft Coronavirus Bill; and • Note that further advice will follow in respect of e) above (including funding or expenditure items).
Decision report	This decision does not require a Decision Report.

ADVICE

1. Context - What is the situation that has led to this advice?

1.1 Background

1.2 On 8 October 2019 the Minister for Health and Social Services agreed the drafting of Welsh Provisions to be included in the draft Pandemic Influenza (Emergency) Bill (MA - L/VG/0643/19 refers), which was then almost complete.

1.3 UK Government Cabinet Office were the initial lead Department for the draft Pandemic Influenza (Emergency) Bill, and developing as part of a 4 nation approach to ensure a co-ordinated response in all parts of the UK.

1.4 Since the Coronavirus outbreak, there have been ongoing discussions between policy and legal officials across Government (and with other Devolved Administrations) to adapt the draft Pandemic Influenza (Emergency) Bill to ensure it is also relevant to Coronavirus. This work has involved combining the original draft clauses for the draft Pandemic Influenza (Emergency) Bill with

additional provisions for Coronavirus to enable Ministers and, where appropriate local authorities, to respond flexibly during a pandemic.

1.5 Current Position

- 1.6 The ownership of this Bill was recently transferred to the Department of Health and Social Care (DHSC) in UKG, who appointed a bill team on 20 February to take forward the work. With the spread of Coronavirus, the draft Pandemic Influenza (Emergency) Bill has been renamed the Coronavirus Bill. It is a UK Parliament Bill.
- 1.7 The draft Coronavirus Bill includes a range of additional health, social care, education, and miscellaneous related provisions; the Minister for Health and Social Services is the lead Minister for Wales. The Minister, supported by the Chief Medical Officer, has been providing weekly updates to the Senedd <https://gov.wales/coronavirus-covid-19> / <https://llyw.cymru/coronafeirws-covid-19>. UK Government proposals are not yet fully developed and Whitehall officials are still working with their respective Ministers to ensure the Bill's scope extends sufficiently and appropriately to enable each of their sectors to respond in England.
- 1.8 Ministers have been kept briefed on the timetable for the Bill. The original timeline for the draft Bill indicated it would be presented to the UK Parliament on 24 March 2020 for Royal Assent on 31 March. However, recent discussions with the DHSC Bill Team have confirmed that the introduction date has been moved to 19 March, and UKG Ministers are currently considering whether this could be brought forward still further (possibly to 16 March). In view of the very short time available to finalise policy and instruct Parliamentary Counsel officials and lawyers have worked closely together to formulate an initial response to the Bill and to instruct appropriately for Wales. The FM indicated he was content for instructions to issue to OPC ahead of formal Ministerial clearance and this has now been completed.
- 1.9 The intention is that provisions of the Bill would only be brought into force for a specified period at the height(s) of any outbreak. Further detail is awaited to clarify the thresholds and decision making processes that would trigger relevant provisions coming into force. In keeping with the steer given by the FM, officials and lawyers have sought throughout to ensure that in respect of devolved powers in Wales the instructions are drafted to provide Welsh Ministers will maximum flexibility in relation to how the powers can be used in Wales.

2. What is your advice to the Minister?

- 2.1 The provisions of the Bill span health, social care, education, childcare and other miscellaneous topics, a list of all devolved and reserved provisions is contained within Annex A.

2.2 Health and Social care

- Mandatory Vaccinations – Ministers may wish to note that the proposed provision in relation to Mandatory Vaccinations has now been removed from the list of Bill provisions;
- Indemnity for pandemic-related health service activity – the proposed provision would permit the Secretary of State to provide emergency indemnity coverage for health care workers who provide care or diagnostic services during the pandemic;
- Isolation and detention powers in respect of asymptomatic and symptomatic individuals into quarantine for screening and medical assessment in order to reduce the risk of spreading the virus to others;
- Mass gatherings – power of direction which allows restrictions to be placed on an event or a gathering;
- Exemptions to pension scheme rules that could catch out doctors that have retired or taken on a pension;
- Temporary modifications to the Mental Health Act 1983 so fewer health professionals are needed to undertake certain functions (e.g. a decision on an application for compulsory admission to hospital for assessment or treatment);
- Excess deaths management;
- Relaxation of requirement for enhanced DBS check to have been obtained before health workers and social care workers start work;
- This provision would avoid delays for health workers or social workers who are taken on by providers of regulated social care services and regulated independent health care services to meet sharp increases in demand for services;
- Discharge – allows a local authority, during the emergency period to complete a social care needs assessment for an adult in hospital without the involvement of the adult their carer and other specified individuals, or of an independent advocate;
- Reduction in Local Authority Service under the Social Services and Well-being (Wales) Act 2014 (the 2014 Act) Ensure that a Local Authority can, in a RWCS, carry out fewer/slower assessments of need and ration the services it provides as a consequence without falling foul of its duties under the 2014 Act; and
- LA Services under the 2014 Act - Sickness of care providers. Powers to enable the Welsh Ministers to direct LA's in relation to the provision of services under the 2014 Act.

2.3 Education and Childcare

2.4 The proposed provisions in the Bill will provide powers in relation to education and childcare and play settings. In terms of education settings, the provisions would cover schools, further education institutions and higher education institutions (educational institutions). In terms of childcare settings, the provisions would cover maintained settings and non-maintained settings registered with the Care Inspectorate Wales.

- Power to close schools, further education and childcare settings
- Power to make directions in connection with the running of the education and registered childcare system and other education / childcare functions
- Powers to dis-apply existing requirements in education and childcare legislation
- Power to require educational institutions and registered childcare providers to take on additional functions

2.5 Miscellaneous

- To give Border Force officers a power of initial detention of persons to enable screening and assessment – there is currently a proposed power for the Secretary of State for the Home Department to direct the suspension of port operations where a minimum level of border security cannot be provided;
- Statutory Sick Pay (SSP);
- Requiring the exercise of skills or use of expertise;
- Power to direct private actors in the death management industry (funeral directors, mortuaries, crematorium) to implement their central plans. Such as ability to direct crematorium to extend opening hours, direct funeral directors to move bodies to regional storage facilities or place of disposal, assigning of roles and responsibilities;
- To give Border Force officers a power of initial detention of persons to enable screening and assessment;
- Power to suspend operations at a specific port where the minimum level of border security cannot be provided; and
- Commencement and sunseting.

2.6 Risks

2.7 Short time in which to consider policy instructions and to instruct OPC

2.8 Although both policy officials and Legal Services in Welsh Government have been engaging throughout the draft Pandemic Influenza (Emergency) Bill, UK

Government was very late in providing drafts of policy instructions for the additional clauses proposed for the new Coronavirus Bill. As a result, Welsh Government and other Devolved Administrations have had only a matter of days to consider the implications of the proposed provisions as they relate to Wales and to formulate an appropriate response.

2.9 Timeline adjustments for Introduction and Royal Assent

2.10 UK Government Officials and Ministers have not yet agreed a final date to introduce the legislation. The current Bill timetable notes introduction for the 19 March however UKG Ministers are currently considering whether this could be brought forward still further. If the date of introduction is brought forward, this will impact on the remaining drafting time for OPC and the ability of officials and lawyers to continue to engage with Whitehall on the detail of the new provisions. This may impact the quality of the legislation or may delay Royal Assent.

2.11 Any delay in Royal Assent might mean that wider Civil Contingencies legislation would have to be relied upon to deal with the impact of a widespread outbreak.

2.12 The Bill will require a Legislative Consent Motion (LCM) to be passed in the Senedd.

2.13 In view of the scale of the threat presented by the coronavirus outbreak, the pace at which the current situation is developing, and the desirability of a UK-wide response, no separate work has yet been undertaken on a potential emergency devolved Bill for Wales. To formulate the provisions of such a Bill would anyway require that we be able to take into account relevant provisions made for England and other DAs and would mean that effective legislation for Wales could only be introduced later than for other UK jurisdictions.

3. What legal or policy obligations are relevant to this advice?

Legal

3.1 Legal Services have been consulted and their comments have been incorporated into this MA and the attached Annex.

3.2 The draft Coronavirus Bill ("the Bill") contains measures designed to either streamline existing statutory provisions or introduce new statutory powers which are designed to support the UK Government's and the Devolved Administrations' (DAs) overall response to coronavirus.

3.3 Welsh Government officials have requested that the Bill provisions include powers for the Welsh Ministers (and if appropriate local authorities in Wales):

- To direct closure of schools, further education institutions (including independent training providers that have contracts for the delivery of learning with Welsh Ministers) and universities;
- To direct to move teachers and pupils from one school to another;
- To amend requirements for teacher-pupil ratios and qualifications;
- To direct additional functions or use of education premises;

- To direct the closure of registered childminding and day care settings; to make directions in relation to the running of settings; to disapply certain requirements set out in legislation governing registered childcare in Wales;
- To require local authorities or other relevant institutions to take on additional functions and make available premises not normally used for childcare;
- Requisition chattels, land or buildings to optimise body storage;
- To direct local authorities in relation to the exercise of functions to provide care and support under the Social Services and Well-being (Wales) Act 2014;
- To indemnify healthcare and social care workers or volunteers;
- To give directions to prevent mass gatherings;
- To screen, contain and isolate those who may or are likely to be infected; and
- To relax requirement for DSB checks to be completed for health and social worker before undertaking the provision of health and social care services.

3.4 With regard to the final provision this will be a Wales only provision, subject to further information from the devolved administrations. The arrangements England currently has with the DBS enable workers in health and social care setting to commence work prior to receipt of a DSB certificate provided they are not listed on the barred list. In order to achieve the same outcome legislation may be required for Wales. This is still being scoped by policy officials.

3.5 The Bill provisions are likely to include powers for the Secretary of State in relation to Wales to:

- Management of death registration;
- Registration of emergency health care workers;
- Provide employment law safeguards and compensation for voluntary sector persons assisting in providing assistance in health, community health and social care settings;
- Make arrangements for Statutory Sick Pay rebate;
- Relaxation of NHS pension restrictions for those health care workers returning to work;
- Powers for Border Force officers to detain; and
- Powers to suspend operations at specific ports.

3.6 Devolved Areas

3.7 As can be seen from the above discussion and the more detailed legal analysis attached at [Annex A], many of the proposed Bill provisions concern the primarily devolved areas of health, social care and education. It is therefore anticipated that in a Welsh context, a range of new powers for Welsh Ministers (and if appropriate local authorities in Wales) would be the result of many of the proposed provisions. In these areas, it is anticipated that the rationale for a decision to take these powers through the proposed UK Bill (rather than an Assembly Bill) would primarily be on the basis of urgency and consistency of approach, given the extenuating circumstances and noting the intention for this Bill to be time limited in its effect.

3.8 Similarly, some proposals (notably the proposal to give Ministers, public health consultants and police powers to screen, isolate and detain) could be achieved by Welsh Ministers exercising existing executive powers to make secondary legislation but the rationale for doing this through the proposed UK Bill would be on the basis of

3.9 urgency, consistency of approach and ensuring complete coverage in areas where existing powers may not go far enough to deliver the complete proposal. For example, in the context of the proposed provisions on screening, isolation and detention, there is a proposed provision that is arguably outside of Welsh Ministers regulation making powers.

3.10 Commencement and sunseting

3.11 The Bill is scheduled to receive Royal Assent on the 31 March 2020 and will remain in force for a period of 2 years. There will be a power to extend the Bill for longer (by up to 6 months at a time) - but it is not intended that this should be used to keep any measures in force on a permanent basis. On Royal Assent the provisions in the Bill will not all automatically be come into force.

3.12 Any provisions not specified as coming into force on Royal Assent may come into force at a later date via commencement regulations.

3.13 The Bill will also make provision to suspend and revive any of the provisions during the 2 year life of the Act. The rationale being that this will accommodate the fact that the coronavirus emergency might have multiple peaks (e.g. a spring peak and a winter peak) and would enable Ministers to switch the provisions on during peak and off in between peaks.

3.14 The intention is on/off switch will apply to all the substantive provisions in the Bill - so will not needed to be replicated in individual clauses.

3.15 Procedure for commencement, suspension or extension of the Bill provisions

3.16 The proposed mechanism would be that the Bill would specify that devolved administration Ministers by way of a no procedure order making power, commence or suspend the provisions in the Bill which are within their own competence. UK Ministers may also make these commencement or suspension orders for the whole of the UK, but will require the consent of relevant devolved administration Ministers to do so where relating to devolved matters.

3.17 Welsh Ministers will therefore have control over provisions within their competence, while allowing for a UK-wide approach in these areas where it is in practice easier to do so. The devolved administration Ministers' consent could be achieved by way of a recorded decision under the auspices of COBR(M), if time was pressing.

3.18 The provision being proposed regarding the power to commence and revive or suspend the powers in the Bill is a concurrent plus function. This is not a new construction, this type of function has been used frequently in both secondary legislation made as part of the EU Exit programme and more recently in UK Bills related to EU Exit.

3.19 Legal Services will be liaising with the Welsh Office, as it has done in the case of EU Exit legislation, to ensure that the Senedd's competence is not restricted by bringing forward s.109 Order to amend Schedule 7B to provide a carve out from the consent provisions where they are conferred by certain enactments. Additionally, Legal

3.20 Services will also liaise with the Office of Parliamentary Counsel to ensure the Welsh Ministers executive competence is equally protected.

3.21 Legislative Consent Motion

3.22 If Welsh Ministers are minded to adopt the proposed approach, section 107(6) of the Government of Wales Act 2006 ("GoWA") is relevant as *"it is recognised that the Parliament of the United Kingdom will not normally legislate with regard to devolved matters without the consent of the Assembly"*. Legal Services' provisional view is that the key devolved provisions referred to above would fall within the legislative competence of the Senedd. This analysis will be kept under review as we begin to see draft provisions for the Bill. The process by which this consent is obtained is to invite the Senedd to agree to a legislative consent motion ("LCM") and Standing Order 29 sets out the usual procedure. This process takes approximately 8 weeks in order for appropriate scrutiny and reporting time for the Senedd's Business Committee and any relevant subject matter committees. A debate on the LCM is then held usually within a week of the scrutiny report being published.

3.33 Early discussion with Constitutional Affairs and Inter-Governmental Relations (CAIGR) during the development of the Pandemic Influenza Bill confirmed that it maybe be possible to expedite the LCM process and complete the process within approximately one sitting week of the Senedd, if necessary. The process would involve laying the required memorandum and tabling the motion (the LCM itself) at the same time in the Senedd and arranging a debate within the week, potentially without any Senedd committee scrutiny. If the debate was urgent the First Minister may make a request to the Presiding Officer to summon the Senedd to consider it under Standing Order 12.3.

3.34 Expediting the LCM in this manner may require agreement to suspend the relevant Standing Orders, requiring two thirds of Assembly Members agreeing to suspend the Standing Orders and debate an expedited LCM. Therefore, immediately prior to the LCM debate itself, a motion to suspend the required standing orders would need to be considered by the Senedd. However, it is of note that Standing Order 29 refers to the timings and requirements 'normally' being required and in such an emergency period there may be scope to relax the requirements normally required. Early discussions around this with CAIGR and the Senedd are therefore advisable.

3.35 Reserved Areas

As noted above, there are a number of proposed provisions that relate to areas that are reserved under Schedule 7A of the Government of Wales Act 2006 (e.g. pensions; registration of health professionals) where it is likely the Secretary of State will have powers in relation to Wales and where Welsh Ministers do not have executive powers. In these areas, using the proposed UK Bill would be the only means by which Wales could achieve parity of provision with England.

3.36 Statutory Powers

The representations that the Welsh Ministers will make formally to the UK government to seek provision in this Bill for Wales (and such representations already made by Welsh Government officials on behalf of Welsh Ministers) can be made under section

62 of the Government of Wales Act 2006 which empowers the Welsh Ministers, the First Minister and the Counsel General to “*make appropriate representations about any matter affecting Wales*”.

3.37 Civil Contingencies Act 2004

In the event that the UK government decide to fall back on wider civil contingencies powers contained in the Civil Contingencies Act 2004 (“the 2004 Act”) the Welsh Government’s proposed policy comments, requests and instructions to the UK Government in this MA relating to the proposed UK wide Coronavirus Bill may be considered as representations about matters which affect Wales. Section 62 of the Government of Wales Act 2006 can be relied upon for this purpose also.

3.38 The 2004 Act seeks to establish a consistent mechanism for dealing with emergency situations across the United Kingdom. It is split into two substantive parts – Part 1 which deals with the ‘local’ response to emergency situations and Part 2 which enables the UK Government to make temporary legislation to help deal with the most serious of emergencies. The Welsh Ministers have a number of functions under Part 1 of the 2004 Act which may be utilised should that need arise.

- 3.13A Accessibility of Devolved Law in Wales
- 3.13B Officials are alive to the fact that if this Bill amends devolved Welsh legislation (and it will be necessary to see the draft clauses in order to ascertain if this will be the case) then it may be that the devolved law is made in English and Welsh and that both language versions will need to be amended in the Bill. This will be kept under review.

3.39 The Well-Being of Future Generations (Wales) Act

In respect of the Well-being of Future Generations (Wales) Act, the continued capability of emergency preparedness in Wales contributes to the well-being objectives set by the Welsh Government as follows:

- a more resilient Wales – the ability to react quickly in the event of a major emergency; and

3.40 Equality and Human Rights and the Promoting Economic Opportunity for All Agenda

3.41 This Advice supports and promotes the equality and poverty agendas by ensuring that citizens of Wales have an equal access to medical supplies and care in the event of a major emergency, regardless of status or income.

3.42 All measures in the draft Coronavirus Bill are to ensure the four nations are able to respond appropriately and effectively to mitigate the effects of a severe Coronavirus pandemic. The DHSC are considering equalities in line with the Public Sector Equalities Duty when developing the policy measures to be used in a severe pandemic. The UK Government are currently producing a summary of the potential impacts, which they plan to share week commencing 2 March.

3.43 Full consideration will need to be given to the potential impact on the Welsh Language Standards, United Nations Convention on the Rights of the Child (UNCRC); Trade Union Engagement or retained EU Law, once there is clarity from UKG on the final draft Bill.

4. What are the financial implications of Ministers agreeing to this advice and which budget will this be paid through?

4.1 Cost:

There are no immediate additional financial implications arising from this advice. Costs associated with the development of the Welsh clauses for the draft Bill have been and continue to be met within existing administration costs.

4.2 In the event of a very severe pandemic, there would be a considerable burden on existing health services and other public services. Whilst the draft Bill attempts to reduce potential costs through the streamlining of services and processes, there is an expectation that the financial impact will be significant. However, this is emergency legislation and is being passed at very fast pace in exceptional circumstances. It is therefore not possible at this very early stage to provide an adequately informed and credible view of the financial implications for the purpose of this briefing. UK Government has formally commissioned financial impact estimates and officials will be working collaboratively with Knowledge and Analytical Services (KAS) and Economic Advisers over forthcoming days and weeks to undertake an analysis of this and will commit to providing further briefing to follow.

4.3 UK Government officials have advised that consideration has been given to the financial impact across the UK and high-level discussions have been held at a strategic level between DoH officials and Her Majesty's Treasury; agreement has been reached that in the extreme event of enactment, the temporary Bill would allow for the timely release of existing contingency funds. However, in the short term, there are no additional sources of funding available from the UK Government to undertake any preparatory work necessary in advance of a pandemic. We have good lines of communication with HMT on pandemic funding. Officials from all four nations are holding weekly teleconferences to discuss emerging priorities. The initial steer from HMT has been that funding can be made available if circumstances change. There are practical considerations given the point we are at in the financial year, but appropriate mechanisms do exist if needed.

4.4 In a pandemic situation, the enactment of the Bill as currently drafted would, for the most part, place no additional pressures on delivery of services other than would otherwise be currently anticipated through our current emergency planning activity. There is a singular exception:

- the Bill (as currently) drafted provides powers for the temporary closure direction of registered childminders and day care settings in Wales in the same way that schools could be directed to close. Welsh Government officials are exploring what options might be applicable to provide financial assistance if Welsh Ministers deem necessary in the circumstances to help safeguard the sustainability of the sector in Wales through a period of temporary closure and loss of income. Further advice will follow shortly on this specific issue.

4.5 The true extent of the financial impact is currently difficult to measure. Emergency measures would need to be taken and consideration of options to maximise funding, and/or redirect or reprioritise existing funding in order to support the response to the pandemic at both a Welsh and UK Government level, which may have an impact on broader Welsh Government budgets. It is anticipated that in the event of a pandemic the Welsh Government would be able to make a claim against the UK Government reserve in accordance with the Statement of Funding policy. In the event of a pandemic, should Ministers opt to pay compensation to registered childminders and day care settings in Wales, and if this decision was at variance with the UK Government position, it is likely that any costs arising would need to be met from within existing budgets and not be included in any call on UK Government Reserves. This principle extends to any decisions which may be divergent from UKG policy. Officials are working with HMT to establish clear processes for clarifying sources of funding while policy decisions are being made, to aid planning. In the event of a pandemic, the Secretary of State will write to Welsh Ministers seeking agreement to enacting the Bill and seeking the LCM process.

4.6 Further advice about the detail of a Legislative Consent Motion will follow. This will also contain further reference to any potential financial implications as assessed at that time.

4.7 HSS Finance Directorate has seen and noted the risks relating to this advice and that it complies with Finance Notice 01/2019.

4.8 The EPS Finance Team is content that this advice complies with Interim Finance Notice 01/2019 (EPS/VG/3/20)

4.9 Strategic Budgeting clearance:

- SB clearance SB1036/5
- EERA Clearance EERA/437/19
- SHELL Clearance SHELL/MFE/225/19
- HSS SE Clearance 2020/7479

5. What communication, engagement or media activity is planned following this decision?

5.1 None relating explicitly to the agreed contents of the Bill or the instructions which have been given for Wales. However, officials understand UK Ministers may be planning to make announcements about the legislation over the coming weekend and next week. Lines to take are currently being prepared for Ministers and further briefing will follow in due course.

5.2 The Minister for Health and Social Services, supported by the Chief Medical Officer are providing weekly updates to the Senedd
<https://gov.wales/coronavirus-covid-19> / <https://llyw.cymru/coronafeirws-covid-19>

5.3 Routine advice is currently being issued shared across all sectors in the UK, which reinforces the importance of robust infection control and good hygiene

practice. Further guidance will be published to support the sectors prepare and respond as the situation changes based upon the Chief Medical Officers' analysis and advice.

Annex 1: ASSURANCE AND COPY RECIPIENTS CLEARANCE TRACKING

Aspect	Tracking	Yes	No	N/A	Clearance no.
Finance	Financial implications over £50,000?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Cleared by Group Finance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Cleared by Strategic Budgeting?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Cleared by Local Government Finance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Legal	Legal issues?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Cleared by relevant lawyers?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Governance	Novel and contentious issues?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Cleared by Corporate Governance Centre of Excellence?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

DEPUTY DIRECTOR, STATEMENT OF ASSURANCE

In clearing this MA, I confirm that I, Neil Surman have quality assured this advice, ensuring it is provided on the basis of evidence, accurately presents the options and facts and I am accountable for the recommendations made

I am satisfied that the recommended decision or action, if agreed, would be lawful, affordable and comply with all relevant statutory obligations. Welsh Government policy priorities and cross portfolio implications have been fully considered in line with delivery of the government objectives.

I have fully considered the statement of assurance contained in the MA guidance to ensure all relevant considerations have been taken into account and that the actions and decisions take account of regularity, propriety and value for money.

COPY LIST

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PS First Minister
PS Minister Finance & Trefnydd
PS Special Advisers
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