

Doc 7: (Stage 2) Assessment of specific restrictions and measures: *Education and childcare* – widening access to settings**Restrictions under assessment**

There are no specific restrictions set out in the Regulations in relation to widening access to childcare or educational facilities, which are already included as a reasonable excuse under Regulation 8.

Widening access to childcare and education represents a policy choice, but one that could have a significant impact on transmission rates and the underlying health objectives under which the Regulations were enacted.

Three key areas are considered in this assessment:

- Opening up schools to particular cohorts as part of a phased reopening
- Opening up FE institutions to particular cohorts as part of a phased reopening
- Widening childcare provision to support other easements.

HE has not been considered in this review as we understand planning is taking place to resume activity in September, and therefore beyond the scope of this review period.

Options continue to be tested outside of this review and are subject to further advice and modelling from SAGE. In addition to the impact on transmission rates, the factors for each of these will consider the impact on children and wellbeing, economic impact, and practicalities.

Schools

For schools options include:

1. Disadvantaged learners - Schools would be open full time to the most disadvantaged learners. This could be capped at a specific percentage or defined in another way.
2. Transition year groups - Schools would be open to focus on specific year groups who are about to make a key transition in learning. This would include years 6, and either 10 and 12 or 11 and 13, but could also include nursery into reception, years 2 or 9
3. All learners at a reduced time - Schools would be open for all learners who would attend for a limited time, depending on maximum safe capacity: for example, one day a week. Staff would similarly rotate.
4. Earlier years - Schools would open for earlier year groups first.
5. Children of parents who need to leave home to work – this would focus on children whose parents need to leave home to work.
6. Increase emergency provision – working through communications and Local authorities, work to increase take up of provision for children of critical workers and vulnerable children

FE institutions

For FE institutions options include:

1. Learners who need to complete courses - Learners who were due to complete vocational qualifications in the 2019/20 academic year, and who need to undertake practical learning and assessments in order to do so. This includes FE learners who are studying qualifications that award occupational competence, and apprentice
2. Vulnerable learners - Vulnerable learners in FE and WBL include those with safeguarding needs and supported by social care (as defined within the safeguarding of children and young people plan)
3. Disengaged learners due to IT issues - Learners who have had difficulty engaging with online learning because of a lack of appropriate equipment, connectivity or digital skills
4. Learners at risk of becoming NEET - Learners who the provider considers to be at risk of disengaging or dropping out of learning
5. All learners at a reduced time - All learners at a reduced time - Schools would be open for all learners who would attend for a limited time, depending on maximum safe capacity: for example, one day a week. Staff would similarly rotate

Childcare

On 20 March a joint statement was issued from the Minister for Education and the Deputy Minister for Health and Social Services setting out the advice at that time in relation to the care of children and young people. The advice was clear: wherever possible children should be cared for at home and only very low numbers of children should be attending schools or childcare. Childcare providers were asked to prioritise the care of children of critical workers and vulnerable children (in line with schools).

This is an important distinction. At the time of the statement the Welsh Ministers had no specific powers to require the closure of childcare providers. We gained these powers on 25 March, when the Coronavirus Act 2020 received Royal Assent, but to date we have not used them. Compliance with the request and with the wider public health messages has been high across the sector, though we are now starting to see some evidence of a change in attitude.

Prior to the pandemic there were 3,600 registered childcare settings operating in Wales, caring for children aged 0-12. These settings have just under 80,000 places registered between them. Around half of all providers are childminders, who operate from domestic premises and care for low numbers of children. The majority of places are in day nurseries, which make up around a quarter of the sector.

Since 20 March 1,640 settings have temporarily closed, mostly citing the low numbers of children in attendance and the costs of maintaining operations with a limited income. We have seen just under 50 settings look to reopen in recent weeks, with some of this driven by growing demand for childcare for the children of critical workers and vulnerable children (which Welsh Government is funding via the

Coronavirus Childcare Assistance Scheme) and increasingly from parents who are not critical workers but who are returning to work. These include people whose workplaces were able to remain open, and some whose employers are looking to reopen services following recent easements.

To support the wider easements underway it would be necessary to support an increase in the number of children able to access childcare.

The core option is to enable all settings to open to the full range of children they would usually have cared for, recognising that different types of setting care for different cohorts of children. For example, day nurseries generally care for pre-school age children; childminders for low numbers of children aged 0-12; out of school childcare for school-aged children at either end of the school day.

If it is not possible to support a full return a phased return over the summer period would be possible, starting with clarity on access to childcare for parents who are not critical workers but whose employers have opened, and for younger children who would benefit most from access to early childhood education and care.

Recommendations:

- **Forward guidance is provided to education and childcare institutions to prepare for a potential first phase of reopening by 22 June at the earliest (subject to the further modelling, TTP capability and continued improvements in the underlying conditions).**
- **For support and guidance to be provided to FE institutions to enable learners to complete practical components of study. This is already allowed within the regulations as a reasonable excuse for a person to access education facilities.**

Principal Assessments

The principal assessments under this section form the basis for the Ministerial decision that needs to be taken.

1. Impact of maintaining or easing a restriction on containing coronavirus

Due to the nature of the legal power, and the gravity of the public health emergency, the consideration of this impact is the most fundamental assessment that needs to be made, and the subsequent assessments below are set against that context.

Advice from TAC on the impact of easing restrictions on schools and childcare is set out below. **This illustrates that there is insufficient headroom and the risk of increasing transmission is too high to advocate a significant further opening of schools and childcare settings during this review period.** Further evidence is required and will be commissioned from SAGE to fully evaluate the impact of opening schools in Wales.

Some models used by SPI-M suggest that any options for schools are likely to significantly impact on R, pushing R over 1. It is TAC's view that additional evidence is required to be able to fully evaluate this. Smaller class sizes (to maintain social distancing) or outdoor learning are likely to reduce the impact on R.

Analysis of monitoring information (such as the impact on R) for England and internationally is likely to provide additional evidence on the impact of this action. Evidence and data regarding the transmission of the virus continues to emerge. Within the UK the primary source of information for government is SAGE, with additional modelling and considerations applied in Wales by the Technical Advisory Cell (TAC). A subgroup of TAC has been established regarding Education and Children, drawing together specialists from a range of fields.

Options for opening schools have been modelled in England, which should have similar effects in Wales. Further modelling for Wales is being commissioned from SAGE. Based on the English modelling, options to restart different groups are ordered in order of impact on R (assuming that those with symptoms quarantine with existing guidance):

1. Current situation
2. More vulnerable children and key workers of children
3. Early year settings
4. Half class (1 week on 1 week off) – half contacts
5. Half class (2 weeks on and 2 off) – half typical number of contacts with other people
6. Transition years (5/6/10/12)
7. Half class 1 week on, 1 off – full contacts
8. Half class – 2 weeks on two weeks off – full contacts

9. Half time, Full class – 2 weeks on two weeks off – full attendance
10. All primary
11. Half time – Half class in AM/PM each day.
12. All secondary
13. Fully reopen

Subsequent modelling with SAGE should help inform which groups to prioritise and in what formulation (e.g. different use of term times or bubbling options). This will be sought for the next review.

The advice of TAC, drawing on data and reports from SAGE, on the impact of easing restrictions on schools and childcare is repeated below:

“The current rate of R across Wales

The summary of advice published by TAC on 12 May put the likely rate of R across Wales at 0.7-1. This is slightly higher than in the previous week. Rates of community infection are falling, while rates of infections in care homes and hospitals remained flat. Consequently the rate at which overall levels of infection are shrinking has slowed.

Short-term indicators estimate that cases, hospital admissions, and deaths are expected to decline over the next three weeks.

To enable further easements in restrictions it is important R remains at less than 1 across Wales. Any decision we take in respect of schools and other providers will have regard to its likely impact on R, both directly and indirectly.

However, R is not the only indicator available. Death rates and infection rates are more contemporary and definitive. Understanding the capacity and occupancy of critical care beds is also a key indicator of infection. Looking at the death rate is helpful as well as rate of infection, although this will be distorted by an increase in testing that picks up more cases. But understanding the full picture and not relying solely on R is important.

Susceptibility of Children and their Role in transmission

The role of children in the transmission of the virus and their susceptibility to it are not yet clear. There is an indication that children are infected at a similar rate to adults, but tend to be less symptomatic with COVID infection and lower in terms of severity than adults, despite the possibility of very rare severe complications. However, there is emerging evidence that viral loads in children can be as high as in adults.

The data suggests transmission and disease in children possibly differs by age. Transmissibility by younger children may also be lower than in adults but the rate at which children pass on COVID infections is still uncertain.

The modelling consistently suggests that resuming early years provision has a smaller relative impact than primary school, which in turn has a smaller relative impact than resuming secondary schooling. However, this analysis does not

incorporate potential for indirect impacts on contacts outside of school – which may differ by age of child.

As and when children return to schools and childcare it is possible we would see an increase in the virus if they do readily transmit infection. This is because of their greater number of contacts at school, and the long time that they are together during the school day. Modelling of scenarios suggest that if children do return to schools and childcare it will be important to restrict network sizes, with the biggest impact on this coming from rota systems, which reduce the numbers of children in attendance at any time and involve breaks from the setting where social contacts can be reduced.

Likely Wider Impacts

As and when children return to schools and childcare, we can expect to see an increase in wider levels of social contact. This is because children will come into contact with other children and adults in schools and childcare, and because in all likelihood it will be accompanied by their parents returning to work and coming into contact with co-workers. It is not, therefore, possible to consider an increase in the number of children in schools or childcare in isolation.

Denmark opened its primary schools on 15 April. Two weeks later there was no noticeable increase in the overall levels of infection, which suggests that where appropriate precautions are taken infection rates can be managed. In Denmark this has included:

- Frequent hand washing and cleaning of settings;
- Staggered break times and drop off / collection times;
- Increased use of outdoor space in line with evidence that the virus is less able to survive in sunlight, or in well ventilated areas;
- Ensuring children remain in small groups, reducing interactions as much as possible.

SAGE advice on the hierarchy of risk control identifies the key control measures as: avoiding contact, engineering solutions to prevent contact and administrative solutions to restrict interactions. Guidance on risk control for schools and childcare settings would support staff to ensure safe environments and take learning from the Danish (and others) experience.

However, it is also clear that to appropriately manage infection and transmission rates, a stringent approach to testing and contact tracing will be needed. The Test, Trace, Protect Strategy published on 13 May sets out the Welsh Government's proposals in this regard, with trials currently underway. Critical workers such as teachers or childcare providers can already access tests. With Test, Trace, Protect scheduled to be rolled out across Wales from early June, tests should be available to all symptomatic individuals.

There are some concerns regarding the suitability of tests for children aged 0-5, though we understand the UK Government aims to resolve these by June. As Wales is using the same testing approach that should resolve those issues here, though it is

important to note the evidence suggests this age group is the lowest risk of contraction or severity of symptoms.

In addition to Test, Trace and Protect any change to the operation of schools of childcare settings will require a system of monitoring and surveillance at a local level. This is key to ensuring that any impact of increased operation of schools or childcare settings can be identified and responded to quickly.”

Mitigating actions and proportionality of restrictions

Schools

A range of mitigating actions are being put in place to enable the safe return to school, education settings and childcare. These include those discussed in Doc 4 around the pre-conditions, with an effective Test Track and Protect capability needing to be in place as an essential condition. SAGE are being asked about the level of TTP capability needed under different options.

Guidance is being developed in conjunction with education providers, building on that published by the UK Government to begin preparations for a safe return to school in different settings. The Education Minister has also committed to provide at least three weeks’ notice before opening up schools. This will provide time for institutions to make appropriate adaptations and preparations for the return of more pupils. A series of mitigation are being considered such as how to support additional cleaning and preparation time, the use of outdoor spaces where the risk is lower, and rota uses of shared spaces.

Options for changing the nature of provision are also being considered by officials and the Minister for Education. These include:

1. Linear roll out of options – schools would adopt one of the options for bringing back specific children and then roll out to add or remove other options as capacity allows.
2. Cycle of different options at different times – schools would adopt different options over time at different points, to support different groups of learners at key points. This would then expand/contract to combine options at any given point as capacity allows.
3. Combination of options at reduced times – schools would combine different options above but at reduced time for each. The time given to each option would then expand/contract as capacity allows.

FE institutions

Similar mitigations can be put in place for other education institutions, and with older students the ability to maintain physical distancing and related practices should be higher. FE colleges will seek to align with schools guidance with its stated aim to support “Year 12” equivalent learners who are in their first year of a two-year vocational or academic programme of learning (BTEC Diplomas, A levels or equivalents).

As there are no regulatory restrictions on the attendance at educational facilities it would be possible to **ensure that learners who need to complete courses are supported to do so following this review**. With limited numbers of students the risk of transmission would be lower; albeit there are an estimated 21,000 vocational qualifications that will fall into the category of professional qualification (i.e. those who need to return to college for some type of face-face practical delivery and assessment). In addition, due to the nature of some of the assessments, close contact may be needed which would mean retaining social distancing may not be possible. This should be mitigated as far as possible through adopting alternative approaches and taking all reasonable measures, as is the case in business premises where physical distancing is not always possible. Enabling these learners to complete their courses would release them from the college and enable them to enter the workplace or move on to the next level.

Childcare

In restarting services, settings would be required to comply with the National Minimum Standards for childcare which set out existing environmental requirements including a minimum allowance of 2.3m space per child (the allowance increases for younger children) and with Welsh Government guidance on social distancing and infection control.

We would not expect all settings to open immediately, and we would not expect all children to return at once. We believe this will be phased return based on the confidence of parents, providers and the workforce; the financial viability of settings opening and running with lower numbers of children; and access to premises, with many smaller settings running from school sites or other community buildings including church and town halls. This should be possible once TTP is in place and evidence shows it can cope with an increase in demand.

Ideally numbers of children in childcare would increase over the summer period, at which time it will be possible to maximise use of outdoor space. Scientific advice suggests sunlight and ventilation reduce transmission rates.

Around half of childcare settings are open and caring for children and managing infection control. The demand is increasing for people asking for more access to childcare as economic activity resumes. If there is a view that the current and planned pace of childcare access is an unacceptable risk, the Welsh Government may need to legislate to prevent that from happening. The childcare sector is not currently restricted in the regulations and is voluntarily complying with requests to limit children in attendance. This has worked effectively to date and continued guidance on a gradual widening of attendance would be a proportionate response. Regulating to prevent them from doing so remains an option, noting it may result in closures and redundancies, which could require additional support.

Secondary tests

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.

Context

On 18 March the Education Minister made a statement¹ bringing forward the Easter break for schools in Wales and announcing that they would close for statutory provision of education at the latest on 20 March 2020. A further statement was made on 20 March², explaining that from 23 March schools would be closed for children and young people with the exception of making provision for children who are vulnerable, or whose parents are critical to the COVID-19 response, so they can continue to work, where alternative childcare arrangements cannot be made.

The Minister has published a decision framework which will guide and decision to increase, or if needs be, decrease the operations of schools during the response to COVID-19.

WELLBEING IMPACTS

Schools

With schools re-purposed to support children of critical workers and vulnerable children, the majority of learners are not in school. This is likely to have an inevitable impact on health behaviours with research³ by Unicef suggesting that:

“When children are out of school they are typically less physically active, have much longer screen time, irregular sleep patterns, and less favourable diets. Prior to the lockdown 50% of children regularly took part in some extracurricular sporting activity and many more were active through school”

As such, it is likely that during the current period of disruption, we may see an increase in obesity and an impact on children’s physical and mental health as a result of reduced exercise and poorer nutrition. As noted in one report⁴, many children and youth rely on free or discounted meals provided at schools for food and healthy nutrition, which will be compromised by school closures.

¹ <https://gov.wales/statement-minister-education-kirsty-williams-school-closures-wales>

² <https://gov.wales/written-statement-eligibility-ongoing-provision-children-who-are-vulnerable-or-whose-parents-are>

³ <https://www.unicef.org.uk/wp-content/uploads/2020/04/Unicef-UK-Children-In-Lockdown-Coronavirus-Impacts-Snapshot.pdf>

⁴ <https://en.unesco.org/covid19/educationresponse/consequences>

The social distancing measures and reduced interaction with peers and loss of routine normally provided via the school day, is also likely to negatively impact children's wellbeing, with some research⁵ suggesting that since schools have been closed to the majority of learners, one in three UK children between five and 18 years old (36%) have told parents they are lonely. Data from the ONS⁶ shows that over half of adults home-schooling their children are confident in their abilities, but 50% say it is affecting the wellbeing of their children.

As noted in another report⁷, loneliness and social isolation adversely affect children's short and long-term mental health and that the duration of loneliness, rather than its intensity, is most strongly related to poor outcomes. Given these facts, it is likely that many children's emotional health is suffering during lockdown. These negative impacts will be greatest for children from marginalised and disadvantaged groups. The same report also emphasises the critical importance of play with peers for children's social, cognitive and literacy development.

Mental health issues amongst children are likely to be exacerbated by the above and as anxiety about their futures climbs. This is demonstrated by the unprecedented demand for Childline services from 21/01/2020 to 22/03/2020. Within this period, Childline delivered 913 counselling sessions to children and young people who were concerned about the Coronavirus⁸. Over half of young people who spoke to Childline during that time about coronavirus were counselled for their mental and emotional health around issues like isolation, arguments at home and removal of professional support from schools and the NHS.

A report by the Sutton Trust⁹ (results for England only) found the following:

- Pupils from independent schools are twice as likely to take part in online lessons every day
- 60% of private schools and 37% of schools in the most affluent areas had an online platform to receive work, compared to 23% in the most deprived schools
- Three-quarters of parents with postgraduate degrees felt confident directing their child's education compared to less than half for parents with A-level or GCSE qualifications
- 15% of teachers in deprived state educated schools report concerns that students do not have access to adequate learning technology compared to 2% in affluent
- 24% say that fewer than 1 in 4 children in their class are returning work they have been set
- 50% of teachers in private schools report they're receiving more than three quarters of work back, compared with 27% in the most advantaged state schools, and just 8% in the least advantaged state schools

⁵ <https://www.worldvision.org.uk/news-and-views/latest-news/2020-news/april/coronavirus-lockdown-uk-children-are-lonely-scared-and-stressed-survey-finds/>

⁶ <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandwellbeing/bulletins/coronavirusandthesocialimpactsongreatbritain/23april2020>

⁷ Play First: Supporting Children's Social and Emotional Wellbeing During and After Lockdown

⁸ <https://www.nspcc.org.uk/what-we-do/news-opinion/childline-coronavirus-counselling/>

⁹ <https://www.suttontrust.com/our-research/covid-19-and-social-mobility-impact-brief/Education>

- 28% of the most advantaged state schools had offered devices to pupils in need, compared to just 15% in the most deprived schools.

Similarly, a report by the Institute for Fiscal Studies¹⁰ found that:

- Higher-income parents are much more likely than the less well-off to report that their child's school provides online classes and access to online videoconferencing with teachers.
- Children from better-off families are spending 30% more time on home learning than are those from poorer families.
- Better-off students have access to more resources for home learning.

In considering the options for reopening schools there are differential impacts on children and wellbeing depending on the option selected:

1. Disadvantaged learners: Disadvantaged children more likely to need contact to support learning and wellbeing. A clear definition of 'disadvantaged' would be required and identifying children as 'disadvantaged' could create stigma. However, this would mean other groups do not benefit from attendance at school and some children may not be identified as being in the 'disadvantaged' category but may live in very disadvantaged conditions. It could be possible to target children who have not engaged in distance learning (e.g. digitally excluded children). Extra interventions could be provided.
2. Transition year groups: Addresses learning and wellbeing issues raised by transitions. Supports those taking exams next year. But, other groups do not benefit. Can conduct learning and wellbeing reviews to craft specific interventions. Potential increase in NEETs (if Years 11 and 13 not included). Staff may have less capacity to support distance learning.
3. All learners at a reduced time: Guarantees some contact/ learning for all learners, leading to equity of provision. Allows progress and wellbeing to be monitored. Staff may have less capacity to support distance learning.
4. Earlier years: High positive impact on earlier child development. Targets age groups least likely to benefit from remote learning. COVID - lower risk to younger children. Other groups do not benefit. Full time learning may be a shock to the system. May especially benefit from partial contact.
5. Children of parents who need to leave home to work: Learning benefit through contact time for some learners. May disadvantage FSM children.
6. Increase emergency provision: Option does not currently provide learning and teaching – so no additional learning benefit. Little educational value. Could target children who have not engaged with distance learning.

¹⁰ <https://www.ifs.org.uk/publications/14848>

Childcare

A number of studies covering Wales and internationally show that coronavirus is having, or is likely to have, a lasting impact on the wellbeing of children and young people¹¹. It is exacerbating feelings of anxiety, loneliness, and unhappiness in children and young people. This is often due to a lack of contact with their peers, which childcare and play services can provide. Attendance at childcare and play could also help alleviate tensions created between families from spending intensive periods of time together in a confined space.

The early years in particular is vital to child development. Modern brain imaging techniques have enabled scientists to evidence the plasticity of the developing brain during the first years of life (Bernier et al, 2016)¹². At this time the brain is especially sensitive to environmental enrichment (Huttenlocher, 2002)¹³. The lockdown, given its purpose, restricts opportunities for environmental enrichment for all, but is likely to have a particularly damaging effect on younger children who have been shown to benefit by attending registered childcare regularly and over time.

An expanding body of international research, over several decades, demonstrates the quality of caregiving relationships can forecast child outcomes across a range of areas as diverse as social and emotional adjustment (e.g. Thompson, 2008¹⁴), moral development (Dunn, Brown, & Maguire, 1995¹⁵), cognitive functioning (e.g. Melhuish et al., 2015¹⁶), sleep–wake cycles (e.g. Bordeleau et al., 2012¹⁷), and sympathetic and parasympathetic response (Luijk et al., 2010¹⁸). Such pervasive effects on socioemotional, cognitive, and biological functioning are often believed to transit through children's neural circuitry (e.g. Belsky & de Haan, 2011¹⁹). We know that pressure inflicted on families during this pandemic is having an adverse effect on family time, and care giving (e.g. children are receiving less physical activity time

¹¹ See for example - <https://www.sussex.ac.uk/about/documents/play-first--supporting-childrens-social-and-emotional-wellbeing-during-and-after-lockdown.pdf>

¹² BERNIER, A.; CALKINS, S. D.; BELL, M. A. Longitudinal Associations Between the Quality of Mother-Infant Interactions and Brain Development Across Infancy. *Child Development*, [s. l.], v. 87, n. 4, p. 1159–1174, 2016

¹³ Huttenlocher, P. R. (2002). *Neural plasticity: The effects of environment on the development of the cerebral cortex*. Cambridge, MA : Harvard University Press

¹⁴ Thompson, R. A. (2008). *Early attachment and later development*. In J. Cassidy & P. R. Shaver (Eds.), *Handbook of attachment: Theory, research, and clinical applications* (2nd ed., pp. 348 – 365). New York, NY : Guilford.

¹⁵ Dunn, J., Brown, J. R., & Maguire, M. (1995). *The development of children's moral sensibility: Individual differences and emotion understanding*. *Developmental Psychology*, 31, 649 – 659.

¹⁶ Melhuish, E., Ereky-Stevens, K., Petrogiannis, K., Ariescu, A., Penderi, E., Rentzou, K., Tawell, A., Slot, P., Broekhuizen, M., & Leseman, P. (2015). A review of research on the effects of early childhood Education and Care (ECEC) upon child development. CARE project; Curriculum Quality Analysis and Impact Review of European Early Childhood Education and Care (ECEC). <http://ecec-care.org/resources/publications/>

¹⁷ Bordeleau, S., Bernier, A., & Carrier, J. (2012). *Longitudinal associations between the quality of parent–child interactions and children's sleep at preschool age*. *Journal of Family Psychology*, 26, 254 – 262.

¹⁸ Luijk, M. P. C. M., Saridjan, N., Tharner, A., van IJendoorn, M. H., Bakermans-Kranenburg, M. J., Jaddoe, V. W. V., ... Tiemeier, H. (2010). *Attachment, depression, and cortisol: Deviant patterns in insecure-resistant and disorganized infants*. *Developmental Psychobiology*, 52, 441 – 452

¹⁹ Belsky, J., & de Haan, M. (2011). *Annual research review: Parenting and children's brain development: The end of the beginning*. *Journal of Child Psychology and Psychiatry*, 52, 409 – 428

than government guidance advises, some are spending longer on technology devices than is advised and are receiving less one to one interaction time, etc). This is particularly pronounced for disadvantaged families.²⁰

Exposure to adverse childhood experiences (ACEs; e.g., maltreatment, household dysfunction) is associated with a multiplicity of negative outcomes throughout an individual's life, for example, increase in alcoholism, drug abuse, depression, and suicide attempts compared to those who experienced none (Ford et al 2019²¹). Survey evidence has shown some parents have increased unhealthy behaviours since the pandemic, which may be putting more children at risk.

Turning to adults, the childcare and play sector is low paid. Given the number of temporary closures within the sector, and the type of provider most likely to have closed, we estimate that in excess of 50% of the workforce will have been furloughed. Some, but not all, employers will be topping up wages beyond the 80% available under the CJRS; prior to the virus the vast majority of staff were paid at national minimum wage. The longer settings remain closed the more likely it is those closures will become permanent and redundancies will follow.

Staff working in the sector, and the families they support, are at risk of poverty if they are unable to access any UK Government support. If they could return to work the risk of poverty in these families would be lowered.

Access to childcare would also support a wider cohort of parents in returning to work as further restrictions are lifted. Since the review of 7 May we have seen an increase in the number of queries about access to childcare from parents who are not key workers (provision is currently restricted to the children of critical workers / vulnerable children). We are also seeing some settings which had closed start to open, particularly in border areas, with increased demand from English families. If further easements are announced we can expect demand to rise again. If no childcare is available parents will either not be able to return to work, or may decide to use family and friends for care, in contravention of guidance and requirements around social distancing.

The impact on parents' wellbeing (stress factor) of putting their children back in childcare settings and the risks, perceived and real, of this for the child are high. This is especially so for households with someone shielding and/or with underlying health conditions. Consequently any announcements in this regard would need to clearly set out the reasons why this was the right time, and that while returning was possible it is not compulsory.

Teaching staff will have the same concerns, as has been demonstrated in discussions with teaching unions in Wales and as we've seen the teacher unions argue in England. Earlier this month, the British Medical Association (BMA)

²⁰ Ipsos Mori (2020 forthcoming) *0 to 4 Year Old Parent Survey on behalf of the Department for Education. This covers parents in England only, but we can assume similarities*

²¹ Ford K, Hughes K, Hardcastle K, et al. The evidence base for routine enquiry into adverse childhood experiences: A scoping review. *Child Abuse & Neglect*. 2019;91:131-146 Ford K, Hughes K, Hardcastle K, et al. The evidence base for routine enquiry into adverse childhood experiences: A scoping review. *Child Abuse & Neglect*. 2019;91:131-146

backed teachers' unions by saying Covid-19 infection rates were too high for England's schools to reopen.

On the other hand, Anne Longfield, Children's Commissioner for England, has called on government and teaching unions to work constructively together to get children back in to the classroom as quickly as possible, raising concerns about the negative impact of prolonged periods out of school on vulnerable and disadvantaged children and the impact of the lockdown on the mental health and wellbeing of children. Discussions with the Children's Commissioner for Wales are ongoing.

ECONOMIC IMPACTS

The closure of schools to the majority of learners has significant implications for businesses and the wider economy, where parents are having to try to fit work around caring responsibilities, or where this is not possible, are having to take paid or unpaid leave. One report²² estimates that 38% of the workforce has dependent children (aged < 16 years) living within the household. Overall, 15.5% of the workforce is estimated to be comprised of women who have dependent children in the home, and would be expected to provide childcare to their children in the event of school closure. A further 0.6% of the workforce is fathers with dependent children in the household, but with no other adults (lone fathers). Thus the aggregate level of absenteeism due to closing of school is estimated to be 16.1%.

Any decision to increase the operation of schools will have implications for learners, their families, the education workforce and wider communities – these will be wide ranging and include educational, social, economic and health related impacts.

Childcare

Childcare is important to employability²³ and economic growth²⁴. Childcare enables a large number of parents to work, and these parents go on to collectively generate an estimated £1.2 billion in income per year, supporting economic growth and poverty reduction across Wales²⁵.

Surveys have shown, even where parents are able to work from home, they are less able to work effectively during the pandemic due to childcare responsibilities, and this is a barrier to working at all for some parents²⁶. Parents report that finding childcare is the biggest barrier to them resuming work when restrictions are lifted²⁷. Not being able to access registered childcare is therefore restricting employability and the economy (financially, but also in terms of innovation, creativity, etc that are driven by workforce diversity and mind-space).

²² <https://link.springer.com/article/10.1186/1471-2458-8-135>

²³ <https://gov.wales/employability-plan>

²⁴ <https://gov.wales/prosperity-all-economic-action-plan>

²⁵ <https://gov.wales/review-childcare-sector-wales-0>

²⁶ <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandwellbeing/bulletins/coronavirusandthesocialimpactsongreatbritain/latest>

²⁷ Department for Education (unpublished) Coronavirus Survey of Parents

The sustainability of the sector, which is a large employer (estimated around 17,000 employees²⁸), is at risk too. The Care Inspectorate Wales (CIW) register of closure notifications shows that 1,640 childcare and play services (45% of the sector compared to pre-lockdown) are now closed.

	Total temporary closures due to coronavirus - adjusted for reopenings	% of services closed compared to baseline (16.3.20 week of school closures)
Creche	3	23%
Full Day Care	590	61%
Open Access Play Provision	10	56%
Out of School Care	259	69%
Sessional Day Care	358	69%
Childminder	420	24%
Total	1,640	45%

Day care services (all categories excl. childminders)	1,220	65%
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Source: CIW Notifications of closures due to Coronavirus at 14.5.2020

It is likely that some services are closed that have not yet notified CIW. Notifications of closures are still increasing daily and therefore we expect when the number of closure notifications begin to stabilise the register will more closely reflect the number of closures on the ground. Local authorities have told us they know local closures are higher than CIW figures suggest too.

Furthermore, services that are open may not have any children attending, and therefore may not be receiving any income as a self-employed person (childminders) or a business. Or they may have less children²⁹, and therefore less income but potentially the same costs (e.g. building costs, pre-ordered food contract, staff time, etc). This position puts the sustainability of large parts of the sector in question.

The UK Government and Welsh Government financial support packages are largely unsuitable for the childcare and play sector, with many providers not meeting the eligibility criteria for these schemes. The vast majority of settings are run by voluntary committees are not eligible because:

- These are not all registered charities or are incorporated associations and thus not able to access the 3rd Sector Resilience Fund

²⁸ <https://gov.wales/sites/default/files/statistics-and-research/2019-07/180110-review-childcare-sector-en.pdf>

²⁹ Childcare settings were asked to provide care for the children of critical workers and vulnerable children only, following public health advice that children should be cared for at home if at all possible.

- The majority rent space in community buildings and so do not pay business rates or qualify for SBBR in their own right; and is 600+ settings (74% of a recent survey conducted by Clybiau Plant Cymru Kids' Clubs indicated this status – 657 organisations offering Out of School Childcare)
- While not VAT registered, very few providers have a turnover of 85k or higher, which is a core element of the Economic Resilience Fund (we understand this may be reduced to 50k, which would benefit some, but not all, of the settings currently excluded)
- Coronavirus Business Interruption Loan (CBIL) funding would need to be applied for by committee members, and potentially secured against personal property. Committee members are unwilling to be personally liable for loans or losses or that their constitution prevents them taking out loans.

We believe there are around 332 out of school childcare settings, 289 Cylchoedd Meithrin and 200 members from Early Years Wales affected by this.

Given the number of temporary closures within the sector, and the type of provider most likely to have closed, we estimate that in excessive of 50% of the workforce will have been furloughed. Some, but not all, employers will be topping up wages beyond the 80% available under the CJRS; prior to the virus the vast majority of staff were paid at national minimum wage. The longer settings remain closed the more likely it is those closures will become permanent and redundancies will follow. It is important to note that patterns of childcare usage suggest that the summer term is the point in the year when the highest number of children are accessing services. The autumn term sees the lowest number of children in attendance. Consequently the business model for most settings is, similar to that of the tourism sector, geared towards maximising income in the summer term to see them through the autumn. Without the ability to do that many settings will not remain viable into the winter.

ENVIRONMENTAL IMPACTS

No direct environmental impacts have been quantified as part of this assessment. The potential increased movement of people could have an impact on air quality should vehicles be used to travel to education and childcare settings. Officials in Environment and Rural Affairs are monitoring the impacts on air quality that have arisen since lockdown measures were introduced, with wide media reporting of apparently improved air quality. External consultants have been commissioned to analyse the impacts and this work will inform future policy with a view to retaining air quality improvements for the future, as far as possible.

The potential negative impacts on air quality could be mitigated through guidance promoting active travel to childcare and education settings.

EQUALITY IMPACTS

Wider impacts are being considered and collated by policy leads to consider the impact on Equality and the Welsh Language. It is expected that integrated impact assessments will be carried out on the approach adopted to return to school. An

integrated impact assessment is being finalised in respect of the suite of key actions taken as part of the Childcare, Play and Early Years Division's response to the Covid-19 outbreak. This includes the Welsh Government's advice that all children should be cared for at home and that childcare providers should restrict access to the children of critical workers and vulnerable children and, only then, if these children could not be cared for safely at home

An outline assessment against the potential impacts on groups with protected characteristics is included below, subject to more formal impact assessment being completed.

Age

The measures for schools will directly benefit children. Groups within this will depend on the specific option taken. More disadvantaged learners will benefit more: given the disproportionately detrimental impact of non-attendance.

Within the childcare sector, users and workers are 80% under the age of 60. There will therefore be a more limited impact on the risks to the workforce and users from contracting COVID-19.

To some extent, it could therefore be argued that the current restrictions have a positive impact on families who are directly involved in the fight against COVID-19 and families who fall within the Welsh Government's definition of 'vulnerable', including families who have a social worker assigned to them and children with a statement of additional learning needs. However, it is also clear that there are differential impacts on children, with the greatest impacts likely to be felt by disadvantaged children.

High quality early childhood education and care plays a critical role in supporting child development; particularly so for our more disadvantaged children. At the beginning of their first year of schools, children from the lowest-income families are on average 16 months behind those from higher-income families. Both SEED and other research, such as that of the OECD, have found that more years of pre-school provision is more beneficial than more hours per week, leading to better outcomes for children, and particularly so for children from disadvantaged families. An early return to childcare will be important in supporting younger children in particular to access school and reach their full potential

Should there be a decision to allow more children to access childcare, an approach would be advocated which enables all children regardless of age or protected characteristic to access registered childcare in order to advance equality of opportunity and promote good relations between all groups in society.

Disability

The implementation of new protocols to facilitate social distancing in education and childcare settings will need to take into account the specific needs of disabled people to avoid discrimination. This will include adaptations and considering any special educational needs are catered for.

Gender reassignment

The restrictions are not currently known to have a different impact on people undergoing gender reassignment compared to others.

Pregnancy and maternity

The specific restrictions considered are not known to have a different impact on pregnancy or maternity compared to others. Adjustments may be required in any protocols to ensure relevant staff are not discriminated against in the design of new working practices.

Race

It is not clear what the potential risks of transmission are in education and childcare settings and whether there is a disproportionate risk for BAME individuals as suggested in some emerging evidence. Advice will be sought on mitigating any potential effects.

Given BAME people seem to be more susceptible to COVID-19, learners from these groups (or their parents) may be reluctant for them to return to education or childcare settings until there is a vaccine. This means that these learners will get a different learning experience, and may not be able to complete FE vocational courses in particular.

Religion or belief

The specific restrictions considered are not known to have a different impact on different practicing religions or beliefs. The benefits of easing restrictions should apply widely and do not appear to discriminate on the basis of religion or belief.

Sex

The majority of employees within the childcare and play sector are women. While most of the sector is closed, loss of employment and/or income is affecting more women than men. In addition to this, the wide burdens of care for children away from schools and childcare are more likely to fall to mothers. Parents, and particularly mothers, cite a lack of affordable childcare as one of the key barriers to them working.

Any policy that encourages the provision of informal care (as opposed to within formal settings) is likely to have a disproportionate impact on girls and women. 2011 census data shows that females are more likely to be unpaid carers than males and research since then has continued to demonstrate the gender gap in the provision of unpaid care. The Women's Budget Group paper "*Covid-19: Gender and Equality Issues*" explains:

"Both the health and economic impacts of Covid-19 will be gendered. Women are the majority of those providing care, paid and unpaid and the majority of health workers."

This means that they are more likely to be exposed to Covid-19, and more likely to be affected by the decision to close schools and nurseries and the need to move non-urgent patients out of hospitals.

Women are more likely than men to deliver unpaid care at home so if elderly, young or vulnerable people need caring for when hospitals are full and schools are closed, it is more likely to be women who pick up the pieces. Carer's Allowance is currently £66.15 per week and this is not sufficient given the crisis faced." [NB: Carers Allowance is not devolved in Wales]

WBG, Covid-19: Gender and Equality Issues, 19 March 2020

Actions to mitigate potential impact include:

- Ensure that those unable to work because of caring continue to be supported to retain their jobs for as long as possible, as well as ongoing flexibility for carers to continue to juggle work and care.
- Ensure that any easing of the restrictions on work and social distancing do not negatively impact on working carers.
- Support employers to provide flexibility to carers to ensure that carers' ability to retain their jobs and work is not affected.

Sexual orientation

The specific restrictions considered are not known to have a different impact on any sexual orientation compared to others.

Protected characteristics summary

It has not been identified that the provisions create unlawful discrimination, harassment or victimisation of protected groups. The different options under consideration for schools and FE settings may potentially have different effects on different groups. This will need to be considered in coming to a decision on which groups of pupils to prioritise and mitigating actions put in place to minimise any potential discrimination.

No indication has been provided that the restrictions or the easements proposed advance equality of opportunity or foster good relations between those who share protected characteristics and those that do not. Neither is there an indication of additional negative effect from the proposals.

Enabling certain learners to access provision before the 'general' learner population would have both positive and negative impacts. Whilst it would have clear positive impacts on those most vulnerable learners – enabling them to get out of the house and access face-to-face learning – there is the danger of these learners feeling stigmatized by being identified as such.

More widely, this could be seen as being unfair and discriminatory to other learners for whom the Welsh Government retains a Statutory Duty to provide education.

There may be a challenge on this basis. We would need to have a very clearly identifiable method of identifying what we would consider 'vulnerable' and this would need to be easily justifiable if challenged.

Welsh language

FE Learners continue to access provision through e-learning systems. Concerns have been raised as to how much of this provision is currently available through the Welsh Language. As such, returning learners to face-to-face provision is likely to have a positive impact on the levels of Welsh Language in use.

There are concerns that the current childcare arrangements will be impacting adversely on the Welsh language. The majority of cylch meithrin have closed since 23 March, reducing availability of Welsh language childcare provision. This both impacts parents' choice, and the ability of children from English speaking homes to access Welsh medium education in the longer term.

United Nations Convention on the Rights of the Child

The convention has been considered in this assessment. A number of Articles relate to the provision of childcare and education both directly and indirectly:

- Article 3 – All organisations concerned with children should work towards what is best for each child.
- 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 18 – Both parents share responsibility for bringing up their children, and should always consider what is best for each child. Governments should help parents by providing services to support them, especially if both parents work.
- Article 19 – Governments should ensure that children are properly cared for, and protect them from violence, abuse and neglect by their parents or anyone else who looks after them
- Article 28 – Children have a right to an education. Discipline in schools should respect children's human dignity. Primary education should be free. Wealthy countries should help poorer countries achieve this.
- Article 29 – Education should develop each child's personality and talents to the full. It should encourage children to respect their parents, and their own and other cultures
- Article 31 – All children have a right to relax and play, and to join in a wide range of activities.

While the provision of education continues through other forms such as digital provision, there is a risk a number of excluded children are not gaining the benefits of education through formal education setting.

We would expect referrals to social services to increase at the point of return, as these cases will have been 'hidden' during the lockdown period. This will help meet obligations under Article 19.

The social distancing measures and reduced interaction with peers and loss of routine normally provided via the school day and also throughout childcare, is also likely to negatively impact children's wellbeing, as promoted via Article 31 (the Right to Play also enshrined in Welsh law). While there is some evidence to suggest children are playing more while at home, there are also concerns that restrictions around access to green spaces, such as parks, and reduced opportunities for outdoor play are having adverse impacts; play is particularly supportive of children's physical literacy. Increased access to play provision would redress some of these concerns.

Childcare and schooling also enables both parents to work as set out in Article 18, which is currently constrained and could be alleviated by prioritising places in childcare for those unable to find alternatives.

More broadly the Welsh Government has recognised the overall approach to coming out of lockdown needs to take into account the views of children (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 is being addressed through an online survey, promoted by schools, that will inform future decisions.

IMPLEMENTATION ISSUES

Public Sector

Almost all schools in Wales (1,480 schools) are provided by the public sector, with local authorities responsible for education provision.

Given the urgent actions that have been taken to decrease operations, there will inevitably be financial implications for the public sector on increase, particularly where these bodies are able to reduce additional or extra activities for example, there are likely to have been increased cleaning costs associated with the hub provision given the increased hygiene requirements that must be met due to COVID-19. Work has started to seek to identify these costs and some additional funding³⁰ has already been provided to local authorities to help them meet the additional costs of delivering existing essential services and the additional demands placed on them by new actions and new responsibilities arising from the emergency legislation made by the UK Government.

³⁰ <https://gov.wales/written-statement-coronavirus-and-local-government>

In order to support the development of delivery of the Continuity of Learning Programme, £13 million has been repurposed from existing education budgets to support schools, learners and parents during the COVID-19 outbreak. This will continue to support virtual learning as operations are increased.

As set out in Section 1, £47 million of funding has been cut from the Education budget in order to support the wider Welsh Government response to the COVID-19 pandemic, some of this funding would have been for the public sector, however as detailed previously wherever possible these cuts have been made by identifying work that cannot be delivered within the year due to the lockdown disruption or by cancelling activities that are no longer appropriate such as conferences and events.

Third Sector

The impact of these policy decisions primarily fall on the public sector however there may be some implications for the third sector for example, schools often provide community facilities that are used by third sector organisations and these will not be available during the current period of disruption. Some third sector organisations provide resources and services to schools which are likely to begin to be available as schools increase operations.

The Welsh Government is working in partnership with certain third sector bodies that provide services to the education sector such as Mudiad Meithrin that provides Welsh medium nursery provision. These bodies have been working with us to re-purpose their offer digitally which is being promoted via the 'Stay Safe Stay Learning' distance learning resources area of Hwb.

Childcare

Any decision to support the restart of the childcare and play sector will need to be considered alongside other proposals put forward from across Welsh Government and the wider public sector. In some cases those matters will support a restart of childcare and play services; in others they may cut across or restrict proposals.

In the eyes of the public, and much of the sector, there is a clear alignment between actions to restart childcare and play services and those to restart the education system; specifically schools. Many childcare and play settings are based on school sites. Others are based on a business model designed to enable wrap around and out of school childcare services, aligned to the school day. Play settings in particular tend to operate only in the school holidays.

There is a clear link between decisions around the increased attendance of children in schools and those around the increased attendance of children in childcare settings in particular. Both schools and childcare settings provide learning and care opportunities for children, supporting child development and attainment, physical and mental health and wellbeing. While there is a clear need for alignment in our thinking given the interrelated issues, it does not follow that the same timing and approach should or will be taken. There will be a point in the summer term at which it will not be feasible to restart education provision in schools until after the summer holidays. This hard end-point is less apparent for childcare.

Childcare settings, unlike schools, are commercial businesses and so will only be able to reopen and stay open if it is financially viable to do so. Given that settings will have to operate with less children attending due to protective measures and an unknown initial demand, not all settings are likely to open at the same time. There may also be those settings that have been forced to permanently close as a result of the crisis, with the permanent loss of those childcare spaces. This means that while Welsh Government can encourage settings to open and provide guidance to assist in the safe reopening, there will be some settings that cannot open and others that may feel it is not financially viable to do so.

A related issue is that of staffing and the availability of the required number of staff. It is not clear how many of the childcare workforce are currently shielding or living with a family member who is, or is otherwise vulnerable. Not all staff may be able to return to settings and this may impact settings' ability to reopen. Some staff will also require access to provision in schools and childcare for their own children to enable them to return to work.

Some families will be reliant on public transport to take their children to a childcare setting, which could pose further health risks to the parent and child. Without safe public transport services running at the right times of day, the logistics of getting their child to and from childcare could prove challenging for some parents.

Funding support from the Welsh Government, either through schemes which support families with their childcare costs or through funding for providers will help attract more parents back into work and make childcare providers viable again. Part of the division's response to the Covid-19 outbreak involved the suspension of the Childcare Offer for Wales and the establishment of the Coronavirus Childcare Assistance Scheme (C-CAS) to provide funding to cover the childcare costs of critical workers and vulnerable children. Officials are current advising the Deputy Minister for Health and Social Services about if, when and how the C-CAS scheme should be phased out and the Welsh Government's Childcare Offer scheme for 3 and 4 year olds of working parents reinstated.

Both the C-CAS scheme and the Childcare Offer scheme are being delivered using the Welsh Ministers' existing powers under section 60 of the Government of Wales Act.

We have had conversations with our main stakeholder groups, Cwlwm and Play Wales (the umbrella bodies for childcare and play) and Local Authorities, about the planning work being undertaken to enable children to return to childcare and play settings. As part of that conversation, we have asked them how the Welsh Government could support the sector, while also being clear that we are limited to the remaining funding allocated to the area. We have been clear that if the sector were to restart, strict control measures would need to be put in place and adhered to.

We have worked with stakeholders to develop this protective measures guidance, which is nearing completion. In preparing it we have worked with PHW and consulted with and received comments from Cwlwm, Play Wales, LAs, Children's Commissioner, Care Inspectorate Wales, Estyn, Welsh Language Commissioner,

and the Future Generations Commissioner. The guidance has been considered by WECTU. A meeting with trades unions is scheduled for 28 May.

In addition, it is important to recognise the role of Flying Start in supporting the Covid response. Whilst many of the issues relating to childcare set out in this document are also relevant to Flying Start settings, the funding stream for Flying Start is via the Children and Communities Grant, which is separate from the funding for the Childcare Offer. Furthermore the number of weeks that Flying Start childcare is available is more limited; for instance these settings are not usually open during the summer holidays. If we require settings to be open during the summer this will have financial implications and additional funding would need to be found. We have established a Flying Start/Families First working group to consider options for the operation of the programmes in a COVID world.

Additional powers have been vested in the Welsh Ministers under the Coronavirus Act which means that directions may be given to close child minders and day care settings if required, as well as to require day care providers to remain open or reopen for the purposes of providing childcare and associated services. There are currently no plans to use these powers in the short term, although the Welsh Ministers have the option of making these directions should there be evidence to suggest that providers are not abiding by restrictions or responding to the lifting of restrictions in the way the Welsh Ministers intended.

The Welsh Ministers also have powers to issue notices to disapply or modify certain statutory requirements relating to childcare should they feel that this is appropriate and reasonable in the circumstances. The only notice currently being pursued is a notice to disapply the requirement on local authorities to submit an annual report to the Welsh Ministers in 2020 on their 2017 Childcare Sufficiency Assessment. This should help reduce some of the current administrative burden on local authorities.

Steps were also taken in April to make small relaxations to the National Minimum Standards on Regulated Childcare to give childcare providers more flexibility as they seek to operate within current restrictions. It is anticipated that these restrictions could remain in place for some time and especially as gradual easements are made, with ongoing monitoring via local authorities and Care Inspectorate Wales.

We have been working closely with Care Inspectorate Wales. They have been providing information on service changes, including temporary closures due to coronavirus, which we will continue to monitor now and as we enter future recovery phases.

We are working with Data Cymru and stakeholders on monitoring requirements. Importantly this will enable us to:

- To model infection spread and plan virus controls, we need to know how many children are not at home
- To enable us to effectively manage budgets we need an early indication of financial implications directly under C-CAS
- Attendance figures of children outside C-CAS will inform budget planning for when government funded early childhood education and care is reinstated

- To inform employability interventions and support for the economy, as childcare is a key enabler we must know if and where there are gaps in provision
- To enable us to better plan if in the unfortunate event that we need to go into a second lockdown in the future (which we of course hope will not happen).

Already weekly and monthly monitoring requirements are in place for our C-CAS which also provide important evidence. Individual level data is required after a few months.

The evaluation of the Childcare Offer has been repurposed to consider the processes involved with the setting up of C-CAS, as well as considering parent, provider and stakeholder views.

We have put in place arrangements to support future administrative data linking to help understand the longer term impact of the pandemic on pre-school children attending registered childcare (and those not attending) eg. a revised privacy notice is in place for the C-CAS.

The ease of reviving the sector, and reversibility of decisions, will be dependent on what happens in the forthcoming weeks which we are monitoring closely. As covered above, the sector is shrinking, if this goes too far revival and the time taken to recover will be longer.