

Departmental Comments provided by: June Ingram

- The purpose of this paper from the Minister of Health is to update the Executive on modelling of the course of the epidemic post-Christmas as a consequence of the relaxations, and to seek agreement on the reintroduction of significant restrictions.
- The paper details the scale of response required to maintain critical care and acute service demand of higher than medium surge and maintain urgent surgery at the same time. The only way to possibly avoid further urgent surgery cancellations is to ensure that action is taken to limit the spread of the virus sufficiently to reduce hospital demand before it reaches critical levels.
- The current estimate for R_t based on hospital admissions is between 1.05-1.25, and based on new cases it is 1.0-1.2. In both cases R_t is above 1. Both 7 and 14 day incidence has increased in the previous week to 175 and 340 per 100k respectively, with a small increase in test positivity from 8.1-8.5%.
- DoH anticipate that case numbers will continue to rise as we approach Christmas, with a more rapid increase as we near the holiday period. This will lead to a significant rise in all aspects of the epidemic on top of a high baseline, in contrast to the position in the first two waves of the epidemic. The impact of Christmas arrangements on R_t is difficult to predict; there is likely to be an overall decrease in contacts but increased household and intergenerational mixing.
- A summary of the recommendations Summary of Post-Christmas Restrictions as they impact on DfE is attached as Annex A.

Available options included in the paper to respond to increased transmission

A) Take no action:

If no action is taken and the current set of restrictions and relaxations remain in place into January shows that by the end of January, with an R_t rate of 1.6, over 2500 patients would require a hospital bed. With R_t at 1.8 this would exceed 6000. Cases would continue to rise exponentially beyond the end of January, as would hospital admissions, and consequently deaths.

This option must be rejected if the health and social care system is to cope with demand.

B) Introduce restrictions from 2 January 2021

The more severe the restrictions, the earlier they are applied and the longer they last, the greater the benefit in terms of reducing transmission of the virus. This needs to be balanced against the significant societal and economic consequences of such restrictions. There is no benefit in considering localised mitigations at this point

A R_t rate of 1.6 prior to introduction of these restrictions therefore possible given the current situation, over 3000 patients would require a hospital bed by the end of January.

It is simply not possible to manage this level of demand within NI's HSC system, and therefore this option must also be rejected.

C) Introduce restrictions from 26 December 2020

Introduce the restrictions outlined in Annex B with effect from 00:01 hours on 26 December. With an R_t rate of 1.6 prior to introduction of these restrictions, hospital inpatients would still exceed wave two, but would not exceed 1000. With R_t at 1.8, around 2000 inpatients would be expected when allowance is made for nosocomial infections.

Leaving the current relaxations in place until 26 December carries significant risk that the measures will be too late to prevent hospital capacity becoming overwhelmed. Whilst the modelling is not a prediction, if the figures illustrated in figure 3 were to come to pass, they are at the very margin of what the health and social care system could

cope with. Any unanticipated increase in demand – whether from Covid-19 or due to any other emergency – would push demand beyond capacity.

D) Introduce restrictions from 19 December 2020

In terms of the reducing virus transmission, the downward pressure on R_t , and easing pressures on the health service, the Chief Medical Officer and Chief Scientific Advisor advise **this is the optimum approach**. That said, they fully recognise the wider societal and economic impacts of such an approach – businesses have only been open for one week during their busiest season of the year; and there may also be unpredictable behavioural and psychological impacts on the population if restrictions are suddenly and significantly tightened this side of Christmas, following a year that has been tremendously difficult for everyone.

Impact of Circuit Breaker

The two week circuit breaker did not bring the case numbers in NI down sufficiently, and there are some potential reasons for this:

- a. Mobility: mobility data suggests that the ‘stay at home’ guidance and the ‘work from home’ guidance has not been adhered to sufficiently, and most certainly not at the levels of adherence experienced during the first lockdown in March 2020.
- b. Click and collect and opening of retail: information from contact tracing suggests that transmission during the recent weeks may be associated with click and collect in indoor settings, particularly shopping centres.
- c. A greater range of businesses opened under the essential retail category than was the case during the initial lockdown.

In terms of click and collect services, the main issues have been due in no small part to the failure of some businesses to adhere to the guidance provided.

Among the issues identified are:

- Not all businesses required customers to pre-order, and instead allowed customers to browse on street and make purchases. This inevitably led to crowds gathering and no control over numbers; and
- Some businesses continued to provide services in their usual way under the realm of ‘click and collect’ such as dog grooming, which was not the intended use of this provision.

An analysis of the click & collect, including suggestions informed by engagement with the retail sector and environmental health officers of the local councils is attached as **Annex B**

Duration of restrictions

It is proposed these measures will be needed for at least 6 weeks. DoH believe there is merit in announcing a six week period of restrictions to allow everyone to prepare effectively, rather than determining a shorter period of restrictions which will inevitably need to be extended.

Enforcement

The measures highlights the issues of compliance and enforcement. The Minister of Health proposes to urgently build on the work of the Junior Ministers' Working Group, in particular, the deployment and use of Covid Marshalls.

Further as the Executive's Covid Taskforce has been established, it is recommended that this issue be remitted to that group, to develop a clear action plan to support the other measures proposed in this paper. This action plan should be brought back to the Executive as a matter of urgency, if it is to have the required impact.

Clinically Extremely Vulnerable (CEV) people

The paper recognises in the first wave of the pandemic, shielding was introduced as a way to protect the extremely vulnerable from exposure to the virus. Whilst it was an effective tool, it had significant impact on those affected, with people who were shielding reporting increased loneliness, isolation, and impacts on their mental health.

Any return to shielding must therefore carefully balance the potential benefits of the intervention with the impact on the individuals affected.

Up to now, the advice from the modelling has been that a return to shielding has not been warranted, based on the trajectory of the virus, and the restrictions that are in place at a given time for the population at large.

The restrictions outlined above, if accepted by the Executive, will mean that CEV people will be protected from exposure from the virus across a wide range of settings. The CEV cell will consider additional advice for

the CEV population for the duration of any restrictions that are agreed. This will include strengthening advice in areas such as attending the workplace, and mixing outside their own household.

Executive Decision sought:

- The Minister for Health's is seeking Executive approval of his recommendations to the Executive, informed by the advice of CMO and CSA, are that:
 - d. An additional intervention, in the form of restrictions as outlined in column 4 of Annex B of the paper, is required from 26 December to avoid the risk of the hospital system becoming overwhelmed;
 - e. The restrictions should be in place for 6 weeks, subject to review at 4 weeks;
 - f. The additional measures of:
 - between 8pm and 6am the following morning;
 - all businesses which are able to remain open as part of the restrictions must close between these hours;
 - no indoor or outdoor gatherings of any kind would be permitted after 8pm and before 6am, including at sporting venues;
 - outdoor exercise would be permitted only with members of your own household;
 - no household mixing would be permitted in private gardens or indoors in any setting between these times, except for emergencies or the provision of health or care services; and
 - no sporting events should be held during this week – indoors or outdoors, in recognition of the fact that a number of annual sporting events scheduled around Boxing Day / St Stephen's Day have the potential for large gatherings of people from multiple households

Above be introduced for one week from 26 December to 2 January 2021.

- g. Measures to limit school opening should be considered, and that officials from DE and DoH should engage urgently on the issue of Education, to develop a package of interventions which will minimise the disruptive impact on the educational provision to our young people, while also maximising, as far as possible, the impact on the transmission of the disease; and

- h. The Covid Taskforce should be asked to urgently prepare an action plan to address work on compliance and enforcement, in support of the other measures proposed in this paper.

DfE Comments on the paper

The paper is silent on the financial requirements and package of supports mechanisms required to be introduced to support the businesses likely to be impacted.

The introduction of restrictions without the regulations and support packages in place to inform businesses in their planning has been a frequent source of criticism of the Executive

The small independent retailers who form the bulk of the non- essential sector were reported as being “seething with resentment” towards the multi- nationals and those who flouted the “circuit breaker” and are likely to articulate their concerns in the media

There has been no consideration of any alternate approach to dealing with the rise in transmission nor any consideration of the principles I corresponded to the Executive previously.

There is little scientific data to link the retail sector to specific transmission of the virus – there is a need for the data behind these proposals to be clearly articulated and demonstrated, including a fresh analysis of the Non Pharmaceutical Interventions Paper presented to the Executive on 24 September. (The DoH paper states at para 41 that “As Executive Colleagues are aware, it is not possible to isolate the impact each individual measure will have on Rt. Whilst this has previously been estimated by SAGE, since it cannot be gauged exactly where in the community transmission is occurring, we cannot accurately assign a reduction in the Rt value to any setting or individual non-pharmaceutical intervention.”)

Economic Impact

- The proposed restrictions will have a detrimental impact on our already beleaguered local businesses. As an Executive we must that our response

of cohesive, coordinated and commensurate. I would welcome discussions with the Finance Minister on the funding available for a further tranche of business support.

- The requirements will be depend on the length and severity of the restrictions.
- The Northern Ireland economy was running around 25% below normal at the height of the spring lockdown. A recovery began over the summer, but then the local economy faced fresh restrictions which were introduced due to rising Covid-19 infection levels.
- As a result of the spring lockdown around 250,000 employees in Northern Ireland availed of HMRC's Job Retention Scheme, and tens of thousands of claims have been made under HMRC's Self-Employment Income Support Scheme. Many furloughed workers returned to work, at least part-time.
- Indications are that some employees may have been put back on furlough as restrictions were introduced during October to December 2020.
- There were 1,370 proposed redundancies in November 2020 and a further 340 proposed between 1st and 11th December 2020. Over 10,000 collective redundancies have been proposed since the beginning of March, with approximately half being proposed in the Manufacturing, and Wholesale and Retail Sectors.
- The Claimant Count in Northern Ireland is now around 59,900 people. The November count is more than double the number recorded in March 2020. The furlough scheme has been extended to March 2021, but further job losses may still have occurred and the peak Claimant Count in 2020 or 2021 may yet go higher than present levels.
- While the economic impact has been quite widespread, restrictions on specific sectors of the economy tends to hit some groups in society disproportionately. Younger workers, females, and those on low paid have been notably affected thus far.
- The autumn / winter restrictions on businesses have directly impacted on tens of thousands of jobs in the local economy and meant millions of pounds

in lost output. However, the impact (in immediate output terms) is likely to be not as severe as occurred in the springtime, but any further restrictions would now occur at a time of heightened business vulnerability / stress and diminished cash flows.

- There are still significant risks if recovery of output and jobs is not swift and sustained. The roll-out of the vaccine, coupled with pent-up demand may stimulate a strong 'bounce back'. Nonetheless, it may take years before economic activity fully returns to pre-pandemic levels.

Annex A

Summary of Post-Christmas Restrictions – DfE impact highlighted in bold

Transition provisions to allow for Christmas bubbling arrangements to remain as outlined in column 2 for 23-27 December. This will allow pre-planned overnight stays on Christmas night, and any additional interaction in private dwellings within these bubbles.

Transitional provisions to be in place to allow proposals for 23-27 to remain in place as agreed.

All educational activities beyond school or higher/further education must be delivered by distance learning unless face to face delivery is essential.

Limits for communal worship should be decided on the basis of the capacity of the place of worship following an assessment of risk, ensuring that a minimum of 2m is in place between all persons not of the same household.

People must not mingle indoors with anyone they do not live with or have formed a support bubble with.

Funeral Directors to maintain contact details of those attending to be maintained by the organiser

Hospitality venues ordinarily closed may open for the purposes of hosting a wedding of no more than 25 persons

Contact details of those attending to be maintained by the organiser

Closure of non-essential retail – see comments in Annex C

No sale of alcohol permitted from any business or venue after 8pm until 8am the following morning Monday to Saturday, or 10am on Sunday mornings. Exemptions for Ferries or airports.

No sale of alcohol permitted from any business or venue after 8pm until 8am the following morning Monday to Saturday, or 10am on Sunday mornings. Exemptions for Ferries or airports.

No outdoor seating on the premises or on any neighbouring area adjacent to the premises must be used by customers.

Homeware stores to close as well as Garden centres and ornamental plant nurseries and Christmas tree sales

Click and Collect not permitted

Those permitted to open must limit numbers permitted entry at any one time in order to ensure social can be maintained by those therein

Further work must be taken forward urgently by the Executive Office on the definition of non-essential retail to minimise the potential for abuse of this. This should include definition of essential hardware stores.

Expanded use of Covid marshals in the retail sector

Face coverings must be worn when permitted to open as per exemptions above

Those businesses permitted to open must operate an appointments only system.

Those businesses permitted to open must collect contact details of all customers

Annex B

Click & Collect

The CMO/CSA report concerns regarding the efficacy and use of the Guidance for Users and providers providing click & collect Services during the recent “circuit breaker”. The concerns are based on – we understand - anecdotal reports of abuses of the principles agreed with the retail sector.

We also understand that if the guidance were more restrictive and could reduce queueing and interactions within shopping centres the CMO/ CSA would be willing to consider the continued operation of Click & Collect (which they currently recommend should cease)..

The CSA has indicated that there is no direct or specific data to link click & collect and or the wider functioning of the retail sector to the increase in the rate of infection and or its transmission. However, he reports the combination of:

- Seasonal nature of corona viruses transmission;
- Numbers of tracing contacts reporting having been in shopping centres in the days before testing;
- Nature of visits to shopping centres (visiting multiple stores, length of time indoors, accessing café/ restaurants and toilet facilities) creates an evidential base linked strongly to shopping malls; and
- Cited example of 25% of TTP contacts in one local district council having been in one specific shopping centre.

DfE engagement with the retail sector, environmental health officers within the councils and intelligence indicates a number of issues were generated by the click & collect:

- Stores used the operation of their click & collect to remain fully open;
- Stores allowed in-store browsing prior to going to a terminal to order the item to game the guidelines;
- EHOs report that it made enforcement of the regulatory requirement to be closed very difficult;
- Stores permitted payments, including cash, to be accepted at the point of collection.

It is noted that in the instances cited the vast majority of stores operated within the guidelines (attached below for information), however, the cumulative impact has been to create the necessity for a review of the guidelines.

Retail NI report that many of the small independent traders do not have the facilities or staffing to maintain the technology to operate the click & collect nor the facilities to take online/ remote payments. Click & Collect, including provision of online catalogues and digital payment facilities do not sit within the small business model operated by many small independent traders.

It should be noted DfE has received no correspondence or questions on the functioning of click & collect.

Lines to Take

DfE have engaged with retail sector to suggest refinements to the operation of the click & collect guidance and suggest:

Non – essential businesses operating click & collect services must:

- **Only provide the service to those who have purchased and pre- paid items prior to arriving at the shop to collect the item(s);**
- **No access to the shop is permitted – the service can only be provided at the designated point for collection and the consumer must remain outside the premises;**
- **No payment transactions are permitted – the click & collect is a collection service only;**
- **Collection must be within allocated time slot; and**
- **No browsing of products or display of goods is permitted.**

It is considered the introduction of these additional requirements will reduce queueing and interactions between consumers and retail staff thereby enhancing their protection and maximising their safety.

DfE recognises that many smaller traders may not have access to online catalogues or the facility to accept payment and we will work with the sector to attempt to mitigate these issues.

Guidance for Users and providers providing Click & Collect Services during the “circuit breaker”

The Executive has agreed a controlled 'click and collect' service for retail can operate during the two-week circuit breaker beginning on Friday 27 November up to and including 10 December 2020.

To ensure click and collect facilities can operate on an appointment-only basis with maximum mitigations in place it is recommended that users should apply the following principles:

- Retailers and customers are encouraged to use on-line ordering and delivery as the first choice for customers. This is preferable as it will limit population mobility and social interactions and contacts;
- Those retailers who do not have an online facility should consider potential of phoned-in or text ordering;
- Collections are required to be by appointment only therefore collections should be scheduled to ensure no customer-customer contact and no queuing;
- Retailers are encouraged to allocate time slots which will allow them to manage a reasonable number of people per hour and customers are encouraged to attend within that timeslot;
- If collection is from a store in a shopping centre the collection point should be close to entrance with a one way system;
- Customers are not permitted to enter stores therefore collection should be from the entrance door;
- Collections should be by a designated customer to collect only therefore no household groups;
- Customers and retailers should encourage where possible pre-payment methods and contactless proof of purchase on collection;
- Customers and retailers are reminded of continuing necessity to use face coverings and the use of screens to protect customers and staff;
- Travel to and from store should if possible be by car, foot, or bicycle. If by car, members of one household should travel together (and only one person to collect, see above).

- Customers and retailers should continue to provide and use hand sanitisers for customers and staff, preferably by way of hands-free dispensing methods.
- Retailers are encouraged to design their click & collect system to avoid/minimise shared contact surfaces, to continue to frequently clean any shared surfaces that are unavoidable and maximise use of hands free technology to deliver their invaluable services.

There are some practical steps businesses can take to keep it as safe as possible. These mitigations are based on the high level general principles of infection prevention, which we are all now familiar with in the COVID context. The use of the appointment system reinforces positive impact of our Test, Trace and Protect.

There is the opportunity for everyone to contribute to managing the spread of Covid 19 by following the public health guidance and regulations by following the Six Daily Doables – Stay Safe.

Closure of Non Essential Retail

The Executive has recognised the issues in identifying the classification of Essential and Non Essential retail

Mobile Phones

The mobile network operators have previously asked that they be regarded as providing essential services and allowed to remain open.

Mobile network operators have around 60 retail stores throughout Northern Ireland.

It is estimated that around 35,000 customer service enquiries went unresolved each day in Great Britain during the recent lockdowns (i.e. over and above those which customers could resolve over the phone or on-line). This comes at a time when it has never been more important for people to remain connected digitally, particularly as it is critical to the functioning of an effective Test, Trace, Protect. With around one in five UK households now being 'mobile-only', many of these customers will struggle to get back online quickly at a time when a mobile connection could be a lifeline, and certainly vital for contact with family and/or work.

The stores are particularly important in supporting vulnerable customers. Since re-opening earlier in the year, the sector has reported an increase in vulnerable customer visits across retail stores. These are customers requiring personal service and include:

- Elderly customers who have low or no digital literacy. For the 55+ age group, experience shows that more than 50% of them prefer to use stores, with less than 20% comfortable using online services or call centres to get a new device. For example retail stores also provide problem solving services for customers experiencing difficulties with their mobile phones e.g. incorrect insertion of a sim card.
- Customers dealing with recent bereavement or in financial difficulty.

Operators have invested heavily over the past months in ensuring their stores are safe places for staff to work and customers to visit. This has been central to its strategy of being able to support staff and customers safely.

In terms of safety measures that the mobile companies have put in place, these include at a minimum as per the sample below:

- Electronic queuing/booking system
- Track and trace alerts at store entry
- PPE provision to staff members
- Face masks mandatory in-store
- Signage for social distancing and store movements

- Provision of hand sanitiser
- Area clean downs where customers have sat down
- Staff training in new COVID-19 measures

The mobile phone stores put in place a limited click & collect repair system in the first lockdown which users reported as being very helpful.

The proposed length of the restrictions, allied to the time of year, make the requirement to keep the mobile phone stores open to reduce social isolation and facilitate the functioning of those working from home is a significant consideration.

Impact on Tourism & Hospitality

- Tourism and hospitality businesses are already finding the current restriction period difficult.
- If we decide to close these businesses for 6 weeks we must fund them for 6 weeks. It has been an incredibly difficult year during which the tourism and hospitality industry has not been able to generate the revenue needed to see it through the Winter and into the Spring.
- We need to use the 6 weeks to somehow identify how we re-open businesses on a sustained basis, and without the need for repeated circuit breakers and lockdowns. That is simply not sustainable.

Impact of Brexit

DfE is concerned about NI businesses readiness for the end of the EU exit transition period.

There are a number of factors which will determine the scale of any disruption in January and further into 2021 including:

- the extent to which businesses have stockpiled in anticipation of disruption;
- GB to NI goods movement issues for example if customs paperwork is not completed correctly or if tariffs are applied to those businesses which haven't registered with the UK Trader Scheme
- Unforeseen issues with new UK Gov IT systems such as Trader Support Service and Goods Vehicle Movement Service.

- GB businesses ceasing to supply the NI market or placing conditions on sale to NI that the NI business will be responsible for transport to NI and all customs processes.

Issues arising to goods moving from GB could see sudden, significant and costly disruption to supply chains to NI businesses, particularly smaller entities, and ultimately consumers.

Despite the efforts of all Departments we cannot prepare all businesses with the time, resource and information available. This is particularly true given the late clarity on a number of key issues for GB to NI trade.

These are the risks which could have the most immediate impact on our economy and society. I am concerned that any COVID restrictions could have the potential to exacerbate or compound these issues.

DfE intend to continue to support businesses to prepare with the resources of my Department and ALBs. This work will continue throughout the Christmas period and into the New Year.

DfE would ask that we consider the potential for any restrictions relating to COVID to compound the impacts which many of our businesses will undoubtedly experience arising from changes to the trading environment at the end of the transition period. This will also need to be reflected in any support packages we bring forward.

FROM: DIANE DODDS MLA

Our Ref:
Your Ref:

DATE: 17 December 2020

TO: Robin Swann MLA

FINAL EXECUTIVE PAPER: POST CHRISTMAS RESTRICTIONS

Thank you for your draft Executive paper of 17th December 2020 regarding the above.

I fully recognise the challenges faced by the health sector, the sterling job done in getting us through the pandemic and the need for you to consider the emerging situation. However, you will understand that it is imperative that papers of the nature and significance be circulated as early as possible to allow full consideration of their wide impact. In addition, I note the absence of one of the annexes referred to in the paper and would hope the absence does not inhibit consideration of the existing paper.

However, the paper is silent on a number of matters:

- the financial requirements and package of supports mechanisms required to be introduced to support the businesses likely to be impacted;
- The introduction of restrictions without the regulations and support packages in place to inform businesses in their planning has been a frequent source of criticism of the Executive;
- There has been no consideration of any alternate approach to dealing with the rise in transmission nor any consideration of the principles I corresponded to the Executive previously; and
- There is little scientific data to link the retail sector to specific transmission of the virus – there is a need for the data behind these proposals to be clearly articulated and demonstrated, I note your reference to the Non Pharmaceutical Interventions Paper presented to the Executive on 24 September.

I would encourage you to revisit the issue of click & collect. DfE officials have engaged with the retail sector and environmental health officers within the councils. I would suggest that the previous guidance provided can be tightened by introducing the following procedures:

Non – essential businesses operating click & collect services must:

- Only provide the service to those who have purchased and pre- paid items prior to arriving at the shop to collect the item(s);
- No access to the shop is permitted – the service can only be provided at the designated point for collection and the consumer must remain outside the premises;
- No payment transactions are permitted – the click & collect is a collection service only;
- Collection must be within allocated time slot; and
- No browsing of products or display of goods is permitted.

I consider the introduction of these additional requirements will reduce queueing and interactions between consumers and retail staff thereby enhancing their protection and maximising their safety.

I recognise that many smaller traders may not have access to online catalogues or the facility to accept payment and my officials will engage with the sector about these issues.

In addition I would suggest that our previous experience indicates that mobile phone stores including the repair of mobile phones should remain open. The mobile phone is a critical tool not only in supporting the Test Trace, Protect App and in addressing the social isolation and loneliness that we recognise the pandemic has generated, and in particular at this time of the year. I can provide further information if required.

Once again Tourism and hospitality businesses are already finding the current restriction period difficult. If we decide to close these businesses for 6 weeks we must fund them for 6 weeks. It has been an incredibly difficult year during which the tourism and hospitality industry has not been able to generate the revenue needed to see it through the Winter and into the Spring.

If a 6 week lockdown is agreed by the Executive, we need to use the 6 weeks to somehow identify how we re-open businesses on a sustained basis, and without the need for repeated circuit breakers and lockdowns. That is simply not sustainable.

Finally we have to consider the potential that the restrictions may have on Brexit preparations.

I am concerned about NI businesses readiness for the end of the EU exit transition period. There are a number of factors which will determine the scale of any disruption in January and further into 2021 including:

- the extent to which businesses have stockpiled in anticipation of disruption;
- GB to NI goods movement issues for example if customs paperwork is not completed correctly or if tariffs are applied to those businesses which haven't registered with the UK Trader Scheme
- Unforeseen issues with new UK Gov IT systems such as Trader Support Service and Goods Vehicle Movement Service.
- GB businesses ceasing to supply the NI market or placing conditions on sale to NI that the NI business will be responsible for transport to NI and all customs processes.

Issues arising to goods moving from GB could see sudden, significant and costly disruption to supply chains to NI businesses, particularly smaller entities, and ultimately consumers.

Despite the efforts of all departments we cannot prepare all businesses with the time, resource and information available. This is particularly true given the late clarity on a number of key issues for GB to NI trade.

These are the risks which could have the most immediate impact on our economy and society. I am concerned that any COVID restrictions could have the potential to exacerbate or compound these issues.

DfE intend to continue to support businesses to prepare with the resources of my Department and ALBs. This work will continue throughout the Christmas period and into the New Year.

I would ask that we consider the potential for any restrictions relating to COVID to compound the impacts which many of our businesses will undoubtedly experience arising from changes to the trading environment at the end of the transition period. This will also need to be reflected in any support packages we bring forward.

The proposed restrictions will have a detrimental impact on our already beleaguered local businesses. As an Executive we must that our response of cohesive, coordinated and commensurate. I would welcome discussions with the Finance Minister on the funding available for a further tranche of business support. The requirements will be depend on the length and severity of the restrictions.

I am copying this to the Attorney General, Departmental Solicitor's Office, First Legislative Counsel and to Executive Secretariat.

DIANE DODDS MLA