



Llywodraeth Cymru  
Welsh Government

**From:** Name Redacted Recovery & Restart

**Cleared by:** Simon Brindle

**Date:** 20 October 2020

## MINISTERIAL ADVICE

**For decision by: First Minister**

**Copied to: Counsel General and Minister for European Transition;  
Deputy Minister for Housing and Local Government; Minister for  
Health and Social Services;**

<b>Subject</b>	Requirements to self-isolate in Wales
<b>100 word summary</b>	This advice explores potential changes to the Health Protection (Coronavirus Restrictions) (No. 2) (Wales) Regulations 2020 in relation to requirements to self-isolate following either a positive test for COVID-19 or being identified by NHS Test, Trace, Protect as a close contact of a positive case.
<b>Timing</b>	Urgent – the UK Government introduced payments and penalties in relation to self-isolation from Monday 28 September
<b>Recommendation</b>	You are asked to: <ul style="list-style-type: none"> <li>1 Agree to amend the Health Protection (Coronavirus Restrictions) (No. 2) (Wales) Regulations to introduce a duty on employers not to knowingly enable or encourage an employee to fail to follow the advice to self-isolate given by the Test, Trace, Protect service.</li> <li>2 Note the options in relation to a potential requirement to self-isolate by all those who test positive for COVID-19 or are identified by NHS Test, Trace, Protect as a close contact of a positive case.</li> </ul>
<b>Decision report</b>	This decision does require a Decision Report, which may be published at any point.

## Advice

### Background

1. The Health Protection (Coronavirus Restrictions) (Wales) Regulations 2020 (“original Regulations”) came into force at 4:00pm on 26 March and were amended substantively by numerous amending SIs. They were revoked and replaced by the Health Protection (Coronavirus Restrictions) (No. 2) (Wales) Regulations 2020 made on 10 July and which are referred to in this advice as “the principal Regulations”.
2. The principal Regulations impose temporary restrictions on gatherings and the movement of people, and requirements and restrictions on the operation of businesses, including closures, in Wales. This was initially done to minimise the extent to which people left their homes to help reduce and control the spread of severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2)

### Advice

3. The UK Government’s approach in England to ensuring people self-isolate combines providing financial support alongside changes to regulations. This advice focuses on potential changes to the regulation in Wales
4. The First Minister has signalled that he is minded to consider a support payment of £500 to individuals who need to self-isolate because they have tested positive for Covid-19, or because they are a close contact (as identified by Test, Trace, Protect (TTP) teams) and are on a low income, would be unable to work from home and would lose income as a result. Separate advice in relation to this financial support was provided on 19 October (MA/FM/3134/20).
5. The UK Government introduced the following changes to the regulations in England from 28 September:
  - Requirement to self-isolate by all those who test positive for COVID-19 or are identified by NHS Test and Trace as a close contact of a positive case;
  - An employer must not knowingly enable or encourage their employees to break the law on self-isolation; and
  - a new offence to knowingly give false information to TTP to either fraudulently claim support payments or to maliciously require a person to self-isolate.
6. They have indicated they would like to see a four nations approach to self-isolation. We understand that neither Scotland nor Northern Ireland intend to introduce any regulatory requirements in relation to self-isolation.

## Analysis of the situation in Wales

7. The underpinning evidence for levels of compliance in relation to self-isolation is set out in Annex 1 to this advice. This sets out the structured evaluation evidence and also summarises feedback from the TTP teams on the factors mentioned by people they are contacting.
8. It is clear that the direct evidence about levels of current compliance with the expectation index cases and their close contacts will self-isolate is limited. Discussions with contact tracing teams do not however suggest significant numbers of people in Wales are failing to comply with the recommendation to self-isolate.
9. The UK Government has cited evidence that only 1 in 5 people in the UK required to self-isolate complies. As set out in Annex 1 the evidence base for this seems poor.
10. It is reasonable to state that some people will experience greater difficulties than others in complying. For example, if working from home is not an option given the nature of someone's work, or where their contractual position meant they would not get paid or if they have existing significant financial pressures then compliance will pose greater challenges.

### Requirement to Self-Isolate

11. Designated public health officers can already use powers under the Coronavirus Act 2020 to use directions to impose legal obligations on individuals who may be infectious:
  - to go to a specified place for a test
  - to take a test
  - to remain at a place for 48 hours for screening and assessment
  - to provide contact tracing information
  - to remain at a specified place or to self-isolate for up to 14 days
12. The requirements in England create an offence for a person not self-isolating, without a reasonable excuse, when requested to do so by specified people (this does not include the NHS App). A breach is punishable by a Fixed Penalty notice of £1,000 for a first offence (in line with the quarantine regulations for people returning from overseas) rising to up to £10,000 on a scale for subsequent offences.
13. A separate offence has been created in England for not self-isolating, without a reasonable excuse, if they: have reason to believe they will come into close contact with another person or group; does then come into close contact with another person or group; is reckless as to the consequences of that close contact for the health of that other person or group. This offence attracts an initial FPN of £4,000 rising to £10,000 for the second and subsequent fine.

14. Ministers have previously received advice covering the behavioural drivers and enforcement of contact tracing (MA/VG/1559/20). This describes how contact tracing has to date been reliant on the public’s willingness to voluntarily engage with the system and provide information. If people do not willingly engage with the process, there is a risk that contact tracing will not be effective.

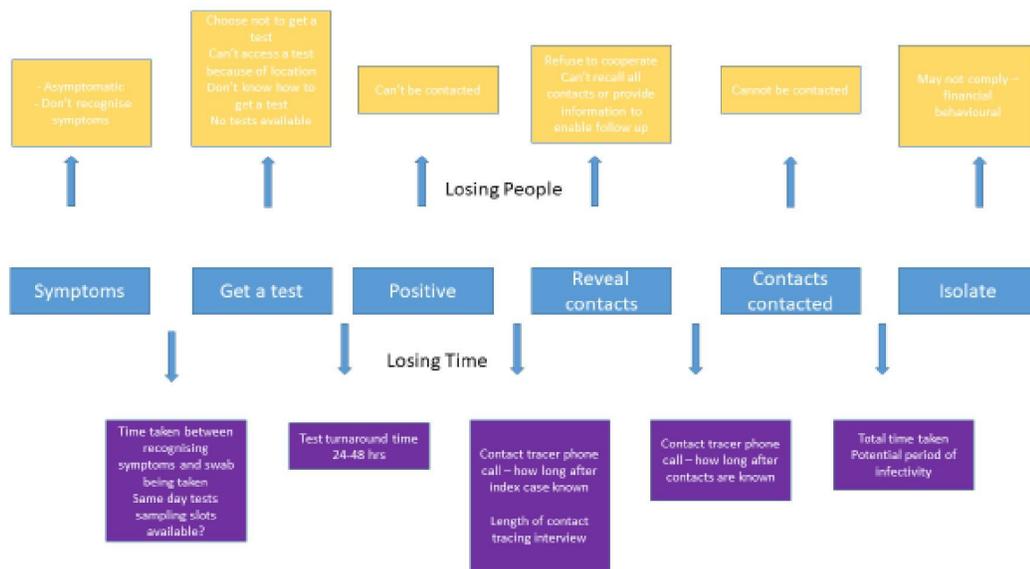
**Context of TTP**

15. In our TTP strategy we set out the important role that public engagement plays in enabling TTP to operate, we rely on the public being willing and able to do the right thing, from getting tested to recalling and sharing information about their contacts and isolating when asked to do so. We have always said that the public are our greatest ally in tackling the coronavirus and their engagement is critical.

16. The effectiveness of TTP is affected by 2 critical factors:

- The speed with which we are able to test cases and then isolate contacts
- Our ability to ‘capture’ as many people as possible.

This is outlined in the diagram below.



17. Anything that reduces people’s willingness to engage with TTP means that we will reduce its effectiveness.

18. We know from the initial outbreaks that we experienced in N Wales, particularly Wrexham that TTP can be viewed with suspicion by some and notably those from our BAME or migrant populations.

19. In recent weeks test positivity has increased sharply, it is now 12%, compared to around 2% over the summer months. This figure includes results generated

by our asymptomatic testing programme in care homes, routine screening for hospital admissions etc. so the positivity rate amongst those seeking tests through our mass testing centres is higher still. This high rate of test positivity is potentially significant. Test positivity could indicate that people have a greater understanding and awareness of the symptoms of covid-19 so that we are testing fewer people with wider respiratory illnesses. It could reflect the targeted active case finding that LHBs are engaged in – for example around their student populations. However it could also signify that too few people are coming forward for testing. In the last month the number of tests undertaken per week through our public facing testing sites has shown a decline - 37,189; 37,604; 34,453; 31,159. The numbers can be 'bumpy so this does come with a note of caution. The overall increase in testing that we have seen has come through asymptomatic and hospital testing. A recent TAC paper has suggested that around 3 in 4 people who may have covid-19 are not seeking a test – while some of those not seeking a test will include the significant numbers of people who will be asymptomatic it would suggest there are a number of people who are symptomatic not getting tested.

20. Anything that further reduces people's willingness to engage with TTP therefore poses a risk to the effectiveness of the system and the contribution that it can make to controlling R.
21. The TAC Risk Communication and Behavioural Insights Subgroup recently published advice on contact tracing and young people and identified some key enablers for young people to engage with contact tracing. This included:
- collective responsibility – specifically highlighting social role and identity in groups they 'belong to';
  - personal benefit i.e. protect themselves from the losses they have experienced or perceived (importance from their perspective);
  - offer/provision of support to barriers of isolation, particularly employment and finance;
  - co-production of contact tracing systems;
  - and the perception of the system as efficient, rigorous and reliable (there has been a lot of negative press related to apps, data breaches and the system)
22. We have been considering what changes we may want to make to TTP – reflecting on the experience of the past few months and also looking ahead to the possibility of new testing technologies. In broad terms we need to be considering how we can reduce the 'burden' of TTP, for example by minimising isolation periods. By way of illustration, if people are going to contract covid-19, 97% of contacts will have done so by day 11, and 90% will have done so by day 7. If we reduced the isolation period to 7 days, would we increase compliance and by doing so reduce the overall risk of transmission?
23. There is some way to go to determine what is possible and of course all of this has to be approached with due caution but there are different ways in which we can tackle the challenge of increasing people's engagement with TTP.

**Advantages of an approach to create an offence**

24. There would be a clear and unambiguous public message about the importance of self-isolation as a means of limiting the spread of coronavirus.
25. The most compelling reason is to ensure rationality and consistency across the entirety of the regulations in Wales. It is an offence to meet someone from outside your household, say, in a pub because of a theoretical risk (even without symptoms) of spreading the virus, but a person who has had a positive test or been asked to self-isolate because of close contact with somebody who has tested positive can go to the pub despite the likelihood of that person passing on the virus being high.
26. As part of the rationality argument, the travel restrictions in Wales have been implemented on the basis of preventing infection from spreading. We risk having a very strict travel policy that we are pressing others to adopt, yet not legally preventing someone from a low risk area that has had a positive test (or at high risk because they have been in contact with someone testing positive) from travelling wherever they like. In other words, is it right that we prevent somebody from Merseyside from travelling to Wales based on a theoretical risk of passing on the virus, when somebody who lives in Powys and has tested positive is free to travel into England and go to a pub or go shopping.
27. Alignment with England could aid compliance as rules may be easier to understand.
28. Public and visible enforcement could help drive wider compliance.
29. An offence (even without a FPN attached – see later discussion) provides a mechanism to prosecute the most egregious examples of breaking isolation rules (even if less serious breaches are not prosecuted).
30. This is consistent with the quarantine regulations for international travellers. It is worth bearing in mind that we have chosen not to enforce these through police, however - PHW follow up returning travellers but do so on welfare grounds and no information is shared with the police. As part of the Global Travel Taskforce the UK government is looking at the quarantine system and at the moment the lead option being considered is 'test and release', a 5 day quarantine period which would end subject to a negative test.

**Disadvantages of an approach to create an offence**

31. It is not clear it would be enforceable in general terms given an unknown and ever-changing cohort of the population.
32. A lack of visible enforcement and people seeing neighbours or others not self-isolating and not being punished could lead to lower compliance generally. This is likely to be true without the offence, but the creation of the offence creates an unrealistic public expectation about enforcement.

33. This offence could not cover those asked to self-isolate through a notification in the NHS Covid-19 App. The app is anonymised and also can be deleted by the user at any time, so there is no way to validate or to check on the status of self-isolation through it. The numbers notified through the app are significantly smaller than through ordinary contact tracing, but could increase. However this does create an anomaly, which needs to be explained to the public and could lead people to conclude that notifications to self-isolate through the app carry less weight and are therefore 'optional' (the app FAQ is already being redrafted to clarify these issues in England).
34. A proactive approach based on targeting 'higher risk' individuals (as the UK Government were considering) would involve sharing of information between the police, Test and Trace Services and the local authorities who will administer support payments. This is not something Ministers have been comfortable considering up until now, and in establishing TTP assurances were made to the public that peoples' data would only used by TTP and will not be shared for enforcement or surveillance purposes. A passive approach (e.g. TTP teams checking names and contact details on request) could alleviate these concerns but would not allow proactive enforcement.
35. The TTP contact tracing system is funded and facilitated by Welsh Government but is operated by LHBs and LAs. This has been a notable strength of the arrangements in Wales, and increasingly there are calls to move to a similar arrangement of 'local contact tracing teams' in England, responding to issues with the centralised and outsourced arrangements currently in place.
36. The collection, storage and use of data by the TTP contact tracing system in Wales is covered by a common Data Sharing Agreement, in which all 22 Local Authorities, all 7 Health Boards, and NWIS and PHW, act as joint data controllers. Welsh government is not a party to the data sharing agreement. A Privacy Notice and Data Protection Impact Assessment describe how data is used. It is proposed to amend these documents to allow 'validation checks' for the purposes of confirming eligibility for self-isolation payments. This would merely confirm whether an individual has been notified to self-isolate through the contact tracing service in Wales. It would not confirm or share any personal details of individuals or groups of people. Consideration of sharing data in a similar way with the police for enforcement is probably something we would want to do with the support and agreement of LAs and LHBs who are the data controllers alongside PHW and NWIS.
37. FPNs, or the risk of a criminal record, for breaking the rules about self-isolation could drive perverse behaviours. A very high FPN could lead to people with mild symptoms choosing not to get tested in order to avoid being subject to legal duties and the risk of a high FPN. This might be even more likely for lower income and higher risk groups unlikely to be able to afford a high fine and potentially less likely to trust the police. However, the counter argument to this is that people who are unwilling to be tested may be unwilling to self-isolate in any event.
38. Other perverse behaviours might be people choosing not to report friends family or work colleagues so that they are not required to self-isolate and

potentially exposed to sanctions, or alternatively falsely reporting acquaintances as contacts in order to force them to self-isolate perhaps even with the intent of subsequently reporting them for breaching self-isolation. Although this could be mitigated by making it an offence to provide false information to TTP (see below) there would be an administrative burden and additional pressure on resources were people to 'game' the system in this way.

### **Police views**

39. In a letter received on 13 October, Alun Michael (Chair, Policing in Wales Group) and Carl Foulkes (Chair, Welsh Chief Officer Group) suggested should Welsh Government want to take a more robust stance in relation to enforce requirements on individuals to self-isolate, "the following powers could be considered".

- Within a Local Health Protection Area, provide powers for a constable and other designated persons to stop a person in a public place to determine their compliance within public health regulations.
- Within a Local Health Protection Area, provide a power for a constable or other designated persons to require a person suspected of not being in compliance with public regulations to provide their name and address.
- Within a Local Health Protection Area, provide a power for a constable or other designated persons to direct a person suspected of breaching public health regulations to a location as is deemed appropriate by that designated person.

### **Potential impact on operation of TTP**

40. The efficacy of contact tracing is highly dependent on compliance particularly prompt symptom reporting and rapid access to testing. It is important people understand the purpose of contact tracing is to continue to protect people within society and the part that they have to play.

41. Learning from outbreaks in North Wales and stakeholder engagement has identified that BAME and other minority groups, such as refugees, travellers etc. has shown that there is a lot of distrust and concern about TTP information being passed onto police, home office, immigration etc.

42. We do not know and cannot forecast the potential impact on compliance which could result from introducing a duty. Nor can we estimate the potential decrease in engagement with TTP: the numbers deterred from taking a test, the number of contacts that we would fail to identify and make contact with. On the balance of risk, engagement offers more scope than punitive action, particularly give we have yet to see the impact of the self isolation payments which remove one important barrier to compliance with isolation.

43. Given the fundamental importance of self-isolating, not introducing a duty to do so could appear contradictory given we have criminalised other activities, such as meeting people indoors. It would also mean that a person from England who tested positive could not come to Wales but a person in a non-restricted area of Wales who tested positive could not be restricted from travelling anywhere in England. This is also considered in the Legal Advice section.

**44. There are compelling arguments for and against introducing a self-isolation duty, with the decision dependent on the overall objective. A view is sought on preferences given the options set out below.**

### Options for a requirement to self-isolate

45. This leads to a number of possible options. Given the evidence above there is no clear evidence there is a significant problem with self-isolation beyond the financial pressures (being addressed through the duty :

- a. Make not self-isolating an offence but do not attach a FPN to it. This would allow for the prosecution of particularly egregious offences but will mean most offences are likely to go unpunished. It is not clear what threshold might be required for such as prosecution to take place and one can only assume there is likely to be a very high bar.
- b. Make non self-isolating an offence and include a FPN regime as part of that. Particularly egregious examples could still be subject to criminal prosecution. There are two current models or a bespoke one could be created. A review of the entire FPN regime is underway to inform the post-firebreak regime, so this could be amended at that time. FPNs might take the form of:
  - i. Standard FPN of £60 for a first offence (reduced to £30 if paid early) and then escalating
  - ii. Quarantine and England approach of £1,000 for first fine (England escalating to £10,000)
  - iii. A new FPN somewhere in between (e.g. £200 or £500 for a first offence).
- c. Do not make it an offence on the individual but address the barriers to self-isolation: payment for self-isolating to address financial barriers (separate advice has been provided on this); and create an offence for employers to not allow staff to self-isolate (below).

46. If introducing a specific offence a series of reasonable excuses will be required to identify situation in which it may be acceptable to break self-isolation. Those set out for England might be replicated:

- to seek urgent medical assistance;
- to access urgent veterinary services;
- to fulfil a legal obligation;

- to avoid a risk of harm;
- to attend a funeral of a close family member;
- to obtain basic necessities where it is not possible to obtain these provisions in any other manner;
- to access critical public services, including social services, and services provided to victims (such as victims of crime); and
- to move to a different place where it becomes impracticable to remain at the address at which they are.

### Requirement on the Employer

47. Feedback from TTP in Wales suggests that a number of the instances where people do not self-isolate following a positive test for coronavirus or being identified as a close contact are due to businesses putting pressure on people to go back to work.
48. Guidance produced by the UK Government describes local authority enforcement officers as responsible for the enforcement of this requirement on employers in England. If employers are found to be in breach of this requirement, they will be issued with a Fixed Penalty Notice. Repeated breaches will see an increase in the level of Fixed Penalty Notice (£1,000 first offence; £2,000 second offence; £4,000 third offence; £10,000 fourth and subsequent offences).
49. UK guidance also sets out if a worker is able to work from home, they should do so while self-isolating. If a worker can't do their job from home, they may take annual leave to accommodate the period of self-isolation, if this is agreed. If not a period of paid or unpaid leave may be agreed. A person qualifies for Statutory Sick Pay if required to self-isolate.
50. The Directors of Public Protection Wales (DPPW) Executive Board recognised that whilst powers existed under Regulation 12 to manage the duties of employers, a similar prescriptive duty to England's would make the enforcement process and messaging to employers in Wales more straightforward. They agree sanctions should be fixed penalty notices but believe this would be more of a deterrent as prosecution is unlikely to be pursued due to limited resources. DPPW also stress that any duty should encompass those who are self-employed.
51. The Wales Trade Union Congress (WTUC) General Secretary, Shavanah Taj, has said the full General Council have indicated they support the burden of responsibility to self-isolate being placed on the employer, rather than the employee. The WTUC argue it is vital to have a safety net whereby the employer would pay self-isolating staff sick pay at the full rate; those members of staff would not be expected to take annual leave or unpaid leave to cover their absence from the workplace; and they would not be disadvantaged as a result of hitting 'milestones' or 'trigger points' set out in the employer's sick absence policies. The WTUC say they are finding some of this bad practice being highlighted as a means to coerce people into work by bad managers.
- 52. Ministers are advised to agree to amend the Regulations so that an employer must not knowingly enable or encourage employees who have**

**tested positive for COVID-19 or are identified by NHS Wales Test, Trace, Protect as a close contact of a positive case to not self-isolate.**

- 53. To support this, as in England, it is recommended the Regulations should also require workers to notify their employer of that they are self-isolating and the start and end dates of the isolation period.**

New offence to knowingly give false information to TTP

54. The separate advice in relation to a financial support package also recommended that a new offence to knowingly give false information to TTP to either fraudulently claim support payments or to maliciously require a person to self-isolate is created. This follows the Star Chamber request to mitigate the potential for fraudulent claims of financial support provided in Wales.

**Legal issues, powers & statutory duties**

55. To date, restrictions have been imposed by means of a series of Coronavirus Restrictions (and Amendments) Regulations by virtue of powers exercisable under section 45C of the Public Health (Control of Disease) Act 1984, subsection (1) of which gives the Welsh Ministers powers to make Regulations “for the purpose of preventing, protecting against, controlling or providing a public health response to the incidence or spread of infection or contamination in... Wales”. There is, however, risk in proceeding to use these powers in order to introduce a requirement on individuals who had tested positive for coronavirus, or who had been contact traced, to self-isolate. These risks are set out in advice annexed to this MA. In brief, these risks arise from the fact that provision which may be made under section 45C may not impose a special restriction or requirement mentioned in section 45G(2)(a), (b), (c) or (d), section 45G(2)(d) being an order that a person be kept in isolation or quarantine. On balance, Legal Services consider that the powers under the 1984 Act would be wide enough to impose such a duty on people. Alternative powers are available, whether by means of reliance of orders of magistrates under section 45G of the 1984 Act requiring individuals to isolate, or by means of powers of public health officials under Part 4 of Schedule 21 to the Coronavirus Act 2020, requiring people to submit for screening and assessment, which may in turn lead to the officials requiring persons to remain in a specified place for a specified period (i.e. self-isolate). However, those powers apply only to individuals who have been specifically assessed. They do not provide a response to combat the threat of a wider category of people, who will have been identified as having been in close proximity with people who have tested positive for coronavirus, from circulating in the community and therefore increasing the risks of transmission of the virus. As such, you will need to balance the public health risks of not pursuing provisions against the legal risks inherent in a challenge which Legal Services assess as low to medium.
56. To the extent that you consider Regulations should be made under section 45C, section 45D(1) provides that regulations may not impose a restriction or requirement, unless the Welsh Ministers consider that the restriction or requirement is proportionate to what is sought to be achieved by imposing it. You will therefore need to be satisfied that the restrictions or requirements are

needed for the purpose of preventing, protecting against, controlling or providing a public health response to the incidence or spread of infection of the coronavirus in Wales and that they are proportionate to that response.

57. The MA sets out both the pros and cons in proceeding with the proposal which you will need to weigh up based on public health advice. Legal Services consider that a situation where greater penalties are imposed on people who may breach requirements to stay at home, even if in reality posing a far lesser health risk, than on people who are aware that they have tested positive to coronavirus and yet who leave home (subject of course to restrictions imposed by the firebreak) is difficult to justify as a rational proposition, at least insofar as that stands. That said, there is separately advice setting out concerns that such restriction and indeed penalties may act as a deterrent on people coming forward for testing, which itself carries significant public health risks. These are all relevant factors to consider and balance in reaching a decision.
58. Legal Services note that an equality impact assessment has not been prepared. This too carries risk, which has been amply set out in advice provided in connection with decisions to amend the Coronavirus Restrictions Regulations.
59. Legal Services have carried out an analysis of the proposals from an ECHR perspective which is annexed to this MA.

### **Equality and UN Convention Rights of the Child (UNCRC)**

60. An Integrated Impact Assessment, incorporating an Equality Impact Assessment and taking account of the UNCRC, is being developed for the TTP programme as a whole. These documents will be amended to take account of any new arrangements around self-isolation.

### **Financial implications**

61. There are no direct financial implications to the Welsh Government arising from either new restrictions on the individual or employers relating to requirement to self-isolate. However, we understand these might have a negative impact on the businesses caught by the restriction.
62. £40m is already available for business support within the ERF budget and this may be used to support some businesses facing difficulty. Work is also ongoing to understand how the Discretionary Assistance Fund (DAF) could provide a mechanism for making support payments to individuals if required.

### **Communication engagement and media activity**

63. If isolation penalties are introduced we will have to adapt our communication materials to ensure that people are clear about the consequences of non-compliance. This will also require a change to the scripts used by contact

tracers and they will need to be trained as to the new regulations and provided with detailed FAQs to be able to answer questions from cases and contacts.

**Annex 1: ASSURANCE AND COPY RECIPIENTS**

**CLEARANCE TRACKING**

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

**DIRECTOR, STATEMENT OF ASSURANCE**

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

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

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

**COPY LIST**

All mandatory copy recipients (as indicated in the guidance). Additional copy recipients specifically interested in this advice:

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