

1) Official submission to the First Minister – 6 July 2020

From: [redacted]
Population and Migration Division
6 July 2020

First Minister
Cabinet Secretary for Justice
Cabinet Secretary for Health and Sport

**PROPOSALS FOR EXEMPTIONS TO QUARANTINE ON ARRIVAL TO SCOTLAND:
ADVICE**

Purpose

1. To provide updated advice and to seek a final decision on proposals for exemptions to the border health measures.

Priority

2. **Immediate** - UK Government has announced the countries they proposed to exempt from the self-isolation requirement of the border health measures.

Background

3. The border health measures as set out in the Health Protection (Coronavirus) (International Travel) (Scotland) Regulations 2020 (“the International Travel Regulations”) and the Health Protection (Coronavirus, Public Health Information for Passengers Travelling to Scotland) Regulations 2020 (“the Information Regulations”) are a key element in the Scottish Government’s measures to control Covid-19 transmission and maintain a safe and healthy population. The International Travel Regulations include two elements:

- The requirement to provide passenger information; and
- The requirement to self-isolate.

The intention is that all passengers will still have to provide information to Border Force on, or before, arrival into Scotland. The focus therefore is the proposal to exempt travellers from specified countries from the requirement to self-isolate.

4. The measures were initially introduced on a blanket basis and applied to travellers arriving from all countries outwith the Common Travel Area (CTA) irrespective of the prevalence rates in each country.

Country Specific Exemptions

5. We have been engaged in a discussion with UK Government at official level about their approach to introducing travel corridors or ‘air-bridges’ and exempting travellers

from certain countries for the self-isolation requirement. [redacted]. However, the UK Government has now published a list of countries it proposes to exempt.

6. As set out in my submission of 2 July the UK Government have provided information on the methodology they have adopted to assess countries as low, medium or high risk. The methodology comprises:

- Estimated point of prevalence – an estimate of the proportion of the population that is currently infectious. The incidence rate measures the rate of new infections and is a useful guide to whether prevalence is likely to increase or decrease. The approach adopted by UK Government considers both prevalence and incidence;
- An assessment by Public Health England (PHE) of the risk of exposure to COVID-19 derived from data published on-line by each country's government or public institute (this assessment is being used to inform FCO Travel Advice).

7. This information is then used place countries within an overall RAG rating. If a country has a point prevalence higher than in the UK the country receives a red indicator and where it is close to the UK an amber indicator. PHE assign a red (high risk); amber (moderate) and green (low) risk rating to countries for their assessment. Countries who receive green in both categories are assessed overall as green; red in both categories red while those with a mixed assessment are rated as amber. [redacted]

Discussion

8. We consider that a tailored approach which differentiates countries on the basis of prevalence rates in other countries is sensible and recommend exempting travellers from those countries assessed as green or low risk.

9. The primary issue therefore is how to deal with travellers from medium or amber risk countries. There are three options here:

- a) Only exempt travellers from green or low risk countries and require international travellers from other countries (apart from Ireland) to self-isolate for 14 days on arrival in Scotland.
- b) Exempt travellers from all countries which the UK Government have assessed as medium or amber risk from the self-isolation requirement on entry into Scotland. This would align Scotland with the position taken by the UK Government for England.
- c) Exempt travellers from some of the countries on the amber list from the self-isolation requirement.

10. I attach at **Annex A** a list of the countries that the UK Government has assessed as low risk (green). The UK has published their list as a single list and has not separated them into low and medium risk. If we were to only exempt low risk countries this would mean that we would have to be explicit about the two categories and the division between the two. [redacted]

11. We have been reviewing the list of medium risk countries and there have been discussions today with the Joint Biosecurity Centre to ensure that we have access to the most up to date information in considering the case for exempting certain countries. I

attach at **Annex B** a list of the countries on the Amber list split to show those countries with a point prevalence significantly below Scotland; those with a point prevalence similar to Scotland and those with a point prevalence significantly above Scotland.

12. One option therefore could be to exempt some of countries on the amber list but not those with a point prevalence significantly above that of Scotland.

13. The only country which has a point prevalence significantly above that of Scotland is Spain. Spain was the most popular destination for international flights. In 2018, an estimated 2.2 million people arrived from Spain (inc Canary islands) into Scottish airports¹. This is 39,000 per week. At the current prevalence rate [redacted] in Spain², this would mean around [redacted] people with Covid would arrive from Spain each week. This compares to a total of 1,100 people with Covid in Scotland as at 3rd July³. While it is unlikely that flights from Spain would immediately return to pre-lockdown levels there is clearly a potential for significant numbers of people to be travelling between the two countries. However, this is significantly less than journeys between England and Scotland, where there are an estimated 23 million vehicle crossings and 7 million train passengers crossing the border.

14. [redacted]:

- [redacted]
- [redacted]
- [redacted]
- In a discussion between Cabinet Secretary for Justice and Edinburgh and Glasgow airports they flagged the importance of routes to Spain in particular for their financial planning.

15. The judgements here are finely balanced. The WHO criterion for importation is: *Manage the risk of exporting and importing cases from communities with high-risks of transmission*. If the focus then is on high rates of transmission then that might suggest that exempting countries assessed as low and medium risk would be consistent with the WHO criteria.

16. If our intention is to achieve and sustain elimination of the virus this will require robust border controls to be in place to reduce the possibility of new introductions of infection. In that case there is a strong argument for limiting the exemptions to countries classified as low risk.

17. [redacted]

18. [redacted]

Wales and Northern Ireland

19. [redacted – out of scope]

¹ Scottish Transport Statistics 2019

² Modelled prevalence estimates for 26th June from JBC/London School of Hygiene and Tropical Medicine

³ Modelled prevalence estimates for Scotland as at 3rd July

20. [redacted – out of scope]

Review

21. It is clear that there could be improvements to the data and evidence which is being used to inform the analysis of countries and their risk rating. The CMOs have committed to undertaking further work to improve the methodology and in discussions with the JBC today analytical colleagues have discussed potential for changes. While there may therefore be a stronger and more robust position for future reviews this information will not be in place in time to take a decision before the planned implementation date of 10 July.

22. The UK Government have indicated that the intention is that the JBC will issue updated data on a weekly basis to reflect the most up to date data and epidemiological intelligence. The next update of the data should be available on 8 July. The UK Government propose to formally review the regulations and the list of countries every 28 days, at which point they may add additional countries to the exemptions list. At the moment the intention is not to add countries between review points but if the weekly review process identifies an issue of concern then it will be possible to remove a country between review points.

23. [redacted]

Conclusion

24. The border health measures are one strand in our wider package of measures to address the threat posed by covid-19. If our intention is to achieve and sustain elimination of the virus this will require robust border controls to be in place to reduce the possibility of new introductions of infection. In that case there is a strong argument for limiting the exemptions to countries classified as low risk (green) with a clear statement that further work is being undertaken on the assessment criteria and that a further review will be undertaken once that work has been completed with a view to widening the list of countries once this work has been undertaken, possibly in advance of the next formal review point, and we have further confidence on the countries in the amber risk rating.

[redacted]

Population and Migration Division
6 July 2020 [redacted]

**PROPOSALS FOR EXEMPTIONS TO QUARANTINE ON ARRIVAL TO SCOTLAND:
ADVICE**

LIST OF COUNTRIES ASSESSED AS LOW RISK: GREEN

Antigua and Barbuda;
Aruba;
Australia;
Austria;
The Bahamas;
Barbados;
Bonaire, Sint Eustatius and Saba;
Curaçao;
Cyprus;
Dominica;
Faroe Islands;
Fiji;
Finland;
French Polynesia;
Germany;
Greenland;
Grenada;
Guadeloupe;
Hong Kong;
Hungary;
Iceland;
Jamaica;
Japan;
Réunion;

2) Official submission to the First Minister – 7 July 2020

From: [redacted]
Population and Migration Division
7 July 2020

First Minister
Cabinet Secretary for Justice
Cabinet Secretary for Health and Sport

**PROPOSALS FOR EXEMPTIONS TO QUARANTINE ON ARRIVAL TO SCOTLAND:
ADVICE**

Purpose

1. To provide updated advice on the border health measures.

Priority

2. Immediate

Background

3. The border health measures as set out in the Health Protection (Coronavirus) (International Travel) (Scotland) Regulations 2020 (“the International Travel Regulations”) and the Health Protection (Coronavirus, Public Health Information for Passengers Travelling to Scotland) Regulations 2020 (“the Information Regulations”) are a key element in the Scottish Government’s measures to control Covid-19 transmission and maintain a safe and healthy population.

4. The measures were initially introduced on a blanket basis and applied to travellers arriving from all countries outwith the Common Travel Area (CTA) irrespective of the prevalence rates in each country. However, the UK Government has stated that from 10 July it will exempt travellers from specified countries from the requirement to self-isolate and has published a list of those countries (attached at **Annex A**).

Country Specific Exemptions

5. The First Minister has asked for further analysis, based on the data provided by UK Government based on data from the Joint Biosecurity Centre (JBC) and Public Health England to identify those countries who have a point prevalence significantly above Scotland.

6. Scotland’s point prevalence on 26 June was 0.028% (0.018%-0.040%). There are no countries on the list of countries that the UK Government has assessed as low risk (green) that have a prevalence point significantly above Scotland.

7. Looking at the list of countries that the UK Government has assessed as medium risk (amber) but who they have included on the list of countries from which travellers will

be exempt from the self-isolation requirement there are countries which have a point prevalence above Scotland:

8. [redacted – out of scope]

However, only one country on the list that the UK Government propose to exempt from the self-isolation requirement is significantly above Scotland on a point prevalence and that is Spain [redacted].

9. [redacted – out of scope]

10. [redacted – out of scope]

11. [redacted]

12. We are aware of significant outbreaks in [redacted – out of scope] as well as localised outbreaks in [redacted – out of scope] and Spain. The JBC recognises that work has to be undertaken to identify and assess the impact of outbreaks in different countries given the recognition by each of the four nations that mechanisms need to be put in place to deal with spikes. We are due to be part of that discussion. It is also the case that an outbreak in a country that has been assessed as a low risk country and where that country has taken clear and decisive action to institute a lockdown and deal with the outbreak represents a different level of challenge than a country wide outbreak where strong measures have not been put in place.

Options

13. If our intention is to achieve and sustain elimination of the virus this will require robust border controls to be in place to reduce the possibility of new introductions of infection. In that case there is a strong argument for limiting the exemptions to countries classified as low risk (green).

14. The other option would be to extend the exemption to amber countries on the list with the exception of Spain given that their point prevalence rate is significantly above that of Scotland. [redacted – out of scope]

15. There are clear challenges here if we were to adopt this approach. We would suggest therefore that an announcement could be made setting out the decision to exempt travellers from the green and amber list countries with the exception of Spain and Serbia. [redacted – out of scope]

16. [redacted]

Non-Pharmaceutical Public Health Measures

17. [redacted – out of scope]

18. [redacted – out of scope]

19. [redacted – out of scope]

20. In terms of handling therefore we could set out our aspiration to exempt travellers from Spain, while noting that the current prevalence rate and the outbreak in Galicia mean that it is not possible at this time. [redacted]

21. [redacted – out of scope]

Economic Impact

22. [redacted – out of scope]

23. [redacted – out of scope]

Timing

24. We are still working towards an implementation date of 10 July which would align with the changes proposed in England. Wales are working to a similar timetable. Northern Ireland have indicated that they may introduce their sectoral exemptions on 10 July but potentially delay the introduction of their country-specific exemptions.

Conclusion

25. The border health measures are one strand in our wider package of measures to address the threat posed by covid-19. If our intention is to achieve and sustain elimination of the virus this will require robust border controls to be in place to reduce the possibility of new introductions of infection. In that case there is a strong argument for limiting the exemptions to countries classified as low risk (green) with a clear statement that further work is being undertaken on the assessment criteria and that a further review will be undertaken once that work has been completed with a view to widening the list of countries once this work has been undertaken, possibly in advance of the next formal review point, and we have further confidence on the countries in the amber risk rating.

26. The alternative is to extend the list to encompass the amber list countries with the exception of Spain [redacted – out of scope] with the proposal that we would extend the list to include those countries once [redacted] and their point prevalence data has improved.

[redacted]

Population and Migration Division

7 July 2020

[redacted]

**PROPOSALS FOR EXEMPTIONS TO QUARANTINE ON ARRIVAL TO SCOTLAND:
LIST OF COUNTRIES EXEMPTED BY UK GOVERNMENT**

GREEN: Antigua and Barbuda; Aruba; Australia; Austria; The Bahamas; Barbados; Bonaire, Sint Eustatius and Saba; Curaçao; Cyprus; Dominica; Faroe Islands; Fiji; Finland; French Polynesia; Germany; Greenland; Grenada; Guadeloupe; Hong Kong; Hungary; Iceland; Jamaica; Japan; Réunion; Macau; Malta; Mauritius; New Caledonia; New Zealand; Norway; Seychelles; St Barthélemy, St Kitts & Nevis; St Lucia; St Pierre and Miquelon; South Korea; Taiwan; Trinidad & Tobago; Vietnam

AMBER: Andorra, Belgium; Croatia; Czech Republic, Denmark; France; Greece; Italy; Liechtenstein, Lithuania, Luxembourg; Monaco, The Netherlands; Poland; San Marino, Serbia; Spain; Switzerland; Turkey, Vatican City State

3) Official email chain regarding Spain data – 8 July 2020

From: Halliday R (Roger)
Sent: 08 July 2020 14:56
To: <[redacted]@gov.scot>; Wightman S (Scott) <Scott.Wightman@gov.scot>; [redacted]@gov.scot>
Subject: Borders - Minister Review - July 06 - Advice - Spain

Scott

I haven't looked in depth at the situation in Spain, but when I've seen international comparisons, the number of cases and deaths in Spain has been relatively high. Therefore a significantly higher prevalence seems sensible, trends in cases has been up in recent weeks there too. To get some data to corroborate the modelled estimates, I looked at new confirmed Covid cases in the last 14 days per 100,000. There were 10 new cases per 100,000 in Spain, compared to 2 per 100,000 in Scotland. This made me feel relatively comfortable with the modelled estimated i.e. that Spain was significantly higher than Scotland overall.

Roger

Professor Roger Halliday
Chief Statistician & Joint Head of Covid Modelling and Analysis Team, Scottish Government
m: [redacted], e: roger.halliday@gov.scot tw:@ScotStat @HallidayRoger

My roger.halliday@gov.scot mailbox is only for non COVID related matters. For all COVID related work please redirect to HeadofCOVIDAnalysis@gov.scot

From: <[redacted]@gov.scot>
Sent: 08 July 2020 14:27
To: Wightman S (Scott) <Scott.Wightman@gov.scot>; Halliday R (Roger) <Roger.Halliday@gov.scot>; [redacted]@gov.scot>
Subject: RE: Spain

Roger

My understanding from various discussions is that the Spain point prevalence was not a huge surprise to you but helpful to have confirmation on that point.

Would the route here be your contact at JBC?

[redacted]

Population and Migration Division | Directorate for External Affairs | 2H South | Victoria Quay | EH66QQ

[redacted]@gov.scot | 0131 244 [redacted] | [redacted]

 save paper - do you need to print this e-mail?

OFFICIAL - SENSITIVE

From: Wightman S (Scott) <Scott.Wightman@gov.scot>

Sent: 08 July 2020 14:24

To: <[redacted]@gov.scot>; Halliday R (Roger) <Roger.Halliday@gov.scot>; [redacted]@gov.scot>

Subject: Spain

I've just spoken to Hugh Elliott, HMA Spain who has been contacted by the DG in the MFA. I took him through the reasoning.

He confessed to being unsighted on point prevalence but said he would be extremely surprised if the point prevalence rate in Spain was higher than the UK. [redacted]. He's going to check with FCO on the data. I explained it had come to us from JBC and PHE and was based on modelling from the London School of Hygiene and Tropical Medicine. [redacted]

[redacted]. We need urgently to get the latest data from PHE/JBC.

Scott

SCOTT WIGHTMAN

Director for External Affairs

Scottish Government, Victoria Quay (Area 2H South)

Leith, Edinburgh, EH6 6QQ

☎ +44 (0)131 244 [redacted] / [redacted]

@Scott_Wightman1 @scotland @scotgov



[redacted]@gov.scot>; [redacted]@gov.scot>; [redacted]@gov.scot>; Social Media
<socialmedia@gov.scot>; [redacted]@gov.scot>; [redacted]@gov.scot>;
[redacted]@gov.scot>; [redacted]@gov.scot>; [redacted]@gov.scot>;
[redacted]@gov.scot>; [redacted]@gov.scot>; [redacted]@gov.scot>
Subject: Borders - Minister Review - July 06 - local area Spain data

Liz

We have some found some information about Covid in different parts of Spain, but [redacted] is right that no data equivalent to the point prevalence estimates are available within nations. The closest we have to this is looking at the number of new confirmed cases in last 7 days per 100,000 people (as at 7th July). The message is that there is significant variation across Spain, and Covid in the Canary Islands is 1/8 of the level for Spain as a whole

new confirmed cases in last 7 days per 100,000 people (as at 7th July).

Spain total 10

Balearic Islands 4.5

Canary Islands 1.3

The highest regions of Spain are

Aragon 35

Catalonia 26

The full report is attached

https://www.msccbs.gob.es/profesionales/saludPublica/ccayes/alertasActual/nCov-China/documentos/Actualizacion_157_COVID-19.pdf

Roger

Professor Roger Halliday

Chief Statistician & Joint Head of Covid Modelling and Analysis Team, Scottish Government

m: [redacted], e: roger.halliday@gov.scot tw:@ScotStat @HallidayRoger

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