

1 (a) On what basis did the Scottish Government decide that face coverings for children aged 5 - 11 were a proportionate and safe measure?

The policy decision to advise that face coverings should be worn for those aged 5-11, where it is safe to do so, was informed by advice provided by the Scottish Government's Covid-19 Advisory Group, the Scientific Advisory Group for Emergencies (SAGE) and the World Health Organisation (WHO).

The advice from the Covid-19 Advisory Group on 12 June 2020 was as follows:

“They should not be used in young children (<5 years of age) and individual discretion should be applied in deciding if they are safe to use in people with learning disabilities and people with breathing problems. Since people are being asked to balance the potential risks and benefits at an individual level, this recommendation is not discriminatory.”

You can find full details of the role, remit and membership of the Advisory Group on the Scottish Government's website [here](#).

In addition, on 5 June SAGE released evidence which stated “governments should encourage the general public to wear masks in specific situations and settings as part of a comprehensive approach to suppress SARS-CoV-2 transmission”. Full details of SAGE can be found [on their website](#).

WHO stated that a risk-based approach should be taken to wearing face coverings. As a result there are a number of exemptions in the regulations and guidance. Under section 25(1) of FOISA, we do not have to give you information which is already reasonably accessible to you, however, I have provided the link to where you can find this information: [Coronavirus \(who.int\)](#)

On the 21 August 2020, the WHO published evidence on the use of face coverings for children within the community [which was drawn upon to consider policy in Scotland](#). Under section 25(1) of FOISA, we do not have to give you information which is already reasonably accessible to you, however, this evidence can be found on the WHO website [here](#).

(b) If your response to 1(a) is based on or refers to scientific advice, guidance or evidence of any kind, please be sure to specify what that advice, guidance or evidence is and where it came from.

This question is answered under questions 1a.

2 - Has the need for the above mentioned policy requiring the use of face masks for children aged 5 - 11 in Scotland been reviewed since it was implemented, particularly taking into account the evidence in relation to transmission of COVID 19 by this age group?

This is a formal notice under section 17(1) of FOISA that the Scottish Government does not have the information you have requested as no formal review of the policy relation to use of face masks for children aged 5 - 11 in Scotland has been undertaken since the policy was implemented.

(b) If there has been no review into the policy referred to in 2(a), why not?

The Scottish Government continue to regularly review the emerging and scientific evidence in relation to wearing face coverings and will revise policy as required in light of this.

(c) If there has been a review following the introduction of the policy referred to in 1(a) and 2 (a) above, then please provide it.

This is a formal notice under section 17(1) of FOISA that the Scottish Government does not have the information you have requested as no formal review of the policy relation to use of face masks for children aged 5 - 11 in Scotland has been undertaken since the policy was implemented.

3 - In relation to the following from the WHO,

'The benefits of wearing masks in children for COVID-19 control should be weighed against potential harm associated with wearing masks, including feasibility and discomfort, as well as social and communication concerns....

For children between six and 11 years of age, a risk-based approach should be applied to the decision to use of a mask. This approach should take into consideration: • intensity of transmission in the area where the child is and updated data/available evidence on the risk of infection and transmission in this age group; • social and cultural environment such as beliefs, customs, behaviour or social norms that influence the community and population's social interactions, especially with and among children; • the child's capacity to comply with the appropriate use of masks and availability of appropriate adult supervision; • potential impact of mask wearing on learning and psychosocial development; and • additional specific considerations and adaptations for specific settings such as households with elderly relatives, schools, during sport activities or for children with disabilities or with underlying diseases.'

please confirm

(a) if the Scottish Government at any time undertook a risk/benefit analysis in relation to requiring face coverings for children aged 5 - 11, prior to and/or since the introduction of this requirement,

In the specific context of schools, we have published an Equality Impact Assessment in relation to the [guidance on Reducing the Risks from COVID-19 in Schools](#). It can be found [here](#) (under the 'Supporting files' tab).

The guidance makes clear that:

- every setting should undertake and update regularly its own specific risk assessment, considering the domestic arrangements of pupils and pupil wellbeing. Risk assessments should also include underlying health conditions.
- appropriate mitigation measures which should be adopted in situations where opaque face coverings may act as a barrier to communication. Consideration should be given to the use of transparent face coverings or appropriate

alternative mitigations adopted which will properly safeguard both pupils and staff.

- where local decisions on the strengthened use of face coverings are made, it will remain vitally important to consider the potential impact on children and young people, including via the appropriate use of Equality Impact Assessments.
- The impact of wearing a face covering for very young learners and/or learners with additional support needs, including any level of hearing loss, should be carefully considered. Communication for many of these learners (including hearing impaired young people) relies in part on being able to see someone's face clearly. This is also important for children and young people who are acquiring English and who rely on visual cues to enable them to be included in learning. Individuals who may not be able to handle and wear face coverings as directed (e.g. young learners, or those with additional support needs or disabilities) should not wear them as it may inadvertently increase the risk of transmission. Scottish Government guidance on "Helping Others" sets out supportive approaches when interacting with hearing impaired people. The National Deaf Children's Society has also suggested some ways in which communication with hearing impaired learners can be supported, in circumstances where face coverings are a barrier to communication.
- In classes where any such impacts are anticipated and no alternative mitigations are reasonable, schools should consider the use of transparent / see-through face coverings which are increasingly available. Some children and young people may need additional support/reassurance about the reasons for adults wearing face coverings. However, as face coverings become more prevalent in wider society, this may be less of a concern.
- No-one should be excluded from education solely on the grounds that they are not wearing a face covering. As is usual, if there are any concerns about a child or young person behaving or acting in a way which does not align with school policy or procedure, their behaviour or actions should be discussed with them to resolve those concerns as quickly as possible, with any further action taken in line with usual school policy or procedure. "Included, engaged and involved part 2: preventing and managing school exclusions", provides national policy guidance on the use of early intervention and prevention to promote positive relationships and behaviour.

(b) if the abovementioned (at 3a) risk/benefit analysis was conducted, please provide it, or outline why it cannot be provided,

This question is answered under 3(a).

(c) if the abovementioned (at 3a) risk/benefit analysis was conducted, please outline whether it has been reviewed at any time since introduction.

The guidance on reducing risks in schools was most recently updated on 30th October 2020. We regularly review the existing and emerging evidence base regarding face coverings and other restrictions on children and young people.

(d) if no risk/benefit analysis (as outlined in 3a) has been conducted, then why not?

Information regarding analysis provided at 3a.

(e) if no review of any risk/benefit analysis (as outlined in 3a) has been conducted, then why not?

We regularly review the existing and emerging evidence base regarding face coverings and other restrictions on children and young people.

4 - In relation to the following from the WHO:

Monitoring and evaluation of the impact of the use of masks in children If authorities decide to recommend mask-wearing for children, key information should be collected on a regular basis to accompany and monitor the intervention. Monitoring and evaluation should be established at the onset and should include indicators that measure the impact on the child's health, including mental health; reduction in transmission of SARS-CoV-2; motivators and barriers to mask wearing; and secondary impacts on a child's development learning, attendance in school, ability to express him/herself or access school; and impact on children with developmental delays, health conditions, disabilities or other vulnerabilities. Data should be used to inform strategies on communication; training and support to teachers, educators, and parents; engagement activities for children; and distribution of materials that empower children to use masks appropriately. Analysis should include sex, age, physical, social and economic stratification to ensure that the policy implementation contributes to reducing health and social inequities.

(a) Please confirm whether monitoring and evaluation of any kind was put in place by the Scottish Government 'at the onset' in relation to the impact of the use of masks in children aged 5 -11? If it wasn't put in place 'at the onset', then why not?

We are continuing to develop and implement plans for monitoring the impacts of the policy. These form part of wider arrangements for ensuring an understanding of the impacts of COVID-19 and risk mitigation measures in schools and on children and young people. We are developing these arrangements in a proportionate and adaptable way given the fast changing nature of the situation with the virus.

Our approach, which we will continue to build upon to cover issues around face coverings, includes the following key sources of information and evidence:

- Public Health Scotland currently collect and publish testing and case data for children and young people. Their weekly statistical report, which includes a link to an interactive dashboard, is available [here](#).
- The Scottish Government collects and publishes attendance and absence data, available [here](#).
- An infographic providing a weekly snapshot of current COVID-related data in relation to children and young people, such as the number of tests and positive cases reported, and the attendance and absence of both children and staff in childcare and school settings, is available [here](#). This information is reviewed on a weekly basis by the COVID-19 Education Recovery Group (CERG).

We are regularly reviewing the existing and emerging evidence base on face coverings and other restrictions for young people. We are commissioning or supporting a number of surveys or focus groups which will add to the existing evidence base, including the following:

- We are currently in the process of commissioning an omnibus survey of secondary school pupils running in January 2021 which will include questions on awareness of face coverings requirements, attitudes towards requirements and wellbeing impacts of face-covering requirements;
- Regular polling on COVID-19 includes questions on parents' awareness of guidance for children and young people, as well as attitudes to restrictions and requirements.
- We are supporting the Scottish Youth Parliament, YouthLink Scotland and Young Scot to deliver the Lockdown Lowdown 2 survey, which includes a question on awareness of rules and restrictions for young people. The Lockdown Lowdown 2 project also includes a number of focus groups with vulnerable groups that will explore views on face coverings among other issues.
- We are working with Public Health Scotland on a second wave of COVID-19 Early Years Resilience and Impact Survey which will include questions around face coverings and children under 7.

We are also currently working with Young Scot to establish a national 'learner - education recovery panel' of 15 children and young people, ages 9 to 18. Young Scot will support the panel to meet on a monthly basis, feeding directly into the CERG, which provides input into school reopening guidance.

The CERG considers stakeholder feedback, including from public health and educational experts, on the impact and effectiveness of risk mitigation measures in schools on a weekly basis. This supports our qualitative understanding of the experiences of children and young people and parents. We have worked with the Scottish Youth Parliament to identify and support a young person to join the CERG and the current Scottish Youth Parliament vice-chair sits on the group to gather, represent and directly feedback the voices and views of children and young people.

As this evidence is collated and assessed over time, our expectation is that it will provide a useful basis on which to adjust or amend policy and guidance as appropriate.

As noted above, many of these sources are already published either by Scottish Government, Public Health Scotland or partner organisations. As we develop our understanding of the impact and effectiveness of the mitigations in place for children and young people, including in respect of face coverings, we will consider how best to make that evidence available more widely.

(b) Please provide evidence that monitoring and evaluation of the use of masks in children of all ages in Scotland has taken place and is ongoing, as well as the results of that monitoring and evaluation. Where you only have

information covering certain age groups, please provide this, alongside an explanation wherever possible of the age groups that are covered.

Answered at 4(a).

(c) Please provide information regarding the 'key information' which the Scottish Government has collected in line with the above from WHO and outline how frequently this is being collected? If no 'key information' has been collected, please outline why.

This is a formal notice under section 27 of the Freedom of Information (Scotland) Act 2002 (FOISA) that Scottish Government intend to publish this information by 22 January 2021. However I have provided some details of the due publication below.

Scottish Government has prepared a 'working paper' which we intend to publish on the Scottish Government website by 22 January 2021. The paper includes evidence from a range of sources available to date, including: The Lockdown Lowdown survey of young people aged 11-25; focus groups with young people from seldom heard groups of carried out to complement the Lockdown Lowdown survey; findings from parents from YouGov polling of adults; small scale qualitative research with young people aged 11 to 25 carried out by the Scottish Collaboration for Public Health Research and Policy; and The Covid-19 Early Years Resilience and Impact Survey (CEYRIS) of parents of children aged 2 – 7 carried out by Public Health Scotland.

The paper also highlights forthcoming evidence sources that have not yet reported, including dedicated survey questions on face coverings in the Young People in Scotland survey, a nationally representative survey of secondary school pupils, as well as relevant findings from wave 2 of CEYRIS, Edinburgh University's TeenCovidLife survey, Lockdown Lowdown wave 3 and YouGov polling. Final reporting and publication will be in Spring/Summer 2021.

(d) Please provide evidence of the ways in which the above mentioned monitoring and evaluation (as outlined in 4a) has informed strategies as per the information from the WHO, also quoted above.

We regularly review the existing and emerging evidence base regarding the impact of face coverings and other restrictions on children and young people. As evidence is collated and assessed over time, it will provide a useful basis on which to adjust or amend policy and guidance as appropriate.

(e) If no monitoring and/or evaluation in relation to the impact of the use of masks in children aged 5 - 11 in Scotland has taken place, please explain why?

Information regarding monitoring/evaluation provided at 4a.

5 - (a) Please provide the risk assessment which was undertaken prior to the decision to mandate face coverings for children as young as five years old on

unsupervised (other than by someone whose attention is on driving and who is therefore unable to observe the child/ren) school transport in Scotland.

The Scottish Government issued guidance to schools and local authorities on 25 August which stated that from 31 August face coverings should be worn on dedicated school transport (subject to exemptions), to align with the position on public transport. This revision to the Scottish Government's policy was based on [updated advice](#) provided by the COVID-19 Advisory Sub Group on Education and Children's issues ("sub group") published on 25 August. The "sub group" was established to provide rapid, regular and more granular scientific advice on education and children's issues to support the iterative development of guidance.

(b) If no risk assessment was undertaken in relation to the Scottish Government's requirement for Scotland's children as outlined in 5(a), please provide an explanation as to why.

The overall assessment of the relevant risks formed an important part of the sub-group's (see above) approach and advice and was accordingly incorporated into the Scottish Government's decision making. This advice was fully informed by the [WHO advice](#), including important relevant information such as:

"The rationale included consideration of the fact that by the age of five years, children usually achieve significant developmental milestones, including the manual dexterity and fine motor coordination movements needed to appropriately use a mask with minimal assistance."

(c) Please advise whether the risks posed to children by mask wearing on school transport, particularly very young children, some of whom are not supervised by any other adult other than one whose attention is on driving, were specifically considered (eg vomiting/nose bleeds etc), and if there was no specific consideration of these and other applicable factors relating to these circumstances, why not?

Children aged under five are exempt from wearing a face covering on school transport, as are older children and young people where they have a medical condition that makes them eligible for an exemption.

The Scottish Government makes decisions based on the available scientific and medical evidence. Regarding the wearing of face coverings on school transport, decisions were based on evidence and advice from the World Health Organisation (WHO), Scientific Advisory Group for Emergencies (SAGE) and the COVID-19 Advisory Sub Group.

I have noted below links to the appropriate information :

- On 4 June 2020, SAGE discussed mitigation measures which included the use of face coverings. You can find further information in the meeting minutes which are available on the UK Government website [here](#).

- The World Health Organisation released update advice on face coverings on 5 June 2020. The guidance advised that to prevent Covid-19 transmission effectively in areas of community transmission, governments should encourage the general public to wear face coverings in specific situations and settings as part of comprehensive approach to suppress Covid-19 transmission. You can find a copy of this guidance as attachment.
- The UK Government released a summary of the relevant SAGE reports for this topic. This can be found on the UK Parliament website [here](#).

On the 21 August 2020, the WHO published advice on the use of face coverings for children within the community and this was used to support the Scottish Government decision on wearing face coverings on school transport. This has been sent as an attachment to you.