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A four-nation exit strategy

How the UK and devolved governments should approach coronavirus

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Summary

The coronavirus crisis has required a co-ordinated response between the UK and devolved governments.

The devolved governments of Scotland, Wales and Northern Ireland are responsible for key public services affected by the pandemic, including the NHS, education and public transport, and for implementing the lockdown within their territories. For these matters, a common approach cannot be imposed by UK ministers, and instead can only be achieved through agreement.

In the early stages of the pandemic, there has been close co-ordination between the four administrations. There have been some differences in policy and guidance, but on the big issues, including the lockdown, the governments have been on the same page.

As the UK enters its sixth week of lockdown, the four governments are beginning to think about the 'exit strategy' from the unprecedented restrictions on personal freedom and other temporary policies imposed to fight coronavirus. Since key powers used in the pandemic response are devolved, this could potentially lead to divergence between the four nations, with, for example, restrictions changed sooner in some places than in others.

A co-ordinated exit strategy would be preferable. But co-ordination is not the same as homogeneity, and a UK strategy is not the same as a UK government strategy.

Introduction: a four-nation exit strategy

The UK exit strategy will be a combination of:

- decisions taken in Westminster that apply across the whole of the UK

- decisions taken collectively between the four governments

- decisions taken separately in the four national capitals.

Although some difference between what happens in the four nations could create logistical problems and public divisions, there are some legitimate reasons why this could take place. Several other countries, such as Spain and Italy, have implemented geographically variable lockdown rules in line with variation in the public health threat.

In the UK, the law requires ministers in each of the nations to lift lockdown restrictions if they are "no longer necessary". So if the pandemic is brought under control sooner in one part of the UK than in others, then this could lead to ministers easing the lockdown in that territory sooner than elsewhere.

Ministers in the four governments might also reach legitimately different judgments about the acceptable trade-offs between health, economic and wider social factors, leading some to favour an earlier easing of restrictions.

Particular considerations apply in Northern Ireland, where economic and health problems could arise if significant policy differences emerge on each side of the Irish border. In this eventuality, there might be a case to align on some matters more closely with Dublin than London.

What would be undesirable is if different decisions are taken in different parts of the country in an ad hoc way, for purely political rather than evidence-driven reasons, or without clear communication about what is happening and why.

Already, there have been some problems in communicating with the public about whether certain policies and announcements apply UK-wide or only in England. This has caused confusion, for instance about free school meals, business rates relief and coronavirus testing targets. Significantly different rules applying in the different UK nations could also be regarded as unfair, leading to a loss of public consent, and undermining compliance.

Devolved administrations also do not have all the necessary levers to allow for markedly different approaches. In particular, Westminster control over big economic schemes to support business, as well as ports and borders, limits the scope for divergence.

Any variation between the nations should be based on a shared evidence base, open communication and collaboration between the governments, and transparency about how decisions are being taken to enable the accountability of ministers in all governments.

The four governments will need to make plain in public and parliamentary debates which rules will apply where, and why any differences in approach are being taken.

Coronavirus has required a four-government response

The coronavirus pandemic is a global crisis that has hit all parts of the UK and has required a nationwide response. This has involved not just the government at Westminster but also the devolved administrations in Edinburgh, Cardiff and Belfast, who hold many of the policy levers that have been pulled in the fight against the disease (see Annex: Table of coronavirus measures).

The UK government is responsible for many big economic and fiscal functions that operate across the UK. Therefore, the key measures introduced by Westminster to support the incomes of those affected by the shutdown operate on a UK-wide basis. These include the Coronavirus Job Retention Scheme, which provides 80% of employees' salaries up to £2,500 a month, the Self-Employment Income Support Scheme, and enhanced sick-pay and welfare entitlements. Some support for businesses has also been provided by the UK government across the country, including the deferral of VAT payments, the purchase of the short-term debt of large enterprises, and government-backed loans for small businesses.

But the devolved governments are responsible for several key public services affected by the pandemic, including the NHS, social care, education, and public transport, as well as for important functions such as ensuring food supply and supporting local economic development. In Scotland and Northern Ireland, policing and justice are devolved too.

Most significantly, the regulations that imposed a 'lockdown' of the country to slow the spread of the Covid-19 virus were made under public health legislation. As health is a devolved matter, the UK government, in legal terms, only imposed the lockdown in England. In Scotland, Wales and Northern Ireland, the lockdown was imposed by separate, but very similar, regulations introduced by the devolved administrations.[1]

The four governments have worked closely together in the first phase of the crisis

The fact that health is a devolved matter, and a large part of the legislative framework to manage the pandemic has been implemented on a devolved basis, creates the potential for different responses to the crisis in the four nations. It also means that a common approach cannot be enforced by UK ministers, but can only be achieved through co-ordination and agreement.

During this crisis, co-ordination between the UK and devolved governments is being facilitated in a number of ways. The leaders of the devolved administrations attend COBR ('Cobra') meetings, and meet the prime minister (and in recent times, his deputy) on an ad-hoc basis. The devolved administrations are also represented on the cabinet committees created by the UK government to respond to the crisis.[2]

There is close co-ordination between the chief scientific advisers (CSAs) and the chief medical officers (CMOs) of the four administrations. The latter group meet a minimum of three times a week and are supported by clinical groups who meet regularly on a four-nation basis.[3]

All three devolved administrations participate in the Scientific Advisory Group for Emergencies (SAGE) structure;[4] Scottish and Welsh governments have their own advisory groups, but their primary purpose is to apply modelling developed by SAGE to their own contexts – and both chairs are members or attendees of the UK-wide group. As a result, the scientific advice given to ministers in each part of the UK is consistent.[5] This appears to have worked reasonably well, although it has been reported that the Scottish government is unhappy about the status of the Scottish CSA at these meetings.[6]

The four governments have been in broad agreement on the strategy for responding to the coronavirus in the first phase of the crisis. In early March, a joint 'action plan' was produced, a rare example of a government document with all four administrations' logos on the cover.[7] There has been a similarly unusual level of co-ordination between the health services of the UK, while the UK government has also sought to lead a four-nation approach to procuring personal protective equipment (PPE) and increasing testing capacity.[*]

Whitehall departments such as the Department for the Environment, Food and Rural Affairs (Defra) have worked closely with devolved counterparts on issues such as ensuring food supply and supporting the agriculture sector. The intense intergovernmental working that took place during the no-deal Brexit preparations in 2019 (as part of Operation Yellowhammer) has reportedly proven useful, as it led to the strengthening of relationships and channels of communication between officials in the different capitals, including in key areas such as civil contingency planning.

The Coronavirus Act 2020, which conferred powers on all four UK governments to tackle the pandemic, was similarly the product of close intergovernmental collaboration. Officials from across the UK worked together to ensure that the bill was drafted to meet the needs of each administration, and the bill was swiftly given consent (under the Sewel Convention)[**] by all three devolved legislatures.

The closure of pubs and restaurants and, shortly after, the decision to impose lockdown were also tightly choreographed between the four governments, with initial announcements by the prime minister followed by similar statements by the devolved leaders. In some cases, co-ordination has been looser, but the outcome has been the same. For instance, all four governments separately announced the closure of schools within their territory on the same day, a few hours apart.

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*   Although the devolved administrations are also allowed to procure their own equipment. See for example: Scottish Government, 'Coronavirus (COVID-19) update: Health Secretary's statement 21 April 2020', Scottish Government, 21 April 2020, retrieved 29 April 2020, www.gov.scot/publications/coronavirus-covid-19-update-health-secretarys-update-tuesday-21-april-2020

**   The Sewel Convention is the commitment by the UK parliament not to legislate in devolved areas without the consent of the devolved legislature or legislatures in question, see www.instituteforgovernment.org.uk/explainers/sewel-convention

Some small differences in the four governments' approaches have emerged

However, there have been modest instances of divergence.

In some cases, this has arisen as jointly agreed strategies have been interpreted and translated into detailed guidance by each administration. For example, in Scotland the construction industry was advised to stop all but essential work, while in England and Wales work of a similar nature was allowed to continue if workers could practise social distancing.[8]

In other cases, divergence can be attributed to local political and economic factors. For instance, the Scottish government announced financial support for Scottish sea fisheries just days after the lockdown began, a full month before the UK government created a similar scheme for England, reflecting the sector's greater importance in Scotland.[9]

Schemes to support small business also vary in some respects. England, Scotland and Wales have all granted year-long business rates holidays, but the Welsh government has limited entitlement to the holiday to properties under the value of £500,000. It has used this money to fund grants for small and microbusinesses instead.[10]

Some examples of policy divergence have been short-lived, and quickly followed by decisions to bring one part of the UK in line with others. For instance, in the early phase of the crisis, the governments in Scotland and Northern Ireland halted all new jury trials "until further notice", whereas the UK government initially continued to allow short jury trials. This gap was closed a few days later, when the lord chief justice announced that there would be no new jury trials in England and Wales either (England and Wales are a joint legal jurisdiction).[11]

Similarly, when lockdown was imposed, off-licences in Northern Ireland were initially required to close, but were classed as essential businesses in other parts of the UK. Days later, the Northern Ireland executive amended its guidance to allow them to re-open.[12]

More recently, on 28 April, Scotland advised people to wear face masks in public in limited circumstances as a precautionary measure.[13] However, in response to the announcement, the UK health secretary, Matt Hancock, said that the UK government's position had not changed and that there was "weak science" on the use of facemasks.[14] Two days later, the prime minister said that face covering could be "useful" as lockdown measures are eased, "both for epidemiological reasons but also for giving people confidence that they can go back to work".[15] This example shows how assessments of the same scientific evidence can lead to different political judgments.

As the UK steps up plans for its exit strategy, more difficult political decisions, and potentially greater opportunity for divergence, may lie ahead.

The UK government and media have been vague about where policies apply

One aspect of co-ordination that has not always gone smoothly has been the communication about the parts of the country to which certain policy decisions apply. The problem stems from the tendency of the UK government, and London-based media, to be unhelpfully vague about whether particular announcements relate to England, the whole UK or (in some cases) England and Wales.

This problem arose in March when the Treasury provided funding for business rates relief, but it was not initially made clear that this applied in England only, and that additional resources would be given to the Welsh government to create its own scheme. This reportedly caused confusion in Wales.[16]

Similarly, in early April, the UK government announced that free school meals for disadvantaged children would continue to be provided, via a voucher scheme, during the Easter holidays. But neither the government guidance on how to access the voucher scheme,[17] nor national media coverage of the policy,[18] made mention of the fact that this applied in England only. Hardly surprisingly, this was reported to have caused confusion among parents in Wales, where London-based newspapers are widely read.[19]

One final important example relates to the UK health secretary's stated aspiration that 100,000 Covid-19 tests should be carried out per day by the end of April. When first announced, this was expressed as a UK-wide target, with the intention being that Public Health England would lead a co-ordinated strategy involving the devolved administrations.[20] However, there were then mixed messages from Whitehall and Edinburgh about whether this pledge was in fact for England only.[21]

The Scottish and Welsh governments subsequently announced their own plans for scaling up testing, but the Scottish first minister, Nicola Sturgeon, pointedly distanced her government from the 100,000 figure, stating that "it's not for me to set out the basis behind the UK government's target, or how it plans to get there".[22] On 1 May, the health secretary announced that the target had been achieved, and by this point it was clear that the 100,000 figure was for the whole UK, although it was also reported that the UK and Scottish governments were running parallel, and slightly different, testing regimes.[23]

These examples illustrate that even when the UK and devolved governments are broadly on the same page, there is potential for confusion. This may become an even greater risk, if greater differences between the four governments emerge.

The four governments could take different approaches to their exit strategies

The simultaneous imposition of the lockdown, and other measures, by the four governments may have created an expectation that these interventions in people's lives will likewise be brought to an end at the same time across the country. But as the crisis eases, and the UK moves back towards normal politics – as well as normal life – there is no guarantee that the four governments will continue to march in lockstep. This raises the possibility that the 'exit strategy' from lockdown may unfold in different ways or on different timelines, in the four UK nations.*

In theory, the UK government could seek to impose a common approach to the exit strategy across the entire UK by passing an Act of Parliament that imposed new obligations or constraints on the devolved administrations. However, to do so without their consent would be regarded in Edinburgh, Cardiff and Belfast as an assault on the devolution settlements.

Even if this were politically palatable, it is hard to imagine why it would be necessary, given the willingness of the devolved governments to work with Westminster. Far better to keep the devolved governments closely involved in UK-wide decision making, while accepting the possibility of some variation in how different parts of the country return to normality.

There may be legitimate reasons for different parts of the country to move at different speeds – especially if there is clear evidence that the public health risk from the coronavirus has fallen substantially in some places, while continuing to pose a greater threat elsewhere.

A geographically differentiated strategy in the UK would not be without international precedent. Several other countries, including South Korea and Australia, have responded to the pandemic in such a way:[24]

- The government of **South Korea** applied containment strategies with continued contact-tracing in areas with low infection. In infection hot-spots, such as Daegu and Cheongdo, response measures were more focused on mitigation strategies to slow the spread, rather than tracing all contacts.[25]

- Different states in **Australia** have imposed and lifted restrictions – which in some cases have included effectively closing state borders – at different times, reflecting different levels of infection across the country.[26]

- Regional governments in **Germany** have applied different rules in some areas, such as mask-wearing, depending on the local level of infection.[27] Decisions on school openings have also varied.

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* The UK government could also decide to vary the exit strategy on a regional basis within England. For a discussion, see: Tetlow G, Owen J, Pope T and others, *Lifting Lockdown: How to approach a coronavirus exit strategy*.

- **Italy** imposed its lockdown in stages, starting with certain municipalities in the northern region of Lombardy in February. It extended the quarantine measures across the country in early March. The Italian government has subsequently sought to keep restrictions uniform across the country, but the Veneto region has eased certain measures before the rest of the country.[28]

- **Spain** is lifting restrictions first on smaller islands. The government plans to take a phased approach to deconfinement on the mainland, depending on local conditions.[29]

Ministers in the different capitals might reach different decisions – for legitimate reasons

In the end, ministers in each of the four governments will separately make – and be held to account for – many of the key decisions relating to the exit strategy within their own territories. The leaders of all the devolved administrations have floated the possibility of diverging from the rest of the UK, should the evidence support this.

As Nicola Sturgeon put it on 17 April: divergence in Scotland could be justified "if the evidence and the science tells us that because we are all at different stages of the infection curve we might need to do things slightly differently".[30] Northern Ireland's first minister, Arlene Foster, said that we could see "different parts of the United Kingdom move in different times to other parts" if the criteria for lifting lockdown were met.[31] Welsh first minister, Mark Drakeford, has been more cautious, suggesting that his government's strategy could differ "at the margins" while emphasising that "a UK way of doing things remains a strength."[32] On 4 May, he went further, declaring that "a four nations approach works best for Wales" and that the four governments should "begin to lift lockdown through a set of common measures implemented to a common timetable".[33]

Ministers in each of the four administrations are legally required to review the need for the lockdown restrictions within their territories at least every 21 days. This provision is written into the four governments' respective regulations that introduced the lockdown. If this review leads any of the four administrations to the conclusion that any of the restrictions are "no longer necessary" to fight the spread of coronavirus, then they are compelled to terminate the rules in question.[34] This means that if clear territorial differences emerge in the threat level posed by Covid-19, then this could lead to ministers easing the lockdown in that territory sooner than elsewhere.

It is also possible that ministers in the four governments will reach legitimately different judgments about the acceptable trade-offs between health, economic and wider social factors, leading some to favour an earlier easing of restrictions. Additionally, industries with particular significance in one nation or another – agriculture in Wales or fisheries in Scotland, for instance – might successfully lobby the devolved administrations to offer additional financial support, or an earlier loosening of some restrictions.

Specific considerations apply in Northern Ireland, where shared geography and a high level of cross-border movement create a need for close co-ordination with the Irish government as well as the other governments of the UK. Public health experts have made the case for an all-island strategy, including a common approach to community testing and controls at ports and airports to contain the virus.[35]

There has already been significant north–south co-operation to provide for elements of a joined-up response that recognises the idea of Ireland as a single epidemiological unit. For instance, the chief medical officers of the two governments have a weekly teleconference and the respective health departments signed a Memorandum of Understanding on how to "promote cooperation and collaboration in response to the COVID-19 pandemic".[36] There have also been discussions on travel restrictions across the two parts of Ireland, and an attempt at joint procurement of PPE.

The Irish government has already announced a phased approach to easing restrictions and reopening the economy, with a provisional timeline for each phase to commence.[37] If the UK decides on a substantially different exit strategy, for instance in allowing schools and workplaces to reopen at different times, then Northern Ireland might face a dilemma about which path to follow. This, inevitably, has the potential to open up divisions within the Northern Ireland executive, with the nationalist Sinn Féin leaning instinctively towards an all-Ireland approach, and the Democratic Unionist Party (DUP) looking to Westminster.

Co-ordination between the four nations on the UK exit strategy is a sensible aspiration. But co-ordination is not the same as homogeneity, and the UK exit strategy is not the same as the UK government exit strategy.

The overall strategy will be a combination of decisions taken in Westminster that do apply across the whole country (for instance those relating to support for business and employees), decisions taken collaboratively between the four governments, and decisions taken separately in the four national capitals. Whether devolved ministers choose to align their exit strategies with Westminster or not, they will be held to account for these decisions by their respective legislatures, and voters.

The UK and devolved governments are now developing their own frameworks for exit strategy decisions

On 16 April, the UK government set out "five tests" that it will use to assess the right moment to adjust lockdown measures.[*,38] As with other announcements made during the crisis, it was not initially clear whether these tests were intended to apply across the UK or in England, or whether they had been agreed with devolved counterparts.

In subsequent government documents, the tests have been spelt out as follows:

1. The NHS has sufficient capacity to provide critical care and specialist treatment right across the UK.

2. A sustained and consistent fall in daily deaths from coronavirus.

3. Reliable data to show the rate of infection is decreasing to manageable levels across the board.

4. Operational challenges including testing and PPE are in hand with supply able to meet future demand.

5. Confident that any adjustments to the current measures will not risk a second peak of infections that overwhelms the NHS.[39]

The tests make reference to the whole of the UK, and have been presented by ministers and officials alongside UK-wide data. However, it does not appear that they have been agreed with the devolved governments, who, as discussed, are responsible for lifting the social distancing restrictions and managing the NHS within their own territories.

The Scottish[40] and Welsh[41] governments have also both published substantial documents setting out how they will take their own decisions about releasing lockdown restrictions. In terms of substance, the plans are largely consistent with the five tests. Both refer to considerations like healthcare capacity, evidence of a decreased infection rate, and supply of PPE and testing equipment as key measures in assessing whether lockdown can be eased.

There is some variation in the emphasis of key messages. The Scottish government talks about the impact on the care system as well as the NHS and is more explicit in discussing the possibility that restrictions may have to be re-imposed if there is evidence that transmission is not under control. The Welsh government paper highlights international experience as a key factor that will guide its thinking.

It is noteworthy that the Scottish and Welsh administrations decided to publish their own documents, rather than producing a common framework with the UK government, as this contrasts directly with the joint plans published at an earlier phase in the crisis.

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* For our assessment of the viability of the UK government's five-tests approach, and other aspects of its approach to its exit strategy see *Lifting Lockdown: How to approach a coronavirus exit strategy*.

Overall, however, there is nothing to suggest that major divergences in strategy lie ahead. The Scottish government commits to continue to take part in "the UK four nations expert advisory groups and collective decision-making process"[42] and the Welsh government states its preference "that all four nations retain a common approach to lifting the restrictions".[43]

One reason why the Scottish and Welsh governments published these documents was to demonstrate a commitment to greater openness than Whitehall, and a willingness to engage in public debate about these important matters. Until the UK government provides further detail on its planned approach, it is hard to assess whether these recent developments might presage the start of a period of greater divergence between the UK nations. The Northern Ireland executive is yet to set out its approach to leaving lockdown.

In any case, at this stage all any government has done is outline how it intends to approach decision making in this difficult area – the real test of the four-nation approach will come when those decisions are actually made. On 30 April, in Boris Johnson's first press conference after returning from his own recuperation from Covid-19, he committed to publishing a "comprehensive plan [to] get the economy moving" the following week, and to build "maximum political consensus as we produce it across all parties and across the U.K".[44] Whether the prime minister is able to achieve this ambition will be a determinant in whether the four-nation strategy will hold.

Divergence in the exit strategy could create confusion and non-compliance – especially if poorly communicated

While there are certain reasons why a geographically differentiated exit strategy could make sense, there are potential downsides too.

First of all, there is a potential for confusion among the public and business about which rules apply where. As discussed above, UK ministers and departments have not always been clear about the territorial scope of different policy announcements, which has caused confusion and some tensions with the devolved governments. Getting this right in the next phase will be crucial.

So if there is to be any differentiation in the exit strategy, UK ministers and departments will need to be precise in their public communications, stating explicitly whether decisions apply only to England, to the whole UK, or to some particular subset of the UK nations.

If ministers at Westminster wish to set a strategy or target for the whole UK that relates to devolved functions, then they should first reach agreement on this with their devolved counterparts. Conversely, if the devolved governments decide to opt out of UK-wide approaches, then it will be for them to explain to their citizens in what ways, and for what reasons, they have chosen to diverge.

Even when communications are clear, variable restrictions on business and citizens could generate a sense of unfairness, potentially undermining compliance. This will be especially likely if there is any suggestion of divergence on the big decisions – such as when to lift the requirement that people stay at home unless they have a reasonable excuse, or when to allow different types of business to reopen.

The challenge may be particularly great if differences arise between England and Wales, since a large number of workers, businesses and public services operate across the Anglo–Welsh border. But regulatory differences across the Anglo–Scottish border would also be contentious, and would raise questions about enforceability, and whether border checks might be required.[45] A poorly co-ordinated UK-wide exit strategy may also make it more difficult to contain the infection in border areas.

As the Institute for Government recently concluded, "public consent for the government's actions during the first phase of the lockdown has been remarkably high. But that may not continue, if people perceive that they are being treated unfairly, for example if there is major differentiation between groups or if the differentiation is not grounded in solid evidence."[46] This factor may serve as a major constraint on the realistic potential for divergent exit strategies between the UK nations.

Devolved administrations do not have the powers – or the capacity – to allow for significantly different approaches

Devolved and reserved elements of the coronavirus response interact with each other in complex ways. This might make it tricky to unwind the different schemes on differing timescales. In particular, as we note above, the UK government is funding support for big business across the UK, including through VAT relief and the furloughed workers scheme. These interventions are predicated on businesses being in lockdown, so if one of the devolved nations were to allow a swifter return to business as usual, this might raise complications about whether the UK funding streams should then be turned off in that part of the country.

Conversely, if the UK government were to favour a faster resumption of ordinary economic activity, and accordingly decided to switch off business support mechanisms such as the furlough scheme, this would likely make it unviable for the devolved nations to maintain a longer lockdown, since many businesses in those territories would swiftly run into serious financial difficulties that the devolved governments would lack the fiscal powers to redress.

Neither do the devolved governments have powers over borders and ports that would enable them to operate a markedly different scheme for controlling arrivals from overseas, for instance in the event that the UK government decided to reopen the country to international travellers sooner than one or other of the devolved governments wished to do. This constrains the devolved administrations' ability to diverge in their approach to disease control, for instance if they wished to open up certain sectors of the economy such as tourism.

Another constraint on divergence is that the devolved administrations have less analytical and implementation capacity than the UK government, which means they might find it easier to follow the lead of Whitehall and to align their strategies with the shared evidence base provided through SAGE. The devolved administrations can also 'piggyback' on work taking place for England. For example, NHS England is developing a contact-tracing app, which will use proximity tracking to identify those who have been in close contact with a person who has tested positive for Covid-19. This work is likely to be useful for the three devolved administrations in implementing their own testing strategies, from which they can benefit without expending significant resources developing this complicated technology.

In practical terms, the UK government can also bring to bear greater resources to tackle the pandemic, which may further limit the practical scope for divergence. For example, the UK government has funded five drive-through coronavirus testing centres in Scotland as part of UK-wide efforts to scale up testing capacity. Although the Scottish government is responsible for defining eligibility for testing, key workers must book through the UK government's online portal.[47] This has increased testing capacity in Scotland significantly.[48] There are clear benefits for the devolved nations in participating in UK-wide schemes, but reliance on technology and systems developed in or commissioned by Whitehall is likely to limit the scope for significant policy differences to emerge.

Conclusion

Many key decisions about the coronavirus exit strategy will be taken, for their nations, by ministers in Edinburgh, Cardiff and Belfast – not at Westminster. A four-nation exit strategy is likely to be preferable on all sides, but co-ordination between the UK and devolved governments need not equal complete uniformity of approach. There may be legitimate reasons for divergence in some areas. Most important is that variation is based on shared evidence, with transparency about how decisions are being taken, as this will enable the scrutiny and accountability of decision makers, both to the UK's legislatures and to the public at large.

Ministers and officials from across the UK will need to maintain close relations and a constant flow of information as big decisions are taken about the exit strategy. The four administrations, and most importantly the UK government, will need to make plain in public communications and parliamentary debates which rules will apply where and why any differentiation is taking place. There should be no divergence by accident.

The reality is that practical and capacity constraints are likely to limit greatly the scope for major differences to emerge between the UK nations. But in the end, ministers in each of the four governments must make their own decisions, and will be held to account accordingly.

Annex: Coronavirus response – social distancing measures and economic support across the UK

	Measure	Territorial extent	Date	Current status
Social distancing measures	Guidance on social distancing and avoiding mass gatherings	UK-wide	16 March (guidance on mass gatherings released in Scotland 15 March)	Until further notice
	Schools closed except for children of key workers	Devolved	20 March 20 March 20 March 20 March	Until further notice
	Pubs, restaurants, gyms and other social venues ordered to close	Devolved	20 March 20 March 20 March 20 March	Reviewed by ministers every three weeks
	People prohibited from leaving their home without a reasonable excuse Gatherings of more than two people banned if not from same household	Devolved – announced jointly by prime minister and first ministers	23 March 23 March 23 March 23 March	Reviewed by ministers every three weeks
	Legislation giving police powers to enforce lockdown	Devolved	26 March in England, Scotland and Wales 28 March in Northern Ireland	Reviewed by ministers every three weeks Legislation expires after six months
Economic support	Enhanced sick pay and employment and support entitlement SMEs reimbursed for the cost of staff sick pay	UK-wide	11 March	No end date set
	Government purchases of short-term debt of major companies Government-guaranteed loans to businesses	UK-wide	17 March	Schemes extended to cover mid-size firms and 100% guarantees introduced since policy first announced
	Job retention scheme – pays 80% of payroll costs for furloughed staff up to £2,500pm	UK-wide	20 March	Currently set to run for four months, backdated from 1 March
	Increased generosity of Universal Credit and Housing Benefit	UK-wide	20 March	No end date set

■ UK-wide   □ England   ■ Scotland   ■ Wales   ■ Northern Ireland

	Measure	Territorial extent	Date	Current status
Economic support	Payment of VAT and self-assessed income tax deferred	UK-wide	20 March	Payments ordinarily due by June/July not due until 2021
	Cash grants to self-employed of 80% of profits up to £2,500 a month	UK-wide	26 March	Runs for at least three months First payments to be made in June for first three months of scheme
	Cash grants for some businesses; retail, leisure and hospitality sector; and fishing industry	Devolved	11 March – support for small businesses and retail, leisure and hospitality sector 11 March – support for small businesses and retail, leisure and hospitality sector 11 March – support for small businesses and retail, leisure and hospitality sector 11 March – support for small businesses and retail, leisure and hospitality sector 20 April – support for fishing sector 25 March – support for fishing sector 16 April – support for fishing sector 3 April – support for fishing sector	One-off payments Small differences in design of schemes between nations
	Business rates holidays for retail, leisure and hospitality firms	England, Scotland and Wales	18 March 18 March 19 March	Applies for 2020/21 tax year Similar schemes applied in three nations with some variations
	Delay in non-domestic rates charges and rates holiday for all businesses	Northern Ireland	17 March	Rates holiday for three months

UK-wide **England** **Scotland** **Wales** **Northern Ireland**

Source: Institute for Government analysis.

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