



Quod

---

# Equality Impact Assessment

Visitor Levy Proposal  
for Conwy County  
Council

---

MARCH 2026

---

# Contents

---

1	Introduction & Executive Summary _____	1
2	Legislative and policy context _____	6
3	Methodology – EQIA _____	10
4	Summary of the Welsh Government national level EQIA _____	12
5	Local equality impact assessment _____	16
6	Welsh Language _____	32
7	Socio-Economic Status _____	35
8	Appendix A – Resident data _____	42

# 1 Introduction

---

- 1.1 This Equality Impact Assessment (EQIA) considers the potential equality impacts related to Conwy County Borough Council imposing a visitor levy.
- 1.2 This document provides information to the Conwy County Borough Council to support their consideration of imposing a visitor levy regarding its Public Sector Equality Duty (PSED).
- 1.3 In addition, it also considers the potential effect on the Welsh Language and considers the socio-economic status in the context of the Socio-Economic Duty.

## Overview of the Visitor Levy

- 1.4 The Visitor Accommodation (Register and Levy) Etc. (Wales) Act 2025 (the '2025 Act') gives councils in Wales the choice to introduce a charge on overnight stays. Known as a 'visitor levy', councils can choose to introduce the levy in their area from April 2027.
- 1.5 The levy is chargeable at two separate rates:
  - Campsites (pitches for tents) or shared accommodation (hostels, bunkhouses, bothies, or dormitories): 75p plus VAT per person, per night
  - All other types of visitor accommodation: £1.30 plus VAT per person, per night, to include:
    - hotels, bed and breakfasts, and guesthouses, self-catering lets, such as cottages and homestays (like Airbnb)
    - pitches for caravans, motorhomes, or campervans
    - temporary accommodation (such as glamping pods for festivals).

Note that those who camp in campervans, caravans or glamping will be required to pay the higher rate.

- 1.6 There are exemptions<sup>1</sup>; Visitors will not pay the visitor levy if they are:
  - under 18 years of age and staying on a campsite pitch or in shared rooms (such as a hostel or in dormitories)
  - staying for more than 31 nights in a single booking
  - in emergency or temporary housing arranged by the local council
- 1.7 The funds from the levy will be reinvested for the purposes of destination management and improvement in the area. Section 44 of the 2025 Act stipulates that councils must use the proceeds of the levy for:

---

<sup>1</sup> The visitor levy: a small contribution for a lasting legacy. Available [here](#)

- managing the effects of visitor activity.
- maintaining and promoting use of the Welsh language.
- promoting and supporting the sustainable economic growth of tourism and other kinds of travel.
- providing, maintaining and improving infrastructure, facilities and services for use by visitors (whether they are also for use by local people).

## Purpose of this Equality Impact Assessment

- 1.8 In considering whether to impose a visitor levy, Conwy County Borough Council is required to consider potential equality effects that may relate to the protected characteristics under the 2010 Equality Act (the '2010 Act').<sup>2</sup> The purpose of this EQIA is to provide information to assist the council in its role as the local authority when discharging its PSED.
- 1.9 **Section 2** of this report provides context by setting out the legislative context and policy, and **Section 3** explains the methodology applied in this EQIA, considering both disproportionate and differential effects.
- 1.10 The Welsh Government has already conducted an EQIA of imposing a visitor levy across Wales.<sup>3</sup> **Section 4** summarises the findings of this EQIA. **Section 5** looks at the effect of imposing a visitor levy in Conwy and the potential ways in which these effects may interact with protected characteristics.
- 1.11 **Section 6** considers the potential effect on the Welsh Language and **Section 7** considers the socio-economic status in the context of the Socio-Economic Duty.
- 1.12 A separate Economic Impact Assessment has been conducted – this is cross-referenced where relevant in this EQIA.

---

<sup>2</sup> The Equality Act 2010.

<sup>3</sup> Welsh Government, 2025. Visitor Accommodation (Register and Levy) Etc. (Wales) Act 2025: Equality Impact Assessment [here](#)

# Executive Summary

---

1.13 This Equality Impact Assessment (EqIA) considers the potential equality, Welsh language, and socio-economic impacts of Conwy County Borough Council introducing a Visitor Levy under the Visitor Accommodation (Register and Levy) Etc. (Wales) Act 2025.

1.14 The Council has a duty under the Equality Act 2010 to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations when making strategic decisions. This EqIA also considers the Welsh Language and the Socio-Economic Duty in Wales.

## 1.15 Overall Findings

1.15.1 No direct or significant adverse equality impacts have been identified for any protected characteristic.

1.15.2 The Welsh Government's national EqIA concludes that impacts are nil or low once statutory exemptions, reduced rates, and refund mechanisms are applied. No Conwy-specific characteristics have been identified that materially change those conclusions.

1.15.3 Any potential impacts are expected to be small, indirect, and highly dependent on how levy revenues are reinvested locally.

## 1.16 Key Considerations for Conwy

1.16.1 Conwy has an older visitor profile and an older workforce in tourism-related sectors. Any affordability impacts are therefore more likely to be indirect and should be monitored.

1.16.2 Disabled visitors may already experience higher costs associated with travel and accommodation; the Act's refund provisions partially mitigate this risk.

1.16.3 Coastal communities in Conwy experience higher levels of deprivation; targeted reinvestment of levy income has the potential to contribute positively to socio-economic outcomes.

## 1.17 Welsh Language

1.17.1 The Visitor Levy itself is not expected to have a direct negative impact on the Welsh language.

1.17.2 There is potential for positive impacts, if levy funds are reinvested in ways that support Welsh-medium visitor services, local culture, and community infrastructure.

1.17.3 Failure to align spending decisions with Welsh language objectives represents the principal risk.

## **1.18 Conclusion**

- 1.18.1 On the basis of the evidence available, nothing has been identified that would prevent the Council from introducing a Visitor Levy from an equality, Welsh language, or socio-economic perspective, provided that:
- 1.18.2 Equality considerations continue to inform spending decisions; and impacts are monitored and reviewed following implementation.

## 2. Legislative and policy context

---

### The Equality Act

2.1 The 2010 Act forms the basis of anti-discrimination law in Great Britain. Section 4 of the 2010 Act defines various protected characteristics which are covered by the Act:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion and belief
- Sex
- Sexual orientation

2.2 The 2010 Act requires authorities to have due regard to equality considerations when exercising their functions. This Public Sector Equality Duty (PSED) requires public authorities to have due regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act.
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- Foster good relations between persons who share a relevant protected characteristic and those that do not share it.

2.3 The need to advance equality of opportunity includes the need to (as set out in Section 149 (3) of the 2010 Act):

- Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic.
- Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it.
- Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

## The Well-being of Future Generations Act 2015 and the Socio-Economic Duty

2.4 The Welsh Government's **Well-being of Future Generations Act 2015**<sup>4</sup> (WFGA) sets out seven goals for improving Wales's social, economic, environmental and cultural well-being. These provide a legally binding common purpose for national and local governments as well as for local health boards and other public bodies. The goal of 'A More Equal Wales' aims to create a society that enables people to fulfil their potential, regardless of background or circumstance.

2.5 Sections 1 to 3 of the Equality Act set out **The Socio-Economic Duty**, and these sections took effect in Wales in 2021. The duty means that an authority "must, when making decisions of a strategic nature about how to exercise its functions, have due regard to the desirability of exercising them in a way that is designed to reduce the inequalities of outcome which result from socio-economic disadvantage". In doing so, the authority must take account of guidance issued by Welsh ministers.

2.6 This guidance<sup>5</sup> defines socio-economic disadvantage as "living in less favourable social and economic circumstances than others in the same society", and that this can include both "communities of interest" and "communities of place".

### Other relevant policy

2.7 The **Future Wales: National Plan 2040** (2021)<sup>6</sup> is to shape a future that is sustainable, healthy, equitable and fair. Each region is encouraged to build on their existing strengths and pursue opportunities to achieve greater prosperity and well-being.

2.8 Two of the twelve future Wales outcomes mention tourism, including the importance of 'attracting the interest and expenditure of tourists and providing a distinctive and trusted brand for Welsh businesses' and providing sustainable transport options.

2.9 Tourism and leisure are recognised as a major and growing employer and contributor to the Welsh rural economy. The plan states that sustainable forms of tourism, including opportunities for active, green and cultural tourism, should be explored. Tourism is also a 'focus' of the North Wales Coastal Settlements Regional Growth Area (Policy 21).

2.10 The Plan also highlights increasing the prevalence of the Welsh language is also a priority.

2.11 **The Economic mission: priorities for a stronger economy (2023)**, sets out the Welsh Government's priorities for building a more prosperous, equal, and greener economy. This includes:

- A just transition and green prosperity

---

<sup>4</sup> Welsh Government. Well-being of Future Generations Act 2015.  
<https://www.legislation.gov.uk/anaw/2015/2/contents/enacted>

<sup>5</sup> Welsh Government. 2021. A More Equal Wales: The Socio-Economic Duty.

<sup>6</sup> Welsh Government. 2021. Future Wales: The National Plan 2040.

- A platform for young people, fair work, skills and success
- Stronger partnerships for stronger regions and our everyday economy
- Investing for growth

2.12 The economic mission outcomes underpin the four priorities: a more prosperous economy, a greener economy and a more equal economy. It defines a more prosperous economy as one that operates within safe environmental limits and advances the well-being of current and future generations. An active government that drives economic development to grow the economy and reduce inequalities.

2.13 The **Strategic Equality and Human Rights Plan 2025-2029** (2025)<sup>7</sup> fulfils the Welsh Government's duties in relation to specific protected characteristics under the Equality Act and commitments to Human Rights. It sets out the long-term aim for Wales as 'Wales is a nation based on equity, anti-discrimination, and inclusion, through strengthening and advancing equality and human rights.'

2.14 The **Economic Contract**<sup>8</sup> is an agreement between the Welsh Government and the businesses it supports to identify how partnership working will improve economic resilience and make Wales a more attractive place to work. The contract commits businesses to providing public investment contributions that prioritise social and environmental needs, including access to fair work and the promotion of wellbeing. In response to these contributions, the contract commits the Welsh Government to setting out the non-financial support it will provide to businesses in return.

## Conwy Policy

2.15 The vision for the Conwy Local Development Plan 2007-2022 is that "By 2022, the communities of Conwy will be more sustainable, offer a higher quality of life and be supported by a more balanced age structure". Spatial objectives include:

- Ensure that development supports and sustains the long-term wellbeing of the Welsh language and the character and linguistic balance of communities within the plan area'
- Assist tourism through the protection and enhancement of coastal and rural based tourism attractions and accommodation and further exploit the potential to develop, strengthen and encourage an all-year-round tourism industry.

2.16 The Destination Conwy Management Plan 2023 – 2029<sup>9</sup> includes several outcomes related to Conwy's tourism industry. Those applicable here include:

- Ensuring the quality of the visitor and resident experience
- The sector working together to improve what we have and to attract new investment

---

<sup>7</sup> Welsh Government. 2025. Strategic Equality and Human Rights Plan 2025-2029

<sup>8</sup> <https://businesswales.gov.wales/economic-contract>

<sup>9</sup> Destination Conwy Management Plan 2023 – 2029. Available [here](#)

- Ensuring the destination meets resident and visitor expectations in terms of cleanliness, facilities and amenities.

2.17 Conwy County's Economic Growth Strategy 2017 – 2027<sup>10</sup> includes transformational tourism as a cross cutting theme. As part of this theme, the strategy notes that:

*“Conwy will need to operate as a truly international destination across all aspects of the visitor experience throughout the County” and “targeted investment [is required] to continue to improve our food and retail offer and develop our night time economy particularly within town centres.”*

2.18 The vision as set out in the Conwy Corporate Plan 2025 to 2027 is “Conwy as a progressive county creating opportunities”. This is underpinned by five long term goals:

- Long-term Goal 1: Conwy County Borough Council is resilient
- Long-term Goal 2: People in Conwy value and look after the environment
- Long-term Goal 3: People in Conwy live in a county that is prosperous, has less poverty, and supports learning and skills
- Long-term Goal 4: People in Conwy have access to affordable, appropriate, good quality accommodation that enhances the quality of their lives
- Long-term Goal 5: People in Conwy have good health, wellbeing, and feel safe

---

<sup>10</sup> Perfectly Placed for Business and Growth. Conwy County's Economic Growth Strategy 2017 – 2027. Available [here](#)

## 3. Methodology – EQIA

---

### Approach

- 3.1 All interventions will have a range of impacts, with potentially both positive and negative impacts.
- 3.2 Everyone affected by an intervention will have some protected characteristics as defined by the 2010 Act, and there will be varying degrees of intersectionality (such as age, race and sex), and people will not all be equally affected. That does not however, necessarily constitute an equality effect.
- 3.3 To identify which effects are relevant to equality considerations, equality assessments distinguish equality effects as those that have either a disproportionate or differential effect upon persons who share a relevant protected characteristic compared to persons who do not share it, as explained below:
- **Disproportionate:** there may be a disproportionate equality effect where people with a particular protected characteristic make up a greater proportion of those affected than in the wider population.
  - **Differential:** there may be a differential equality effect where people with a protected characteristic are affected differentially to the general population as a result of vulnerabilities or restrictions they face because of that protected characteristic.
- 3.4 The scale and significance of such impacts cannot always be quantified. Therefore, the consideration of equality effects includes a descriptive analysis of the potential impacts and identifying whether such impacts are adverse or beneficial.
- 3.5 Equality effects are complex and impacts are difficult to accurately and comprehensively predict. People's protected characteristics are personal and not always known, and not all of the people who will live near, work in or visit the area in future are already there today. For this reason, the EQIA can only consider effects that can reasonably be foreseen.
- 3.6 Any decision taken by a public body may involve a need to consider and balance a range of both positive and negative effects of different types. There may be reasonable mitigation measures that can eliminate or reduce some disproportionate or differential equality effects, but some impacts may not always be avoidable.

### Scope of Assessment

- 3.7 The main objective of an EQIA is to provide CCBC with information, with regard to the likely impact on the protected characteristics identified in the 2010 Equality Act, to inform their decision making.
- 3.8 There are three broad groups of people who may be affected by the visitor levy:

- Those who are (or may be in the future) employed in tourism jobs (or related sectors) whose employment may be affected by the introduction of the levy – this equally applies to business owners who may be affected.
- Residents who live in the area who may be affected by the introduction of the levy – through change in visitor numbers and / or who benefit from the investment of the levy spending
- Visitors (or others who are staying overnight) who are required to pay the levy

3.9 Within these groups there will be people with different protected characteristics and there will be varying degrees of intersectionality.

3.10 The starting point for the assessment is the Welsh Government All-Wales level EQIA<sup>11</sup> (WG EQIA), including the assessment, consultation / engagement and mitigation. We then consider whether there are any Conwy specific characteristics that may alter the findings of the WG EQIA and lead to disproportionate or differential effects. This is set out in Section 4 while the local EQIA is set out in Section 5.

3.11 Later sections consider the potential effect on the Welsh Language and consider the socio-economic status in the context of the Socio-Economic Duty.

---

<sup>11</sup> Welsh Government, 2025. Visitor Accommodation (Register and Levy) Etc. (Wales) Act 2025: Equality Impact Assessment [here](#)

## 4. Summary of the Welsh Government national level EQIA

---

4.1 The WG EQIA draws on a range of statistical data and figures on all protected characteristics and engagement with stakeholders including charities, disability groups and faith organisations to identify and (where possible) mitigate potential negative equality impacts.

4.2 The WG EQIA states that:

***‘The overall aim of the levy is to generate additional revenue for local authorities that choose to use a levy and it is not expected there are “direct” impacts on those with protected characteristics.’***

4.3 The assessment identified that a visitor levy will affect local authorities, visitors, local residents and businesses where a levy is implemented, either directly or indirectly. A ‘direct impact’ of the visitor levy was defined as any potential impact of having to pay or charging the levy. An ‘indirect impact’ was defined as potential impacts due to the existence of a levy.

4.4 The WG EQIA acknowledges that existing research on the impacts of introducing a visitor levy on protected characteristics is limited so uses qualitative information and some data to make inferences as to potential “indirect” impacts. The same caveats apply to the local assessment.

### Overall position on refunds and exemptions

4.5 Welsh Government conducted formal engagement on the Act, including with regard to exemptions. Generally, those in favour of applying exemptions to certain groups typically did so on the basis that:

4.5.1 Exemptions should be applied to promote fairness and equality of outcome by supporting groups with protected characteristics, and

4.5.2 that certain groups should not be classified as visitors and therefore, should not be imposed upon a levy.

4.6 Those who disagreed with applying exemptions, did so on the basis that exemptions could introduce complexities, increase administrative burden for tax authorities and visitor accommodation providers, and could be unfair since all visitors benefit from the visitor services and infrastructure.

4.7 Ultimately, Welsh Government is clear that there needs to be a clear policy basis for a reduced rate or exemption based on protected characteristics. The approach is therefore to minimise the use of exemption but use a lower levy rate.

4.8 To ensure a level of progressivity is met and those on lower incomes are not dissuaded or unable to meet the extra costs associated with the levy, there are two rates set out in the Bill

a lower rate for hostels and campsites and a higher rate for all other visitor accommodation. Although it is noted that those who camp in campervans, caravans or glamping will be required to pay the higher rate.

4.9 The Welsh Ministers can assess and revise the visitor levy rates that are set in legislation should adverse impacts materialise.

4.10 The legislation sets out two categories of stays in relation to the levy, that will be either, exempted or refunded:

- **Exemptions** include stays arranged by local authorities, those who are homeless, accommodation for asylum seekers, private hospitals, approved premises, care homes and gypsy and traveller sites.
- **Refunds** may be provided where it is not possible to provide an exemption. This includes stays where there is a risk to the health, safety or welfare if an individual stayed at their sole or main residence, where an individual was homeless (and the stay was not exempt), and stays by those in receipt of a disability benefit where the person was accompanied by a person providing care, support or assistance.

4.11 Exemptions are made for the following groups and situations:

- Overnight stays at a gypsy and traveller site.
- Home office arranged stays as part of their statutory obligations.
- Local authority arranged emergency stays in visitor accommodation as part of their duties under the Housing Act (Wales) 2014.
- Ministry of Justice arranged stays as part of their statutory obligations.
- Those under the age of 18 are not included in the calculable charge for lower-rated stays.

4.12 Similarly, refunds are available in cases where it is not possible to provide an exemption, such as:

- Stays related to temporary emergency housing arranged by charitable organisations in visitor accommodation on behalf of homeless people including those fleeing domestic abuse and asylum seekers.
- Disabled persons in receipt of a qualifying disability benefit who has paid visitor levy whilst staying in visitor accommodation and who are accompanied by a carer.
- Stays where there is a risk to the health, safety or welfare if an individual stayed at their sole or main residence (for example stays arranged by charities for vulnerable persons or where fire, flood or other disaster has rendered a property uninhabitable or where emergency services have advised not to stay at the property for such reasons).

4.13 As part of the consultation process, Welsh Government officials engaged with policy teams in Welsh Government and the third sector to gain a better understanding of the lived experiences of vulnerable groups requiring visitor accommodation.

4.14 As a result of this engagement, the following actions were undertaken with respect to exemptions and refunds:

- Exemptions:
  - Making clear in the 2025 Act, the types of stays in visitor accommodation not subject to a visitor levy to ensure policy aims are realised.
  - Ability to introduce new, modify or remove exemptions should there be emerging evidence of any disproportionate impact.
- Refunds – ability to add to the list of scenarios in which a refund may apply, should emerging evidence suggest so.

## Protected characteristics

4.15 Table 4.1 summarises the impact on each protected characteristic and measures to mitigate the impacts in the WG EQIA.

Table 4.1: Impact on protected characteristics – WG EQIA

Protected characteristic	Potential Impact	Mitigation
Age	<p>No direct negative or positive impacts. Some secondary impacts identified for children and young people.</p> <p>The ability to pay a levy may affect those with lower incomes, e.g. younger or lower income people differently.</p>	Under 18s are excluded from the levy for lower-rated stays.
Disability	It could be construed as indirect discrimination to apply a visitor levy to carers accompanying a disabled person requiring care as part of their visit. This is because disabled persons requiring a carer would potentially face additional costs due to the levy applying to the carer, should those additional costs be incurred by the disabled person.	Refund mechanism for persons in receipt of a disability benefit who are accompanied by a person providing care, support or assistance.
Gender reassignment	No direct negative impact.	Stays in private hospitals are exempt from a levy.
Marriage and civil partnership	No direct negative impact	
Pregnancy and maternity	No direct negative impact.	
Race	No direct negative impact	Gypsy, Roma and Travellers sites provided by a local authority or registered social landlord are exempt from a levy.

Protected characteristic	Potential Impact	Mitigation
		Exemptions / refunds are available for vulnerable groups, e.g. asylum seekers and those fleeing domestic abuse
Religion and belief	No direct negative impact. The levy may affect affordability for religious tourism but free accommodation is exempt.	The Welsh Revenue Authority (WRA) will offer non-digital processes to accommodate those whose faith may restrict digital engagement. Free accommodation exempt from a levy and stays in lower rated accommodation have a lower levy charge.  Revenue generated from the levy could be used for the preservation and maintenance of religious sites.
Sex	No direct negative impact.	
Sexual orientation	No direct negative impact.	

4.16 As a result of the stakeholder engagement, additional mitigation measures that will be implemented include:

- Local authorities publishing a report on the amount of revenue generated and how the revenue has been / will be used for the purposes of destination management and improvement in the local area where it is spent (reflected in Section 45 of the 2025 Act).
- Welsh Ministers carrying out a review of the operation and effect of the 2025 Act and publishing a review on a 5-year cycle (reflected in Section 63 of the 2025 Act).
- Monitoring the use of data such as Visit Wales surveys, the Tourism Barometer and engagement with local authorities and businesses.
- WRA monitoring and reviewing the effectiveness of levy administration through engagement with local authorities and businesses and reporting on the amount of revenues collected.

4.17 The findings of this national level assessment and the mitigation measures are considered below where appropriate.

## 5. Local equality impact assessment

---

5.1 The following section provides baseline data on the demographics of the local population and visitors with respect to the protected characteristics as defined by the 2010 Act where available data exists. It also provides a comparison against baseline demographic data for Wales with respect to the protected characteristics. Appendix A includes a summary of the relevant data for the resident population and is cross-referred to here as necessary.

5.2 Consultation with stakeholders is forecast to commence in 2026. Comments through the consultation process will inform the next stage of the EQIA (as appropriate).

5.3 Mitigation measures and recommendations set out within the EQIA draw upon those presented in the WG EQIA already conducted by the Welsh Government of imposing a levy across Wales and those mentioned in the 2025 Act.

### Protected Characteristics

#### Age

5.4 The potential impact with respect to age is considered for:

- Visitors
- Local population in terms of employment

#### Visitors

5.5 The WG EQIA noted that 'It may be that those at ages typically associated with lower incomes (for instance, younger people), are less able to afford the extra cost of visitor accommodation'.

5.6 Those under the age of 18 staying in lower rated stays are not required to pay the levy for lower rated stays. This will help mitigate any potential negative effects on young people as they may be more likely to stay in lower rated visitor accommodation (although the WG EQIA notes that there is no data to confirm this assertion). Note that those who camp in campervans, caravans or glamping will be required to pay the higher rate

5.7 The WG EQIA also notes that extra costs might not discourage those earning less to go on holiday, but it might alter behaviour in other ways, such as staying for a shorter period or spending less.

5.8 The WG EQIA does not specifically consider the potential impact on older people.

5.9 While interpreting the table, it should be noted that:

- The Conwy visitor age profile is from 2019, whereas the all-Wales visitor age profile is from 2024.
- The Conwy visitor age profile is across both day and overnight visitors whereas the all-Wales visitor age profile is for domestic overnight visitors

5.10 Table 5.1 shows the age distribution of visitors to Conwy and Wales. There appears to be a smaller proportion of younger visitors to Conwy than to Wales as a whole and a larger population of older people (although the data is not like for like).

5.11 While interpreting the table, it should be noted that:

- The Conwy visitor age profile is from 2019, whereas the all-Wales visitor age profile is from 2024.
- The Conwy visitor age profile is across both day and overnight visitors whereas the all-Wales visitor age profile is for domestic overnight visitors

Table 5.1: Age profile of visitors

	16 – 24	25 – 34	35 – 44	45 – 54	55 – 64	65+
Conwy (% of visitors) <sup>12</sup>	3 <sup>13</sup>	19	19	16	18	23
Wales (% of trips) <sup>14</sup>	20	27	19	13	13*	7*

Note: where a figure is followed with a single asterisk, the base size is below 100 and the figure should be treated as indicative.

5.12 The extent to which there is likely to be a differential impact on young people is (in part) mitigated by the exemption for under-18s from the lower band of the Levy. There does not appear to be a disproportionate impact (as the data suggests there are fewer young Welsh visitors to Conwy than Wales as a whole).

5.13 There are a higher proportion of older visitors to Conwy who could be disproportionately affected by increases in the cost of visiting. On the other hand, the WG EQIA also notes the following benefits, which is relevant to visitors and residents (emphasis added):

5.13.1 ‘The additional revenue could also indirectly benefit older and younger residents by improving the overall quality of life in the community, should the funds be used to enhance infrastructure, making the destination more accessible for more people’.

5.13.2 ‘The funds could also support cultural preservation efforts, which could help to protect and promote local heritage and traditions, benefiting older people who may have a deeper connection to these cultural elements<sup>12</sup>, and conversely younger people by maintaining or creating new facilities for younger generations to use’.

### Employment

5.14 The age profile of Conwy residents is older than the Welsh and North Wales – refer to Appendix A for more detail.

5.15 The WG EQIA notes that those employed in tourism often have jobs that are more insecure, i.e. part-time working or spending less time working for the same employer. Additionally, those employed in the tourism sector are generally younger.

<sup>12</sup> Conwy County Borough Council. BP 22: Conwy County Tourism Assessment. Available [here](#)

<sup>13</sup> For the age group of 18-24 since data for the age group 16-24 was unavailable.

<sup>14</sup> Domestic GB tourism statistics (overnight trips): annual report 2024. Available [here](#)

5.16 The WG EQIA also draws on the national level economic impact assessment and notes the impact of a visitor levy on employment as being between +100 FTE jobs to around -400 FTE jobs. The range arises due to the uncertainty in the extent to which a downturn in demand for tourism services will be offset by expenditure of visitor levy revenues.

5.17 The equivalent number for Conwy is between -43 and +15 FTE jobs (refer to the Economic Impact Assessment for more data). Any loss of jobs could be felt disproportionately by young people.

5.18 The WG EQIA noted that 38% of tourism workers were aged between 16-29 in 2022 across Wales.

5.19 More recent data shows that over the period Oct 2025, 10% of Conwy residents worked in the distribution, hotels and restaurants sector were aged between 16-19.<sup>15</sup> This is in line with the Welsh average (10%). There were higher proportions of older people in Conwy.

Table 5.2 Employment by age (Distribution, hotels and restaurants) – resident (Oct 2024 – Sept 2025)<sup>16</sup>

Age group	Conwy		Wales	
16 – 19	1,000	10%	23,700	10%
20 – 24	*	*	35,300	15%
25 – 49	5,400	55%	104,800	45%
50+	3,500	35%	67,000	29%
<b>Total</b>	<b>9,900</b>	<b>100%</b>	<b>230,800</b>	<b>100%</b>

5.20 While there could be a disproportionate effect (due to higher likelihood of older people being employed in the tourism sector), the magnitude of any negative effect is likely to be very small – there is a maximum reduction of 43 jobs, equivalent to loss of -0.1% of employment in Conwy, and that is a worst case scenario. There could also be a positive effect (estimated of up to 15 jobs).

5.21 The WG EQIA also notes that ‘should the additional revenue raised stimulate improvements to the local infrastructure and services, this could see an increase in visitors to the area, spurring more employment opportunities in the tourism sector’.

### Age overall

5.22 WG concludes there are ‘nil’ potential direct impacts regarding age once mitigation (including the under-18 exemption for lower bound accommodation) is taken into account.

<sup>15</sup> Office for National Statistics. Annual Population Survey

<sup>16</sup> *Ibid*

5.23 There are possible impacts related to a higher proportion of older visitors to Conwy, but any impacts of the levy are likely to be small – and will to some extent be offset by the spending of the levy. Therefore, it is not anticipated that there would be any Conwy specific characteristics that would change the findings of the WG EQIA.

5.24 A further assessment of the likely impact on younger or older people could be carried out once further information is available on how the fund will be spent.

## Sex

5.25 The potential impact with respect to sex is considered for:

- Visitors
- Local population in terms of employment

## Visitors

5.26 Provisions in the 2025 Act apply to all visitors staying in overnight visitor accommodation that is not their usual place of residence, and do not make any distinction based on sex.

5.27 The WG EQIA notes that studies have reported men being more amenable to paying a visitor levy - this may be due to the interaction of gender and income, where women have lower incomes on average than men.

5.28 Between January and December 2024, 59% of overnight trips to Wales were with female visitors and 40% were with male visitors.<sup>17</sup> The equivalent data for Conwy is unavailable.

5.29 The WG EQIA also notes that surveys suggest that:

- A majority (58%) of respondents agreed that tourists should contribute towards the costs of maintaining and investing in the destinations they stay in. Very few (13%) disagreed.
- There was agreement that tourists should contribute to maintaining and investing in destinations and this correlates strongly with social grade and 'financial means'.

5.30 WG concludes there are 'nil' potential direct impacts regarding Sex.

## Employment

5.31 In terms of employment, the WG EQIA also notes that across Europe, the share of women in the tourism workforce is also often higher. However, Table 5.3 shows that the employment in distribution, hotels and restaurants is higher amongst men in both Conwy and Wales.

---

<sup>17</sup> Domestic GB tourism statistics (overnight trips): annual report 2024. Available [here](#)

Table 5.3: Employment by sex (Distribution, Hotels and Restaurants)<sup>18</sup>

	Conwy	Wales
Female	5,473 (48%)	132,116 (49%)
Male	6,011 (52%)	137,360 (51%)
<b>All persons</b>	<b>11,484 (100%)</b>	<b>269,476 (100%)</b>

5.32 It is not anticipated that there would be a disproportionate or differential impact in Conwy as a result of the levy on females or males working in the tourist sector.

### Marriage and Civil Partnership

5.33 Provisions in the 2025 Act are not expected to have any impact on marriage and civil partnership characteristic. Overnight visitor accommodation for weddings / civil partnership ceremonies will be subject to a levy.

5.34 There are slightly lower proportions of single people in Conwy than the North Wales or Wales average and slightly higher proportions of people who are married or in a civil partnership, or are divorced, separated or widowed – refer to Appendix A for more detail.

5.35 WG concludes there are ‘nil’ potential direct impacts regarding marriage and civil partnership. It is not anticipated that there would be any Conwy specific characteristics that would change the findings of the WG EQIA.

### Gender Reassignment

5.36 Provisions of the 2025 Act apply to all visitors staying in overnight visitor accommodation that is not their usual place of residence, and do not make a distinction based on gender reassignment.

5.37 However, consideration in the 2025 Act is given to those requiring medical treatment for gender reassignment process and hospital stays do not get charged a levy.

5.38 WG concludes there are ‘nil’ potential direct impacts with regard to gender reassignment. It is not anticipated that there would be any Conwy specific characteristics that would change the findings of the WG EQIA.

### Sexual Orientation

5.39 Provisions in the 2025 Act apply to all visitors staying in overnight visitor accommodation that is not their usual place of residence, and do not make distinction based on sexual orientation.

<sup>18</sup> Office for National Statistics. Census 2021

## Visitors

5.40 Evidence suggests that 10% of trips taken to Wales were undertaken by LGBTQ+ visitors from January to December 2024.<sup>19</sup> The WG EQIA notes that there is no evidence to suggest that visitors with this sexual orientation characteristic would be disadvantaged through the provisions of the 2025 Act. The equivalent data for Conwy is presently unavailable.

## Employment

5.41 In the general population there are similar proportions of people who are gay, lesbian or bisexual in Conwy as there are across North Wales and Wales. In terms of employment, the table below shows that:

- There are slightly lower proportions of bisexual and gay or lesbian workers employed in the distribution, hotels and restaurants sector in Conwy (3%) compared to Wales (4%).
- There are the same higher proportions of bisexual and gay or lesbian workers employed in the distribution, hotels and restaurants sector (3%) than the average across all sectors in Conwy (3%).

Table 5.4: Employment of residents by Sexual Orientation<sup>20</sup>

		Straight or Heterosexual	Gay or Lesbian	Bisexual	All other sexual orientations	Not answered	TOTAL
Distribution, hotels and restaurants	Conwy	90%	2%	1%	0%	6%	100%
	Wales	90%	2%	2%	0%	6%	100%
All sectors	Conwy	91%	2%	1%	0%	6%	100%
	Wales	91%	2%	1%	0%	5%	100%

Note: percentages may not sum to 100% due to rounding

## Sexual Orientation – overall

5.42 WG concludes there are ‘nil’ potential direct impacts with regard to sexual orientation. It is not anticipated that there would be any Conwy specific characteristics that would change the findings of the WG EQIA.

## Race

5.43 Provisions in the 2025 Act apply to all visitors staying in overnight visitor accommodation that is not their usual place of residence, and do not make a distinction based on race.

5.44 As the WG EQIA notes, the impact of visitor levies on race can vary depending on specific contexts and implementation approaches, and where the revenue raised is spent. Proactive measures can be taken to ensure that the benefits of tourism are distributed more

<sup>19</sup> Domestic GB tourism statistics (overnight trips): annual report 2024. Available [here](#)

<sup>20</sup> Office for National Statistics. Census 2021

equitably among all segments of the population, with community engagement and inclusive decision-making processes being crucial to address potential negative impacts on minority ethnic groups.

5.45 As set out in Section 5, there is a refund mechanism that allows for refunds where groups are to be housed in visitor accommodation temporarily and this is paid for by a supporting charity, in emergency situations

### Visitors

5.46 Table 5.5 shows the ethnicity profile of domestic Wales overnight tourism in 2024. The equivalent data for Conwy is unavailable.

Table 5.5 Ethnicity profile of visitor trips and visitors

Ethnicity of respondent	Wales (% of trips) <sup>21</sup>
White	80%
Mixed / Multiple ethnic groups	3%**
Asian / Asian British	6%*
Black / African / Caribbean / Black British	7%*
Chinese	0%**
Arab	0%**
Other ethnic group	0%**
Prefer not to say / Don't know / Unspecified	3%**
<b>Total</b>	<b>100%</b>

Note: where a figure is followed with a single asterisk, the base size is below 100 and the figure should be treated as indicative. Where a figure is followed with a double asterisk, the base size is below 30 and users are advised to not use this estimate.

Note: percentages may not sum to 100% due to rounding

### Employment

5.47 In terms of employment, the table below show that:

- There are lower proportions of people who are from an ethnic minority group employed in the distribution, hotels and restaurants sector in Conwy (9%) compared to Wales (12%).
- There are slightly higher proportions of people who are from an ethnic minority group employed in the distribution, hotels and restaurants sector (9%) than the average across all sectors in Conwy (7%) – this means a change in employment levels could affect this group (albeit any change is likely to be small).

<sup>21</sup> Domestic GB tourism statistics (overnight trips): annual report 2024. Available [here](#)

Table 5.6: Employment of residents by ethnicity<sup>22</sup>

		Asian, Asian British or Asian Welsh	Black, Black British, Black Welsh, Caribbean or African	Mixed or Multiple ethnic groups	White: English, Welsh, Scottish, Northern Irish or British	White: Irish	White: Gypsy or Irish Traveller, Roma or Other White	Other ethnic group	Total
Distribution, hotels and restaurants	Conwy	3%	0%	1%	91%	0%	4%	1%	100%
	Wales	4%	1%	1%	88%	0%	5%	1%	100%
Total	Conwy	2%	0%	1%	93%	1%	3%	0%	100%
	Wales	3%	1%	1%	91%	0%	4%	1%	100%

Note: percentages may not sum to 100% due to rounding

### *Gypsy Roma and Traveller sites*

5.48 The WG EQIA notes that Gypsy, Roma and Travellers lifestyle is inherently transient and involves movement across local authority boundaries.

5.49 The WG EQIA mentions that a discussion between Welsh Government officials and Tros Gynnal Plant Cymru highlighted that if the designated permanent and transient sites were exempt from paying a levy then there would unlikely be a significant impact on Gypsy Roma Travellers.

5.50 Gypsy, Roma and Traveller sites that are provided by a local authority or registered social landlord are exempt from a levy. There were four registered sites in Conwy in the last available data (2020); there was a count in 2025, but data is not available as the data collection has paused to allow for a review of the process.

5.51 The WG EQIA notes that Gypsy Roma Travellers use several public and private sites across Wales, including seasonal sites, land suitable for negotiated stopping, mainstream holiday sites for seasonal travel. Members of the Gypsy Roma Traveller community who use visitor accommodation other than for their main or usual place of residence would be subject to the levy.

5.52 The Act provides Welsh Ministers with powers to create new national exemptions should there be evidence of negative impact on any particular group.

### *Asylum seekers and refugees*

5.53 The WG EQIA notes that given asylum seekers will have limited or no recourse to funds, application of a levy could have a negative impact. However, the 2025 Act allows accommodation for asylum seekers arranged by local authorities to be exempt from paying

<sup>22</sup> Office for National Statistics. Census 2021

a levy. There is also a refund mechanism to allow charities to recoup the costs from the levy for any eligible stays.

5.54 In September 2025, there were 3,331 asylum seekers in Wales in receipt of Home Office support that were housed in Contingency Accommodation (hotel), Initial Accommodation, Dispersal Accommodation (longer term accommodation) or receiving subsistence only.<sup>23</sup>

5.55 Similarly, in September 2025, 13 asylum seekers in Conwy in receipt of Home Office support that were housed in Dispersal accommodation.<sup>24</sup>

5.56 The WG EQIA notes that there are difficulties in identifying how many refugees there are in Wales and its entirety as there is lack of data on where refugees settle. Nevertheless, latest evidence suggests that there were 11 cases of resettlement in Wales in Q2 of 2025 (in Denbighshire, Flintshire, Wrexham, Carmarthenshire and Powys).<sup>25</sup>

5.57 Again, the 2025 Act provides Welsh Ministers with powers to create new national exemptions should there be evidence of negative impact of any particular group.

#### *Race – overall conclusion*

5.58 WG concludes there are ‘nil’ potential direct impacts with regard to race. It is not anticipated that there would be any Conwy specific characteristics that would change the findings of the WG EQIA.

5.59 Employees in the distribution, hotels and restaurants sector are more likely to be white, than the average across Wales.

5.60 As noted by the WG EQIA, proactive measures can be taken to ensure the benefits of tourism, including the spending of the fund, are distributed more equitably among all segments of the population.

#### **Violence against Women, Domestic Abuse and Sexual Violence (VAWDASV)**

5.61 The WG EQIA sets out the engagement that Welsh Government has undertaken with service providers and survivors to understand the lived experience more fully and understand the levels of these types of scenarios.

5.62 Exemptions and mechanisms for refund have been included in the Act and guidance will be prepared with regard to the application process (with regard to the disclosure of personal details). Further information is set out in Section 4.

#### **Religion and Belief**

5.63 The WG EQIA estimated that there were 174,456 domestic tourists that “visited a cathedral, church, abbey or other religious building” in 2023.

---

<sup>23</sup> Home Office. Immigration system statistics data tables. Available [here](#)

<sup>24</sup> Home Office. Immigration system statistics data tables. Available [here](#)

<sup>25</sup> Home Office. Immigration system statistics data tables. Available [here](#)

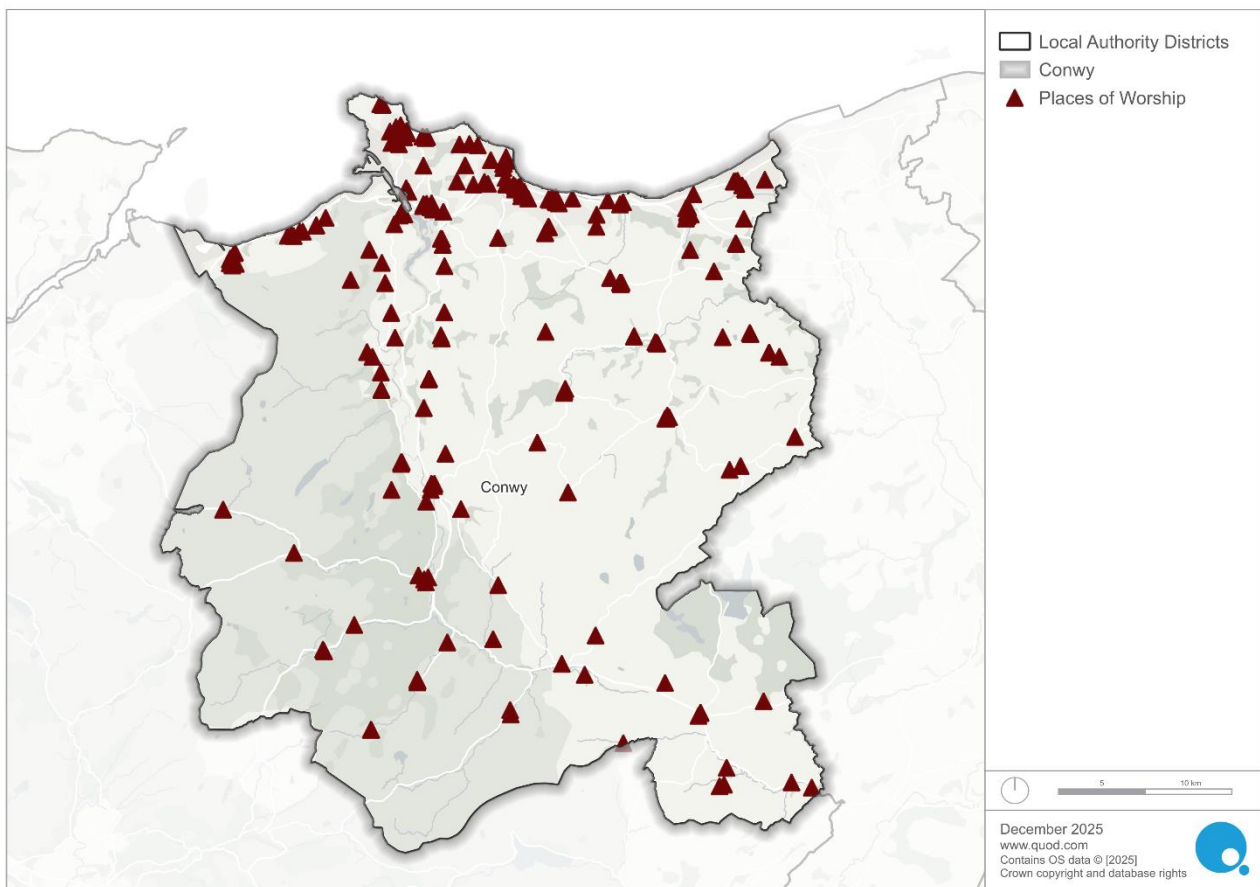
5.64 The WG EQIA notes that there is no direct correlation between visitor levies and religion, belief or non-belief. It also notes that tourism-related policies or taxes might interact with an individuals' freedom to practice religion, depending on the nature of the visit. Introducing a visitor levy might affect the affordability of visiting such places, potentially influencing the number of pilgrims or tourists visiting religious sites due to the levy increasing the cost of stay for visitors staying overnight in visitor accommodation.

5.65 In undertaking the national level assessment, Welsh Government officials met with the Inter-faith Council for Wales in 2023 and also received a response to a further request for feedback in June 2024 via their representation in the Third Sector Partnership Group.

5.66 The levy would not apply to accommodation that was free of charge. However, the levy will apply to stays in lower rated overnight visitor accommodation (an issue raised through engagement as faith groups often arrange camping trips), although the lower rate may mitigate potential negative impacts.

5.67 The equivalent data for number of tourists visiting a religious building in Conwy is unavailable. However, Figure 5-1 shows there are 226 places of worship in Conwy. Note that mapping of the places of worship is indicative and may not always be complete and there is no clear legal definition of places of worship.

Figure 5-1: Places of worship in Conwy



5.68 There may be an adverse impact on those who do not engage with digital processes as part of their faith. To mitigate any potential impact there will be a non-digital service when required.

5.69 WG concludes there are 'nil' potential direct impacts with regard to religion and belief. It is not anticipated that there would be any Conwy specific characteristics that would change the findings of the WG EQIA.

## Disability

5.70 Provisions in the 2025 Act apply to all visitors staying in overnight visitor accommodation that is not their usual place of residence and do not make any distinction based on disability.

## Population

5.71 There were about 25,950 people who were disabled under the Equality Act in Conwy accounting for 22.6% of the total population – this is higher than the Welsh average of 21.6%.<sup>26</sup>

## Visitors

5.72 The WG EQIA identified that according to historic evidence, there may be some scenarios where disabled people may face higher costs for staying in visitor accommodation and identified some barriers and challenges for disabled people including:

- Environmental barriers: The UK Disability Survey research report 2021 showed that 57% of disabled people reported being unable to go on holiday due to accessibility issues, i.e. access into public buildings.
- There is a lack of information and awareness about the availability and quantity of accessible tourism facilities and services, and the rights and entitlements of disabled people as tourists. Information on accessible destinations is a key factor in increasing tourism opportunities among disabled individuals.
- Booking a holiday may lead to extra costs due to a lack of availability of accessible and affordable accommodation and transport options, especially in rural and remote areas, and during peak seasons. In a recent survey by Leonard Chesire Disability, published in Enable Magazine, 8 in 10 disabled people said they faced barriers and difficulties staying at UK hotels and resorts. Over 70% flagged issues finding accessible rooms. Costs of accessible accommodation are also a common barrier to taking a break for around 6 in 10 survey respondents, with accessible rooms often seen as more expensive.

5.73 The WG EQIA noted a number of other challenges including:

- Limited choices and opportunities for disabled people and those with impairments - that can affect their quality and satisfaction with their tourism experiences.

---

<sup>26</sup> Census 2021

- Lack of accessibility for some disabled people in campsites and hostels leading to further strain on travel budgets – this is mitigated to some extent by the lower rate in the legislation.
- Additional cost and or limited options for people who need a carer, specialist equipment or guide dog.

5.74 Recognising that there is an overall lack of data and evidence, Welsh Government officials met with representatives from Disability Wales, Autistic UK and the Fair Treatment for the Women of Wales in formulating the WG EQIA.

5.75 The WG EQIA identified that it could be construed as indirect discrimination to apply a visitor levy to carers accompanying a disabled person requiring care as part of their visit.

5.76 WG EQIA considers a number of options for refunds for both disabled people and carers. Ultimately, the option included in the Act was to issue refunds for disabled people in receipt of a qualifying disability benefit who has paid a visitor levy while staying in a visitor accommodation and accompanied by a person providing care. The WG EQIA acknowledges (in part because it does not include carers) that whilst this option is ‘not fully eliminating the risks of indirect discrimination, it was perceived to be a proportionate response which balances the need to address the indirect discrimination but also ensure the integrity and efficiency of the tax system’.

5.77 In terms of tourism activity, 31% of all trips to Wales include somebody who is disabled or has an impairment. Additionally, 20% of all overnight trips taken to Wales from January to December 2024 were by those taking care of people with medical conditions.<sup>27</sup> Some of these trips relate to stays with friends and family in their own homes rather than visitor accommodation and it does not mean that these visitors were accompanying the person they care for rather that they simply have this type of caring responsibility. The equivalent data for Conwy is unavailable.

### *Employers and employment*

5.78 The WG EQIA also notes the WRA will collect and manage levy. For accommodation providers, it is anticipated that the day-to-day operation of the levy will have minimal impact on business owners who have visual and / or hearing impairments due to the multiple ways a person can interact with the WRA – digital system for filing and remitting returns to the WRA alongside the provision of a telephone and paper service, where necessary.

5.79 Additionally, the WG EQIA notes that disabled workers are more likely to end up in insecure work than non-disabled workers. Of the workers working in tourism in Wales, 18% are disabled – a similar proportion to the average across all industries.<sup>28</sup>

5.80 The equivalent data for Conwy is presently unavailable.

### *Disability overall*

---

<sup>27</sup> Domestic GB tourism statistics (overnight trips): annual report 2024. Available [here](#)

<sup>28</sup> Welsh Government. Welsh tourism sector business and labour market statistics. Available [here](#)

5.81 The WG EQIA identified that it could be construed as indirect discrimination to apply a visitor levy to carers accompanying a disabled person requiring care as part of their visit but that the option (not including an exemption) was a proportionate response.

5.82 Once mitigation (including refund for person in receipt of a disability benefit) is included, no other impacts were identified, and it is not anticipated that there would be any Conwy specific characteristics that would change the findings of the WG EQIA.

5.83 Proactive measures can be taken to ensure the benefits of tourism, including the spending of the fund, are distributed more equitably among all segments of the population – this could include measures to improving accessibility for disabled people to tourist sites.

### Pregnancy and maternity

5.84 Provisions in the 2025 Act apply to all visitors staying in overnight visitor accommodation that is not their usual place of residence, do not make distinction based on pregnancy and maternity.

5.85 The ONS does not provide statistics on the number of people who are pregnant. Therefore, this baseline analysis considered live birth data<sup>29</sup> as a proxy. The latest available data from 2024 indicate the general fertility rate<sup>30</sup> is higher (46.8) in Conwy than the average for Wales (45.7).

5.86 WG concludes there are ‘nil’ potential direct impacts with regard to pregnancy and maternity. While there is a higher fertility rate in Conwy, it is not anticipated that this would change the finding of ‘nil’ impact.

## Summary of impact on groups who share a protected characteristic

5.87 Table 5.7 below summarises the findings of the equality impact assessment against protected characteristics.

Table 5.7 Summary of impacts

Protected characteristic	Potential impacts	Potential mitigation where required
Age	WG concludes there are ‘nil’ potential direct impacts regarding Age once mitigation (including the under-18 exemption for lower bound accommodation) is considered. It is not anticipated that there would be any Conwy specific characteristics	Under 18s are excluded from the levy for lower-rated stays  Future use of the levy

<sup>29</sup> Office for National Statistics, 2024. Live Births.

<sup>30</sup> Office for National Statistics, 2021. Census.

Protected characteristic	Potential impacts	Potential mitigation where required
	<p>that would change the findings of the WG EQIA.</p> <p>There are possible impacts related to a higher proportion of older visitors to Conwy, and an older workforce, but any impacts of the levy are likely to be small – and will to some extent be offset by the spending of the levy.</p>	
Disability	<p>The WG EQIA identified that it could be construed as indirect discrimination to apply a visitor levy to carers accompanying a disabled person requiring care as part of their visit but that the option (not including an exemption) was a proportionate response.</p> <p>Once mitigation (including refund for person in receipt of a disability benefit) is included, no other impacts were identified, and it is not anticipated that there would be any Conwy specific characteristics that would change the findings of the WG EQIA.</p>	<p>Refund mechanism for persons in receipt of a disability benefit who are accompanied by a person providing care, support or assistance.</p> <p>Future use of the levy.</p>
Gender reassignment	<p>WG concludes there are ‘nil’ potential direct impacts regarding gender reassignment. It is not anticipated that there would be any Conwy specific characteristics that would change the findings of the WG EQIA.</p>	<p>Stays in private hospitals are exempt from a levy.</p>
Marriage and civil partnership	<p>WG concludes there are ‘nil’ potential direct impacts regarding marriage and civil partnership.</p> <p>It is not anticipated that there would be any Conwy specific characteristics that would change the findings of the WG EQIA.</p>	<p>No potential impacts identified</p>

Protected characteristic	Potential impacts	Potential mitigation where required
Pregnancy and maternity	WG concludes there are 'nil' potential direct impacts regarding pregnancy and maternity. While there is a higher fertility rate in Conwy, it is not anticipated that this would change the finding of 'nil' impact.	No potential impacts identified
Race	<p>Employees in the distribution, hotels and restaurants sector in Conwy are more likely to be white, than the average across Wales.</p> <p>WG concludes there are 'nil' potential direct impacts regarding race. It is not anticipated that there would be any Conwy specific characteristics that would change the findings of the WG EQIA.</p>	<p>Gypsy, Roma and Travellers sites provided by a local authority or registered social landlord are exempt from a levy.</p> <p>Exemptions / refunds are available for vulnerable groups, e.g. asylum seekers and those fleeing domestic abuse.</p> <p>Future use of the levy.</p>
Religion and belief	WG concludes there are 'nil' potential direct impacts regarding religion and belief. It is not anticipated that there would be any Conwy specific characteristics that would change the findings of the WG EQIA.	<p>The WRA will offer non-digital processes to accommodate those whose faith may restrict digital engagement.</p> <p>Free accommodation exempt from a levy and stays in lower rated accommodation have a lower levy charge.</p> <p>Future use of the levy.</p>
Sex	<p>WG concludes there are 'nil' potential direct impacts regarding sex. There are no Conwy specific characteristics that would change the findings of the WG EQIA.</p> <p>It is not anticipated that there would be a disproportionate or differential impact in Conwy because of the levy on females or males working in the tourist sector.</p>	No potential impacts identified.

Protected characteristic	Potential impacts	Potential mitigation where required
Sexual orientation	WG concludes there are 'nil' potential direct impacts regarding sexual orientation. It is not anticipated that there would be any Conwy specific characteristics that would change the findings of the WG EQIA.	No potential impacts identified.

## 6. Welsh Language

6.1 The Wellbeing of Future Generations Act states that Welsh public bodies must carry out sustainable development to improve the country’s economic, social, environmental and cultural wellbeing. One Wellbeing Goal for achieving this is to create a society that promotes and protects the Welsh language. In accordance with this, this EqlA considers the potential impact of the Visitor Levy on the prevalence of the Welsh language in Conwy.

6.2 The Welsh Government has undertaken a national Welsh Language Impact Assessment of the Act<sup>31</sup>.

6.3 The Welsh Government also undertook a consultation exercise as part of this assessment. This found that whilst most respondents did not have specific views concerning the impact of the visitor levy on the Welsh language, a small number of respondents expressed concern about the impact on the perception of Wales, and that any decline in tourism resulting from a levy could reduce opportunities to use the Welsh language, as well as having a potentially negative impact on Welsh speaking communities. On the other hand, some respondents highlighted that revenues raised through a levy could be used to promote and facilitate the use of the Welsh language.

### The Welsh Language in Conwy – and in the tourist and food sector

6.4 The 2021 Census identifies the prevalence of skills in the Welsh language across Wales. The proportion of residents who have some skill in Welsh (reading, writing, speaking or understanding spoken Welsh) is similar in Conwy (38%) to across North Wales (39%) and higher than Wales (25%).

6.5 The proportion of Conwy residents who can speak, read and write Welsh (20%) is lower than the average for North Wales (24%) and higher than the Wales average (14%).

Table 6.1: Welsh Language (Census 2021)

	Measure	Conwy	North Wales	Wales
Welsh Language Skills	Any skills in Welsh (reading, writing, speaking or understanding spoken Welsh)	38%	39%	25%
	Can understand spoken Welsh only	10%	7%	5%
	Can speak, read and write Welsh	20%	24%	14%
	No skills in Welsh	62%	61%	75%

<sup>31</sup> [Visitor Accommodation \(Register and Levy\) Etc. \(Wales\) Act 2025: Welsh Language Impact Assessment](#)

6.6 The distribution, hotels and restaurants sector has slightly fewer Welsh speakers than the average across all sectors, but it is still relatively high (20% of residents aged 16 years and over in employment in the sector).

Table 6.2: Welsh Language - residents aged 16 years and over in employment in the sector (Census 2021)

	Conwy	North Wales	Wales
All sectors	28%	29%	17%
Distribution, hotels and restaurants	20%	25%	14%

6.7 The WLIA notes that the visitor levy could potentially impact the Welsh language if it were introduced in areas where relatively high proportions of Welsh-speakers work in the accommodation and food services industry. These could be positive and negative.

### Potential for positive impacts

6.8 The WLIA notes that there could be positive impacts resulting from:

- A boost to the local economy through the spending of the levy leading to an increase in employment in the tourism sector – the Conwy Economic Impact Assessment suggested there could be between -43 and +15 jobs, so this is likely to be relatively small impact.
- Positive impact in terms of exposure to Welsh language.
- Use the revenue from the levy to promote and support the Welsh language or to fund initiatives that improve the infrastructure and services in areas which currently have (or until recent decades have had) a relatively high percentage of Welsh-speakers. This could promote the visibility, vitality, and viability of the Welsh language, as well as increase the awareness and appreciation of visitors and residents alike.

6.9 We have identified four broad areas where spending of the Levy could benefit the Welsh language – note this is indicative and will need to be confirmed through governance processes and in line with the Act were the Levy to be adopted:

**1. Strengthening Welsh Language Infrastructure and Promotion, including:**

- Community initiatives promoting Welsh language use
- Local cultural events, festivals, and Welsh-medium visitor experiences
- Grants to organisations delivering Welsh-medium services

**2. Supporting Sustainable Tourism that Respects Welsh Identity, including:**

- Welsh cultural programmes
- Interpretation and signage in Welsh
- Preservation of local heritage

These could strengthen Welsh identity in the visitor experience.

**3. Mitigating Pressures on Welsh-speaking Communities, including:**

- Managing tourism pressures in communities with high proportions of Welsh speakers

- Infrastructure provision, maintenance or improvement (paths, car parks etc)

#### 4. Economic Opportunities for Welsh Speakers, including:

- Welsh-medium customer service training
- Encouraging tourism businesses to use Welsh in branding
- Alignment with existing schemes that link language and economic development

6.10 If the visitor levy boosts economic resilience in areas with relatively high rates of overnight stays where Welsh-speakers are prevalent, it could help support the delivery of one of 'Cymraeg 2050' objectives: creating favourable conditions for the Welsh language to thrive.

6.11 It is recognised that unless levy funding is targeted at Welsh language initiatives, the opportunity would be lost.

### Potential for negative impacts

6.12 The WLIA also notes some potential negative impact:

- The potential negative economic impact of the levy – although as above, there are anticipated to be a maximum of a loss of -43 jobs in a worst-case scenario) and so this impact is likely to be relatively minimal.
- The potential impact on overnight trips that aim to support the Welsh language and Welsh-medium education. This could have education and cultural impacts. However, under 18s will not have to pay the levy when staying in hostel style accommodation or on campsite pitches. Reliefs are applied to overnight stays that are supplied by education providers as part of the supply of a course of study offered to pupils or students.

### Summary

6.13 Overall, a visitor levy in Conwy could have both positive and negative impacts on the Welsh language. There could be small negative impacts associated with a reduction in visitor spending, or there could be a small increase because of the employment supported through spending of the levy.

6.14 Similarly, there could be positive impacts associated with the outcome of the spending of the levy – that will depend on the how the fund is spent (which will be developed including feedback through consultation).

## 7. Socio-Economic Status

- 7.1 Although socio-economic status is not a protected characteristic, it is relevant to the socio-economic duty in the Equality Act and therefore is included in this EqIA. There are multiple aspects to socio-economic status, which are considered below.
- 7.2 We consider the socio-economic status of residents of Conwy as well as North Wales to account for those who may commute to Conwy for work (note that there are multiple Travel to Work Areas (TTWAs) and so North Wales is taken as capturing those who commute into work). Those local / regional stats are compared to national (Welsh level) statistics.
- 7.3 The impact of the Visitor Levy is estimated to be between -43 and +15 FTE jobs (refer to the Economic Impact Assessment for more data) – this is a very small impact in the context of the Conwy economy (a loss of 43 jobs is equivalent to loss of -0.1% of all employment).
- 7.4 We do not consider directly the socio-economic status of visitors, since those visitors who are able to travel are by definition able to fund leisure activities and are able to change how (or where) they spend their leisure spending.

### Health and lifestyle

- 7.5 Health and lifestyle factors can be taken as indicators of socio-economic status. Higher rates of obesity, smoking and alcohol consumption are often associated with areas of high deprivation and low socio-economic status.
- 7.6 According to ONS data<sup>32</sup>, in 2022-2024, life expectancy at birth was higher in Conwy for both men and women than North Wales (across the BCUHB - Betsi Cadwaladr University Health Board) and Wales averages. Life expectancy is taken as an indicator of socio-economic status in the WGFA and the Welsh National Plan.

Table 7.1: Health and Lifestyle indicators

		Conwy	North Wales (BCUHB)	Wales
Life expectancy at birth (years) (2018-20)	Male	78.9	78.4	78.3
	Female	82.6	82.4	82.2

- 7.7 Table 7.2 demonstrates that self-assessed health in Conwy is broadly in line with averages for North Wales and Wales. There are slightly higher numbers of people who are disabled as defined by the Equality Act.

32

<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandlifeexpectancies/datasets/lifeexpectancyforlocalareasoftheuk>

Table 7.2: Health and Disability (2021 Census)

		Conwy	North Wales (BCUHB)	Wales
Self-Assessed Health	Very good & Good	78%	80%	79%
	Fair	15%	14%	14%
	Bad & Very Bad	7%	6%	7%
Disability under the Equality Act	Day-to-day activities limited a lot	10%	9%	10%
	Day-to-day activities limited a little	12%	11%	11%

7.8 The visitor levy could have negative impacts on health if it leads to an increase in unemployment or economic activity, but the impact of jobs is expected to be very low. Conversely, the levy could have a positive impact on health if it were to increase employment (though the spending of the levy) and through the spending of the levy if it (for example) encouraged community cohesion or improved local assets that have a positive impact on health and wellbeing.

## Qualifications

7.9 The WFGA identifies the qualification level of a population as a wellbeing indicator.

7.10 Overall, Conwy’s population’s highest level of qualification aligns with the other spatial levels<sup>33</sup>. The proportion of young adults with further or higher education-level qualifications (17%) is slightly lower than the Welsh average (18%), but the older populations (65 years and above) are generally slightly more qualified in Conwy than across Wales as a whole – 26% with further or higher education-level qualifications, compared to 25% and 24% across North Wales and Wales, respectively.

7.11 Conwy has a similar proportion of people with no qualifications (19% of adults over 16) compared to 19% and 20% across North Wales and Wales, respectively.

Table 7.3: Qualifications (Census 2021) - % of residents over 16

Measure		Conwy	North Wales	Wales
No qualifications	<b>Total</b>	<b>19%</b>	<b>19%</b>	<b>20%</b>
	Aged 16-24	13%	12%	11%
	Aged 25-64	12%	12%	14%
	Aged 65+	33%	35%	38%
GCSEs or A-Level equivalent	<b>Total</b>	<b>40%</b>	<b>41%</b>	<b>40%</b>
	Aged 16-24	66%	66%	66%
	Aged 25-64	43%	44%	42%
	Aged 65+	26%	26%	24%

<sup>33</sup> Office for National Statistics, 2021. Census.

Further or Higher Educations	<b>Total</b>	<b>32%</b>	<b>31%</b>	<b>32%</b>
	Aged 16-24	17%	17%	18%
	Aged 25-64	38%	37%	38%
	Aged 65+	26%	25%	24%
Other qualifications	<b>Total</b>	<b>9%</b>	<b>9%</b>	<b>8%</b>
	Aged 16-24	4%	5%	5%
	Aged 25-64	7%	7%	7%
	Aged 65+	15%	15%	14%

## Economic activity

7.12 The rate of economic activity in Conwy and North Wales (both 78%) is higher than Wales as a whole (76%). The WFGA identifies the proportion of people not in employment or education as a key wellbeing indicator. There are high levels of economic inactivity in those aged 16 to 19 at all spatial levels but is particularly pronounced at a Conwy level.

7.13 The rate of unemployment in Conwy (3%) is lower than across North Wales (4%) and Wales (5%). Again, there is higher unemployment amongst young people (particularly 16 – 19).

7.14 Promoting economic activity in young people, as well as retaining those who are economically active, are priorities of the Welsh National Plan and in Conwy's local policy.

7.15 Claimant count data shows 4% of residents claiming benefits principle for the reason of being unemployed – slightly higher than the Welsh Average.

7.16 The visitor levy could result in a small increase or small decrease in employment – as set out above this magnitude of the impact means that the overall effect on economic activity and unemployment is likely to be small.

Table 7.4: Economic Activity and Unemployment

Measure		Conwy	North Wales	Wales
Economic activity rate (APS Oct 2024-Sep 2025)	Total (16 - 64)	78%	78%	76%
	Aged 16-19	53%	45%	43%
	Aged 20-24	66%	69%	70%
	Aged 25-34	82%	89%	86%
	Aged 35-49	88%	86%	86%
	Aged 50+	37%	41%	39%
Unemployment rate (APS Oct 2024-Sep 2025)	Total (16 - 64)	3%	4%	5%
	Aged 16-19	43%	*	29%
	Aged 20-24	*	*	11%
	Aged 25-34	*	*	3%
	Aged 35-49	*	*	3%
	Aged 50+	*	*	3%
		4%	*	3%

Claimant Count (Dec 2025) - Claimants as a proportion of residents

\* Figure not available at this spatial level.

## Income

7.17 The National Plan identifies wages as a key indicator of socio-economic status.

7.18 The Annual Survey of Hours and Earnings provides data on residents' and workers' pay and hours worked based. In 2025, the average gross weekly pay for a resident in Conwy was £565, slightly lower than Wales (£602). Workers in Conwy also earned less than the Welsh average (£513 compared to £590).

7.19 The 10<sup>th</sup> percentile for weekly wage in Conwy is also lower than the Welsh average for both residents (£179 compared to £223) and workers (£184 compared to £217).

7.20 Data by sector is not available at a lower than country (Wales) level. The accommodation and food sector in Wales is typically paid less well than the average across all jobs, in part (but not entirely) due to the high occurrence of part time work. Again, to the extent that the levy resulted in a change in income, there could be a (small) change in income.

Table 7.5: Gross Weekly Pay 2025

		Resident - all sector		Worker - all sector		Worker - Accommodation and Food
Measure		Conwy	Wales	Conwy	Wales	Wales
Median	Full time	£726	£719	£625	£704	£519
	Part time	£286	£292	£254	£290	£201
	All	£565	£602	£513	£590	£293
10th percentile	Full time	£458	£487	£448	£483	£415
	Part time		£ 90		£92	x
	All	£179	£223	£184	£217	£82

\* Figure not available at this spatial level.

## Deprivation

7.21 The Welsh Government's Index of Multiple Deprivation (2025) combines indicators including a range of social, economic, and housing factors, to yield a deprivation score for all areas across Wales (Lower Layer Super Output Areas [LSOAs]). There are eight domains of deprivation that are investigated:

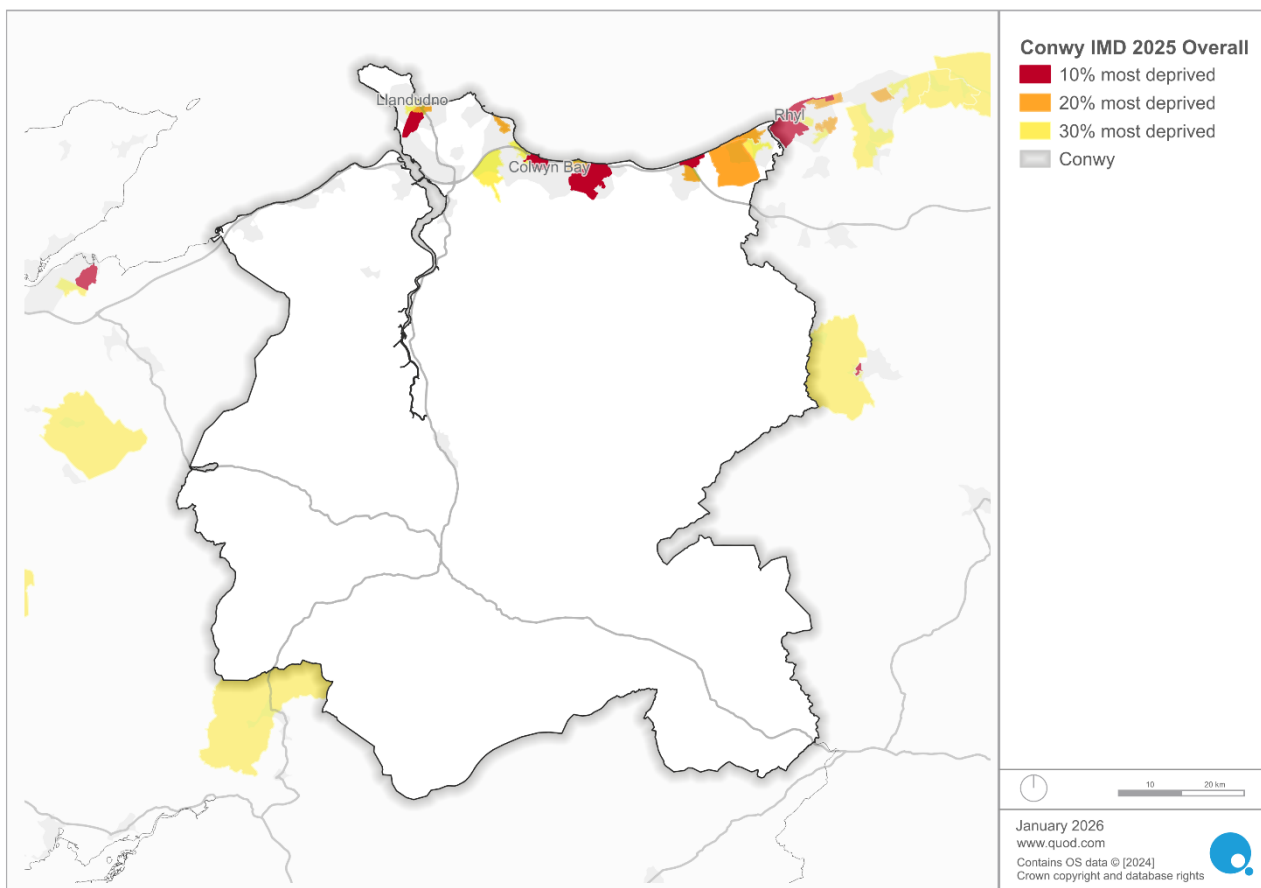
- Income

- Employment
- Health
- Education
- Access to services
- Housing
- Community safety
- Physical environment

7.22 All areas are ranked relative to one another according to their level of deprivation. The Figure below shows the relative levels of deprivation in Conwy – areas shown in red are within the 10% most deprived, areas in orange are within the 10% - 20% most deprived areas and areas in yellow are within the 20% - 30% most deprived.

7.23 As shown in , the deprived areas are largely on the coast and are a mix of areas that are within the 10% most deprived, the 10% - 20% most deprived and the 20% - 30% most deprived.

Figure 7.1 IMD map for Conwy



7.24 The use of funds from the levy will be reinvested for the purposes of destination management and improvement in the area, including providing, maintaining and improving infrastructure, facilities and services for use by visitors (whether or not they are also for use

by local people), and managing visitor impacts. Depending on the use of the fund, it could reduce deprivation (or indicators of deprivation) as a result of investment.

## Housing and living situation

7.25 According to the 2021 Census, 2% of households in Conwy live in overcrowded homes (occupancy rating of bedrooms of -1 or less). This is consistent with the other spatial areas. A slightly higher proportion of households have a car (82%) compared to the Wales (81%) average but fewer than the North Wales (83%) average.

7.26 The 2021 Census also provides data on housing tenure. In Conwy, the proportion of owner-occupied households (69%) is slightly higher than the North Wales average (68%) and the Wales average (66%). Conwy has a higher proportion of people in private sector (19%) compared to North Wales and Wales averages (both 17%).

7.27 To the extent that the visitor demand did fall as a result of this levy (which is likely to be relatively small), this could relieve some pressure on the private rented sector.

Table 7.6: Housing and living situation

Measure	Conwy	North Wales	Wales
<b>Overcrowding (occupancy rating of -1 and -2 or less, bedrooms)</b>	<b>2%</b>	<b>2%</b>	<b>2%</b>
<b>Owner-occupied households</b>	<b>Total**</b>	<b>69%</b>	<b>68%</b>
	Aged 16-64**	61%	62%
	Aged 65+**	81%	79%
Privately rented households	<b>Total**</b>	<b>19%</b>	<b>17%</b>
	Aged 16-64**	25%	22%
	Aged 65+**	10%	8%
Socially rented households	<b>Total**</b>	<b>12%</b>	<b>16%</b>
	Aged 16-64**	14%	17%
	Aged 65+**	10%	13%
One or more car or van in household	82%	83%	81%

\*\* By household reference person.

## Overall impact on socio-economic status

7.28 Conwy generally performs in line with regional and national averages on health, qualifications, economic activity, though some coastal areas still fall within the most deprived categories in Wales. Young people show higher levels of economic inactivity and unemployment compared with older groups, and wages - especially in lower-paid sectors - are below Welsh averages.

7.29 Any employment effects from the levy are likely to be relatively small (and could be marginally positive or marginally negative).

7.30 The use of funds from the levy will be reinvested for the purposes of destination management and improvement in the area, including providing, maintaining and improving infrastructure, facilities and services for use by visitors (whether or not they are also for use by local people), and mitigating the impact of visitors. Depending on the use of the fund, it could reduce deprivation (or indicators of deprivation) as a result of investment.

## 8. Appendix A – Resident data

Table 8.1: Resident summary

Measure		Conwy	North Wales	Wales
<b>Population (2021 Census)</b>				
Population		114,700	686,900	3,100,000
<b>Age (2021 Census)</b>				
Age Structure	Aged 0-15	16%	17%	18%
	Aged 16-64	57%	59%	61%
	Aged 65+	27%	23%	21%
<b>Sex (2021 Census)</b>				
Male / Female		48% / 52%	49% / 51%	49% / 51%
<b>Gender Identity (2021 Census)</b>				
Gender identity different from sex registered at birth total		0.3%	0.3%	0.5%
<b>Sexual Orientation (2021 Census)</b>				
Gay, Lesbian or Bisexual		2%	2%	3%
Not Answered		8%	8%	8%
<b>Marriage and Civil Partnership Status (2021 Census)</b>				
Single		33%	35%	37%
Married / Civil Partnership		46%	45%	44%
Divorced / Separated / Widowed		22%	20%	19%
<b>General Fertility Rates (2024)</b>				
General Fertility Rates (number of live births a year per 1,000 women aged 15 to 44 years)		46.8	*	45.7
<b>Race (2021 Census)</b>				
Ethnicity	Asian/Asian British	1%	1%	3%
	Black/Black British	0%	0%	1%
	Mixed/Multiple	1%	1%	2%
	White	97%	97%	94%
	Other	0%	0%	1%
Place of Birth	UK	95%	94%	93%
	Europe (excluding UK)	3%	4%	3%
	Africa	1%	1%	1%
	Middle East and Asia	1%	1%	2%
	Americas and Caribbean	0%	0%	0%
	Antarctica and Oceania	0%	0%	0%

Main Languages	English or Welsh	98%	97%	97%
	European	1%	2%	2%
	Outside of UK and Europe	1%	1%	2%

### Religion and Belief (2021 Census)

Christian	51%	50%	44%
Buddhist	0%	0%	0%
Hindu	0%	0%	0%
Jewish	0%	0%	0%
Muslim	1%	1%	2%
Sikh	0%	0%	0%
Other religion	1%	0%	1%
No religion	51%	42%	47%
Not Answered	6%	7%	6%

### Health and Disability (2021 Census)

Self-Assessed Health	Very good & Good	78%	80%	79%
	Fair	15%	14%	14%
	Bad & Very Bad	7%	6%	7%
Disability under the Equality Act	Day-to-day activities limited a lot	10%	9%	10%
	Day-to-day activities limited a little	12%	11%	11%