

A Smart Lockdown that trusts the people: The DA's proposal for opening more of the economy, safely

Introduction

The DA was supportive of an early hard lockdown.

We subsequently expressed concern about the need to balance lives and livelihoods. As a result, we proposed a phased lifting of lockdown restrictions, which would move the country between different levels of economic activity based on epidemiological data.

The government's risk-adjusted model also proposes a phased approach, and to this end is a step in the right direction towards getting South Africa's economy going again.

However, we have serious concerns. Many of which can be summarised as the government not trusting citizens and stakeholders enough to make the Smart Lockdown work. There has been a lack of trust and transparency from the beginning.

Concerns with 'System 1: An alert system to determine the level of restrictions in place nationally, in provinces and in districts'

Our concerns with the alert system are as follows:

1. Lack of data transparency

How South Africa will move between alert levels will depend on four indicators, two related to community transmission and two related to health sector capacity. The South African public, health professionals, and other policymakers are privy to too little of this information.

Since the first confirmed case on the 5th of March, the DA has emphasized the need for comprehensive and detailed data which is publicly available. Data that is credible is an important tool for public buy in and building trust with the citizens of South Africa. It is also an essential accountability tool in order for people to understand how government strategy and decisions are made.

With the announcement of the Risk-adjusted strategy credible data sets and models are key so that the public can understand the move between the various levels of the strategy.

This is why we have sent requirements for a data dashboard to the presidency to demonstrate what a credible and comprehensive data set would look like. The dashboard is **Appendix A** of this document.

2. Need for devolution of decision-making to other spheres of government

What we have been informed is that levels of alert for each province and district will be determined by the National Command Council at each meeting, upon a recommendation from the Minister of Health, the Minister of Trade, Industry and Competition and the Minister of Cooperative Governance and Traditional Affairs.

Provinces in particular, have localized knowledge and should be central to the decision making on the alert level for the areas where they govern. We urge that the National Command Council determine an alert level for each province and district upon a recommendation from the Minister of Health, the Minister of Trade, Industry and Competition and the Minister of Cooperative Governance and Traditional Affairs **and** the Premiere of each province.

Concerns with 'System 2: Industry Classification'

Our concerns with the industry classification are as follows:

1. *Too incremental*

The stage 4 which has been proposed too closely resembles stage 5, and is thus a continuation of a hard lockdown. We fear it will make no significant difference to business activity and thus will devastate the livelihoods of millions of South Africans.

2. *Generalised*

The sector-wide approach taken by the government applies a risk assessment to an entire industry, and determines which businesses must remain closed on that basis.

This is too blunt an instrument. Not only is each industry different, but businesses in the same industry are themselves very different. Car dealerships aren't the same as car manufacturers, and small construction projects (like home improvements) should not be treated the same as huge construction projects.

3. *Subjective*

The risk adjusted approach prioritises industries which meet the following criteria:

1. Have acceptably low transmission risk (or be able to attain this through mitigation measures) and any of the following
2. Be of critical value to the economy or
3. Be under severe near-term economic stress

We need to minimise subjective criteria. Any business able to operate at acceptably low transmission risk, should be allowed to operate as soon as possible. Since it is the risk of transmission which is keeping economic activity closed. At this time every single business is of critical value to the economy and many are under near-term economic stress. Therefore, in our view only the first criterion matters.

As a result of this subjectivity too many businesses with low transmission risk will not be permitted to operate in stage 4 e.g. e-commerce.

4. *Civil liberties*

Stage 4 also comes with additional personal restrictions, like an 8pm curfew, which were not present in the hard lockdown.

To be truly Smart, the lockdown must trust people.

Using this trust-based model, safety protocols are determined not in blanket fashion by the government, but in a customised way by the industry themselves. The higher the risk, the higher the protocol.

This would foster trust and partnership between businesses and employees to meet the protocols at each stage; and would develop a model of self-regulation, as each business would need to display their risk assessment publicly, allowing customers and employees to help in ensuring compliance.

How a Smart Lockdown based on trust will work:

- Firstly, we propose that sector bodies and government work together to agree on **minimum risk mitigation standards for each sector**, and for each level of lockdown from Stage 4 to Stage 1. Based on a self-assessment any business able to meet these minimum standards should be trusted and allowed

to open. Those that do not can choose either to invest as required to meet the standards, or to remain closed until a lower lockdown stage is reached.

- All businesses not covered by sector risk mitigation standards, should still complete a **standard risk based self-assessment**. Those who “pass” the self-assessment, must be trusted enough to open. Those that do not pass, can choose either to invest as required to improve their score, or to remain closed until a lower lockdown stage is reached. See **Appendix B** as an example of the assessment Canada is using.
- **Trust but verify**. While this is a trust system, in that businesses will open based on self-assessment and not certification (SA lacks the administrative capacity), government must monitor and penalise companies who open without complying with the required protocols. Businesses will be required to make available their risk assessments and mitigation strategies at their premises and website.

As a general rule, employees should only be present at the workplace where this is strictly necessary for the firm’s successful operation. Workers who can work remotely must continue to do so. Thus, this document only describes requirements that should be met before workers are able to return to workplaces where the operation of a physical workplace is necessary and not just desirable.

Three basic requirements must be met in every workplace that opens before the COVID-19 epidemic is declared under control. They are:

- Maintenance of a distance of 1.5 meters between persons
- Mandatory use of masks and handwashing
- Continuous screening for COVID-19 symptoms

Social distancing

All employees are to be required to maintain a strict distance of 1.5m between them and other employees. This also applies to businesses where members of the public will come into contact with each other and with employees. In this regard, it is important that spaces do not become overcrowded.

A conservative rule of thumb is that each person should have 9m² of free floor space in a building available to them at any given time. The number of people that should be admitted to a room or building at any given time is thus given by the formula:

$$\text{number of persons admissible} = \frac{\text{total available free floor space (m}^2\text{)}}{9\text{m}^2}$$

Masks and handwashing

The latest medical evidence is that besides social distancing, a dual strategy of mask-wearing and handwashing is the most effective strategy for preventing the spread of COVID-19. While it is trite that handwashing is an effective way to mitigate the risk of transmission of most diseases, the wearing of masks has been controversial, mostly because of confusing WHO recommendations against their use.¹ However, consensus has recently begun to emerge in the scientific community that mass masking (ie the wearing of masks outside of healthcare settings by uninfected individuals) may reduce a likely increase in transmission as people return to work.²

Handwashing which involves the use of soap and warm water, for at least twenty seconds at a time, is preferable to hand-sanitising.

Every workplace that opens during the pandemic should be able to ensure:

- Every employee is fitted with a cloth mask for the duration of their attendance at the workplace
- Hand washing and sanitising stations are available for the use of every employee upon entering and exiting the building, and at regular intervals throughout the work day

¹ Chan et al ‘To wear or not to wear: WHO’s confusing guidance on masks in the covid-19 pandemic’ *BMJ Blog* March 11, 2020 [online]. Available at: <https://blogs.bmj.com/bmj/2020/03/11/whos-confusing-guidance-masks-covid-19-epidemic>. Accessed 23 April 2020.

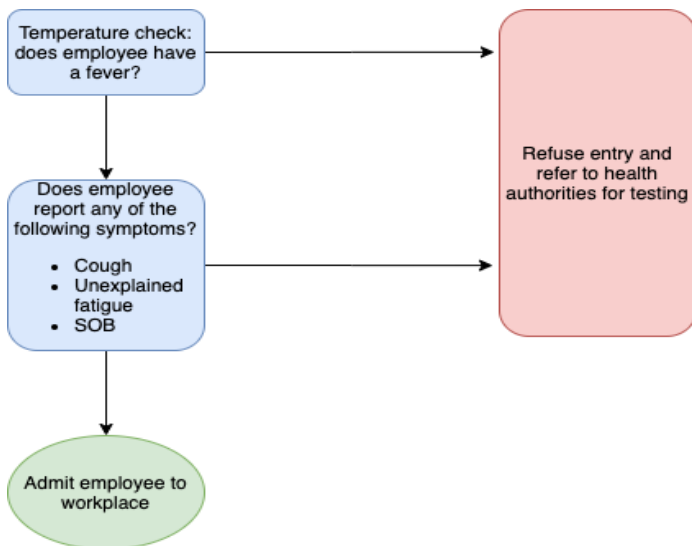
² Greenhalgh et al ‘Face masks for the public during the covid-19 crisis’ (2020) *BMJ* 369; Javid et al ‘Covid-19: should the public wear face masks?’ (2020) *BMJ* 369; MacIntyre & Hasanain ‘Community universal face mask use during the COVID 19 pandemic – from households to travelers and public spaces’ (2020) *Journal of Travel Medicine*; Cheng et al ‘Wearing face masks in the community during the COVID-19 pandemic: altruism and solidarity’ *The Lancet* April 16, 2020 [online]. Available at: [https://doi.org/10.1016/S0140-6736\(20\)30918-1](https://doi.org/10.1016/S0140-6736(20)30918-1). Accessed 23 April 2020.

Screening

Mandatory screening for the symptoms of COVID-19 must be implemented at every workplace. Upon admission to the workplace, every employee is to be screened with a temperature check and short questionnaire, listing the most common symptoms of COVID-19 (a cough with or without phlegm, unexplained fatigue and shortness of breath). These screening measures will determine the admissibility of a person to the workplace.

Screening time should also be used as an opportunity to educate employees about what symptoms they should look out for, and to remind them daily that they should stay away if they (or anyone they live with) are feeling unwell, and present to a healthcare facility for testing instead.

The following simple protocol is to be observed in every workplace for the duration of the pandemic:



Industry-specific requirements

Note: Where possible, remote work should be the norm. Even in industries listed below, where a service can be performed remotely, this should be done.

Below we provide an illustration of what the health protocols to be followed in each sector for stage 4 could look like. Of course, the actual protocols must be developed by industries in consultation with the health department. Companies in each sector capable of meeting the protocols should be allowed to do so, those which cannot will wait for a lower stage in which some of the protocols will be a bit more relaxed.

Level 4: Agriculture

- Vehicles containing more than one operator should be capable of being operated with open windows
- Insofar as possible, farmers and workers should reside on farms and should leave as seldom as possible
- If workers and farmers are resident on the farm, screening can be dispensed with; only new arrivals on the property need to be screened
- When interacting with people not resident on the farm (i.e. truck drivers, veterinarians or contractors), PPE must be worn

Level 1 (Open): Full open of all agricultural activity. Comply with standard health protocols.
Level 2 (Soft Open): All seasonal workers to travel across provinces, screening of all workers. Auctions to proceed, health regulations in place. Comply with minimum level 2 health protocols.
Level 3 (Soft Lockdown): No agricultural shows, NAMPO and other farmers days. Specialised seasonal workers to move across provinces, with health and transport regulations adhered to. Auctions with < 200 people present, but should look to use virtual bidding. Comply with minimum level 3 health protocols.
Level 4 (Hard Lockdown): No agricultural shows, NAMPO and other farmers days. Level 4 to include full agricultural exports, including wine. Auctions with <100 people present, but should look to use virtual bidding. Comply with level 4 minimum health protocols.
Level 5 (Hard Lockdown): No agricultural shows, NAMPO and other farmers days. No seasonal workers to move across provincial boundaries; would only be permissible if nearest town is another province. Auctions with < 100 people present, but should look to use virtual bidding. Comply with level 5 minimum health protocols.

Level 4: Hospitality

- Hotel lobby counters, information counters, food counters and other employee-guest interaction points must be fitted with a Perspex shield capable of preventing droplet spread
- Teams must operate in cohorts (i.e. the same workers must work together in every shift), and cohorts should not come into contact with each other between shifts
- Restaurants inside establishments must operate only in order to provide room service. Guests may not dine communally.
- All staff must be fully trained and equipped on the required hygiene and protection protocols, including wear masks at all times
- Kitchen staff are to observe standard hygiene practices, e.g. hand washing and surface cleaning
- Public spaces such as lounges in hotel lobbies must have seating which enables social-distancing, and guests should be discouraged from sitting there for too long
- Cleaning materials that meet the required specifications must be stocked and utilised
- Provision of Covid-19 education material and other support resources for employees.

Level 1 (Open): Establishments are fully open for guests including dining and must comply with standard health protocols.
Level 2 (Soft Open): Establishments and tourism sites are limited to 60% capacity and must comply with level 2 minimum health protocols.
Level 3 (Soft Lockdown): Establishments are limited to 40% capacity and must comply with level 3 minimum health protocols.
Level 4 (Medium Lockdown): Establishments open with 25% occupancy limit and comply with level 4 minimum health protocols.
Level 5 (Hard Lockdown): Establishments to be used for quarantines purposes. Hotel restaurants not to open.

Level 4: Restaurants

- All staff must be fully trained and equipped on the required hygiene and health protocols.
- Kitchen staff are to observe standard hygiene practices, e.g. hand washing and surface cleaning
- Delivery drivers should avoid physical contact with customers when dropping off food.
- Provision of Covid-19 education material and other support resources for employees.

<p>Level 1 (Open): Restaurants may resume normal trade. On-consumption alcohol sales permitted. Comply with standard health protocols.</p>
<p>Level 2 (Soft Open): Restaurants may only make use of 50% of their seating capacity providing it does not exceed 100 patrons. There will be a limit of 4 people per table which should include a perspex screen between patrons. On-consumption alcohol sales permitted. Comply with level 2 health protocols.</p>
<p>Level 3 (Soft Lockdown): Restaurants may only have their kitchen preparing ordered food through online delivery services. No on-consumption alcohol sales permitted. Comply with level 3 minimum health protocols (might be unchanged from previous level).</p>
<p>Level 4 (Medium Lockdown): Restaurants may only have their kitchen preparing ordered food through online delivery services. No on-consumption alcohol sales permitted. Comply with level 4 minimum health protocols (might be unchanged from previous level).</p>
<p>Level 5 (Hard Lockdown): Restaurants may only have their kitchen preparing ordered food through online delivery services. No on-consumption alcohol sales permitted. Comply with level 5 minimum health protocols.</p>

Level 4: Manufacturing and processing

Manufacturing is a highly sophisticated sector that is interdependent on other primary sectors as well as a supply and demand system in the market economy.

It does not make sense to allow the manufacturing of 'cement and other construction material and hardware' in level 4 whereby it will only be used by construction companies in level 2.

No construction company will order any cement or construction materials until they know by what date they will be back on site in level 2. Similarly, you can only produce cement to order as it is not a storable commodity as it will set.

This is why we propose that all manufacturing from level 4 should be allowed as long as certain minimum health protocols are met. The following protocols could be required in level 4:

- Staff in factories should not work face-to-face but rather side-by-side
- All machinery and equipment are to be sanitised between shifts, or when transferred to a different operator
- Teams must operate in cohorts (i.e. the same workers must work together in every shift), and cohorts should not come into contact with each other between shifts
- Production should be paused if necessary, to allow the sanitising of surfaces and equipment, or the sanitising of spaces with fogger
- Workers must be required to wash their hands before and after entering the plant and before and after handling any equipment or machinery
- Workers' break times should be staggered to prevent large numbers of people congregating socially at the same time, and break areas must be conducive to social distancing
- Worker spacing (staff density) in open plan offices has been increased by allowing some ^[1]_{SEP} workers to work remotely
- Restrictions of the number of people in work-related gatherings (restricting numbers of people in meeting rooms)
- Provision for employees with symptoms to self-isolate, making use of sick leave provisions;
- Provision of Covid-19 education material and other support resources for employees.

Level 1 (Open): All manufacturing to be in full operation subject to standard health protocols.
Level 2 (Soft Open): All manufacturing to be open subject to level 2 minimum health protocols.
Level 3 (Soft Lockdown): All manufacturing to be open subject to level 3 minimum health protocols.
Level 4 (Medium Lockdown): All manufacturing to be open subject to level 4 minimum health protocols.
Level 5 (Hard Lockdown): Manufacturing sectors are limited to the production of PPE, ventilators, medical equipment, maintenance equipment, textiles used for hospital purposes, agri-processing for time-bound products & food security. Strict enforcement of protocols and shift system to enforce social distancing. Transport to and from ports is necessary.

Level 4: Mining

Mines provide community services (e.g. water, electricity or sanitation) to local communities and should continue to provide these services at all stages, and will be required to reduce staff levels appropriately to minimise risk and exposure.

It is vitally important that the sector and DMR agreed on minimum health protocols. Minimum health protocols for level 4 could include:

- In an effort to promote social distancing, underground communication must be rolled out. This could include “motorbike” style radios, as people get very up close when talking, due to the need for ear protection.
- Since ventilation is a limitation in underground/shaft mines, all workers working in these types of mines must be properly fitted with an N95-type respirator mask
- The social distancing requirement of 1.5 m can be reduced to 1m in underground/shaft mines on the condition that every worker is properly fitted with an N95-type mask
- In underground/shaft mines it must be possible for lifts, hoists and cages to be operated in a way that makes social distancing possible (being a 1 metre radius of clear space when wearing an N95-type mask)
- In respect of all mining operations, hands must be washed before and after fitting any mask, before and after handling any equipment or machinery, and upon entering and exiting the mine
- Where noise is an issue such that workers cannot communicate while maintaining social distancing, they must be fitted with communication systems that allow such communication
- The parts of all equipment, machinery and vehicles that are touched by workers must be wiped down with sanitiser after every shift or between uses by different operators
- Diggers and vehicles which contain more than one person must be capable of having open windows or sides
- Provide the necessary emergency personnel and implement a “safe” procedure for ongoing care and maintenance of the mine assets (including, but not limited to, pumping and fire prevention/control).
- Teams must be sorted into cohorts (i.e. the same workers must work together in every shift), and cohorts should not come into contact with each other between shifts
- Where a mine has a confirmed case of COVID-19 where other mineworkers may have been exposed, that mine will immediately be moved to Stage 5 (even though other mines may be at other stages), for a quarantine period of 14 days, whereafter it will be considered for movement to Stage 4 (for a further 7 days).

<p>Level 1 (Open): All mines operate at normal capacity, with screening, tracking and tracing and medical facilities onsite, subject to Mine Health and Safety oversight and inspection.</p>
<p>Level 2 (Soft Open): Mining operations (primarily high value export mines) and support services will be granted permission to operate on level 2 minimum health protocols (might be unchanged from previous level).</p>
<p>Level 3 (Soft Lockdown): Mining operations (primarily high value export mines) and support services will be granted permission to operate on level 3 minimum health protocols (might be unchanged from previous level).</p>
<p>Level 4 (Hard Lockdown): Mining operations (primarily high value export mines) and support services will be granted permission to operate on level 4 minimum health protocols (might be unchanged from previous level).</p>
<p>Level 5 (Hard Lockdown): All mines closed, with the exception of open-cast coal mines supplying critical stocks to power plants. Support services for the coal mines (transportation, engineering services etc.) would be permitted to operate, as would care and maintenance services (only) for other mines. Strict health protocols to be observed.</p>

Level 4: Construction

Opening general construction only from level 2 is a big mistake. Coupled with the manufacturing of construction materials starting at level 4, (reasons outlined in section 2) this is a recipe for disaster for both manufacturers of material and construction companies.

When one looks at open cast mining being allowed to operate at 100% capacity in level 4, there is no logical reason to not afford construction the same opportunity when they operate in generally open spaces with sufficient distances between them.

We believe that these protocols if they are met, should allow construction companies to begin in level 4.

Workplace entry:

- Construction sites by nature & design already have strict sign-in requirements and access control. There must be one point of entry and one point of exit on each site.
- Clear protocol (social distancing & hygiene) signage to be displayed all around the site
- Any person entering the site should need to follow health protocols including, sanitising, temperature readings, any bags or personal items to be wiped down, masks, face shields/goggles and gloves to be issued

On-site / operations:

- All work to be conducted on site in such as way as to limit contact between workers. Minimum social distancing of 1.5 m to be implemented between workers.
- Designated Covid-19 cleaners to ensure all contact surfaces are continuously wiped down with disinfectant.
- All tools, equipment must be cleaned before use and after use by the person taking the tool/s out of storage for use.
- Hand washing stations to be provided around site with periodic hand washing monitored

Leaving site:

- Site to be disinfected at the end of each day.
 - All contact surfaces to be cleaned a final time (pipes, ladders, scaffolding supports, doors, handles, door frames, tools, stair ways, lift buttons, floors, tea towels washed etc.)
 - PPE to be disinfected daily (hard hats and face shield if applicable)
 - Non reusable PPE to be discarded. Reusable PPE to be taken in to be washed / sterilised
- Workers to sign-out on register

Level 1 (Open): All construction sites as well as tradesmen to scale up to 100% of total staff subject to standard health protocols.
Level 2 (Soft Open): All construction sites as well as tradesmen to scale up to 100% of total staff subject to level 2 minimum health protocols (might be unchanged from previous level).
Level 3 (Soft Lockdown): All construction sites as well as tradesmen to scale up to 100% of total staff subject to level 3 minimum health protocols (might be unchanged from previous level).
Level 4 (Medium Lockdown): All construction sites as well as tradesmen to scale up to 100% of total staff subject to level 4 minimum health protocols.
Level 5 (Hard Lockdown): No construction except for critical infrastructure and maintenance.

Level 4: Retail

There is a critical misstep in the government's approach to retail and e-commerce. While the rest of the world is embracing e-commerce during this pandemic, South Africa appears to be retreating in the wrong direction.

The official reason provided is that it would be 'unfair' as we would then have to open other sectors of retail like spaza shops and informal traders. This is false because spaza shops and informal traders are already allowed to trade under strict conditions.

This argument further fails to stand on its own when one considers large retail supermarkets have been delivering food under the hard lockdown while many smaller stores have been unable to do so. Government has had no problem with it this approach until now.

Further, food from restaurants will be delivered under level 4, understanding that many, especially in townships may not be able to do so. The issue of 'fairness' does not come into play then.

It is also not acceptable in law for a single Minister to determine what is 'fair' or not in terms of the Disaster Management Act. This is better left to the Competition Commission to adjudicate.

The advantages of allowing e-commerce from level 4 include: promoting social distancing, allowing consumers the freedom of choice to access all products from their phone or computer, less people in retail stores which lowers the potential to spread the virus and generating VAT receipts and other forms of tax for government which is desperately needed.

Our submission is that e-commerce retailers should be allowed to sell **all** goods in their offering to consumers as well as allowing the logistics chain in support of e-commerce to be operational from level 4 onwards.

There are also very specific health protocols that can be introduced by e-commerce businesses which include masks and gloves for workers packing goods, sanitising boxes before shipment as well as on arrival to the customer. This level of care is already in place for incoming cargo into South Africa and could easily be done at e-commerce hubs.

From level 4 onwards in the retail sector, there should be a phased-in approach for brick and mortar stores but it should not be based on specific items, but rather mandatory protocols required in order to shop.

This will eliminate the continued confusion of what is and what is not allowed. It also allows retailers to generate much needed turnover on all stock that they are already holding or have been holding for some 6 weeks.

We further reiterate our proposal for liquor to be sold under specific conditions as previously outlined in our 'smart lockdown' document.

These are the level 4 protocols we propose for retail:

- Every employee-customer interaction point (tills and dispensing counters) must be fitted with a Perspex shield capable of preventing droplet spread between customer and worker
- Demarcation on store floor to ensure customers queue 1.5m apart
- Teams must be sorted into cohorts (i.e. the same workers must work together in every shift), and cohorts should not come into contact with each other between shifts
- Items touched by customers, especially card machine keypads, trolley/basket handles and till surfaces, must be sanitised between each use
- At the end of every shift, all surfaces that have been exposed to touch, including screens and keyboards, must be sanitised
- It is recommended that retailers selling essential goods should have a restricted opening hour at the beginning of the day reserved for vulnerable population groups like the elderly and those with a letter from a health-worker saying they are at particular risk
- Hand-sanitisers must be installed throughout stores, particularly at entrances/exits
- All equipment used in warehouses and distribution centres, including forklifts, communications headsets, tablets and scanners, must be fully sanitised before being handled by a different operator
- Where stationary is used, it should not be shared — each worker must have his own pens/clipboards etc.

Level 1 (Open): All retail to be open subject to standard health protocols.
Level 2 (Soft Open): E-commerce able to sell all goods to consumers online, logistic chains required to deliver to customers should be operational. All brick and mortar stores to open subject to complying with level 2 minimum health protocols (might be unchanged from previous level).
Level 3 (Soft Lockdown): E-commerce able to sell all goods to consumers online, logistic chains required to deliver to customers should be operational. All brick and mortar stores to open subject to complying with level 3 minimum health protocols (might be unchanged from previous level).
Level 4 (Medium Lockdown): E-commerce able to sell all goods to consumers online, logistic chains required to deliver to customers should be operational. All brick and mortar stores to open only to fulfil online deliveries, may not have customers in store. Must comply with level 4 minimum health protocols.
Level 5 (Hard Lockdown): Essential goods only to be sold. Comply with level 5 minimum health protocols.

Level 4: Personal Services

One of the glaring omissions from level 4 and 3, was that of personal care services like hairdressers and beauticians. They will only be permitted to operate from level 1 onwards which at a best guess, would be months away.

These are mostly small businesses, often run out of homes or small premises.

It is believed that there can be a real opportunity for a high standard of protocols to be given to this sector which can be implemented.

There is also the opportunity for local authorities to certify these premises as compliant on top of self-assessments.

Proposed health protocols for personal services at level 4 could include:

- One hairdresser/beautician can only see one client at a time on a scheduled basis.
- On arrival at a salon, all staff can have temperatures taken and mask and goggles/visor issued
- Hands to be washed before and after every client, gloves to be used
- On arrival of clients they shall wait outside of salon to be screened
- Clients to wear a mask at all time while in the salon
- Perspex screens at nail section and desk between client and staff
- After every client, that chair/booth/section is sprayed down everything sanitiser

- Every hairdressing chair has a barber side bottle where all equipment is sanitised
- All equipment to be wiped down after use
- All service providers to wear a mask and gloves at all time

Level 1 (Open): Personal care services permitted subject to standard health protocols.

Level 2 (Soft Open): Personal care services permitted subject to level 2 minimum health protocols.

Level 3 (Soft Lockdown): Personal care services permitted subject to level 3 minimum health protocols.

Level 4 (Medium Lockdown): Personal care services permitted subject to level 4 minimum health protocols.

Level 5 (Hard Lockdown): Personal care services not permitted.