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DRAFT Equality Impact Assessment

Visitor Levy Proposal
for Cyngor Gwynedd

JANUARY 2026

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1 Introduction

- 1.1 This Equality Impact Assessment (EQIA) considers the potential equality impacts related to Cyngor Gwynedd imposing a visitor levy. This document provides information Cyngor Gwynedd to support their consideration of imposing a visitor levy with regard to its Public Sector Equality Duty (PSED).

Overview of the Visitor Levy

- 1.2 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.
- 1.3 The levy is chargeable at two separate rates:
- Campsite pitches and shared rooms (hostels and dormitories): 75p per person, per night
 - All other types of visitor accommodation: £1.30 per person, per night
- 1.4 There are exemptions¹; 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 a dormitories)
 - staying for more than 31 nights in a single booking
 - in emergency or temporary housing arranged by the local council
- 1.5 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:
- mitigating the impact of visitors;
 - 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 or not they are also for use by local people).

Purpose of this Equality Impact Assessment

- 1.6 In considering whether to impose a visitor levy, Cyngor Gwynedd is required to consider potential equality effects that may relate to the protected characteristics under the 2010 Equality Act (the '2010 Act').² 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 The visitor levy: a small contribution for a lasting legacy. Available [here](#)

² The Equality Act 2010.

- 1.7 **Section 2** of this report provides context by setting out the legislative context and explains the methodology applied in this EQIA, considering both disproportionate and differential effects.
- 1.8 The Welsh Government has already conducted an EQIA of imposing a visitor levy across Wales.³ **Section 3** summarises the findings of this EQIA.
- 1.9 **Section 4** looks at the effect of imposing a visitor levy in Gwynedd and the potential ways in which these effects may interact with protected characteristics.
- 1.10 A separate **Economic Impact Assessment** has been conducted – this is cross-referenced where relevant in this EQIA.

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

2 Legislative Context

- 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 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

3 Methodology

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 Cyngor Gwynedd 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 EQIA⁴ (WG EQIA), including the assessment, consultation / engagement and mitigation. We then consider whether there are any Gwynedd specific characteristics that may alter the findings of the WGIA and lead to disproportionate or differential effects.

⁴ 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 to include 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.

- 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 below 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 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	<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>
Religion and belief	No direct negative impact. The levy may affect affordability for religious tourism but free accommodation is exempt.	<p>The Welsh Revenue Authority (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</p>

Protected characteristic	Potential Impact	Mitigation
		<p>accommodation have a lower levy charge.</p> <p>Revenue generated from the levy could be used for the preservation and maintenance of religious sites.</p>
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 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.
- 5.2 Consultation with stakeholders is forecast to commence in early 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).
- 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 Table 5-1 below shows the age distribution of visitors to Gwynedd and Wales. There appears to be a smaller proportion of younger visitors to Gwynedd than to Wales as a whole and a larger population of older people (although the data is not like for like).
- 5.10 While interpreting the table, it should be noted that:
- The Gwynedd visitor age profile is from 2019, whereas the all-Wales visitor age profile is from 2024.

- The Gwynedd visitor age profile is across both day and overnight visitors whereas the all-Wales visitor age profile is for overnight visitors

Table 5-1: Age profile of visitors

	16 – 24	25 – 34	35 – 44	45 – 54	55 – 64	65+
Gwynedd (% of visitors) ⁵	3	18	22	24	18	15
Wales (% of trips) ⁶	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.

- 5.11 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 Gwynedd than Wales as a whole).
- 5.12 A higher proportion of older visitors to Gwynedd could lead to disproportionate impact as a result adverse impact of the increase in the cost of the trip. On the other hand, the WG EQIA also notes the following benefits, which is relevant to visitors and residents (emphasis added):
- 5.12.1 ‘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’.
- 5.12.2 ‘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 elements¹², and conversely younger people by maintaining or creating new facilities for younger generations to use’

Employment

- 5.13 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.
- 5.14 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.
- 5.15 The equivalent number for Gwynedd is between -50 and +21 FTE jobs (refer to the Economic Impact Assessment for more data). Any loss of jobs could be felt disproportionately by young people.
- 5.16 The WG EQIA noted that 38% of tourism workers were aged between 16-29 in 2022 across Wales. More recent data shows that over the period July 2024 – June 2025, 26% of Welsh residents worked in the Distribution, hotels and restaurants sector were aged between 16-24.⁷

⁵ Wales Visitor Survey 2019 for Gwynedd Council. Available [here](#)

⁶ Domestic GB tourism statistics (overnight trips): annual report 2024. Available [here](#)

⁷ Office for National Statistics. Annual Population Survey

This is the same as in Gwynedd where the equivalent figure is also 26%. There are particularly high proportion of people ages 16-19 (16%) working in the sector in Gwynedd, compared to the Welsh average (10%).

Table 5-2: Employment by age (Distribution, hotels and restaurants)⁸ – resident (July 2024 – June 2025)⁹

Age group	Gwynedd	Wales
16 – 19	800 (16%)	24,400 (10%)
20 – 24	1,300 (10%)	34,300 (15%)
25 – 49	6,300 (47%)	97,200 (43%)
50+	5,200 (37%)	70,500 (31%)
Total	13,400 (100%)	226,400 (100%)

- 5.17 While there could be a disproportionate effect (due to higher likelihood of young people being employed in the tourism sector), the magnitude of any negative effect is likely to be very small – there are is a maximum reduction of 50 FTE jobs, equivalent to loss of 0.1% of employment in Gwynedd, and that is a worst case scenario. There could also be a positive effect (estimated of up to 21 FTE jobs).
- 5.18 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

- 5.19 WG concludes there are ‘nil’ potential direct impacts with regard to Age once mitigation (including the under-18 exemption for lower bound accommodation) is taken into account.
- 5.20 There are possible impacts related to a higher proportion of older visitors to Gwynedd, and a young 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. Therefore, it is not anticipated that there would be any Gwynedd specific characteristics that would change the findings of the WG EQIA.
- 5.21 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

- 5.22 The potential impact with respect to sex is considered for:
- Visitors
 - Local population in terms of employment

⁸ Ibid

⁹ Ibid

Visitors

- 5.23 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.
- 5.24 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
- 5.25 While interpreting the table below, it should be noted that:
- The Gwynedd visitor profile is from 2019, whereas the all-Wales visitor profile is from 2024.
 - The Gwynedd visitor profile is across both day and overnight visitors whereas the all-Wales visitor profile is for domestic overnight visitors.
- 5.26 Table 5-3 below shows that there are similar proportions of female and male visitors visiting Gwynedd and Wales as a whole (although the data is not like for like) and in both cases there is a larger proportion of female visitors
- 5.27 While interpreting the table below, it should be noted that:
- The Gwynedd visitor profile is from 2019, whereas the all-Wales visitor profile is from 2024.
 - The Gwynedd visitor profile is across both day and overnight visitors whereas the all-Wales visitor profile is for domestic overnight visitors.

Table 5-3: Visitor distribution by sex

	Gwynedd ¹⁰	Wales ¹¹
Female	58%	59%
Male	42%	40%
All persons	100%	100%

NB that percentages may not sum to 100% due to rounding

- 5.28 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'
- 5.29 WG concludes there are 'nil' potential direct impacts with regard to Sex. There are no Gwynedd specific characteristics that would change the findings of the WG EQIA.

Employment

¹⁰ Wales Visitor Survey 2019 for Gwynedd Council. Available [here](#)
¹¹ Domestic GB tourism statistics (overnight trips): annual report 2024. Available [here](#)

5.30 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 5-4 below shows that the employment in Distribution, Hotels and Restaurants is roughly split evenly between men and women in both Gwynedd and Wales.

Table 5-4: Employment by sex (Distribution, Hotels and Restaurants)¹²

	Gwynedd	Wales
Female	5,613 (50%)	132,116 (49%)
Male	5,720 (50%)	137,360 (51%)
All persons	11,333 (100%)	269,476 (100%)

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

Marriage and Civil Partnership

5.32 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.

5.33 WG concludes there are 'nil' potential direct impacts with regard to Marriage and Civil Partnership. It is not anticipated that there would be any Gwynedd specific characteristics that would change the findings of the WG EQIA.

Gender Reassignment

5.34 Provisions of 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 gender reassignment.

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

5.36 WG concludes there are 'nil' potential direct impacts with regard to Gender reassignment. It is not anticipated that there would be any Gwynedd specific characteristics that would change the findings of the WG EQIA.

Sexual Orientation

5.37 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 sexual orientation.

Visitors

¹² Office for National Statistics. Census 2021

5.38 Evidence suggests that 10% of trips taken to Wales were undertaken by LGBTQ+ visitors from January to December 2024.¹³ The WG EQIA notes that there is no evidence to suggest that visitors with this sexual orientation characteristics would be disadvantaged through the provisions of the 2025 Act. The equivalent data for Gwynedd is presently unavailable.

Employment

5.39 terms of employment, the table below show that:

- There are similar proportions of bisexual and gay or lesbian workers employed in the distribution, hotels and restaurants sector in Gwynedd (4%) compared to Wales (4%)
- There are slightly higher proportions of bisexual and gay or lesbian workers employed in the distribution, hotels and restaurants sector (4%) than the average across all sectors in Gwynedd (2%).

Table 5-5: Employment of residents by Sexual Orientation in Gwynedd¹⁴

		Straight or Heterosexual	Gay or Lesbian	Bisexual	All other sexual orientation s	Not answered	TOTAL
Distribution, hotels and restaurants	Gwynedd	89%	2%	2%	0%	7%	100%
	Wales	90%	2%	2%	0%	6%	100%
All sectors	Gwynedd	91%	1%	1%	0%	7%	100%
	Wales	91%	2%	1%	0%	5%	100%

Sexual Orientation – overall

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

Race

5.41 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 race.

5.42 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 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.

¹³ Domestic GB tourism statistics (overnight trips): annual report 2024. Available [here](#)

¹⁴ Office for National Statistics. Census 2021

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

Visitors

5.44 Table 5-6 below shows the ethnicity profile of domestic Wales overnight tourism in 2024 and the ethnicity profile of visitors to Gwynedd.

Table 5-6: Ethnicity profile of visitor trips and visitors

Ethnicity of respondent	Wales (% of trips) ¹⁵	Gwynedd (% of visitors) ¹⁶
White	80%	97%
Mixed / Multiple ethnic groups	3%**	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%**	100%
Total	100%	

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

5.45 While interpreting the table above, it should be noted that:

- The Gwynedd visitor profile is from 2019, whereas the all-Wales visitor profile is from 2024.
- The Gwynedd visitor profile is across both day and overnight visitors whereas the all-Wales visitor profile is for domestic overnight visitors
- Because the Gwynedd and Welsh visitor profiles are derived from different data sources, the categories are slightly different.

5.46 None the less this suggests that the is a lower proportion of visitors to Gwynedd who are from an ethnic minority group, compared to the Wales average.

Employment

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

¹⁵ Domestic GB tourism statistics (overnight trips): annual report 2024. Available [here](#)

¹⁶ Wales Visitor Survey 2019 for Gwynedd Council. Available [here](#)

- There are lower proportions of people who are from an ethnic minority group employed in the distribution, hotels and restaurants sector in Gwynedd (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 Gwynedd (7%) – this means a change in employment levels could affect this group (albeit any change is likely to be small).

Table 5-7: Employment of residents by ethnicity¹⁷

		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	Gwynedd	3%	0%	1%	91%	0%	4%	1%	100%
	Wales	4%	1%	1%	88%	0%	5%	1%	100%
Total	Gwynedd	2%	0%	1%	93%	1%	3%	0%	100%
	Wales	3%	1%	1%	91%	0%	4%	1%	100%

Gypsy Roma and Traveller sites

- 5.48 The WG EQIA also 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 exempted from a levy. There were 12 registered pitches in Gwynedd in the last count (January 2025), although it should be noted that data collection has paused to allow for a review of the process.
- 5.51 The WG EQIA notes that Gypsy Roma Travellers use a number of 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

¹⁷ Office for National Statistics. Census 2021

visitor accommodation other than for their main of 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 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.¹⁸
- 5.55 Similarly, in September 2025, 44 asylum seekers in Gwynedd in receipt of Home Office support that were housed in Dispersal accommodation.¹⁹
- 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).²⁰
- 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 Gwynedd specific characteristics that would change the findings of the WG EQIA.
- 5.59 Visitors to Gwynedd and 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)

¹⁸ Home Office. Immigration system statistics data tables. Available [here](#)

¹⁹ Home Office. Immigration system statistics data tables. Available [here](#)

²⁰ Home Office. Immigration system statistics data tables. Available [here](#)

- 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.

Welsh Language

- 5.63 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 Gwynedd.
- 5.64 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 significantly higher in Gwynedd (74%) than across Wales (25%).
- 5.65 Additionally, the proportion of Gwynedd residents who can speak, read and write Welsh (55%) is almost four times the Welsh average (14%).
- 5.66 This is also identified by the Welsh Language Impact Assessment (WLIA)²¹ undertaken by Welsh Government for the Act – it shows that there is a high prevalence (52.9%) of Welsh speakers in the population aged 16 years and over living in the Gwynedd and working in the accommodation and food services industry.
- 5.67 The WLIA specifically notes that Gwynedd could be affected as a result of a levy given it has both the highest proportion of Welsh-speakers and the highest number of nights spent by domestic visitor of any local authority:

'Were a visitor levy to be introduced in Gwynedd and as a result, the levy impacts on the Welsh language, the impact could therefore be greater in Gwynedd when compared to other local authorities.'

- 5.68 The WLIA notes that the visitor levy could potentially impact the Welsh language if it were introduced in areas where high proportions of Welsh-speakers work in the accommodation and food services industry. It 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 Economic Impact Assessment suggested there could be between -50 and +21 FTE jobs so this is likely to be relatively small impact.

²¹ <https://www.gov.wales/sites/default/files/publications/2025-09/visitor-accommodation-register-and-levy-wales-act-2025-welsh-language-impact-assessment.pdf>

- 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 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.

5.69 It also notes some potential negative impact:

5.69.1 The potential negative economic impact of the levy – although as above, there are anticipated to be a maximum of a loss of -50 FTE jobs in a worst case scenario equivalent (which is equivalent to a loss of 0.1% of employment in Gwynedd) and so this impact is likely to be relatively minimal.

5.69.2 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.

5.70 Overall, there is a very strong prevalence of Welsh speakers in Gwynedd, including in the tourism sector. A visitor levy in Gwynedd 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 as a result of the employment supported through spending of the levy. 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).

Religion and Belief

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

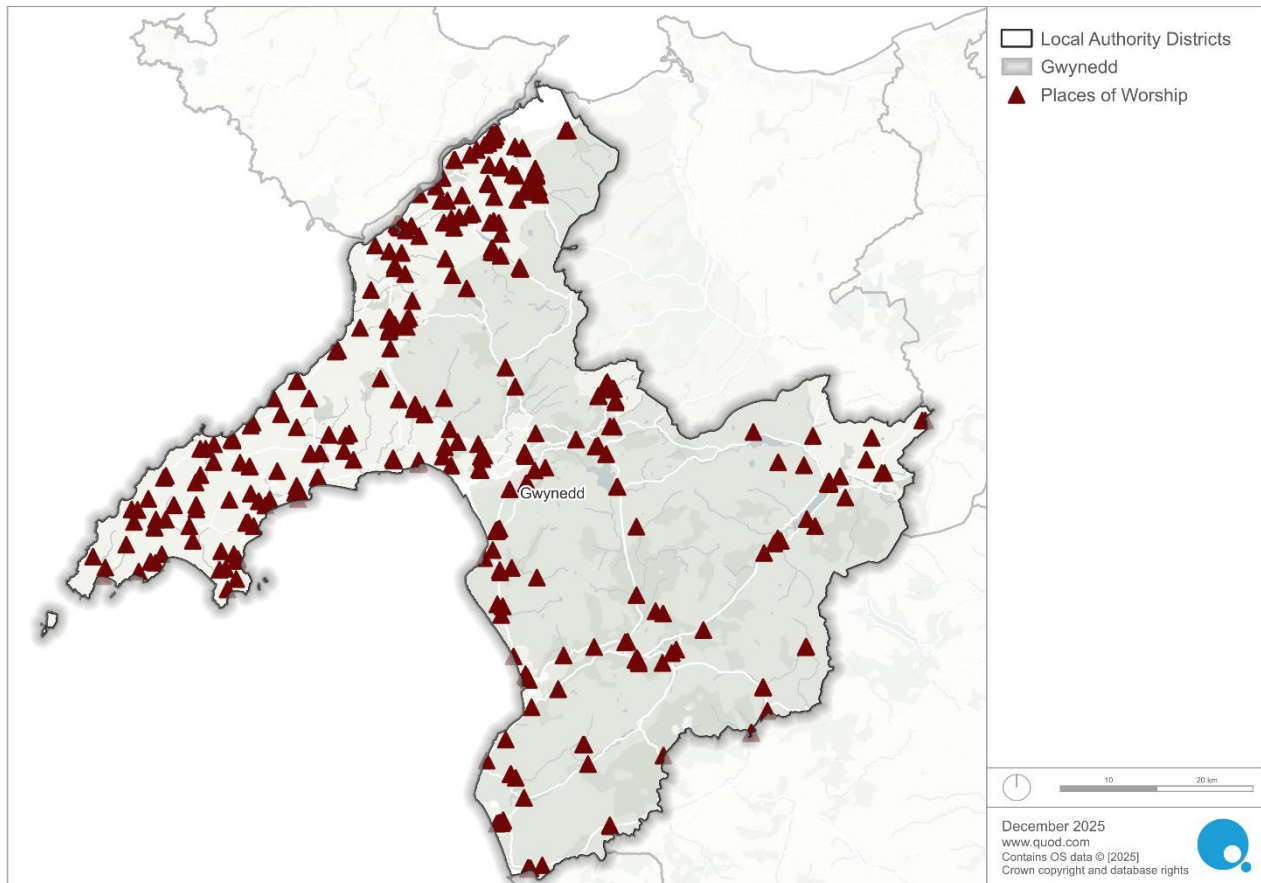
5.72 The WG EQIA notes that there is no direct correlation between visitor levies and religion, belief or non-belief. It also notes that tourism-related policies or taxes might interact with an individuals’ freedom to practice religion, depending on the nature of the visit. Introducing a visitor levy 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.

5.73 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.

5.74 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.

- 5.75 The equivalent data for number of tourists visiting a religious building in Gwynedd is presently unavailable.
- 5.76 However, Figure 5-1 shows there are 350 places of worship in Gwynedd. 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 Gwynedd



- 5.77 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.
- 5.78 WG concludes there are 'nil' potential direct impacts with regard to Religion and Belief. It is not anticipated that there would be any Gwynedd specific characteristics that would change the findings of the WG EQIA.

Disability

- 5.79 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

5.80 There were approximately 22,500 people who were disabled under the Equality Act in Gwynedd in 2021 accounting for 19.2% of the total population - lower than the Welsh average of 21.6%.²²

Visitors

5.81 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.

5.82 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.
- 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

5.83 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.

5.84 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.

5.85 WG EQIA considers a number of options for refunds for both disabled people and carers. Ultimately, the option including 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.

²² Census 2021

5.86 The WG EQIA acknowledges (in part because it does not include carers) that this option does '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'.

5.87 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.²³ 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 than they simply have this type of caring responsibility.

5.88 The equivalent data for Gwynedd is presently unavailable.

Employers and employment

5.89 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.

5.90 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.²⁴

5.91 The equivalent data for Gwynedd is presently unavailable.

Disability overall

5.92 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.

5.93 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 Gwynedd specific characteristics that would change the findings of the WG EQIA.

5.94 It is also noted that Ysbyty Gwynedd is a hospital located in Gwynedd but as above hospital stays are exempt from the levy.

5.95 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

²³ Domestic GB tourism statistics (overnight trips): annual report 2024. Available [here](#)

²⁴ Welsh Government. Welsh tourism sector business and labour market statistics. Available [here](#)

- 5.96 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.
- 5.97 The ONS does not provide statistics on the number of people who are pregnant. Therefore, this baseline analysis considered live birth data²⁵ as a proxy. The latest available data from 2024 indicate the general fertility rate²⁶ is lower (42.7) in Gwynedd than the average for Wales (45.7).
- 5.98 Agani, it is noted that Ysbyty Gwynedd is a hospital located in Gwynedd but as above hospital stays are exempt from the levy.
- 5.99 WG concludes there are 'nil' potential direct impacts with regard to Pregnancy and maternity. It is not anticipated that there would be any Gwynedd specific characteristics that would change the findings of the WG EQIA.

Deprivation

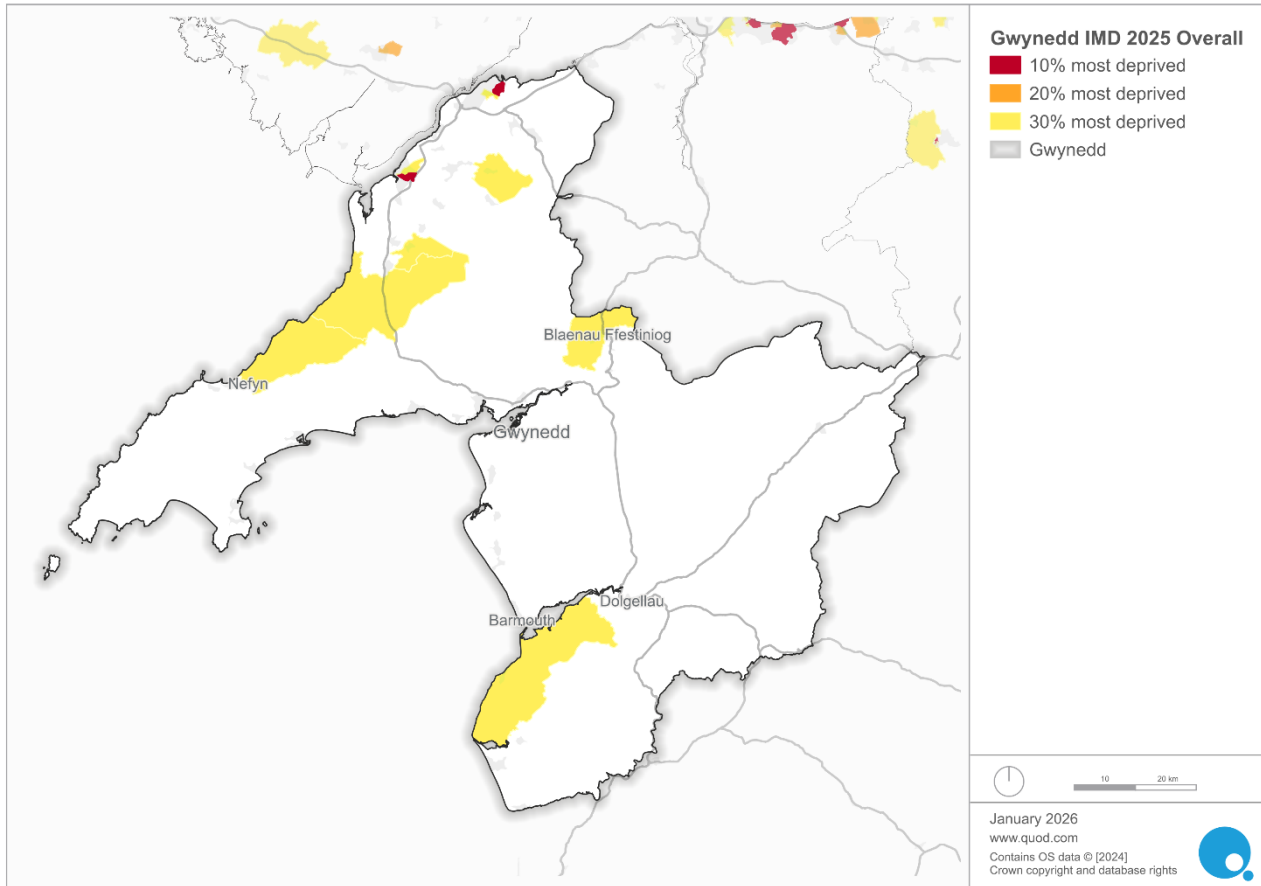
- 5.100 While deprivation is not classified as a protected characteristic under the 2010 Act, it is considered due to its intersecting nature with different protected characteristics.
- 5.101 The Welsh Government's Index of Multiple Deprivation (2025) combines indicators including a range of social, 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
- 5.102 All areas are ranked relative to one another according to their level of deprivation. Figure 5-2 below shows the relative levels of deprivation in Gwynedd – 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.

²⁵ Office for National Statistics, 2024. Live Births.

²⁶ Office for National Statistics, 2021. Census.

5.103 As shown in Figure 5-2, there are some areas in Gwynedd that are within the 20% - 30% most deprived areas in Wales and small areas in Bangor and Caernarfon that fall amongst the top 10% most deprived areas in Wales.

Figure 5-2: IMD map for Gwynedd



5.104 The use 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.

Summary of impact on groups who share a protected characteristic

5.105 Table 5-8 below summarises the findings of the equality impact assessment against protected characteristics.

Table 5-8: Summary of impacts

Protected characteristic	Potential impacts	Potential mitigation where required
Age	<p>WG concludes there are 'nil' potential direct impacts with regard to Age once mitigation (including the under-18 exemption for lower bound accommodation) is taken into account. It is not anticipated that there would be any Gwynedd specific characteristics that would change the findings of the WG EQIA.</p> <p>There are possible impacts related to a higher proportion of older visitors to Gwynedd, and a young 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>	<p>Under 18s are excluded from the levy for lower-rated stays</p> <p>Future use 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 Gwynedd 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 with regard to Gender reassignment. It is not anticipated that there would be any Gwynedd 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 with regard to Marriage and Civil Partnership.</p> <p>It is not anticipated that there would be any Gwynedd 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 with regard to Pregnancy and maternity. It is not anticipated that there would be any Gwynedd specific characteristics that would change the findings of the WG EQIA.	No potential impacts identified
Race	<p>Visitors to Gwynedd and employees in the distribution, hotels and restaurants sector are more likely to be white, than the average across Wales.</p> <p>WG concludes there are 'nil' potential direct impacts with regard to Race. It is not anticipated that there would be any Gwynedd 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 with regard to Religion and Belief. It is not anticipated that there would be any Gwynedd 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 with regard to Sex. There are no Gwynedd 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 Gwynedd as a result 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 with regard to Sexual Orientation. It is not anticipated that there would be any Gwynedd specific characteristics that would change the findings of the WG EQIA	No potential impacts identified