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*Protecting human rights  
in childbirth*

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Registered address:  
Birthrights  
Union House  
111 New Union Street  
Coventry CV1 2NT  
0300 400 30 400

15th November 2021

Dear Ms Morgan,

We are writing to you as an alliance of organisations interested in maternity care to urge you to revise your visiting guidance for maternity services to ensure that the human rights of service users are protected.

Whilst the current guidance in Wales delegates decisions to local Boards to a large extent, in practice Wales has some of the most restrictive visiting arrangements in maternity services in the UK. With the exception of Aneurin Bevan (who are managing to facilitate visiting hours of 8am to 8pm), there is no Board in Wales that is facilitating visiting on maternity inpatient wards for more than two hours a day. One Board, Cwm Taf is not currently allowing any inpatient visiting in maternity services at all (Birthrights sent a letter before action to the Board on the 12<sup>th</sup> November as we believe this is a disproportionate restriction of Article 8 rights to family and private life). It is women with more complicated pregnancies and births who need to stay in hospital around this period. Many have described to us what it is like to be recovering from a long labour or caesarean birth and yet be unable to sleep or go to the bathroom for fear of leaving their newborn baby unattended, while coping with their own pain, blood loss and exhaustion. In addition partners are denied the opportunity to care for and bond with their own baby during the first few days of life.

Furthermore, second birth partners face exclusion from maternity services throughout Wales, despite an additional person being relatively easy to accommodate in individual labour rooms, especially with additional measures such as vaccination, testing and personal protective equipment available to reduce the risks of transmission.

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Registered charity number 1151152  
Patron: Nadine Montgomery

**birthrights**



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There is now significant evidence about the adverse impact of visiting restrictions during the pandemic (see [this analysis](#) for example, by health economist Rachel Hunter about the mental health cost of visiting restrictions on pregnant women/birthing people). The Health and Safety Investigation Branch have published a [report](#) into stillbirths in England between April and June 2020. The report concludes that, unlike in other industries, NHS providers appear to have no system in place to enable them to weigh up any increased risks of COVID transmission against any unintended clinical consequences of changes they make to services in order to reduce the risks of COVID transmission. This is a safety issue as well as a human rights issue.

Annex 2 of the Welsh guidance on hospital visiting during the coronavirus outbreak severely restricts visiting in maternity services when coronavirus levels are high or very high. We welcome the update to the guidance in July which recognised the adverse impact of visiting restrictions and the potential of lateral flow testing to support hospital visiting particularly in maternity and neonatal settings. Given the availability of other measures to reduce the rate of transmission we now urge you to review this guidance as a matter of urgency, so that restrictions never go beyond what is recommended for a “medium” level of cases.

We would be happy to meet with you to discuss further and await your most urgent response.

Yours sincerely,

Maria Booker, Birthrights  
Nadia Higson, AIMS

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Joeli Brearley, Pregnant then Screwed  
Abbi Leibert & Holly Avis, But Not Maternity  
Zelle Baggaley, Birth Trauma Association,  
Katherine Jones, The Fatherhood Institute  
Scott Mair, Paternal Mental Health  
AJ Silver, Queer Birth Club  
Sarah Robinson, Doula UK  
Trudi Webber, Make Birth Better  
Sarah Rees - Service User rep - Wales

Cc

Karen Jewell - Senior Midwifery Officer, Welsh Government