

Equally Safe

A consultation on challenging men's demand for prostitution, working to reduce the harms associated with prostitution and helping women to exit



Ministerial Foreword

The Scottish Government's aim is for "a strong and flourishing Scotland where all individuals are equally safe and respected, and where women and girls live free from all forms of violence and abuse – and the attitudes that help perpetuate it."

Equally Safe – Scotland's strategy for tackling violence against women and girls - promotes a shared understanding of the causes, risk factors and scale of gender based violence, including commercial sexual exploitation, and seeks to address the underlying attitudes that create the societal conditions for gender based violence.

Commercial sexual exploitation refers to a continuum of violence. Prostitution is just one act on this continuum. Different acts will require different responses to challenge men's demand. However, there will inevitably be common ground and shared learning to be found.

Prostitution, in particular, is an area where much of the harm may occur behind closed doors and is hidden from the public view. There has been a noticeable shift from on-street to indoor prostitution. The scale of indoor prostitution, which is now thought to comprise the vast majority of the market, is much less visible than on-street activity and therefore commonly acknowledged as even more difficult to estimate. Recorded crimes for prostitution in the last ten years have substantially decreased and yet the circumstances that we know may lead to involvement in prostitution remain very much present.

The European Parliament passed a resolution in 2014 which recognised that prostitution, forced prostitution and sexual exploitation are gendered issues, and violations of human dignity and human rights. Under the UN Convention on the Elimination of Discrimination against Women, the UK has agreed to take appropriate measures to "suppress all forms of traffic in women and exploitation of prostitution of women". We must act upon these international obligations which recognise that sexual exploitation is completely unacceptable and inexcusable in 21st century Scotland.

We want to challenge men's demand for prostitution, work to reduce the harms associated with prostitution and support women to exit.

The launch of this consultation was delayed by the COVID-19 public health emergency as work focused, inevitably, on the immediate response and on protecting public safety. However, we know that the outbreak of COVID-19 and the essential lockdown measures have, regrettably, further raised the risk of harm to victims of gender-based violence. Women involved in prostitution experienced extreme hardship due to COVID-19. Stigma and the hidden nature of prostitution creates a barrier to engagement with mainstream services and we have worked across services to raise the profile of the barriers faced by women and to ensure they receive adequate support.

It is of vital importance that we engage with the people of Scotland to discuss our future approach to prostitution in this country. I acknowledge that there are people who hold a different opinion on the approach they believe should be taken in relation to prostitution, and we will not always agree. I would encourage those who both agree and disagree with the Scottish Government's position as outlined in Equally Safe to share their views. I see this consultation paper as an opportunity for us to hold that national discussion to inform future policy decisions about how we address this form of gendered violence, protect the human rights and dignity of women and improve outcomes for them.

I thank you in advance for taking the time to respond to this consultation.

Ash Denham MSP
Minister for Community Safety

1. Introduction

Prostitution is a form of commercial sexual exploitation. Commercial sexual exploitation persists as a result of how women are viewed by society.

In 2014, the European Parliament passed a resolution¹ recognising that prostitution, forced prostitution and sexual exploitation are gendered issues, and violations of human dignity and human rights.

As a member of the UN Convention on the Elimination of Discrimination Against Women (CEDAW)² the UK has agreed to take appropriate measures to suppress exploitation through prostitution. Article 6 of CEDAW states “parties shall take all appropriate measures including legislation to suppress all forms of traffic in women and exploitation of prostitution of women.”

The Scottish Government’s definition of gender based violence is clearly set out in Equally Safe³, Scotland’s strategy for preventing and eradicating violence against women and girls:

“Gender based violence is a function of gender inequality, and an abuse of male power and privilege. It takes the form of actions that result in physical, sexual and psychological harm or suffering to women and children, or affront to their human dignity, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or private life. It is men who predominantly carry out such violence, and women who are predominantly the victims of such violence. By referring to violence as ‘gender based’ this definition highlights the need to understand violence within the context of women’s and girl’s subordinate status in society. Such violence cannot be understood, therefore, in isolation from the norms, social structure and gender roles within the community, which greatly influence women’s vulnerability to violence”

Equally Safe Priority 4 states the Scottish Government’s priority to ensure men desist from all forms of violence against women and girls and perpetrators of such violence receive a robust and effective response. This violence includes the violence perpetrated by men in relation to acts of commercial sexual exploitation, of which prostitution is one aspect.

¹ European Parliament Committee on Women's Rights and Gender Equality (2014) 'Report on sexual exploitation and prostitution and its impact on gender equality' available at: <https://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+REPORT+A7-2014-0071+0+DOC+XML+V0//EN>

² United Nations (1979) 'Convention on the Elimination of All Forms of Discrimination against Women, New York, 18 December 1979' available at: <https://www.ohchr.org/EN/ProfessionalInterest/Pages/CEDAW.aspx>

³ Scottish Government (2018) 'Equally Safe: Scotland's strategy to eradicate violence against women' available at: <https://www.gov.scot/publications/equally-safe-scotlands-strategy-prevent-eradicate-violence-against-women-girls/>

The Scottish Government commissioned research⁴, published in 2017, to consider the reliability of international evidence regarding the criminalisation of the purchase of sex, and to explore the available knowledge and evidence of prostitution in Scotland.

The research found that there is a lack of robust data on men and women engaged in prostitution in Scotland and the decline in on-street prostitution and growth in indoor prostitution organised by mobile phone and online technology has made estimating numbers more difficult, as it is now less visible.

The research did conclude, however, that in countries where purchasing sex has been criminalised, there appears to be a continued but decreased demand for prostitution.

It is important that the Scottish Government develops policy in line with international best practice and where research is limited, it learns from the different approaches which have been adopted elsewhere, and what the impacts have been on challenging men's demand, reducing harms for women and supporting them to exit.

This consultation is written through the lens of Equally Safe and clearly adopts the definition of gender based violence adopted therein.

What do we mean by prostitution?

In this consultation paper "prostitution" refers to the activity of buying and selling sex, including women and men, and from "on-street" or indoor environments. The consultation paper focusses mainly on women, reflecting on prostitution as a form of gender based violence, the mainstay of support provision and the majority of those police come into contact with. The consultation paper focuses on the sale and purchase of sex, but does not include wider aspects of commercial sexual exploitation (such as lap-dancing, intimate camming or pornography).

Why do we need to challenge men's demand?

Fundamentally, masculinity and femininity are part of the underlying social construct of gender that contributes to the continuing prevalence of violence against women and girls in society. The Scottish Government condemns all forms of violence and abuse, whilst recognising that particular forms of violence are disproportionately experienced by one gender and require a strong strategic focus. Men have a critical

⁴Scottish Government (2017) 'Exploring available knowledge and evidence on prostitution in Scotland via practitioner-based interviews' available at: <https://www.gov.scot/publications/exploring-available-knowledge-evidence-prostitution-scotland-via-practitioner-based-interviews/pages/20/>

role in challenging violence, including reducing demand for prostitution, breaking down gender norms and in helping to ensure greater gender equality in society – they are also entitled to support when they experience violence and abuse, including commercial sexual exploitation.⁵

Why are we focussing on women involved in prostitution?

A gendered analysis does not exclude men, but rather recognises that women and girls are disproportionately affected by particular forms of violence that they experience because they are women and girls. Men also engage in prostitution as the party selling sex⁶. We are also aware that people who are transgender⁷ engage in prostitution. As previously stated, the focus of this consultation is on women involved in prostitution, reflecting the focus of support provision in Scotland and the majority of those police come into contact with. Any findings from this consultation and subsequent work would be hoped to benefit anyone involved in prostitution and society's understanding of this issue as a whole.

What are the harms associated with prostitution?

Scotland's approach to tackling violence against women and girls is drawn from the UN definition⁸ which directly links this violence to gender inequality:

“... the term “violence against women” means any act of gender-based violence that results in, or is likely to result in, physical, sexual or psychological harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or private life.”

Those interviewed for research conducted by the Scottish Government in 2017⁹ highlighted “a range of risks and adverse impacts associated with prostitution in the

⁵ Scottish Government (2018) 'Equally Safe: Scotland's strategy to eradicate violence against women' available at: <https://www.gov.scot/publications/equally-safe-scotlands-strategy-prevent-eradicate-violence-against-women-girls/>

⁶ Tampep (2009) 'Sex work in Europe - A mapping of the prostitution scene in 25 European Countries' available at: <https://tampep.eu/wp-content/uploads/2017/11/TAMPEP-2009-European-Mapping-Report.pdf>

⁷ Scottish Government (2017) 'Exploring available knowledge and evidence on prostitution in Scotland via practitioner-based interviews' available at: <https://www.gov.scot/publications/exploring-available-knowledge-evidence-prostitution-scotland-via-practitioner-based-interviews/pages/20/>

⁸ United Nations (1993) 'Declaration on the Elimination of Violence against Women proclaimed by General Assembly resolution 48/104 of 20 December 1993' available at: <https://www.ohchr.org/en/professionalinterest/pages/violenceagainstwomen.aspx>

⁹ Scottish Government (2017) 'Exploring available knowledge and evidence on prostitution in Scotland via practitioner-based interviews' available at: <https://www.gov.scot/publications/exploring-available-knowledge-evidence-prostitution-scotland-via-practitioner-based-interviews/pages/20/>

short and longer term in relation to general and mental health, safety and wellbeing and sexual health.”

How do we support women to exit prostitution?

The needs of women seeking to exit prostitution can be complex and varied.

From the 2017 Scottish Government Research and JAS 2020 VAWG Report¹⁰, the main reasons given as barriers to women exiting prostitution, as reported by support services, were financial reasons and a lack of choice, with poverty being the main driver. The lack of alternatives with a similar perceived earning potential as prostitution can make the cycle for women particularly difficult to break.

An extended period of involvement in prostitution was also cited during research, as a barrier to exit. Exiting would involve leaving networks and friendships and resulting in a possible feeling of isolation.

A longer term approach is adopted by many support services, acknowledging the complex journeys and intersectional challenges women face when exiting prostitution, including the possibility of returning to prostitution at times of financial hardship or relapses into drug dependency.

Evidence of success offered by third sector support organisations included giving women the opportunities to make informed choices, improvements in safety, quality of life more generally, and to increase options available, enabling them to eventually move out of prostitution.

What is in the scope of this consultation?

This consultation will focus on adult women involved in on-street and off-street prostitution.

Out of Scope

This paper will not address those who do not identify as women who are involved in prostitution. See the section “*Why are we focussing on women involved in prostitution?*”

¹⁰ Scottish Government (2020) 'Domestic abuse and other forms of violence against women and girls (VAWG) during COVID-19 lockdown for the period 30/3/20 - 22/05/20' available at: <https://www.gov.scot/isbn/9781839608292>

This paper will not address child sexual exploitation. This is an area of focus with a complex landscape, currently best served by the multi-agency National Child Sexual Exploitation Group¹¹. The group was established to oversee the implementation of actions within the national action plan to prevent child sexual exploitation.

This paper will not directly address human trafficking for the purposes of sexual exploitation. This is an area which is currently addressed by the Trafficking and Exploitation Strategy¹² and in May 2020, the first statutory review¹³ of the Strategy was published. While the review concluded that the Strategy remains fit for purpose in the short term, a commitment to develop a revised Strategy was set out.

This paper will not address other areas of commercial sexual exploitation.

Purpose of this paper

1. This consultation paper takes forward the Programme for Government¹⁴ commitment to consult on approaches to challenging men's demand for prostitution in Scotland.
2. This paper, acknowledges the limitations of available data and current research, which is often polarised and regardless of position can be difficult to accept as representative of all women involved in prostitution due to aforementioned lack of data. This paper invites views from a wide range of readers including key stakeholders, statutory partners, those who work in the sector to challenge men's demand for prostitution, support women and those who may have lived experience to help inform the development of this policy and provide contributions which will help decisions to be made between alternative policy proposals.
3. Information on the Scottish Government consultation process and details on how to respond to this consultation is set out in Annex A.
4. A list of consultation questions in Annex B.

¹¹ Scottish Government (2020) 'National Child Sexual Exploitation Group' available at: <https://www.gov.scot/groups/national-child-sexual-exploitation-group/>

¹² Scottish Government (2017) 'Human trafficking and exploitation strategy' available at: <https://www.gov.scot/publications/trafficking-exploitation-strategy/>

¹³ Scottish Government (2020) 'Trafficking and exploitation strategy: third annual progress report' available at: <https://www.gov.scot/publications/trafficking-exploitation-strategy-third-annual-progress-report-strategy-review/>

¹⁴ Scottish Government (2019) 'Protecting Scotland's Future: the Government's Programme for Scotland 2019-2020' available at: <https://www.gov.scot/publications/protecting-scotlands-future-governments-programme-scotland-2019-20/>

2. Scotland's Current Approach to Prostitution

Equally Safe

Equally Safe, the Scottish Government's Strategy for preventing and eradicating violence against women and girls, sets out the Scottish Government's definition of gender based violence. The Strategy, originally published in 2014, was developed by the Scottish Government and COSLA in association with a wide range of partners from public and third sector organisations. It has since been refreshed and is intended as a living document through which Scotland's approach to tackling and eradicating violence against women is clearly defined. The strategy makes a clear correlation between systemic gender inequality and violence against women and girls. It takes a strong focus on prevention and requires us to be bold in our approach to this issue. This definition includes commercial sexual exploitation, of which prostitution is one aspect.

Human Trafficking and Prostitution

The Human Trafficking and Exploitation (Scotland) Act 2015¹⁵ strengthens legal protections for survivors and gives police and prosecutors greater powers to detect and prosecute those responsible.

Part 4 of the Act introduces Trafficking and Exploitation Prevention and Risk Orders. These Orders can be imposed on convicted, and suspected traffickers. For a list of offences that include human trafficking for the purposes of prostitution or sexual exploitation and offences under section 22 of the Criminal Justice (Scotland) Act 2003¹⁶ and sections 57, 58, 58A, 59 or 59A of the Sexual Offences Act 2003¹⁷.

Women who have been the victims of human trafficking may have been trafficked to Scotland for the purposes of sexual exploitation, of which prostitution is one aspect. As outlined in the Scottish Government's Trafficking and Exploitation Strategy Third Annual Progress Report¹⁸, the Scottish Government continues to provide funding to TARA and Migrant Help to support adult trafficking victims across Scotland. TARA specifically supports female victims of trafficking for commercial sexual exploitation,

¹⁵ Scottish Parliament (2015) 'Human Trafficking and Exploitation (Scotland) Act 2015' available at: <http://www.legislation.gov.uk/asp/2015/12/contents>

¹⁶ Scottish Parliament (2003) 'Criminal Justice (Scotland) Act 2003' available at: <https://www.legislation.gov.uk/asp/2003/7/contents>

¹⁷ UK Parliament (2003) 'Sexual Offences Act 2003' available at: <http://www.legislation.gov.uk/ukpga/2003/42/contents>

¹⁸ Scottish Government (2018) 'Trafficking and Exploitation Strategy: third annual progress report' available at: <https://www.gov.scot/publications/trafficking-exploitation-strategy-third-annual-progress-report-strategy-review/>

reflecting the particular impacts on this group of survivors and upholding the gender equality obligations under the Council of Europe Convention Article 17¹⁹.

The National Referral Mechanism (NRM) is the UK framework for identifying potential victims of human trafficking and exploitation and ensuring they receive the appropriate support. Figures relating to Scotland in 2019 are provided in table 2.1 below. This shows 113 people being trafficked for the purposes of sexual exploitation. Of those, 4 people identified as male adults and 6 male minors. Female adults accounted for 77 referrals with a further 22 cases relating to female minors. In the case of 4 further females, age was not recorded.

Table 2.1 Referrals to the National Referral Mechanism for human trafficking and exploitation - 2019

Type	Male adult	Female adult	Male Minor	Female Minor	Male age not recorded	Female age not recorded	Total
Domestic servitude	4	7	4	4	0	3	22
Labour exploitation	194	23	67	13	6	2	305
Sexual exploitation	4	77	6	22	0	4	113
Criminal exploitation	10	3	14	2	2	1	32
Unknown	6	10	21	3	0	0	40
Total	218	120	112	44	8	10	512

The Scottish Government works with criminal justice agencies and support organisations to tackle human trafficking and all forms of exploitation in Scotland. Any form of human trafficking for the purposes of exploitation, including sexual exploitation and prostitution, is completely unacceptable in 21st century Scotland and is a criminal act.

Scotland's Serious Organised Crime Strategy²⁰ recognises the links between human trafficking, prostitution and serious organised crime and underpins a joined-up approach to tackling this alongside the Scottish Government's Trafficking and Exploitation Strategy²¹.

¹⁹ Council of Europe, European Court of Human Rights (2020) 'European Convention on Human Rights' available at: https://www.echr.coe.int/Documents/Convention_ENG.pdf

²⁰ Scottish Government (2015) 'Serious Organised Crime Strategy' available at: <https://www.gov.scot/publications/scotlands-serious-organised-crime-strategy/>

²¹ Scottish Government (2017) 'Human trafficking and exploitation strategy' available at: <https://www.gov.scot/publications/trafficking-exploitation-strategy/>

The strategy's main themes are to:

1. identify victims and support them to safety and recovery
2. identify perpetrators and disrupt their activity
3. address the conditions, both local and global, that foster trafficking and exploitation.

Legal Context

Certain laws^{22 23} in Scotland prohibit many activities associated with prostitution, including:

- Running a brothel.
- Publicly soliciting for the purposes of selling sex.
- Publicly soliciting for the purposes of purchasing sex.
- Loitering in a public place for the purposes of selling sex.
- Loitering in a public place for the purposes or purchasing sex.
- Illegal to procure someone into becoming a prostitute to have sex with other people.
- Trafficking persons for the purposes of sexual exploitation.

The law is clear that no one can be forced into sexual activity without their consent, and enables a prosecution where someone seeks to exploit another or others.

Covid-19 Response

The Scottish Government recognises the increased risk to victims of domestic abuse, gender-based violence and commercial sexual exploitation (CSE), including prostitution, as a result of restrictions introduced to respond to the public health emergency, including the need for physical distancing.

In particular the needs of women engaged in prostitution are complex and services across sectors including housing, public health and financial support, were of vital significance during the public health crisis.

In recognition of the disruption caused to support services by the pandemic emergency funding was awarded to organisations to support women involved in

²² UK Government (1982) 'Civic Government (Scotland) Act 1982' available at: <http://www.legislation.gov.uk/ukpga/1982/45/section/46>

²³ Scottish Parliament (2007) 'Prostitution (Public Places) (Scotland) Act 2007' available at: <http://www.legislation.gov.uk/asp/2007/11/section/1>

prostitution during this period, and to act as a bridge to access mainstream services²⁴.

Research which took place over the initial 8 weeks of the COVID-19 “lockdown”, with week 1 being considered to commence on 30/03/20 and week 8 commencing 18/05/20 included a number of organisations who support women who are engaged in prostitution²⁵. This research found that a number of services reported that the stigma associated with engaging in prostitution during lockdown prevented women in prostitution from safety planning as effectively as usual. Services also reported that women were not accessing sexual/reproductive health services as frequently during lockdown, due to the stigma associated with continuing to offer to see buyers²⁶. Some services reported that a significant proportion of women applying for destitution grants were those with insecure immigration status²⁷.

Feeling stigmatised was a recurrent theme for lack of engagement with mainstream support services. Concerns were raised through regular multi-agency discussions with Scottish Government that women perceived that their only option was to support themselves and their families through selling or exchanging sex, which poses/posed a public health risk but also put vulnerable women at a risk of harm.

The Scottish Government identified women involved in prostitution as an at-risk (non-shielding) group requiring additional support needs, including around housing, fuel and energy needs and food. Other groups included in this work stream include gypsy travellers, victims of domestic abuse and victims of human trafficking.

Laws prohibiting activities associated with prostitution, the position outlined in Equally Safe and the Coronavirus legislation was reported by some justice and third sector partners to be a difficult route to navigate. This included Police Scotland’s statutory duty to uphold the law, including those aspects relating to prostitution which remained unchanged during the management of the pandemic. Some organisations have reported that women engaged in prostitution felt in a precarious economic position in having to follow public health guidelines whilst not receiving any financial support and public messaging did not specifically take account of their individual needs.

²⁴ Scottish Government (2020) 'Support for women involved in prostitution' available at: <https://www.gov.scot/news/support-for-women-involved-in-prostitution/>

²⁵ Scottish Government (2020) 'Domestic abuse and other forms of violence against women and girls (VAWG) during COVID-19 lockdown for the period 30/3/20 - 22/05/20' available at: <https://www.gov.scot/isbn/9781839608292>

²⁶ Scottish Government (2020) 'Domestic abuse and other forms of violence against women and girls (VAWG) during COVID-19 lockdown for the period 30/3/20 - 22/05/20' available at: <https://www.gov.scot/isbn/9781839608292>

²⁷ Scottish Government (2020) 'Domestic abuse and other forms of violence against women and girls (VAWG) during COVID-19 lockdown for the period 30/3/20 - 22/05/20' available at: <https://www.gov.scot/isbn/9781839608292>

Recorded crime data for April 2020 indicated that there was 50% less crimes recorded associated with prostitution than the previous year (2 crimes in total) and the number for May 2020 was also 2. This data appears consistent with the information received from support organisations that demand for street prostitution was reduced during the first 8-10 weeks of lockdown.²⁸

Services reported concerns during lockdown that women in prostitution were resorting to higher-risk practices, including increased reports of women offering unprotected sex throughout lockdown. The drivers for higher-risk practices are not immediately apparent but it could be caused by the general reduction in demand due to the restrictions on movement that were in place during lockdown. Services reported significant concerns for those women who continued to work in public and their exposure to coronavirus.²⁹

Questions

Question 1. Do you agree or disagree that the Scottish Government's approach to tackling prostitution, as outlined in this section, is sufficient to prevent violence against women and girls?

Question 2. What are your observations as to the impact of the coronavirus outbreak on women involved in prostitution in Scotland?

²⁸ Scottish Government (2020) 'Domestic abuse and other forms of violence against women and girls (VAWG) during COVID-19 lockdown for the period 30/3/20 - 22/05/20' available at: <https://www.gov.scot/isbn/9781839608292>

²⁹ Scottish Government (2020) 'Domestic abuse and other forms of violence against women and girls (VAWG) during COVID-19 lockdown for the period 30/3/20 - 22/05/20' available at: <https://www.gov.scot/isbn/9781839608292>

3. International Approaches to Prostitution

Background

Different countries have adopted different policy approaches to prostitution. New Zealand decriminalised sex work with their Prostitution Reform Act (PRA) 2003³⁰, whilst Sweden adopted Sexköpslag (Sex Purchase Law)³¹, more commonly known as the Nordic Model whereby those who purchase sex are criminalised with those selling decriminalised, in 1999.

Countries have continued to adopt new approaches in recent years, with France and Northern Ireland adopting new laws to criminalise the purchase of sex in 2016³² and 2015³³ respectively.

Policies in Other Countries

A 2005 paper, “Study on National Legislation on Prostitution and the Trafficking in Women and Children” for the European Parliament noted that, though the policies on prostitution adopted by the then 25 member states were different, it was possible to group them into 4 models, seen below in Table 3.1.

Table 3.1 – Policy Approaches by EU Member States to Prostitution³⁴

Policy Approach	Definition
Abolitionism	A country falls under this model if outdoor and indoor prostitution are not prohibited. The State decides to tolerate prostitution and not to intervene in it. Prostitution by adults is not subject to punishment, but profiting from another person’s prostitution is, however, criminalised.

³⁰ New Zealand Parliamentary Counsel Office (2003) 'Prostitution Reform Act 2003' available at: <http://www.legislation.govt.nz/act/public/2003/0028/latest/DLM197815.html>

³¹ Government of Sweden (1997) 'Bill 1997/98:55 Kvinnofrid [Women’s peace]'

³² Available at:

<https://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000032396046&categorieLien=id>

³³ Northern Ireland Assembly (2015) 'Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015' available at:

<http://www.legislation.gov.uk/nia/2015/2/contents>

³⁴ European Commission (2005) 'Study on National Legislation on Prostitution and the Trafficking in Women and Children' available at: https://ec.europa.eu/anti-trafficking/publications/study-national-legislation-prostitution-and-trafficking-women-and-children_en

Policy Approach	Definition
New abolitionism	This model is a development on the “abolitionism” model. A country falls under this model if outdoor and indoor prostitution are not prohibited, but with reference to the latter the State intervenes to explicitly prohibit the existence of brothels.
Prohibitionism	<p>A country falls under this model if outdoor and indoor prostitution are prohibited. Parties involved in prostitution can be liable to penalties, including in some cases, the clients.</p> <p>Includes the approach adopted by Sweden in 1999, where the purchase of sexual services was criminalised whilst the provision of sexual services was decriminalised. This model is more commonly known as the “Nordic Model”.</p>
Regulationism	A country falls under this model if outdoor and indoor prostitution are regulated by the State and are therefore not prohibited when exercised according to this regulation. Prostitutes are often registered by local authorities and are in some cases obliged to undergo medical controls.

Question

Question 3. Which of the policy approaches (or aspects of these) outlined in Table 3.1 do you believe is most effective in preventing violence against women and girls?

4. Challenging Men's Demand for Prostitution

Background

The Scottish Government published research into prostitution in 2017³⁵. This research demonstrated there was little consistent or reliable information being sourced about men who purchase sex, including their backgrounds and reasons for buying it.

This lack of evidence is particularly pertinent in the case of indoor prostitution. On-street prostitution by its nature, meant that service providers often came into contact with or had awareness of the buyers. The rise in off-street prostitution has led to purchasing sex becoming less publically visible, and the ability for buyers to arrange purchase with the use of smartphones and the internet, negating their need to frequent historic "red-light" areas.

A number of support services in Scotland are able to engage with women in on-street prostitution and collect data and information through direct observations and engagement through outreach work, programmes and online scoping exercises. If prostitution moves indoors, services have limited mechanisms to observe and record the demand, risks and reality of prostitution.³⁶

Due to the hidden nature of prostitution, data recorded by police provides limited information on the men who come into contact with the justice system. Information available as part of the Recorded Crimes in Scotland³⁷ is limited to crimes collectively recorded as "crimes related to prostitution". This grouping includes crimes associated with buying, as well as with selling sex.

Available information on men who purchase sex in Scotland

A study, "Challenging Men's Demand for Prostitution in Scotland"³⁸ interviewed men who had self-presented as having purchased sex.

³⁵ Scottish Government (2017) 'Exploring available knowledge and evidence on prostitution in Scotland via practitioner-based interviews' available at: <https://www.gov.scot/publications/exploring-available-knowledge-evidence-prostitution-scotland-via-practitioner-based-interviews/pages/20/>

³⁶ Scottish Government (2017) 'Exploring available knowledge and evidence on prostitution in Scotland via practitioner-based interviews' available at: <https://www.gov.scot/publications/exploring-available-knowledge-evidence-prostitution-scotland-via-practitioner-based-interviews/pages/20/>

³⁷ Scottish Government (2019) 'Recorded crime in Scotland: 2018-2019' available at: <https://www.gov.scot/publications/recorded-crime-scotland-2018-19/pages/1/>

³⁸ Women's Support Project (2008) 'Challenging Men's Demand for Prostitution in Scotland' available at: http://www.womenssupportproject.co.uk/userfiles/file/uploads/Challenging_Men%C2%92s_Demand.pdf

This research found that men's age in relation to their first involvement with women involved in prostitution was 14 to 49 years old. 37% had first bought sex between the ages of 18 and 20 years old.

52% of men interviewed had purchased sex before the age of 21, and 74% by 25 years old.

These indicative ages are supported by research data from the Sandyford Clinic in Glasgow. The Sandyford Initiative provides regional integrated sexual health services for people in the west of Scotland from their Glasgow base. Information was gathered from men and women who were newly presenting to the genitourinary medicine and reproductive health services in Glasgow via the Sandyford health screen (SaHS) – a staff administered questionnaire. Their data³⁹ suggested that if a man had not purchased sex by 25 years old, then he would be less likely to do so in the future.

Attitudes of Men

Research presented by the Challenging Men's Demand for Prostitution in Scotland report, suggested that acceptance of the purchasing of prostitution has contributed to the harmful attitudes around violence against women and girls⁴⁰. This report suggests that some men's self-held belief of superiority to and entitlement of sexual access to women have been associated with men's violent behaviours towards women.

During the 2017 research⁴¹ conducted by the Scottish Government, attitudes on prostitution were explored.

Some respondents spoke about the possibility of demand for prostitution being increased or enabled by longer-term social causes such as the normalisation of prostitution within certain parts of culture, including stag parties, pornography and the sexualisation of women in the mainstream media. Structural gender inequality and its impact on economic and sexual exploitation was also cited by interviewees as possible contributing factors, as were the factors influencing vulnerable and disempowered members of society including young people, people from "looked after" backgrounds, and people from deprived economic backgrounds and immigrant communities.

³⁹ Groom & Nandwani (2006) 'Characteristics of men who pay for sex: a UK sexual health clinic survey' available at: <https://www.ncbi.nlm.nih.gov/pubmed/17012511>

⁴⁰ Women's Support Project (2008) 'Challenging Men's Demand for Prostitution in Scotland' available at: http://www.womenssupportproject.co.uk/userfiles/file/uploads/Challenging_Men%C2%92s_Demand.pdf

⁴¹ Scottish Government (2017) 'Exploring available knowledge and evidence on prostitution in Scotland via practitioner-based interviews' available at: <https://www.gov.scot/publications/exploring-available-knowledge-evidence-prostitution-scotland-via-practitioner-based-interviews/pages/20/>

Educating Men

The Challenging Men's Demand for Prostitution in Scotland report also suggested that young men may benefit from education related to prostitution, in a similar vein to education programs around the harms of drug use and supporting young people to feel able to resist peer pressure.

They describe the goal of any such "prostitution prevention" educational programmes as being to "shift cultural attitudes about prostitution so that there is a cultural taboo against men who buy sex and cultural respect for men who make the choice not to buy sex."

Curriculum for Excellence

Curriculum for Excellence (CfE) is the national approach to learning and teaching for young people aged 3 to 18 in Scotland. It provides significant flexibility, within broad national guidelines, for teachers to develop lessons which best meet the needs of individual learners, including teaching young people about prostitution. Teachers, head teachers and other professional educational practitioners are best placed to decide what is taught in Scotland's schools.

Relationships, sexual health and parenthood (RSHP) education is an integral part of the health and wellbeing area of the school curriculum in Scotland. This aspect of the curriculum is intended to enable children and young people to build positive relationships as they grow older and should be presented in an objective, balanced and sensitive manner within a framework of sound values and an awareness of the law on sexual behaviour.

It is for schools to decide how they deliver RSHP education, based on the needs of the children or young people in their classroom. To support teachers in the delivery of RSHP education, an online, nationally available teaching resource for RSHP education was published in September 2019. This resource includes up-to-date content that can support teachers to deliver high quality and age and stage appropriate RSHP education across the entire 3-18 age range of CfE.

This resource includes content to support teaching of topics such as prostitution and paying for sex, in the senior phase (S4-S6). These learning intentions are for pupils to learn about prostitution in terms of the law, social attitudes and harm to individuals. The intention is also that prostitution is framed as sexual exploitation. In addition, in the third/fourth level (S1-S3), there are opportunities for young people to learn about abuse and relationships which covers grooming, sexual exploitation, partner control, coercion and violence. Also romantic and loving relationships and, at senior phase, there are further opportunities to discuss the relationships young people want.

The messages offered in the RSHP resource reflect the messages of the document Key Messages for Young People on Healthy Relationships and Consent, a resource for professionals working with young people. This messaging will be consistent with the wider messages of the Equally Safe strategy to prevent and eradicate violence against women and girls.

Further and Higher Education

The Scottish Government is clear that university and college campuses should be safe places for students to live, work and study free from gender based violence. It is important, therefore, that consideration is given to the experiences of those within Further and Higher Education, in particular, to the experience of students to fully understand the drivers to prostitution, address the harms associated with it and challenge demand.

The Delivery Plan for Equally Safe included a specific action to work with universities and colleges to ensure the provision of a safe environment for students and staff through learning and on campus action, utilising learning from existing practice, relevant recommendations for improvement, and learning from the “Equally Safe in Higher Education” project on further and higher education.⁴² Action on ensuring Equally Safe is embedded in these institutions is led by the Equally Safe in Colleges and Universities Working Group⁴³.

Questions

Question 4. What measures would help to shift the attitudes of men relating to the purchase of sex? Do you have any examples of good practice either in a domestic or an international context?

Question 5. Taking into account the above, how can the education system help to raise awareness and promote positive attitudes and behaviors amongst young people in relation to consent and healthy relationships?

⁴² Equally Safe Delivery Plan (2017) available at : <https://www.gov.scot/binaries/content/documents/govscot/publications/strategy-plan/2017/11/equally-safe-delivery-plan-scotlands-strategy-prevent-violence-against-women/documents/00528064-pdf/00528064-pdf/govscot%3Adocument/00528064.pdf>

⁴³ More information on the Equally Safe in Colleges and Universities Working Group is available at: <https://www.gov.scot/groups/equally-safe-in-further-and-higher-education-working-group/>

5. Supporting Women to Exit Prostitution

Background

The shift from women working on-street to off-street has had an impact on several services. With women becoming less visible to support services, it can be more difficult for support services to identify women and make an offer of support. Some services have been closed or their hours reduced due to a decrease in users. It has also been suggested that the more hidden nature of prostitution made it more difficult to raise awareness of the support available and to encourage people to engage with services. This was encapsulated by one respondent to the 2017 research who highlighted how: “if you’ve got somebody that’s physically in front of you, you can say look there’s these services if you want them”.⁴⁴

The majority of services are aimed at supporting women, with the known exceptions of Roam in Edinburgh and the Steve Retson Project in Glasgow who provide support to men involved in prostitution.

Support Services

Organisations generally value the importance of partnership working and actively pursue this through individual collaboration and engagement in multi-agency forums such as local violence against women partnerships. Effective collaboration can include signposting to other relevant specialised support services, as well as to statutory bodies and public services, including the police and social work, where appropriate, as well as working closely with agencies in a holistic way to support individuals and communities and resolve shared challenges

Support services, located primarily in four of Scotland’s main cities – Aberdeen, Dundee, Edinburgh and Glasgow – offer specialised support to women involved in prostitution, usually with a support to reducing harm to women still involved in prostitution, whilst some do offer support for women looking to exit. It is acknowledged that varying degrees of emphasis are placed on the latter aspect depending on the organization.⁴⁵

Specialist support focussing on exit can be a lengthy process. Respondents to the Scottish Government’s research noted that viewing exit as a “fixed” event was not

⁴⁴ Scottish Government (2017) 'Exploring available knowledge and evidence on prostitution in Scotland via practitioner-based interviews' available at: <https://www.gov.scot/publications/exploring-available-knowledge-evidence-prostitution-scotland-via-practitioner-based-interviews/pages/20/>

⁴⁵ Scottish Government (2017) 'Exploring available knowledge and evidence on prostitution in Scotland via practitioner-based interviews' available at: <https://www.gov.scot/publications/exploring-available-knowledge-evidence-prostitution-scotland-via-practitioner-based-interviews/pages/20/>

always realistic and that women may become involved in prostitution again. For example, this could happen during periods of financial hardship in a woman's life.

Third sector respondents to the Scottish Government's research highlighted trust as a key component of any support work. This was key in building relationships and encouraging women to engage. Women may choose not to engage with services if they feel they are being stigmatised or through fear of a lack of confidentiality. This theme was also identified in research associated with the COVID-19 lockdown⁴⁶.

Organisations acknowledge that the level of support required will vary from woman to woman. Often support will include a needs assessment, with follow up support tailored as a result. This support may include services such as employability, housing, finance and health – physical, mental and sexual.

Barriers to Exit

The needs of women seeking to exit prostitution can be complex and varied.

From the 2017 Scottish Government Research⁴⁷, the main reasons given as barriers to women exiting prostitution, as told by support services, were financial reasons and a lack of choice, with poverty being the main driver. The lack of alternatives with a similar perceived earning potential as prostitution can make the cycle for women particularly difficult to break.

An extended period of involvement in prostitution was also cited during research, as a barrier to exit. Exiting would involve leaving networks and friendships and resulting in a possible feeling of isolation.

Mental health problems, including pre-existing conditions, were also noted as posing a barrier to exit for women involved in prostitution. "Self-medication" through drugs alcohol or a combination of both in relation to mental health problems could lead to chaotic substance use and riskier sexual practices. This combination was identified by interviewees as having the potential to lead to more trauma and deterioration in mental health, which could be difficult to recover from and to exit.

Disclosure of Convictions

A criminal record and previous convictions, often for minor offences, can also pose as a barrier to exit by restricting forms of alternative employment. This may be due to

⁴⁶ Scottish Government (2020) 'Domestic abuse and other forms of violence against women and girls (VAWG) during COVID-19 lockdown for the period 30/3/20 - 22/05/20' available at: <https://www.gov.scot/isbn/9781839608292>

⁴⁷ Scottish Government (2020) 'Domestic abuse and other forms of violence against women and girls (VAWG) during COVID-19 lockdown for the period 30/3/20 - 22/05/20' available at: <https://www.gov.scot/isbn/9781839608292>

concerns about disclosure, fear of exposure and worry as to how to explain employment gaps.

The National Strategy for Community Justice firmly supports the view that people with convictions can turn their lives around, and recognises that to do so they often need opportunities and support.

It is also known that employment is one of the essential components for an individual's reintegration back into society. However, employers are often apprehensive about employing someone with a previous conviction and as such, many people face difficulties in having to disclose a previous conviction when looking for a job.

The consequences of having to self-disclose previous offending behaviour for long periods of time and for such information to be included on a basic disclosure certificate can have an on-going impact on people's ability to gain employment, attend university or college, volunteer, secure an apprenticeship or get insurance or a bank account, etc.

It is the [Rehabilitation of Offenders Act 1974](#), ("the 1974 Act"), which provides certain rules governing whether people with convictions are required to tell others about those convictions.

It has been argued for some time that the disclosure periods under the 1974 Act were too long, the legislation was too complicated and therefore poorly understood and, as a result, not properly applied in practice.

[Part 2 of the Management of Offenders \(Scotland\) Act 2019](#), ("the 2019 Act"), reforms the 1974 Act so that it achieves a more appropriate balance between the rights of people not to disclose their previous offending behaviour and to move on with their lives while ensuring the rights of the public to be protected are effectively maintained (e.g. the disclosure period for a fine will be reduced from 5 years to 12 months and the disclosure period for an admonishment will be reduced from 5 years to zero).

The provisions also increase clarity and make the legislation more accessible to those required to understand it. Part 2 of the 2019 Act will:

- reduce the period of disclosure for the majority of sentences,
- bring more people within the scope of the protections under the 1974 Act,
- provide an enabling power to bring forward regulations to create an independent review mechanism for certain sentences greater than 48 months,
- increase the clarity and accessibility of the legislation, and
- change the terminology used within the legislation to reduce confusion about the purpose of disclosure.

In relation to higher level disclosures, a prostitution offence under section 46 of the Civic Government (Scotland) Act 1982 (“the 1982 Act”) is not included in either schedule A1 or B1 of the Rehabilitation of Offenders Act 1974 (Exclusions and Exceptions)(Scotland) Order 2013 or the equivalent schedule 8A or 8B of the Police Act 1997. This means that if a woman is convicted of such an offence under section 46 of the 1982 Act it will become a protected conviction as soon as it is spent. A protected conviction will not be disclosed in a higher level Disclosure certificate issued by Disclosure Scotland and will not be required to be self-disclosed if asked.

This will be an aid for those convicted of such an offence to gain employment and help them move away from prostitution without having to worry about the stigma of having to disclose their previous conviction(s). It will also allow those individuals, who wish to undertake roles in the caring profession to be able to, without having to disclose any convictions under section 46 of the 1982 Act.

Supporting Women to Exit

A longer term approach is adopted by many support services, acknowledging the complex journeys women face when exiting prostitution, including the possibility of returning to prostitution at times of financial hardship or relapses into drug dependency.

Evidence of success offered by third sector support organisations included giving women the opportunities to make informed choices, improvements in safety, quality of life more generally, and to increase options available, enabling them to eventually move out of prostitution.

For some women involved in prostitution, support services are key to their exit but for others, exit is driven by other events. The Scottish Government Research published in 2017, heard from a number of respondents in the NHS and third sector, who described the positive and negative life events that lead to women exiting. Some of these were identified as:

- Rape or sexual assault or other traumatic event
- General poor health and exhaustion, for women with complex needs
- Seeing peers moving on and having a positive example
- Meeting a partner and settling in a relationship
- Pregnancy and or child protection issues

Availability of Services

Services vary by area. The 2017 Scottish Government research heard from respondents that more could be done in regards to preventing women becoming involved in prostitution, as well as halting an escalation of problems.

Some local authority respondents who were interviewed detailed specific gaps in provision including in mental health services and specialist psychological support. It was also suggested that more could be done in relation to employability services and in terms of the extension and greater use of diversionary criminal justice approaches.

The need for a holistic service to address the complex needs of women involved in prostitution, is necessary to reduce harms and support them to exit.

Support organisations emphasis the multiple needs of support for women involved in prostitution, consider prostitution to be a symptom of wider issues as opposed to the cause. Support services or pathways for referral can be necessary for trauma, mental health needs, economic hardship and addictions.

The stigma of disclosing involvement in general or mainstream organisations has been reported to be significant and may lead to women choosing not to disclose their involvement in prostitution. This presents a barrier for women engaging with required support services.

When registering with specialist support services, there can also be a reluctance from women due to privacy concerns to engage with services were they are required to provide personal information, including their name, address or date of birth.

For women involved in prostitution, flexibility of support is essential, including provision of out of hours and weekend support.

A trauma informed service would also benefit the support offered to women, allowing for empathy and understanding of potential trauma experienced and complex needs.

Some respondents to the 2017 Scottish Government research noted that women involved in prostitution often accessed non-specialist services first, including those supporting women experiencing domestic abuse and alcohol problems. Women may choose to engage with non-specialist support services to prevent disclosure of their involvement in prostitution due to stigma. It was suggested that improved opportunities could be created in terms of women involved in prostitution who are accessing non-specialised support services.

There was also concern raised by interviewees about women not being offered appropriate support, often due to non-disclosure, or possibly due to questions not being asked by those administering mainstream services, including GPs and social work departments.

Some respondents suggested that a more consistent approach to asking the question of “are you involved in prostitution?” in appropriate settings, would allow for better provision of support, as well as increased understanding of the scale and nature of prostitution in Scotland.

In relation to offering services, a number of organisations voiced concerns around short-term funding cycles. It was viewed as problematic, due to organisations inability to complete long-term planning and the time and resources that are allocated to securing funding.

Short-term funding also proved a barrier to women trying to exit prostitution, as it made it difficult for service providers to assure them of longer term support.

Questions

Question 6. How can the different needs of women involved in prostitution (in terms of their health and wellbeing) be better recognised in the provision of mainstream support?

Question 7. In your opinion, drawing on any international or domestic examples, what programmes or initiatives best supports women to safely exit prostitution?

Question 8. Support services are primarily focussed within four of Scotland's main cities – Aberdeen, Dundee, Edinburgh and Glasgow – how can the needs of women throughout Scotland who are engaged in prostitution be met, noting that prostitution is not solely an urban issue?

Question 9. If there are any further comments you would like to make, which have not been addressed in the questions above, please use the space below to provide more detail.

Annex A

Responding to this consultation

Please respond to this consultation using the online platform 'Citizen Space' which can be found at: <https://consult.scotland.gov.uk>. Access and respond to this consultation online at <https://consult.gov.scot/violence-against-women-team/equally-safe-reduce-harms-associated-prostitution/>. You can save and return to your responses whilst the consultation is still open. Please ensure that consultation responses are submitted before the closing date.

If you are unable to respond using 'Citizen Space', please send your views and comments either by email to vawgconsultations@gov.scot or by posting a paper copy to:

Violence against Women and Girls and Barnahus Justice Unit
Scottish Government
GWR St Andrew's House
Regent Road
Edinburgh
EH1 3DG

However you respond, please complete the Respondent Information Form (see 'Handling your response' below).

Responses should reach us by 10 December 2020. Earlier responses would be welcome.

Handling your response

If you respond using 'Citizen Space', you will be automatically directed to the Respondent Information Form at the start of the questionnaire. This will let us know how you wish your response to be handled and, in particular, whether you are happy for your response to be made public.

If you are unable to respond via 'Citizen Space', please complete and return the Respondent Information Form attached to the end of this document. This will ensure that we treat your response appropriately.

All respondents need to be aware that the Scottish Government is subject to the provisions of the Freedom of Information (Scotland) Act 2002⁴⁸ and would therefore

⁴⁸Scottish Parliament (2002) 'Freedom of Information (Scotland) Act 2002' available at: <http://www.legislation.gov.uk/asp/2002/13/contents>

have to consider any request made to it under the 2002 Act for information relating to responses made to this consultation exercise.

Next steps in the process

Where respondents have given permission for their response to be made public, and after we have checked that they contain no potentially unlawful or offensive material (for example defamatory material), or personal data, responses will be made available to the public at <http://consult.gov.scot>. If you use the consultation hub to respond, you will receive a copy of your response via email.

Following the closing date, all responses will be analysed and considered along with any other available evidence to help us. Responses will be published where we have been given permission to do so. An analysis report will also be made available.

Comments and complaints

If you have any comments about how this consultation exercise has been conducted, please send them to the contact address above.

Scottish Government consultation process

Consultation is an essential part of the policymaking process. It gives us the opportunity to consider your opinion and expertise on a proposed area of work.

You can find all our consultations online: <http://consult.gov.scot>. Each consultation details the issues under consideration, as well as a way for you to give us your views, either online, by email or by post.

Responses will be analysed and used as part of the decision making process, along with a range of other available information and evidence. We will publish a report of this analysis for every consultation. Depending on the nature of the consultation exercise the responses received may:

- indicate the need for policy development or review;
- inform the development of a particular policy;
- help decisions to be made between alternative policy proposals; and/or
- be used to finalise legislation before it is implemented.

Whilst details of particular circumstances described in a response to a consultation exercise may usefully inform the policy process, consultation exercises cannot address individual concerns and comments, which should be directed to the relevant public body.

Annex B

Summary of Consultation Questions

Question 1. Do you agree or disagree that the Scottish Government's approach to tackling prostitution, as outlined in this section, is sufficient to prevent violence against women and girls?

Question 2. What are your observations as to the impact of the coronavirus outbreak on women involved in prostitution in Scotland?

Question 3. Which of the policy approaches (or aspects of these) outlined in Table 3.1 do you believe is most effective in preventing violence against women and girls?

Question 4. What measures would help to shift the attitudes of men relating to the purchase of sex? Do you have any examples of good practice either in a domestic or an international context?

Question 5. Taking into account the above, how can the education system help to raise awareness and promote positive attitudes and behaviors amongst young people in relation to consent and healthy relationships?

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Question 9. If there are any further comments you would like to make, which have not been addressed in the questions above, please use the space below to provide more detail.



Equally Safe

A consultation on challenging men's demand for prostitution, working to reduce the harms associated with prostitution and helping women to exit

RESPONDENT INFORMATION FORM

Please Note this form **must** be completed and returned with your response.

To find out how we handle your personal data, please see our privacy policy:
<https://www.gov.scot/privacy/>

Are you responding as an individual or an organisation?

- Individual
 Organisation

Full name or organisation's name

Phone number

Address

Postcode

Email

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Information for organisations:

The option 'Publish response only (without name)' is available for individual respondents only. If this option is selected, the organisation name will still be published.

If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

- Publish response with name
- Publish response only (without name)
- Do not publish response

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

- Yes
- No



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