

The Scottish Government Home Energy Efficiency Equity Loan Pilot

**Call for evidence to inform the consideration
of the future expansion of the pilot to a
nationwide support scheme**

August 2021



Scottish Government
Riaghaltas na h-Alba
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The Scottish Government Home Energy Efficiency Equity Loan Pilot

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Ministerial Foreword



Reducing emissions from our homes and buildings is one of the most important things we can all do to help end Scotland's contribution to climate change. Over the next 24 years, we will need to transform Scotland's homes and workplaces so that they are warmer, greener and more efficient.

We published the draft Heat in Buildings Strategy in February this year and it sets out how we will achieve that ambition through actions and proposals for transforming our buildings and the systems that supply their heat, ensuring all buildings reach net zero emissions by 2045. We need to rapidly scale up deployment of zero emissions heating systems, such as heat pumps and heat networks, as well as improve energy efficiency for all domestic homes.

We have committed to tackling housing's contribution to climate change in Housing to 2040; Scotland's first ever long-term national housing strategy. This sets out our commitment to support people to live in homes they want to live in and which are affordable and meet their needs through adapting and retrofitting existing homes to improve energy efficiency and decarbonise heating.

This call for evidence seeks views on the potential future development of the Home Energy Efficiency Equity Loan Pilot to support the realisation of these ambitions, offering homeowners a potential finance route to improve the energy efficiency of their homes and decarbonise their heating in an affordable way.

Your views and evidence will help the Scottish Government to consider the challenges and opportunities. We have posed questions throughout the document and encourage you to respond.

I very much look forward to hearing your views.

A handwritten signature in blue ink, appearing to read 'Michael Matheson'.

Michael Matheson MSP
Cabinet Secretary for Net-Zero, Energy and Transport

Chapter 1 Call for Evidence

- 1.1 As set out in the 2020 Climate Change Plan Update¹, Scotland's long term climate change targets will require the near complete decarbonisation of our energy system by 2045, with renewable energy meeting a very significant share of our needs. Emissions from homes and non-domestic buildings will have to fall by 68% by 2030 as compared to 2020.
- 1.2 The Scottish Government published the draft [Heat in Buildings Strategy](#) for consultation in February 2021. This strategy sets out a pathway to zero emission buildings by 2045 and details a series of near-term actions as well as long term commitments to accelerate the decarbonisation of both existing and new buildings. [Housing to 2040](#) commitments align with this strategy in affirming that all existing housing be warm, affordable to heat with heating emissions reduced.
- 1.3 The Scottish Government's Home Energy Efficiency Equity Loan Pilot has been operating since 2017 and during this time has delivered over 55 loans to eligible homeowners to enable financing of installation of energy efficiency measures and associated essential home improvements. We now wish to consider the potential to develop the pilot as part of the suite of support schemes for the decarbonisation of buildings as set out in the draft Heat in Buildings Strategy.
- 1.4 This call for evidence seeks feedback on the pilot as well as stakeholder views to inform the Scottish Government's consideration of future delivery. We are also seeking input on potential actions to modify and enhance the pilot to ensure optimal and sustainable outcomes should the decision be taken to proceed with progressing the pilot to a national scheme.
- 1.5 Alongside this call for evidence, which will run for 10 weeks, we will gather detailed feedback through an independent survey of homeowners who have participated in the pilot, to assess the impact that the measures they have implemented have had on their wellbeing, as well as their energy bills and carbon reductions achieved. Three facilitated webinars will also be run during the time period the call for evidence is open.
- 1.6 This engagement builds upon the lessons learned and improvements already implemented on a continuous basis throughout the delivery of the pilot.

Activity	Date
Call for evidence live	2 August – 8 October
3 x webinars	Mon 16 August 3pm – 5pm Thursday 26 August 10am – 12 noon Wednesday 1 September 10 – 12 noon
Equity loan pilot review and call for evidence response reports published	Dec 2021

¹ Securing a green recovery on a path to net zero: climate change plan 2018 – 2032 – update: [Securing a green recovery on a path to net zero: climate change plan 2018–2032 - update - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/2020-climate-change-plan-update/secure-a-green-recovery-on-a-path-to-net-zero-climate-change-plan-2018-2032-update-gov.scot/)

1.7 Call for evidence questions can be found at the end of each chapter. In particular, evidence and views on the points below are welcome:

- the proposal to expand the pilot to a nationwide scheme, along with potential benefits and challenges;
- enhancing the sustainable delivery of the loans to support nationwide uptake;
- scope of eligibility and loan offers to maximise opportunities.

1.8 Reports will be published at the end of 2021 reviewing the pilot, stakeholder responses and providing information on future next steps.

Chapter 2 Equity Loan Pilot Background

2.1 In January 2017, the Scottish Government launched an area-based equity loan pilot to assist homeowners with the costs of carrying out energy efficiency installations and essential repairs to their properties. The pilot is run in eight local authority areas: Perth & Kinross, Stirling, Dundee, Glasgow City, Inverclyde, Renfrewshire, Argyll and Bute and the Western Isles. The pilot is managed by the Energy Saving Trust (EST) with Care and Repair officers² sub-contracted to promote the loan and provide support to borrowers.

2.2 The equity loan pilot allows eligible homeowners (including private landlords with up to two properties) to borrow up to £40,000 from the Scottish Government against the value of their property for eligible works (energy efficiency measures, heat loss reduction measures, decarbonisation of heat sources and repairs) and repay when they sell their home or transfer ownership. The amount repaid to the Scottish Government is the lesser amount of:

- a. the Scottish Government's agreed equity share of the property's sale price, or
- b. the loan amount if it had been a commercial loan at 2.5% APR for the duration of the agreement.

2.3 The loan is currently available for properties in Council Tax bands A to C or for properties in all Council Tax bands where the owner is in receipt of qualifying benefits. Owners must retain a minimum of 30% equity stake in the property and energy efficiency / decarbonisation improvements must make up 55% or more of the total loan value with the remainder available for eligible maintenance works.³

2.4 Between January 2017 and April 2021, a total of £1.98 million in loans have been provided, with a further £640,000 in progress. All enquirers are taken through a full advice service journey by the Energy Savings Trust (EST) which includes assessing the most appropriate source of support for their individual circumstances.

2.5 Informal feedback received to date from EST, Care and Repair and clients is largely positive about the benefits. The pilot provides a unique borrowing route to funding for those where access to a typical Scottish Government energy efficiency loan (where regular loan repayments are required) or a commercial loan may not be a preferable or an available option, therefore enabling home energy improvements and repairs that would not otherwise have been undertaken.

2.6 It is noted that the pilot enables older homeowners, those who receive disability benefits and services, and those who may be seen as vulnerable consumers who may have minimal liquid assets, an opportunity to release equity to carry out required energy efficiency and maintenance improvements allowing them to remain living independently in their home and their community for as long as possible.

2.7 As set out in the draft Heat in Buildings Strategy, the Scottish Government's support programmes for domestic energy efficiency will continue to be delivered over

² Care and Repair Scotland – support for the equity loan: [Equity Loan Pilot Scheme | Care and Repair Scotland](#)

³ Please see Annex A for a full list of qualifying benefits and eligible works

the next five years of the Parliamentary term. The Equity loan pilot is currently providing support to a group of homeowners for whom other existing support mechanisms may not be viable.

Questions

- 1. What is your view on the use of equity in people's homes in order to support the decarbonisation of buildings and the improvement of energy efficiency as a means to improve wellbeing and support independent living? Please explain your answer.**
- 2. If you have direct experience of the equity loan pilot, please provide views or evidence of the impact of the loan product and support provided.**
- 3. Do you have views on the eligibility and scope of the pilot as it exists now? Please explain your views.**

Chapter 3 Net – Zero Policy Context

3.1 From the experience and feedback received to date, the equity loan has demonstrated the potential to deliver against the policy priorities as set out in the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, including the targets of net zero greenhouse gas emissions by 2045, with interim targets of a 75% reduction by 2030 and 90% by 2040, through providing a financial mechanism to enable the installation of eligible renewable technologies and energy efficiency measures in households where access to other forms of financial support are challenging.

3.2 The target of no more than 5% of homes in fuel poverty by 2040 as set out in the Fuel Poverty (Target, Definition and Strategy) (Scotland) Act 2019 is also supported as some equity loan customers may not have been eligible for commercial loans and therefore would not have been able to improve the fabric of their homes and reduce their heat demands without this equity loan offering.

3.3 The Scottish Government's [Housing to 2040](#) strategy commits to introduce legislation in the next Parliament for phased introduction from 2025-2030, to implement a new Housing Standard which will align with work to tackle emissions from homes, representing a shift towards greater partnership between Government and home owners and still rooted in the responsibilities home owners have for the repair and maintenance of their properties.

3.4 Aligning with both Climate Change and Fuel Poverty Legislation, the draft [Heat in Buildings Strategy](#) commits to reducing emissions from the way we heat our buildings over the next decade and to reach net zero by 2045. By 2025, where it is within our legal competence, a framework of regulations setting clear standards for property owners across all tenures and buildings types, building upon existing standards already in place and requiring action on energy efficiency and zero emission heating will be brought forward. These targets are far reaching, necessitating the involvement of all property owners. The continuation and expansion of the equity loan has potential to support these policy objectives. The equity loan product is currently providing an important route for homeowners who have minimal liquid assets to install energy efficiency measures and low/zero emission technologies as part of our suite of support measures to deliver the outcomes set out in the Heat in Buildings Strategy.

3.5 The draft strategy estimates that the total cost of converting all Scotland's homes and non-domestic building stock to net zero emissions by 2045 will be in the region of £33 billion. Whilst public funding will be part of the solution, investment from individuals through mechanisms, such as the equity loan, will be an essential financial tool which will support the decarbonisation of homes.

Questions

4. What is your view on the contribution a nationwide equity loan scheme focused on both energy efficiency and decarbonised heat solutions can make towards supporting our climate change and fuel poverty targets? Please explain your answer.

5. Please provide your views on the proposal to expand the equity loan pilot to a full nationwide support scheme, please explain your position.

6. Do you have a view on which energy efficiency measures and zero emission heating solutions should be included in the list of eligible measures? Please explain your position.

Chapter 4 Fuel Poverty and Consumer Protection

4.1 As set out in the Fuel Poverty Act, we want to see the energy efficiency of homes with fuel poor households improved so they reach an energy efficiency rating equivalent to Energy Performance Certificate C by 2030 and B by 2040. This aims to balance the ambitions of achieving net-zero with ensuring a Just Transition and improving the lives of those in fuel poverty.

4.2 It is recognised that increased energy efficiency and a fabric first approach alone will not be enough to reduce emissions to meet our climate change targets, however such measures are seen as a critical pre-cursor to the deployment of many zero emission heating systems to ensure that the transition to zero emissions heating does not lead to increased running costs. This will remain at the core of our approach to all fuel poverty interventions.

4.3 We will review the eligible measures for any expansion of the equity loan to remove fossil fuel solutions and include zero emission heating solutions such as heat pumps. Where zero emission heat solutions are not technically feasible or financially viable, or where they would otherwise lead to higher running costs for fuel poor households, secondary technologies will be considered such as solar PV and thermal storage, alongside energy efficiency improvements and fabric repairs.

4.4 The need for consumer protection in the zero emissions heat and energy efficiency sector - particularly for those in vulnerable circumstances - has been highlighted by consumer organisations as an area of current and growing concern as the rate of installations increases. As we design new heat and energy efficiency delivery schemes, we will aim to create the necessary environment to allow exemplary practice to become the norm and to ensure that confidence in energy efficiency and zero emissions heat measures is not undermined by poor or illegal practice. We will learn lessons from the design and implementation of consumer protection frameworks in similar schemes, both at home and further afield. As consumer protection is reserved to the UK Government, we will work closely to ensure protections are fit-for-purpose in Scotland.

4.5 Should the equity loan proceed with expansion to a full scheme, we propose adopting the latest retrofit standards to ensure consumers receive high quality work carried out by skilled operatives. We are also considering the use of the UK Government endorsed TrustMark quality assurance framework which includes a Consumer Code and Consumer Charter.

Questions

7. a: Do you agree that a nationwide equity loan can support the reduction of fuel poverty in Scotland?

b: Do you have any suggestions on how a future scheme could better support a reduction in fuel poverty in Scotland? Please explain your answer.

8. a: The equity loan pilot uses the EPC recommendations as a basis for eligible measures which can be funded by the loan and we will be consulting

on a reformed EPC assessment process to better align with wider net zero objectives as part of our Heat in Buildings Strategy. Do you agree with using the EPC in this way for a future scheme?

b:Can you provide any alternatives? Please explain your position.

9. a: Do you agree with the proposed approach to consumer protection set out above?

b: Are there any additional consumer protection measures that can be considered within Scottish Government competence? Please explain your position.

Chapter 5 Opportunities and Challenges

5.1 The equity loan pilot will operate until March 2022 whilst gathering evidence and consideration of the future of the scheme is undertaken. The pilot has demonstrated some of the challenges of operating such a scheme, such as supporting the applicant through the legal and installation processes. In considering the potential for nationwide expansion, we must also consider any challenges to delivery that the potential scaling up will pose as well as opportunities for collaboration and efficient delivery.

5.2 There is a long time-frame for the application journey, notably the legal element of the process. The necessary complexity of the legal process due to the need for specific documents / consents from third parties, such as the Scottish Land Register and mortgage lenders can cause anxiety and concern to homeowners. Guidance has been updated to further explain the process followed, the requirements of the applicant's solicitor and examples of where the most likely delays can occur.

5.3 The pilot has enabled homeowners to participate when their property forms part of a mixed tenure block that a local housing association or local authority are refurbishing. However, there have been challenges aligning the equity loan application journey with the refurbishment project timelines. Consideration is being given to developing a process which can be applied to such applications to streamline communications and minimise delays. The expansion of the pilot also provides opportunities to increase partnership work with local authorities and housing associations and to support the delivery of Local Heat and Energy Efficiency Strategies (LHEES).

5.4 The equity loan pilot has benefitted from a robust support service to ensure applicants, including those who may have vulnerabilities, are supported through all elements of the application process as well as the installation of the recommended measures once the loan has been approved. Anecdotal evidence suggests that this service has been crucial to the success of the pilot and has been valued by homeowners, particularly through the impacts of the Covid-19 Pandemic.

5.5 The cost of running the support service during the pilot has been funded by the Scottish Government, however consideration must be given to affordability in light of the proposed expansion, including options to include a proportion of these costs within the loan or to offer differing levels of support with the application journey through an online toolkit including guidance videos on how to approach each section of the application journey and a phone line.

Questions

10. The expansion of the pilot could provide a greater opportunity for eligible homeowners to participate in scheduled refurbishment works being undertaken by local housing associations and local authorities. Do you have suggestions on how best to achieve such a working partnership? Please explain your position.

11. Do you have any suggestions on how to ensure delivery of the scheme is efficient and robust, including the legal process and customer support service whilst ensuring value for money? Please explain your answer.

12. Please provide your views on any challenges and/or opportunities offered by the potential expansion of the pilot.

Summary of Call for Evidence Questions

Question Number	Question
1	What is your view on the use of equity in people's homes in order to support the decarbonisation of buildings and the improvement of energy efficiency as a means to improve wellbeing and support independent living? Please explain your answer.
2	If you have direct experience of the equity loan pilot, please provide views or evidence on the impact of the loan product and support provided.
3	Do you have views on the eligibility and scope of the pilot as it exists now? Please explain your views.
4	What is your view on the contribution a nationwide equity loan scheme focused on both energy efficiency and decarbonised heat solutions can make towards supporting our climate change and fuel poverty targets? Please explain your answer.
5	Please provide your views on the proposal to expand the equity loan pilot to a full nationwide support scheme, please explain your position.
6	Do you have a view on which energy efficient measures and zero emission heating solutions should be included in the list of eligible measures? Please explain your position.
7	a: Do you agree that a nationwide equity loan can support the reduction of fuel poverty in Scotland? b: Do you have any suggestions on how a future scheme could better support a reduction in fuel poverty in Scotland? Please explain your answer.
8	a: The equity loan pilot uses the EPC recommendations as a basis for eligible measures which can be funded by the loan and we will be consulting on a reformed EPC assessment process to better align with wider net zero objectives as part of our Heat in Buildings Strategy. Do you agree with using the EPC in this way for a future scheme? b: Can you provide any alternatives? Please explain your position.
9	a: Do you agree with the proposed approach to consumer protection set out above? b: Are there any additional consumer protection measures that can be considered within Scottish Government competence? Please explain your position.
10	The expansion of the pilot could provide a greater opportunity for eligible homeowners to participate in scheduled refurbishment works being undertaken by local housing associations and local authorities. Do you have suggestions on how best to achieve such a working partnership? Please explain your position.
11	Do you have any suggestions on how to ensure delivery of the scheme is efficient and robust, including the legal process and customer support service whilst ensuring value for money? Please explain your answer.
12	Please provide your views on any challenges and/or opportunities offered by the potential expansion of the pilot.

ANNEX A

Eligibility Criteria for the Equity Loan Pilot

The property that work is to be carried out on must be in Perth & Kinross, Stirling, Dundee, Glasgow City, Inverclyde, Renfrewshire, Argyll and Bute or the Western Isles council areas. The following people can apply:

- Owners of properties in Council Tax bands A - C, or owners (or permanent occupiers, like partners or children) who receive the qualifying benefits. (see below)
- Private landlords with no more than two properties to rent that are in Council Tax bands A - C, or whose tenants receive the qualifying benefits. A landlord must be classed as a 'natural person' (meaning they're not registered as a business) and cannot own more than two properties.

List of qualifying benefits

If any of the permanent occupiers (including homeowner, their children or partner, or their tenants) receive any of the qualifying benefits listed below, then they can apply for the HEEPS Equity Loan. The qualifying benefits are:

- Guarantee element of the Pension Credit
- Attendance Allowance
- Universal Credit
- Any of the benefits replaced by Universal Credit, like income-based Job Seekers' Allowance, Child Tax Credits, Working Tax Credits, Employment and Support Allowance, Income Support or Housing Benefit
- Council Tax Reduction (excluding the 25% discount for single occupancy)
- Carer's Allowance
- Disability Living Allowance or Personal Independence Payment
- Armed Forces Independence Payment
- War Disablement Pension
- Industrial Injuries Disablement Benefit

Equity Loan Pilot Eligible Measures

Energy Efficiency

Repairs that reduce heat loss through the building fabric and/or reduce damp or moisture penetration	Insulation (including external wall, internal wall, cavity wall, lofts, rooms in roofs, flat roof, under floor and primary pipework)
Gas, oil or LPG boiler	Solar (PV, thermal and PVT)
Warm air unit	Draught proofing
Electrical storage heaters	Hot water tanks

Heating controls	Double glazing (new or replacement) and secondary glazing
Radiator panels	Gas connection (to the mains or to a district heating system)
Repairs to existing systems (if this is more cost effective than a full replacement)	External doors
Biomass boilers and stoves	Low energy lighting
Heat pumps (air source, ground source and water source)	Works that improve water efficiency

Repairs

Roof structure, coverings and flashings	Rainwater goods
Chimney stacks and heads (including removal)	Work to eradicate rising and penetrating damp
External wall repairs including finishes	Work required to make good plaster and/or decoration after a repair
Active and passive ventilation systems	Repairs considered essential to allow an approved measure to be carried out, for example if re-wiring is needed to allow electrically powered energy efficiency measures to be installed
Wet and dry rot	Other repairs to be considered on a case by case basis (not including purely cosmetic)

ANNEX B – Responding to this Call for Evidence

We are inviting responses to this call for evidence by 8 October 2021

Please respond to this call for evidence using the Scottish Government's consultation / call for evidence platform, Citizen Space. You can view and respond to the at: <https://consult.gov.scot/energy-and-climate-change-directorate/home-energy-efficiency-equity-loan-pilot>

You can save and return to your responses while the call for evidence is still open.

Please ensure that the call for evidence responses are submitted before the closing date of 8 October 2021

If you are unable to respond online, please complete the Respondent Information Form (see 'Handling your Response' below) and return to:

Scottish Government

3F South

Victoria Quay

Edinburgh

EH6 6QQ

It would be most helpful to have your response submitted by using the electronic response form.

The electronic response form can be accessed at the following website
Address: <https://consult.gov.scot/energy-and-climate-change-directorate/home-energy-efficiency-equity-loan-pilot>

You can also email your response to heatinhomesequityloan@gov.scot

Handling your response

If you respond using Citizen Space (<https://consult.scotland.gov.uk>), you will be directed to the Respondent Information Form. Please indicate how you wish your response to be handled and, in particular, whether you are happy for your response to be published.

If you are unable to respond via Citizen Space, please complete and return the Respondent Information Form included in this document. If you ask for your response not to be published, we will regard it as confidential, and we will treat it accordingly.

All respondents should be aware that the Scottish Government is subject to the provisions of the Freedom of Information (Scotland) Act 2002 and would therefore have to consider any requests under the Act or information relating to responses made to this call for evidence exercise.

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

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 defamatory material, responses will be made available to the public at <https://consult.scotland.gov.uk>

If you use Citizen Space 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.

Comments and complaints

If you have any comments about how this call for evidence exercise has been conducted, please email them to heatinhomesequityloan@gov.scot OR send them to:

Scottish Government
3F South Victoria Quay
Edinburgh
EH6 6QQ

Scottish Government consultation / call for evidence process

Consultation / call for evidence is an essential part of the policy-making process. It gives us the opportunity to consider your opinion and expertise on a proposed area of work.

You can find all our consultations / calls for evidence online: <https://consult.scotland.gov.uk> Each 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 / call for evidence. Depending on the nature of the consultation / call for evidence 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

- be used to finalise legislation before it is implemented.

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

Next steps

The Scottish Government will review responses to the call for evidence and the issues raised during engagement with stakeholders to inform the potential establishment of a nationwide roll-out of an Equity Loan Scheme, information on which will be published in due course.

RESPONDENT INFORMATION FORM



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

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:

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

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.

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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