

Next steps on delivery of Employment Injury Assistance

April 2024

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Ministerial foreword



Since 2016 we have delivered 14 new social security benefits, 7 of which are completely new, and established Social Security Scotland as a new public service founded on the principle of treating people with dignity, fairness and respect. In 2024/25 we expect to provide benefit payments of £6.3 billion to over 2 million people in Scotland, providing essential and improved support to disabled people and unpaid carers and, through new benefits like the Scottish Child Payment, which modelling estimates will keep 60,000 children out of relative poverty in 2024-25. By the time the current social security devolution programme concludes we will have delivered a further 3 benefits and completed the transfer of around 750,000 existing cases to Social Security Scotland.

By any measure this has been an extraordinary achievement. I would like to thank again the many individuals and stakeholder groups that have worked with us since 2016 to successfully establish this new Scottish social security system.

The final devolved benefit to be replaced by a new benefit is the Industrial Injuries Scheme. We intend to replace this with a new benefit called Employment Injury Assistance. We are considering carefully how to implement this new benefit. This paper describes the unique challenges and opportunities in doing so and invites views on the best way to proceed.

I know how important the Industrial Injuries Scheme is to the 24,000 people in Scotland who currently receive this support, with payments totalling over £80 million per year. I also share the concerns many people have about the Scheme and their ambition that Employment Injury Assistance should better reflect the modern economy and workforce, including addressing the significant under-representation of women. I am committed to considering how Employment Injury Assistance can best meet the needs of the people of Scotland while protecting payments to current clients which is, as always, our utmost priority. I also recognise, however, that for as long as powers on health and safety and employment law continue to be reserved to Westminster, our freedom to put in place a new and comprehensive approach will be constrained.

I know some people want to move quickly to deliver a new and modernised Employment Injury Assistance. As explained in this paper that is not practicable in the immediate future. The current Scheme was introduced in 1948 and is almost entirely paper-based with information about people's awards held in bulky paper case files going back many years and seeking to move them would present risks to ensuring the continuity of payments. More generally, given the dated eligibility rules and approach to administration we need to think carefully about whether to proceed initially to establish a 'like-for-like' benefit scheme pending later reform, in line with our usual approach, or whether instead we should guarantee continuity to existing clients and focus on delivering a reformed and modernised benefit. Developing and delivering a modernised benefit that is more reflective of occupational health in Scotland will take time.

These are the key questions considered in this consultation. Following decisions on immediate next steps we will consult widely on all aspects of Employment Injury Assistance and establish a stakeholder advisory group to support that work.

I look forward to hearing your views and thank you for contributing.

Shirley-Anne Somerville

Cabinet Secretary for Social Justice

Purpose of the paper

Since April 2020, the Scottish Government has been responsible for the Industrial Injuries Scheme in Scotland. This Scheme, which provides financial support to those who have become disabled or have developed a long-term health condition as a result of their employment, is currently delivered by the Department for Work and Pensions (DWP) under an agency agreement. That agreement, which currently runs to the end of March 2026, ensures people continue to receive the payments they are entitled to without any disruption.

The Scottish Government has committed to replacing the UK Government's Industrial Injuries Scheme with a new benefit called Employment Injury Assistance to be delivered by Social Security Scotland. Due to the Covid-19 pandemic it has taken longer than initially intended to decide how to take this forward. In addition, delivery of other new benefits has been prioritised, like the brand-new Scottish Child Payment, and Adult Disability Payment, our replacement for the UK Government benefit Personal Independence Payment.

This consultation provides an overview of the benefits that make up the Industrial Injuries Scheme and the unique complexities and challenges of transfer to the Scottish Government. The paper explains why it would not be possible to quickly deliver a new and modernised benefit and outlines the options and next steps as we work toward meaningful reform and delivery in the long-term. Views are sought on the approach to delivery and proposed next steps.

Formal consultation on the design and implementation of a fully reformed and modernised Employment Injury Assistance will be undertaken in due course, including consideration around a potential replacement for the UK Government's Industrial Injuries Advisory Council (IIAC). When decisions have been taken about immediate next steps, a stakeholder advisory group will be established to guide future work.

What comments are requested and by when?

If you wish to respond electronically, please use the Scottish Government's consultation hub, [Citizen Space](#).

To request a version of the paper in Braille, please e-mail EIAconsultation@gov.scot. All responses should be submitted to us by 25 June 2024. Whilst usually a consultation will run for 12 weeks to allow stakeholders as much time as possible to respond, due to the narrow focus of the discussion and the need to decide next steps quickly, this timeline is shorter. Substantive policy development on the establishment of Employment Injury Assistance, including through formal consultation, will follow in due course.

An Easy Read version of this paper can be accessed [here](#).

If you are unable to respond using our consultation hub, please complete the Respondent Information Form (Annex A) and send to:

Employment Injury Assistance Consultation
Disability Benefits Policy Team
Social Security Policy
Victoria Quay Edinburgh EH6 6QQ

What Happens Next

The Scottish Government will review the responses to the consultation and set out next steps shortly thereafter.

Section 1 – The Industrial Injuries Scheme

Background

The Industrial Injuries Scheme was introduced in 1948 to provide social security support to workers, typically from heavy, historically state-owned, industries who became disabled or developed a long-term health condition as a result of their employment. Although some minor statutory changes have been made since, the structure and administration of the Industrial Injuries Scheme has undergone little reform in 76 years.

The Scheme consists of the following seven live benefits.

Open to new applications	Closed to new applications but some people still receive payments
Industrial Injuries Disablement Benefit (IIDB)	Un-employability Supplement – closed in 1987
Constant Attendance Allowance (CAA)	Industrial Death Benefit – closed in 1988
Exceptionally Severe Disablement Allowance (ESDA)	
Reduced Earnings Allowance (REA)	
Retirement Allowance (RA)	

Table 1: Outline of benefits included in the Industrial Injuries Scheme.

There are currently around 24,000 recipients of an Industrial Injuries Scheme benefit in Scotland. The overall number of people receiving these benefits in Scotland has been decreasing by an average of around 900 people per year since 2017. This is likely due to the ageing population of those receiving an Industrial Injuries Scheme benefit. There are fewer than 1,000 new applications per year under the Scheme in Scotland. This is likely due to a combination of factors: workplaces becoming safer in general, and the Industrial Injuries Scheme’s focus on industrial jobs within declining industries. The Scottish Government is expected to spend £86.6 million on benefits under the Scheme in 2024-25.

All Industrial Injuries Scheme benefits, except Industrial Death Benefit, are tax free and all are payable regardless of income. They are payable in addition to other disability benefits, for example Adult Disability Payment, but are taken into account for the purposes of income-related benefits, such as Universal Credit.

Industrial Injuries Disablement Benefit

The main benefit in the Industrial Injuries Scheme is Industrial Injuries Disablement Benefit (IIDB) which has around 21,000 recipients in Scotland, as of June 2023. In order to meet the eligibility criteria, someone must either;

1. have a long-term health condition or disease that is listed in a list of prescribed diseases set out in regulations¹; or
2. be disabled as a result of an accident; and
3. the condition or injury must have arisen out of and in the course of employment, or whilst on an approved employment training scheme or course.

IIDB consists of 9 rates depending on the “percentage of disablement” determined by a DWP “medical advisor” as a result of a medical examination². Someone must usually be considered at least “14% disabled” to be eligible for payment. For example, someone who experiences the loss of an index finger is generally considered “14% disabled”. Assessments for accidents and diseases can be added together, or ‘aggregated’, over a period. The maximum rate payable is 100%. The assessment involves establishing the connection between the disability and/or disease and employment. Most people who are in receipt of IIDB receive it for life.

There are some schemes that are closely linked to the Industrial Injuries Scheme that remain reserved to the UK Government. Currently lump sum payments are available to IIDB recipients who contract an asbestos related disease through the 2008 Mesothelioma Act and the Diffuse Mesothelioma Payment Scheme (DMPS) and the Pneumoconiosis etc. (Workers Compensation) Act 1979. The 2008 Mesothelioma scheme and DMPS remain reserved to the UK Government.

An Industrial Injuries Advisory Council (IIAC) scrutinises Industrial Injuries Scheme regulations and advises the UK Government on the addition of new diseases and the occupations for which they should be prescribed. Members of the Council include scientific and medical professionals, specialists in occupational health, legal experts, and representatives of both employers and employees.

The UK Government can formally request specific pieces of advice or request IIAC to undertake consideration of whether a disease and occupation should be prescribed in legislation. To prescribe a condition for certain types of employment, a person’s risk of contracting the disease must more than double due to undertaking the occupation.

The UK Government have advised that IIAC will only provide advice relating to Industrial Injuries Scheme and that they will not provide advice to the Scottish Government relating to Employment Injury Assistance.

¹ [Industrial Injuries Disablement Benefits: technical guidance](#)

² [Social Security Contributions and Benefits Act 1992](#)

Challenges with the current Scheme

The Scheme does not reflect the modern economy and workforce. There is a significant gender disparity within the Scheme with men making up an overwhelming majority of people receiving the main benefit, as set out in the table below.

Gender	IIDB only	REA and RA only	IIDB and REA and RA
Male	81%	85%	89%
Female	19%	15%	11%

Table 2: People in receipt of Industrial Injuries Scheme benefits by gender. Figures accurate as of June 2023³.

The small number of women in the Scheme may be unsurprising, given its historic development and the subsequent scale of change in the employment landscape. It has been noted by the Disability and Carers Benefits Expert Advisory Group (DACBEAG⁴) that the prescribed conditions list does not currently account for many injuries and diseases common in industries in which women are more heavily represented in the workforce, which may be attributed to the lack of scientific research into the ways in which women are affected by illness⁵.

Other criticisms of the Scheme can be made from an equalities perspective, including relating to race and age. People who are Black or from an ethnic minority are more at risk from workplace hazards, yet less likely to access benefits, according to the UK Government's Race Disparity Audit⁶. 64% of those in receipt of Industrial Injuries Scheme benefits are over state pension age. DWP statistics show that no applications have been received by anyone under the age of 20 in Scotland between March 2017 and June 2023. According to the European Agency for Safety and Health at Work, young people (defined as anyone between 15-24) in Europe are up to 40% more likely to suffer a work-related injury than older workers⁷.

The current Scheme requires an assessment to be made of the degree to which an individual is disabled by their condition, which is represented by a percentage. These assessments are therefore more clinical in nature than those for other UK disability benefits) and that approach is not readily in line with the person-centred approach we have taken for Adult Disability Payment.

³ [Stat-Xplore](#)

⁴ [Disability and Carers Benefits Expert Advisory Group - Employment Injury Assistance: advice](#)

⁵ [Has the Women's Health Strategy listened to what women really need? | The King's Fund](#)

⁶ [Cabinet Office - Race Disparity Audit Summary Findings - March 2018](#)

⁷ [International Labour Organization - Injury and Illness for young workers](#)

Conclusion

This section describes the eligibility rules and approach to administration of the current Industrial Injuries Scheme. In light of this evidence the Scottish Government believes that the priority should be to reform the Scheme to meet the needs of the modern economy and workforce and that administration should be improved so that it is delivered in line with our social security principles and provides value for money.

Question 1: Do you agree or disagree that the Industrial Injuries Scheme is not fit for purpose and should be reformed? [agree/disagree/don't know]

Please give reasons for your answer.

Section 2 – Taking forward delivery of Employment Injury Assistance

Introduction

The section considers matters relating to the delivery of Employment Injury Assistance, including the transfer of current Scheme cases and sets out two options for implementation.

Our overriding priority in delivering new social security benefits is to ensure the safe and secure transition of existing claims in order to protect payments to which people are entitled and which they depend upon. This approach has involved maintaining existing eligibility rules, known as a 'like-for-like' delivery, in order to avoid a 'two-tier' system where different groups of people would be subject to different eligibility criteria whilst cases transfer between Governments. This approach has also been important to protecting existing clients' entitlement to other social security benefits and entitlements which continue to be administered by the UK Government. This is often described as 'passporting' arrangements.

Taking this approach has allowed the Scottish Government to move forward quickly to establish new benefits. However, we have still made significant improvements to the benefits we have delivered so far. These include enhancement of eligibility rules, such as the provision of Short-Term Assistance when people request a review of an award, and improved rules for people with a terminal illness. We have introduced a new client-centred approach to assessment, so that people applying for disability benefits are treated with dignity, fairness, and respect, in contrast to their experience under DWP. We have put in place a modern and efficient delivery system providing flexibility for applications to be made in a range of ways, including through a digital channel.

Option 1: Like-for-like benefit delivered with full case transfer with benefit reform to follow

The Industrial Injuries Scheme is largely administered on a clerical basis. This means that, unlike the Scottish social security system which routinely provides a choice, including a digital approach, application processes and Scheme records are almost entirely paper-based.

There are multiple manual systems involved in the processing of an application under the Scheme. Files are held in multiple locations and many of these files are decades old and in poor condition. Certain benefits under the Scheme require a review of the entire case history during a review of an award. Therefore, the number and size of case files is much greater than for other benefits. That also means that identifying which paper-based files relate to a Scottish client is much more complex than with other benefits we have delivered.

The devolution of all other benefits has involved building the required digital application portal and delivery system. Putting in place a similar system for Employment Injury Assistance would be time-consuming and expensive. It is estimated that it would cost around £39.8 million (including an estimated £2.1 million for a digital case transfer process)⁸.

The Scottish Government could choose not to develop a fully modernised digital approach and could instead choose to continue to run a paper-based system through Social Security Scotland. This approach would require a new operating system in order to administer Employment Injury Assistance. It is estimated that a non-digital system would cost around £13 million to build. A non-digital operating model would also not meet the standards and expectations set out in the Social Security Charter.

Either system would still have ongoing delivery costs and these have been estimated to be approximately £2 million per year. This accounts for; agency staffing, file storage, and staffing costs for healthcare professionals needed to undergo medical assessments.

The like-for-like delivery of Employment Injury Assistance presents significantly more challenges than for other disability benefits and would be very expensive to establish and administer for a very small number of new and existing claims. This approach would provide very limited scope to address the criticisms relating to equalities. A like-for-like delivery would not deliver substantive changes to eligibility, for example through the inclusion of new diseases or conditions.

As described earlier, the safe and secure transfer of awards to ensure people do not face a disruption to their benefit payments is our over-riding priority when delivering a new Scottish social security benefit. By the end of the current devolution programme around 750,000 cases will have transferred to the Scottish social security system.

For most benefits, the vast majority of documents pass electronically from the Department for Work and Pensions to Social Security Scotland and the information is uploaded automatically. However, the transfer of the Industrial Injuries Scheme would be particularly complex given its largely clerical nature. The physical transfer of up to 150,000 paper files would be required and the time and cost of transfer would be significantly higher than for other benefits. Paper files would need to be physically transferred via courier and securely stored. It is estimated that it could cost over £0.5 million a year to store these files and of course the transfer of paper files brings significant added risk to continuity of payment of current awards as a result of the age, condition, and location of the relevant files.

The delivery and administration costs associated with a like-for-like delivery are summarised below.

⁸ These estimates are provisional since the cost of transferring files, physically or digitally, largely depends on the condition of those files and the ability to locate all relevant information.

Delivery costs	Paper-based delivery	Digital delivery
Development	£13 million	£39.8 million
Administration	£2 million per year	£2 million per year
Case Transfer	£0.5 million per year	£2.1 million

Table 3: Summary of costs associated with a like-for-like delivery.

Although detailed work is required to determine precisely the resources required and the timetable for delivery, it is likely that a like-for-like benefit could be established before May 2026. Further work would be required, including with DWP, to determine whether case transfer would be practicable and on what timetable.

Importantly, delivering Employment Injury Assistance now on a like-for-like basis would use up resources which can be used more productively in the short-term, including to take forward policy development and design of a modernised benefit.

Option 2: Prioritise fundamental reform of Employment Injury Assistance

As set out in this paper there are unique challenges in taking forward the delivery of Employment Injury Assistance.

Section 1 described how the current eligibility rules for the Industrial Injuries Scheme need to be updated to reflect the modern economy and workforce. Section 2 described the unique complexities involved in administration of the Scheme and in transferring current cases and the significant costs of establishing Employment Injury Assistance.

Section 1 also set out that under current Scheme rules it is expected that around 1,000 new applications per year are likely to be submitted and around 900 of the current 24,000 people in receipt of payments are expected to leave the Scheme year on year. By way of contrast Scottish Child Payment cost around £31 million to develop and supports roughly 10 times as many people as the Industrial Injuries Scheme in Scotland.

In light of this evidence the Scottish Government believes a different approach to delivery may be required in order to provide a high-quality service to clients, ensure value for money and deliver the more fundamental reform which many stakeholders are calling for.

That approach would not involve delivery on a like-for-like basis to the current Scheme nor the transfer of current cases, given the need for modernisation of eligibility rules and to ensure value for money in establishing the administrative systems required. It would instead focus on the design and implementation of a new

benefit with new eligibility criteria fit for purpose for all employment sectors not only traditional heavy industry.

As has been the case with all other benefits devolved, time and investment would be committed to the design of a new benefit, including reform of eligibility criteria. Developing a modernised and fit for purpose Employment Injury Assistance will rightly involve extensive research and engagement with stakeholders and experts to fully consider how best we support those who have become injured or developed a health condition in the course of their work. As a first step to driving that work forward, the Scottish Government proposes to establish a stakeholder advisory group.

Question 2: Of the two options which do you think the Scottish Government should proceed with? Please give reasons for your answer.

1. Prioritise like-for-like benefit delivered with full case transfer and benefit reform to follow in the longer-term
2. Prioritise reform to deliver an updated benefit and a modernised approach delivery)
 - A. Option 1
 - B. Option 2
 - C. Neither
 - D. Don't know

Please give reasons for your answer.

Section 3 – Next steps for Employment Injury Assistance in Scotland

Option 1 Timeline

The following timeline sets out the steps involved if the Scottish Government were to proceed to deliver Employment Injury Assistance on a 'like-for-like' basis to the current Scheme.

2 months after end of consultation:

- Focus on exploring how Employment Injury Assistance could be delivered in this Parliament.

June 2024- early 2026:

- Policy and operational work on developing systems and processes required for delivery of Employment Injury Assistance
- Regulations drafted and laid.

Late 2025/ early 2026:

- Employment Injury Assistance launches on a like-for-like basis with the Industrial Injuries Scheme.
- Establishment of stakeholder advisory group.

Option 2 Timeline

This timeline below sets out proposed next steps in the development of Employment Injury Assistance in line with the Scottish Government's preference to prioritise long-term reform of the current Industrial Injuries Scheme. While, this timeline is dependent on the extent and complexity of the changes people would like to see made to the Scheme, work would commence immediately following this consultation.

1 month after end of consultation:

- Establishment of Employment Injury Assistance stakeholder advisory group.
- Advisory Group to include experts, and organisations with experience of supporting people access the Industrial Injuries Scheme.

3 months after end of consultation:

- First meetings of stakeholder advisory group, with input from people with experience of the Industrial Injuries Scheme.

9 months after end of consultation:

- First reports and advice issued by stakeholder advisory group.

12 months after end of consultation:

- Publication of high-level options for Employment Injury Assistance.
- Ongoing engagement with stakeholders and people with lived experience.

Question 3: Please tell us if there is anything relating to the timelines set out above that you wish to provide feedback on. Please specify which timeline you are providing feedback for.

Please give reasons for your answer.

List of questions asked

Question 1: Do you agree or disagree that the Industrial Injuries Scheme is not fit for purpose and should be reformed? [agree/disagree/don't know]

Please give reasons for your answer.

Question 2: Of the two options (1 – prioritise like-for-like benefit delivered with full case transfer and benefit reform to follow in the longer-term, and 2 – prioritise reform to deliver an updated benefit and a modernised approach delivery) which do you think the Scottish Government should proceed with?

Please give reasons for your answer.

- A) Option 1
- B) Option 2
- C) Neither
- D) Don't know

Please give reasons for your answer.

Question 3: Please tell us if there is anything relating to the timelines set out above that you wish to provide feedback on. Please specify which timeline you are providing feedback for.

Please give reasons for your answer.

Responding to this consultation

We are inviting responses to this consultation by 25 June 2024.

Please respond to this consultation using the Scottish Government's consultation hub, [Citizen Space](#). You can save and return to your responses while the consultation is still open. Please ensure that consultation responses are submitted before the closing date of 25 June 2024.

If you are unable to respond using our consultation hub, please complete the Respondent Information Form to:

Disability Benefits Policy Unit

Scottish Government
Area 1B (South) Victoria Quay
Edinburgh EH6 6QQ

Handling your response

If you respond using the consultation hub, you will be directed to the About You page before submitting your response. Please indicate how you wish your response to be handled and, in particular, whether you are content for your response to be published. 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 request made to it under the Act for information relating to responses made to this consultation exercise.

If you are unable to respond via Citizen Space, please complete and return the Respondent Information Form included in this document.

To find out how we handle your personal data, please see our [Privacy Policy](#).

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 on the [Scottish Government consultation page](#). 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 or at EIAconsultation@gov.scot.

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 on the [Scottish Government consultation page](#). 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
- be used to finalise legislation before it is implemented

While 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 A

Next Steps for Employment Injury Assistance

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](#).

Are you responding as an individual or an organisation?

- Individual
 Organisation

Full name or organisation's name

Phone number

Address

Postcode

Email Address

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

Questionnaire

Question 1

Do you agree or disagree that the Industrial Injuries Scheme is not fit for purpose and should be reformed?

- Strongly agree
- Mostly agree
- Mostly disagree
- Strongly disagree

Please give reasons for your answer.

Question 2

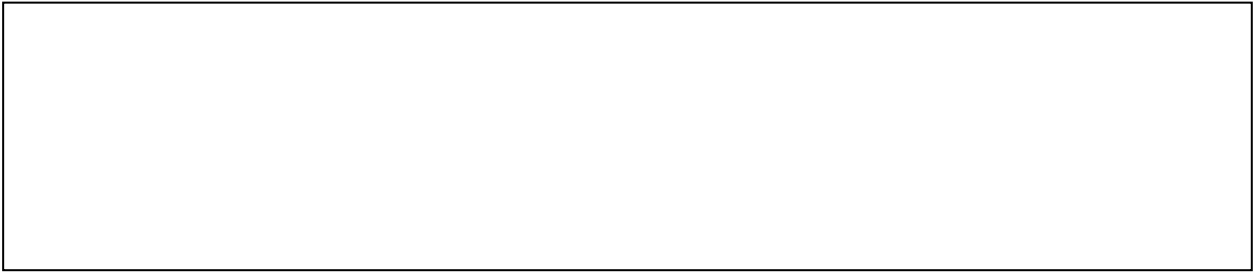
Of the two options (1 – prioritise like-for-like benefit delivered with full case transfer and benefit reform to follow in the longer-term, and 2 – prioritise reform to deliver an updated benefit and a modernised approach delivery) which do you think the Scottish Government should proceed with?

- Option 1
- Option 2
- Neither
- Don't Know

Please give reasons for your answer.

Question 3

Please tell us if there is anything relating to the timelines set out above that you wish to provide feedback on. Please specify which timeline you are providing feedback for.





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