

Access to Free Sanitary Products Programme for Government Commitment

Business and Regulatory Impact Assessment

September 2018



Scottish Government
Riaghaltas na h-Alba
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Business and Regulatory Impact Assessment

Title of Proposal

Access to Free Sanitary Products Programme for Government Commitment

Purpose and intended effect

Background

The issue of 'period poverty' has had significant and sustained media coverage both within the UK and internationally in the past 12-18 months. In our Programme for Government, published in September 2017, we committed to introducing a scheme to fund access to free sanitary products in schools, colleges and universities. In October 2017 the First Minister announced that delivery of the commitment would take place from the beginning of the 2018 academic year.

Objective

The Scottish Government has committed to providing access to free sanitary products to students attending schools, colleges and universities to support equality, dignity and rights for those who menstruate and to ensure that lack of access to products does not impact on an individual's ability to fully participate in education at all levels.

Rationale for Government intervention

The Scottish Government believes being able to access sanitary products is fundamental to equality, dignity and rights for all people who menstruate. In a society as wealthy as Scotland's, no-one should have to suffer the indignity of not having the means to meet their basic needs.

The growing body of evidence on access to sanitary products suggests that between 10 and 25 per cent of people have had difficulty accessing sanitary products at some point. A Plan International UK survey, for instance, found that between 10 and 15 per cent of young girls surveyed had struggled to afford sanitary products and 12 per cent has had to improvise sanitary wear, while 26 per cent of those in education who responded to a Young Scot survey said they had 'struggled' to access sanitary products in the previous year. There is also some evidence to suggest that these difficulties mean some students are missing education to manage their menstruation, potentially affecting educational attainment. As such, we anticipate this policy will have a positive impact on all individuals in school, college and university who menstruate. By providing access to free sanitary products to those attending educational institutions, the policy will ensure that all students who need these products will have access to them in a dignified manner. It is hoped the policy will have a positive impact on the wellbeing and attendance of students who previously had difficulty accessing products.

The policy will contribute to the following National Outcomes:

- We tackle poverty by sharing opportunities, power and wealth more equally
- We respect, protect and fulfil human rights and live free from discrimination
- We are well educated and able to contribute to society.

Consultation

Within Government

Initially, Scottish Government policy and analyst teams worked together to assess the evidence base and to consider how different groups of people might be affected by the policy. Wider discussion on the policy's development took place with a number of Scottish Government teams including Procurement, Analytical Services, SG Legal Directorate, Health, Education and Local Government Finance.

We have also shared our developing policy with relevant colleagues in the UK Government, the Welsh Government and the Northern Ireland Executive.

This inter- and intra-governmental engagement allowed us to better understand the nature and potential scale of the issues the policy seeks to address, current provision, and potential options for action.

Public Consultation

1. Access to Free Sanitary Products Working Group

We have established an Access to Free Sanitary Products Working Group with membership drawn from a number of Scottish Government teams:

- Colleges
- Young Workforce and SFC Sponsorship
- Higher Education and Science
- Education Analytical Services
- Communities Analysis Division
- Support & Wellbeing Unit
- Empowering Schools Unit
- Collaborative & Scottish Government Procurement Division
- Social Justice Delivery Unit

The Group's membership also includes:

- CoSLA
- Colleges Scotland
- Universities Scotland
- College Development Network
- Young Scot
- National Union of Students
- Scottish Funding Council
- Scotland Excel
- Advanced Procurement for Universities and Colleges Ltd (APUC)

The Working Group's role is to support the development, implementation and delivery of the policy as it relates to educational settings. The Group has played an important role in the policy's development, with, for example, members being strongly in favour of primary school pupils who menstruate also being eligible to access products, thus ensuring this particular group of young people do not miss out on provision. The Group has also been instrumental in the development of the

policy's Guiding Principles, which all partners must be consider when developing their delivery models. The Guiding Principles are:

- **Protecting students' dignity**, avoiding anxiety, embarrassment and stigma
- Making a range of products and different qualities available, giving students **choice** about the products they want to use
- A response that is **reflective of students' views and experiences**
- An efficient and dignified approach which demonstrates **value for money**
- An offer for all eligible students **throughout the year** to include both **term time and holidays**
- Ensuring sanitary products are easily accessible to **meet individual needs**
- Individuals being able to get sufficient products to **meet their needs**
- **Gender equality**, ensuring anyone who menstruates can access products, including transgender men and non-binary individuals, and that language is gender neutral. The roll out of gender neutral toilets should also be taken account of
- **Awareness raising and education** to both promote the 'offer' and change cultural norms

As per the above, each delivery partner was expected to develop a delivery model that is 'reflective of students' views and experiences'. As such, delivery partners have undertaken extensive engagement with the policy's potential beneficiaries to ensure local plans are fully informed by students' experiences. A number of partners have, for example, engaged with students via student associations and pupil councils.

The Working Group has been clear from the beginning that a voluntary approach rooted in collaboration is the best approach to the policy, particularly given the current, albeit developing, evidence base and the complexities involved in delivering the policy across 32 separate local authorities and 44 further and higher education institutions. The Working Group continues to meet regularly and contact between members and the Scottish Government is ongoing.

2. Young Scot engagement activities

To inform the delivery of the policy and to ensure the Guiding Principles are in line with the views of those the policy will impact on, we worked with Young Scot to gather insight on young people and students' views about accessing sanitary products. The engagement aimed to provide further information on the following main topics:

- what issues or circumstances can make accessing sanitary products difficult for young people and students and what impact lack of access to products has;
- how they feel about discussing menstruation; and
- how they feel about receiving free sanitary products and what way/s of accessing products young people think would work best for them.

Young Scot used three engagement activities:

- A short online survey hosted by Young Scot between 21 December 2017 and

31 January 2018. The survey asked questions about current experiences accessing sanitary products and future provision;

- An open letter – this method involved asking young people to write an anonymous letter to share their experiences and perceptions of a topic. The letter encouraged open feedback around management of periods, accessibility of sanitary products, and individuals' relationships with their periods. Also hosted by Young Scot between 21 December 2017 and 31 January 2018; and
- Two focus group discussions with small groups of young people at school, and at college and university to allow us to explore findings emerging from the survey and letter in more detail.

The survey received 2,050 complete responses, while 181 individuals submitted a letter. Ninety two per cent of survey respondents were currently in education, either at secondary school, college or university. This is one of the highest response rates to engagement of this kind that Young Scot has seen.

Around a quarter of respondents (26 per cent of those in education and 24 per cent of those not in education) said they had struggled to access sanitary products in previous year. Around six in ten respondents of these reported struggling to access products because they did not have the product they needed. The most common reason respondents in education who had struggled to access products coped was by asking someone else for a tampon/towel (71 per cent) or by using an alternative e.g. toilet paper (70 per cent).

For those in education, the most popular option for accessing free products in the future was having free products available in the school, college or university toilets. Half of respondents rated this as number one out of five options. Similarly, for those not in education the most popular option for accessing free products in the future was free products available in toilets.

Almost a third of respondents (648) provided further comments. These were split into six themes: issues with affordability, difficulty with discussing periods/sanitary products, opinions on the commitment, problems with existing sanitary products or facilities, difficulty with accessing products, and other suggestions. Similar themes were found in the Dear Periods letters. These also highlighted the physical and emotional impact of periods.

We have shared the raw data from the survey with local authorities, colleges and universities to inform thinking about their delivery plans for the commitment.

3. Aberdeen Pilot

The Scottish Government funded a six-month pilot in Aberdeen between September 2017 and February 2018. The main aim was to test different approaches to providing access to free sanitary products for people from low income households as well as all students, and to better understand the circumstances people are in that mean they cannot access sanitary products.

The pilot was run by Community Food Initiatives North East (CFINE) using established relationships with local partners through the FareShare network. The

pilot was initially rolled out in a number of third sector organisations and regeneration areas. It was later extended to educational settings – Robert Gordon’s University (RGU), North East College Scotland (NESCol) and three secondary schools where universal provision was offered – and some additional community/third sector organisations. A primary school was also added. Just over 1,000 participants received products during the pilot.

Participants were asked to ‘sign up’ to take part. Methods for signing up participants and distributing products varied depending on how the organisation works with clients. Generally, sign up took place in a private room and products were picked up from the same location. However, other examples include a worker taking products out with them on a visit or inclusion in a food parcel.

To test whether participants would prefer to buy their own products, rather than receive them directly, the option of offering cash to participants was introduced in October and a pre-paid card in December.

CFINE and partners collected a range of monitoring data about the distribution of products. In addition, the evaluation surveyed participants at the start and end of the pilot, and qualitative interviews were conducted with a small number of participants and administrators at a sample of the partners.

Findings

Accessing sanitary products had presented difficulties in the past for almost two thirds of community participants. Asked if they had ever been unable to purchase sanitary products, 58 per cent said they had. The main reason for difficulty in accessing products related to affordability.

Schools, colleges and universities

Access to sanitary products was found to be an issue for some students. Students raised similar issues about being able to afford products on a low income; however, not having a product when you needed one in school or away from the home was also a consideration. Around a third of student participants had difficulties in the past accessing sanitary products, while slightly under a quarter been unable to purchase products at some point in the past. Twenty percent of pupils who answered the question had experienced difficulty accessing sanitary products and had been unable to purchase products. Affordability and being ‘caught out’ were the main issues raised.

A small number of students reported that lack of access to products had an impact on their attendance at school, college or university during menstruation. The pilot was not, however, able to shed light on whether lack of access to sanitary products has a significant impact on attendance at school, college or university.

In providing access to products in educational settings, embarrassment about periods generally and having to ask someone else for products were considered particular issues, especially for younger students. However, schools were reluctant to trial making products available in school toilets because of concerns about misuse and, where this was tested, problems were encountered. School staff noted a need

for education around menstruation and sanitary products to reduce stigma and normalise discussion of menstruation.

Having free products available in toilets was a popular option for college and university students. This may be because it was viewed as a good option if you are 'caught short'. Receiving a card and ordering online were also popular options. The least popular option, by far, for college and university students was to get free products from a member of college or university staff – having to ask someone for products was generally seen as a barrier.

4. Proposed Member's Bill consultation

While not specific SG consultation, Monica Lennon MSP (Labour, Central Scotland and Shadow Secretary for Communities, Social Security and Equalities) launched a public consultation on a Member's Bill to ensure free access to sanitary products on 12 August 2017 and the results are of relevance. The consultation closed on 8 December 2017 and a summary of the consultation responses was published on 7 March 2018.

The aim of the proposed Bill is 'to ensure that all those who menstruate, including women, girls and trans people who have periods, are able to access sanitary products during menstruation, at no cost, as and when they are required. This will help to prevent people experiencing period poverty'. In order to achieve this, the proposed Bill outlines a series of measures 'to improve the accessibility of sanitary products in Scotland'. It will introduce:

- A duty on Scottish Ministers to introduce a universal system of free provision of sanitary products;
- A duty on all schools to provide free sanitary products in school toilets;
- A duty on all colleges and universities to provide free sanitary products in campus toilets; and
- Measures to allow Scottish Ministers to extend these duties to other bodies in future, following a period of review, if deemed appropriate or necessary.

There were 1,753 responses to Ms Lennon's consultation – 109 from organisations and 1,644 from individuals. 96 per cent of respondents supported the draft proposal – 90 per cent were fully supportive and 6 per cent were partially supportive.

On the question of an obligation on schools, colleges and universities, 85 per cent of those who answered the question agreed that there should be specific obligations on these institutions to provide products.

Some respondents considered that implementing the proposal would be a waste of money and that funds would be put to better use elsewhere. There were strong views that the taxpayer should not have to pay for free sanitary products for others with opposition to people being giving 'freebies' and 'handouts', and statements that it was the responsibility of the individual to manage their own budgets.

Business

Scottish Government has had discussions with a number of retail businesses and retailers' groups. The businesses have ranged in size from national organisations employing thousands of people to independent retailers, and include:

- Scotmid
- Co-op
- Boots
- National Federation of Retail Newsagents
- Lidl
- Scottish Grocers Federation
- Sainsbury's
- Asda

The-then Cabinet Secretary for Communities, Social Security and Equality also met in January 2018 with representatives from the following organisations at the Scottish Parliament:

- Scottish Retail Consortium
- Scottish Grocers Federation
- Scotmid
- Lidl
- National Federation of Retail Newsagents
- An Independent retailer

During these meetings and discussions - and in correspondence with retailers - both the Cabinet Secretary and officials emphasised the importance of understanding their views of the policy, including in terms of 'supply and demand'. The Cabinet Secretary stated she wished to engage with retailers to think through the options (and potential impact of these on retailers), to seek their views on innovative approaches and how to ensure best value and to work in partnership.

Options

1. **Do nothing.** The evidence gathered to date clearly suggests that some groups are more likely to struggle to access sanitary products. Young people, especially those at school, may have greater difficulty accessing sanitary products because they are not able to access products while in their education institution or do not have financial independence. Doing nothing means we will not be able to support equality, dignity and rights for those who menstruate and that those who struggle to access products may not be able to participate fully in education at all levels.

Benefits

- No new administrative burden on delivery partners.

Costs

- Some students may be prevented from participating fully in their education

because they are unable to access products when required.

- Lack of access to products may lead to stress, anxiety and mental health problems, potentially increasing the burden on health services.

Sectors and groups affected

- Students, but particularly those unable to access sanitary products.

2. Provide access to sanitary products schools, colleges and universities via a national card system. While this was initially considered as a solution, discussions with retailers and their representative organisations highlighted that no current card systems exists which could meet the policy's requirements and be in place by August 2018. Retailers highlighted that development of a bespoke card could take up to two years.

Benefits

- A national scheme would ensure consistency across the country.
- Allows beneficiaries to choose products best suited to their need, up to the value charged on the card.
- Voluntary approach may create a snowball effect and encourage other organisations to make provision available.

Costs

- Requires significant investment of resource to develop.
- Potential costs of up to £16m due to development and administration costs.
- Development time may result in immediate needs of some people not being met.
- Smaller retailer operations may be precluded from participating due to the need for requisite equipment and systems.
- No guarantee retailers will accept the card.
- No guarantee that beneficiaries will use the card for the purposes intended.

Sectors and groups affected

- Retailers
- Suppliers of sanitary products
- Students in schools, colleges and universities
- Schools, colleges and universities

3. Provide access to sanitary products in schools, colleges and universities in partnership with local partners. This option ensures equality, dignity and rights for those who menstruate and that lack of access to products does not impact on a person's ability to fully participate in education at all levels. Local delivery partners are free to develop delivery models best suited to local circumstances.

Benefits

- Students who menstruate will have access to products through their educational institution, in line with the policy's Guiding Principles.
- Local delivery partners can develop delivery models best suited to local circumstances and student needs.
- Partners may share knowledge and increase best practice in delivering the

policy in line with the Guiding Principles.

- Allows local partners to respond to emerging evidence, and beneficiaries' feedback, adapting their delivery model as required.
- Potential increase in trade for sanitary product manufacturers and providers of washroom services.

Costs

- Total cost estimated at £5.5m per annum.
- Delivery partners may see a small increased administrative burden as they monitor and evaluate the policy.
- Delivery partners need to commit required time and resource to developing a local delivery action plan.
- Potential for small decrease in trade for retailers.

Sectors and groups affected

- Students at schools, colleges and universities
- Schools, colleges, universities
- Local or smaller retailers (potentially)
- Sanitary product manufacturers
- Providers of washroom services

Scottish Firms Impact Test

During discussions with retailers and their representative groups SG set out our Programme for Government commitment as well as our wider commitment to further explore access to sanitary products for women on low incomes. We explained our interest in exploring various delivery mechanisms, including a voucher or card-based system, and our firm desire to work in partnership with all stakeholders, including retailers. We emphasised, too, the policy's underpinning principles of dignity and choice. Retailers welcomed the fact that SG wished to involve them in the policy's development at an early stage.

Retailers raised the point that they were being asked to implement a number of strands of work, including deposit return and minimum unit pricing for alcohol. Some retailers suggested that other sections of the supply chain should be involved in the policy's development, including manufacturers. Concerns were expressed around the scope and scale of the policy and how it could be best controlled.

In terms of adopting a card-based system, retailers stressed that no system currently exists which would allow us to achieve our policy aims. Concerns were raised about using a card-system because smaller or independent retailers may not have access to the prerequisite technology. Concerns were likewise raised that if a Scottish card- or voucher-based system were developed, retailers in other parts of the UK may refuse to accept it.

Retailers raised questions about whether the intention was to develop a new platform or use an existing one. Some retailers, for instance, have encountered difficulties with well-established payment systems and often run them at a loss:

paying for the transaction is often less financially valuable than the transaction itself. Other retailers use touch pads or barcodes for loyalty schemes, but again, not all retailers use loyalty cards, which could limit engagement, although some retailers agreed to investigate whether current loyalty card systems could be adopted to support delivery of the policy.

Retailers highlighted the difficulties inherent in changing any existing information technology systems or platforms; any new platform would require at least two or three years' worth of planning and development and significant resource investment. Developing a new or changing an existing card also means all other systems have to be changed to ensure compatibility. For some retailers this may be more straightforward, particularly if they own the Electronic Point of Sale (EPOS) licence. But not all retailers will hold an EPOS licence, particularly smaller businesses. Even if a bespoke system could be developed, independent retailers would require significant amounts of time to ensure a proper roll out.

Retailers raised concerns about the development of a voucher-based system, which may have potentially higher costs to retailers, including the administrative costs required to oversee such a system. Questions were also asked about how vouchers could be distributed to ensure they reach the people who need them, as well as about ensuring they become accepted among retailers. A similar scheme, while long-established, was cited as an example of a voucher- or token-based system that has only achieved limited acceptance. Using a voucher scheme would also undermine the policy's Guiding Principles by limiting or restricting the selection of products available because retailers may charge different prices.

Retailers raised a number of other points. It was, for example, suggested that a system could be developed whereby eligible participants would be invited to register to receive products, with an attendant distribution system also developed. Such a system could, however, potentially distort the market and impact the retail economy, particularly if the system was online. Similarly, a partnership between Scottish Government and one or two retailers, while attractive from a delivery perspective, could also distort the market.

Discussions with retailers have contributed to our decision to pursue option three. Retailers' input, coupled with the Working Group's clear view that a voluntary approach is preferred and the expectation that delivery will commence in August 2018, means that option three is the only viable solution at this point.

Competition Assessment

Will the measure directly or indirectly limit the number or range of suppliers?

No – we do not believe the policy will impact on the number or range of suppliers. The policy's Guiding Principles ensure that beneficiaries should have access to a range of products. We have also been keen to promote the use of environmentally-friendly or reusable products, which may well stimulate the market and encourage suppliers to look at developing and supplying such products. As local partners develop and refine their delivery models, there is the possibility of additional or new suppliers being brought into the market place including through a new Local Authority Washroom Services Procurement Framework.

Will the measure limit the ability of suppliers to compete?

We do not believe the policy will limit the ability of suppliers to compete. Local delivery models – for example, a local authority’s – may encourage competition as local delivery partners look to explore the best solution for meeting local circumstances. While some local or independent retailers may see some reduced footfall as the policy’s beneficiaries acquire some of their supply of products from their educational establishment, it is also possible that local businesses might work with local delivery partners to meet local circumstances. As noted above, as delivery partners refine their models, there may opportunities for local retailers to be involved in delivery. We know that some local partners are already considering engaging with different suppliers, including retailers, in order to meet local circumstances, in line with the policy’s Guiding Principles.

Will the measure limit suppliers’ incentives to compete vigorously?

No, we do not envisage that the policy will limit suppliers’ incentives to compete vigorously. As the policy develops and as delivery partners refine their delivery models and procurement processes, it is possible that the policy will encourage competition among suppliers seeking to secure or develop procurement options to meet local circumstances.

Will the measure limit the choices and information available to consumers?

No – the policy’s Guiding Principles emphasise the importance of choice and awareness raising and education. As such, beneficiaries should have access to a range of products in quantities sufficient to meet their needs. Information will also be made available to beneficiaries explaining the policy. Delivery partners will run their own information campaigns.

Test run of business forms

There are no new business forms to be introduced.

Legal Aid Impact Test

The voluntary nature of the policy and the lack of sanctions for non-compliance indicate that there should be no impacts on the legal aid fund.

Enforcement, sanctions and monitoring

The collaborative nature of the policy means that enforcement mechanisms or sanctions will be unnecessary. Instead, a common reporting and evaluation framework has been developed with input from the Access to Free Sanitary Products Working Group.

Each local authority and further and higher education institution has developed their own delivery plan in accordance with local circumstances and with the policy’s Guiding Principles. As a requirement of the policy, implementation plans have been shared with the Scottish Government. We expect delivery to begin from the new academic year in 2018, and delivery partners are confident this will be the case.

The policy will be monitored throughout the first year to ensure that it is appropriately funded and having the expected positive impact on beneficiaries. In January/February 2019, the Scottish Government will collect information from local authorities, colleges and universities on: spend to date; number of products purchased; the split of products (i.e. sanitary towels, tampons, other); unit cost of products; and, where possible, an estimate of the number of products taken up to date. This will help determine the actual costs of delivering this policy and any funding adjustments required for future years. In order for educational establishments to refine and improve their delivery models, we will also share examples of good practice and learning about what works well between institutions. A full review of the policy will take place in Autumn 2019 to allow a full year of data to be collected.

Further information will be sought directly from beneficiaries on their use of and thoughts around having access to sanitary products in their place of learning, including whether they had the opportunity to contribute their views on the products available and models used for delivery, whether they have used the products and how regularly (and how this impacted on their ability to attend their place of learning or participate in learning and activities while there). The Scottish Government will work with Young Scot to collect this information at a national level and work in partnership with CoSLA, Colleges Scotland and Universities Scotland on the design of any surveys/engagement tools.

Summary and recommendation

Scottish Government will pursue option three to work with local partners to ensure free sanitary products are available through schools, colleges and universities. The Access to Free Sanitary Products Working Group has been clear from the outset that a voluntary and collaborative approach to the policy is the most appropriate one, particularly as understanding and the evidence-base grow.

The preferred option allows us to move quickly, capitalising on the growing momentum that exists around making sanitary products available to those who need them. By contrast a card- or voucher-based system would require a greater investment of time and resource and therefore would not be in place for delivery within the relevant timescales. Option three not only allows us to meet our timescales for delivery but also gives partners the opportunity to develop delivery mechanisms best suited to local circumstances.

• **Summary costs and benefits table**

Option	Total benefit per annum: - economic, environmental, social	Total cost per annum: - economic, environmental, social - policy and administrative
1	- None – status quo.	- Some students may be unable to participate fully in education - Increased stress and anxiety arising from inability to access products may increase burden on health service.
2	- National scheme would ensure consistency across the country - Give beneficiaries options to choose products best suited to their need - Voluntary approach to policy may create snowball effect among other organisation	- Potential costs of up to £16m - Development lag may result in people's immediate need not being met - Smaller retailers may struggle to participate given cost of required equipment and systems - Retailers may reject card/voucher - Intended beneficiaries may use card/voucher for reasons other than to buy products.
4	- Students who menstruate will have access to products in their educational establishment through delivery mechanism developed in line with policy's Guiding Principles - Local partners able to develop delivery models best suited to local circumstances - Partners may share knowledge and increase best practice in delivering the policy in line with the Guiding Principles - Allows local partners to respond to emerging evidence, and beneficiaries' feedback, adapting their delivery model as required - Potential increase in trade for sanitary product manufacturers and providers of washroom services.	- Annual costs of approx. £5.5m - Delivery partners may an increased administrative burden as they monitor and evaluate the policy - Delivery partners need to commit required time and resource to developing a local delivery action plan - Potential for small decrease in trade for retailers.

Declaration and publication

I have read the Business and Regulatory Impact Assessment and I am satisfied that (a) it represents a fair and reasonable view of the expected costs, benefits and impact of the policy, and (b) that the benefits justify the costs. I am satisfied that business impact has been assessed with the support of businesses in Scotland.

Signed:

Date: 10 September 2018

Minister's name: Aileen Campbell

Minister's title: Cabinet Secretary for Communities and Local Government

Scottish Government Contact point: Elaine Moir, Access to Free Sanitary Products Policy Lead, Social Justice Delivery Unit, Directorate for Housing and Social Justice



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