

Equality and Fairer Scotland Impact Assessment

**United Nations Convention
on the Rights of the Child
(Incorporation) (Scotland) Bill**

September 2020

United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Bill

Equality and Fairer Scotland Impact Assessment (EQFSIA)

Introduction

The UNCRC was adopted by the General Assembly of the United Nations in 1989 and it was ratified by the UK Government in 1991. It is the most widely ratified human rights treaty in the world. The UNCRC was a landmark treaty, recognising the importance of childhood and the unique needs of children across the globe. It sets out the civil, political, economic, social and cultural rights that all children, everywhere, are entitled to and it remains, to this day, the global “*gold standard*” for children’s rights. The rights in the UNCRC are guaranteed to every child, whatever their ethnicity, gender, religion, language, abilities or any other status.

The United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Bill will incorporate, into Scots law, the UNCRC and the first optional protocol (on the involvement of children in armed conflict) and the second optional protocol (on the sale of children, child prostitution and child pornography).

Incorporation of the UNCRC will mean that public authorities, including the Scottish Government, will be legally obliged not to act incompatibly with the provisions of the UNCRC that the Bill will incorporate into Scots law. If they don’t, children, young people and their representatives will be able to use the courts to enforce their rights. The Bill aims to ensure that there is a proactive culture of everyday accountability for children’s rights across public services in Scotland. It will ensure that public authorities are required to take proactive steps to ensure compliance with children’s rights in their decision-making and service delivery. This will mean that the structures within which decisions are made in Scotland must enable children and young people to be heard and take an active role in their own lives and communities.

The Bill will take a “*maximalist*” approach to incorporation, meaning that the Bill will incorporate as much of the UNCRC and the first and second optional protocols as is within legislative competence, using a “*direct*” model of incorporation i.e. using the wording of the articles as found in the UNCRC itself.

Children and young people face additional barriers to realising their rights and accessing justice. In recognition of this, some specific measures are provided for in the Bill which remove barriers and build in greater accountability and transparency in relation to the proactive realisation of children's rights in practice. These provisions include giving power to the Commissioner for Children and Young People in Scotland to raise claims in the public interest and provision requiring the Scottish Ministers to make a Children's Rights Scheme.

The Bill will mean that children, young people and their families will experience public authorities consistently acting to uphold the rights of all children in Scotland. Public authorities, including the Scottish Ministers, will be legally obliged to respect children's rights and rights-holders will be able to challenge public authorities in the courts for breaches of their rights. Delivering the new legislation will improve outcomes for children and young people and help make Scotland the best place in the world to grow up.

The Scottish Government believes that incorporation of the UNCRC into Scots Law will have a positive impact in reducing inequalities for children and young people in Scotland. The Scottish Government wants a Scotland where policy, law and decision-making take account of children's rights and where all children have a voice and are empowered not just to know and understand their rights, but also to assert and defend those rights and the rights of others. Fully realising the fundamental human rights of children and young people is essential to building the more prosperous, equal future which the Scottish Government wants for Scotland. Only by respecting and fully realising the rights of all children and young people can all of Scotland flourish.

Whilst all children and young people under the age of 18 will hold the rights being incorporated by the Bill equally, it is considered that the Bill will have a positive effect in relation to removing barriers which children and young people in protected groups can face in practice.

This **draft** document is an **initial assessment** of the impact of incorporating the UNCRC into Scots Law on groups with protected characteristics. The Scottish Government will continue to update this assessment where required, and any future iterations will reflect an increased understanding of these impacts as the amount of data and research available continues to grow.

Background – Policy Objectives

On the 20th November 2019, on the 30th Anniversary of the United Nations Convention on the Rights of the Child (UNCRC), the Deputy First Minister, John Swinney, announced that the Scottish Government would seek to incorporate the UNCRC into Scots law to the maximum extent possible within the powers of the Scottish Parliament.

The Scottish Government is committed to fully realising the human rights of all people in Scotland. It is committed to building a Scotland where respect for human rights forms the bedrock of society and the institutions which govern and deliver public services for the people of Scotland. The United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Bill represents a significant step on the road to fully realising that future for Scotland: a future based on tolerance, equality, shared values and respect for the worth and human dignity of all people.

The Scottish Government is committed to a revolution in children's rights. The dual impacts of the Covid-19 pandemic and EU exit underline the importance of human rights being built into the fabric of society. Nowhere is this more important than in relation to children and young people, whose futures depend on the action taken by all public authorities to implement their rights in practice. The Bill will deliver a fundamental shift in the way children's rights are respected, protected and fulfilled in Scotland, ensuring that children's rights are built into the fabric of decision-making in Scotland and that these rights can be enforced in the courts.

Delivering the rights of children and young people, as enshrined in the UNCRC, is fundamental to making children's rights real and Scotland the best place in the world to grow up. One of the most fundamental tests of success in respecting, protecting and fulfilling those rights is whether they are part of the day-to-day lived experience of every child and young person in Scotland. The Scottish Government believes that the Bill will be a catalyst for change in all aspects of public life, supporting full and consistent realisation of all children's rights in practice.

It is intended that the Bill will have the effect of building children's rights considerations into day-to-day decision-making and policy formulation across the public sector in Scotland. This is achieved in the Bill by requiring public authorities to act in a way that is not incompatible with the incorporated UNCRC rights and obligations (section 6). The Bill applies this compatibility duty to all public authorities to the maximum extent of the powers of the Scottish Parliament.

The Bill will, therefore, make it unlawful for public authorities to act in a way that is incompatible with the incorporated UNCRC requirements. As is the case under the Human Rights Act, a claim may be raised in legal proceedings brought against the public authority in question or may be relied on in any legal proceedings. It is intended that the ordinary rules of standing and title and interest would apply to claims brought under the Bill and as such no further provision in relation to this is provided for.

Further detail about the policy intention for the specific provisions in the Bill is provided in the Policy Memorandum.

The Scope of the EQFSIA

Ensuring that the human rights of all people are fully respected, protected and fulfilled is central to building the more equal and prosperous future which the Scottish Government wants for Scotland. The Bill is the first step in the delivering the Scottish

Government's wider ambition on human rights and will be followed by a Bill to deliver a statutory human rights framework for all further to the recommendations of the Human Rights Taskforce later this year. By incorporating the UNCRC into Scots law the Bill will ensure that all children and young people can access their rights equally. The Scottish Government know that full enjoyment of human rights is often more challenging for those with protected characteristics and the Scottish Government considers that the Bill, by incorporating and making children's rights enforceable, will support children and young people and their families to advocate for their rights and have these respected in practice.

The UNCRC sets out the civil, political, economic, social and cultural rights that all children hold up to the age of 18 years old, whatever their ethnicity, gender, religion, language, abilities, or any other status. The provisions within this Bill will affect all children and young people below the age of 18 living in Scotland.

The Bill will also ensure that children can access rights that will be of particular importance to their situations, such as care experienced children and young people (article 9 - Separation from parents, article 18 - Parental responsibilities and state assistance, article 19 - Protection from all forms of violence, article 20 - Children deprived of a family) and those with additional support needs or disabilities (article 23 - Children with disabilities).

The Scottish Government has drawn on a wide range of evidence in the development of this Bill and to inform the Impact Assessments. The "*Children's Rights: Consultation on incorporating the United Nations Convention on the Rights of the Child into our domestic law in Scotland*" sought to ensure that the voices of as many different children and young people could be heard as possible. In addition, a wide range of third sector organisations and public authorities with experience of working with children and young people from protected groups and with additional needs were heard from.

Consultation in preparation of the Bill

The Scottish Government has engaged with a wide range of stakeholders to inform the development of this Bill. The Scottish Government recognises the need for continuous and effective engagement and will continue to engage with a range of stakeholders as the Bill progresses through parliament and into implementation.

Public Consultation

Public consultation and engagement

The Scottish Government launched a public [consultation](#) on 22 May 2019 called "*Children's Rights: Consultation on incorporating the United Nations Convention on the Rights of the Child into our domestic law in Scotland*" which invited views on the best model of incorporating the UNCRC into Scots law. The consultation was undertaken from 22 May 2019 to 28 August 2019. 162 responses were received from individuals, public bodies, third sector, legal organisations, academia and others.

To complement the public consultation, a range of bilateral official and Ministerial meetings were held over the summer, meeting 47 organisations representing a number of different sectors. The Scottish Government recognises the right of children to be involved in decisions that affect them and to that end, funded seven events which engaged over 180 children and young people to support their engagement in the consultation.

The [responses](#) to the consultation were published in November 2019, where the Scottish Government has permission to do so. In addition, the Scottish Government has published an [analysis](#) of all consultation responses was published. An [accessible version](#) of the consultation analysis can be found on the Scottish Government website.

Since the consultation closed, the Scottish Government has continued to engage with a range of stakeholders including:

- Aberdeen City Council
- Aberdeenshire Council
- Association of Directors of Education in Scotland
- Care Inspectorate
- Child Protection Committees Scotland
- Commissioner for Children and Young People in Scotland
- Children's Hearings Scotland
- Community Justice Scotland
- Disclosure Scotland
- Fife Council
- Judicial Institute for Scotland
- Mental Health Welfare Commission
- NHS Highland
- Police Scotland
- Public Health Scotland
- Scottish Children's Reporter Association
- Scottish Courts and Tribunals Service
- Scottish Enterprise
- Scottish Legal Aid Board
- Scottish Parliament
- Scottish Prison Service
- Scottish Public Services Ombudsman
- Shetland Council
- Social Work Scotland
- South Lanarkshire Council
- Sports Scotland
- Together Scotland
- The Convention of Scottish Local Authorities (COSLA)
- The Scottish Social Services Council
- UNICEF.

UNCRC Incorporation working group

A short-life working group was convened in June 2019 to inform the development of a model that incorporates the United Nations Convention on the Rights of the Child (UNCRC) into domestic law in Scotland.

The Group considered the policy, practice and legislative implications of UNCRC incorporation, using the Scottish Government's consultation document, '[Incorporating the UN Convention on the Rights of the Child into Scots Law consultation](#)' as a key framework for its work.

The [terms of reference](#), minutes from meetings, summaries of workshop discussions and a [summary report](#) of discussions of the Working Group can be found on the Scottish Government website. The group met a number of times and the views described in these documents are the opinions and discussions of those individuals in the working group, as expressed during the meetings of the group.

Consultation with Children and Young People

One of the General Principles of the UNCRC is Article 12, which states that children and young people have a right to express their views, feelings and wishes in all matters affecting them, and to have their views considered and taken seriously. In keeping with this right the Scottish Government supported seven engagement events to hear directly from children and young people. The events were hosted by:

1. Children 1st
2. Children in Scotland
3. Children's Parliament
4. Scottish Learning and Disability Commission
5. Scottish Youth Parliament
6. Young Scot
7. YouthLink Scotland

In addition, A stand-alone [analysis](#) based on responses to the public consultation by eleven respondents identified by the Scottish Government as being organisations that represent the views of children and young people was also undertaken.

The First Minister's Advisory Group on Human Rights Leadership

The principal recommendation of the First Minister's Advisory Group on Human Rights Leadership which [reported](#) on 10 December 2018 was the creation of a new statutory human rights framework for Scotland. This would involve a new Act of the Scottish Parliament (ASP) which incorporates rights from UN and other human rights treaties, including the UNCRC into Scots law. The Advisory Group proposed that such an ASP should set out, for the first time, and in one place, the rights belonging to everyone in Scotland. The group proposed that the ASP could be legislated for at the commencement of the next session of the Parliament in 2021.

Rather than delivering a Bill to incorporate the UNCRC in this parliamentary session, it would be possible to achieve this as part of such a comprehensive human rights framework. This would allow all rights to be brought together in one place, including those of children and young people under other human rights treaties. It would not, however, be possible to pass this legislation before the next Scottish Parliament election in 2021. As a result the Scottish Government has confirmed its intention to push ahead with the UNCRC incorporation now. The Advisory Group explicitly recognised in its report that longer term ambitions to incorporate all human rights treaties should not cause any delay to UNCRC incorporation.

Since then, the Scottish Government have kept the National Taskforce for Human Rights Leadership group advised on the policy development for the UNCRC Bill and it is expected that the approach taken can dovetail with any wider approach recommended by the Taskforce in due course.

Key Findings

As one of the core UN human rights treaties, the UNCRC recognises that the inherent dignity and the equal and inalienable rights of all members of the human family is the foundation of freedom, justice and peace in the world. Incorporation of the UNCRC will, therefore, have a positive impact in relation to all elements of the public sector equality duty. It will complement and be supportive of the duties under the Equality Act 2010.

Incorporation through the Bill will represent a significant step in realisation of children's rights in practice for all children. International experience shows that incorporation of human rights treaties is particularly important in the realisation of rights for those from underrepresented groups including those experiencing discrimination such as on the basis of sex, race, religion or other characteristics. This is expected to be particularly so in relation to incorporation of UNCRC, given that children facing discrimination or who have additional needs often face a double barrier in relation to the realisation of their rights: that discrimination or need, coupled with the fact that, as children, their voice can be unheard, or more easily dismissed.

Incorporation of the four articles known as the "General Principles" (non-discrimination (article 2), best interest of the child (article 3), right to life survival and development (article 6) and right to be heard (article 12)) alongside the other substantive rights as they relate to issues such as education, health, family relations and justice will mean that the rights and needs of all children are brought to the fore and that the requirement for children to be heard and take part in decisions which affect them is built into decision-making structures across public authorities. The Bill will foster a culture of respect for children's rights across public authorities which in turn puts the needs of all children at the centre of decision-making and practice.

To understand the international experience of the impact of incorporation, UNICEF's report ,*The UN Convention on the Rights of the Child: a study of legal*

implementation in 12 countries¹ was reviewed. It found that “CRC incorporation in and of itself is significant. The very process of incorporation raises awareness of children’s rights and the CRC in government and civil society. In countries where there has been incorporation (Belgium, Norway, Spain), interviewees felt that children were more likely to be perceived as rights holders and that there was a culture of respect for children’s rights. Whilst incorporation provided opportunities for strategic litigation given that the CRC was part of the domestic legal system, its main value was thought to be in the strong message it conveyed about the status of children and children’s rights, and the knock-on effects for implementation of children’s rights principles into domestic law and policy”.

Evidence suggests that the impact of incorporation of the UNCRC is likely to “lead to an increase in awareness of children and young people as rights holders and for there to develop a culture of respect for children’s rights”.

Building on this, the Scottish Government will develop an implementation programme covering three years to ensure that the Bill’s duties are fulfilled with children’s rights being embedded in decision-making at all levels in public services.

Leadership – The Scottish Government is fully committed to ensuring that accessible guidance and training is developed as part of an implementation programme in support of the Bill and for public authorities to support preparation and planning in advance of commencement of the Bill. This will be supported by a central implementation team within the Scottish Government who will be dedicated to coproducing and delivering effective guidance and training with public authorities and the third sector so that it best meets the needs of practitioners, and the rights of the children and young people they serve. The Scottish Government will ensure that an appropriate governance structure provides collective leadership to the implementation programme. The central implementation team will also be responsible for delivery of the Scottish Government’s Children’s Rights Scheme. The Scottish Government will continue to make Child Rights and Wellbeing Impact Assessment guidance and templates freely available so partners in the public sector and the third sector can assess how their policy and practice impacts on children’s rights and wellbeing.

Empowering children to claim their rights – Ensuring that children, young people and their families can claim their rights is central to delivering a Scotland where human rights are made real. As set out in the Progressing Children’s Human Rights Action Plan 2018-2021, children’s rights awareness-raising and children and young people’s participation are two of the strategic priorities to which the Scottish Government is already committed. The Scottish Government will make available a fund of £250,000 for awareness-raising in each of the three years of the implementation programme, with a commitment to increase funding to enable the participation of children and young people in decision-making in public services by £100,000 in each year for the

¹ https://www.unicef.org.uk/wp-content/uploads/2012/11/UNICEFUK_2012CRCImplementationreport-FINAL-PDF-version.pdf

same period. The awareness-raising activities aim to support children and young people across Scotland to be human rights defenders and challenge breaches of their and others' rights. The fund for participation will look to provide a sustainable approach to the strategic participation of children and young people in decision-making, and to enable the voices of those children and young people who are seldom heard to be listened to. A social marketing campaign, at a cost of £200,000, will also be developed in the second year of the programme and delivered in the third year. This campaign will aim to raise the profile and support for children's rights across Scottish society.

Embedding children's rights in public services – The Scottish Government recognises the vital role that public services play in delivering for children, young people and their communities. To ensure that public services are appropriately supported in delivering the step-change in respecting, protecting and fulfilling children's rights that this Bill seeks to deliver, the Scottish Government will create a fund of £835,000 over two years to support the delivery of this implementation.

Protected characteristics

The Bill is likely to have a positive impact on children and young people because of their age as the Bill aims to provide the highest protection possible for the UNCRC, ensuring that children's rights are respected, protected and fulfilled by all public authorities, within the powers of the Scottish Parliament. For the purposes of the present Convention, a child means every human being below the age of 18 years unless under the law applicable to the child, majority is attained earlier (UNCRC article 1).

While the Equality Act only protects against age discrimination for those under the age of 18 in employment situations, Article 2 of the UNCRC states that all articles of the convention apply to every child without discrimination, whatever their ethnicity, gender, religion, language, abilities or any other status, whatever they think or say, whatever their family background.

By incorporating the UNCRC into Scots law the Bill will strengthen children and young people's right to non-discrimination on any grounds including disability and the obligation of public authorities to not act incompatibly with the Bill to protect children from all forms of discrimination. (UNCRC Article 2 and UNCRPD Articles 2-6 and 8)

The Bill is also likely to strengthen children and young people's ability to be heard and engaged in decision-making which is a fundamental issue for children and young people (UNCRC Article 12).

To inform an understanding of the potential impact of statutory CRWIA, research into the implementation of child rights impact assessments (CRIA) by national Government (Payne, 2019)² was consulted. This research showed that when used appropriately, these impact assessments provide a means to further progress,

² <https://www.tandfonline.com/doi/abs/10.1080/13642987.2018.1558989>

implement and embed human rights principles, standards and processes in the workings of government to make a child rights based approach the norm in policy development. It also suggested that the act of being involved in the drafting of a CRIA/CRWIA can change the way officials and politicians regard both children's policy and children's 'place' in society.

All actions taken by Ministers and public officials concerning children and young people, including those with disabilities, should ensure that their best interests are of primary consideration. Services, facilities and institutions caring for children must comply with appropriate standards in respect of health, safety, quality of staff and proper supervision (UNCRC Article 3 and UNCRPD Articles 7 and 16).

The Bill will also ensure that children can access rights that will be of particular importance to their situations, such as care experienced children and young people (article 9 - Separation from parents, article 18 - Parental responsibilities and state assistance, article 19 - Protection from all forms of violence, article 20 - Children deprived of a family) and those with additional support needs or disabilities (article 23 - Children with disabilities).

This benefit was noted during the "*Children's Rights: Consultation on incorporating the United Nations Convention on the Rights of the Child into our domestic law in Scotland*" by organisations who represent children and young people. For example, LGBT Youth Scotland highlighted that the right to privacy provided by article 16 can help ensure that LGBT young people's rights are protected so they are not needlessly 'outed' to their families and other professionals by public authorities.

The Scottish Government have also often heard that children with disabilities experience barriers to the realisation of their rights often as a result of the environment in which they live rather than as a result of their impairment. Incorporation of article 23 will ensure their right to live a full and decent life with dignity and, as far as possible, independence and to play an active part in the community can be claimed.

Reducing socio-economic related inequality

At present there is a lack of evidence which shows a direct link between incorporation of the UNCRC and a reduction in poverty related inequality for children and young people (Nolan and Pells, 2019³).

A child rights approach, however, to the development of legislation or policy, will support public authorities to consider the negative impacts on children's rights and wellbeing in poverty related policy areas such as housing, education, health, employment and disability. Evidence suggests, that for this to lead to better outcomes for children and young people, "*legislation and policies that affect them need to be linked and integrated consistently*" across government (Nolan and Pells, 2019).

³ https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3477152

This Bill will strengthen children and young people’s ability to be heard and engaged in decision-making processes. Tackling child poverty: first year progress report (2018 to 2019) has highlighted that the participation of children and young people is a fundamental issue for young people experiencing poverty (Children’s Parliament, 2018⁴).

Through the “*Children’s Rights: Consultation on incorporating the United Nations Convention on the Rights of the Child into our domestic law in Scotland*”, stakeholders expressed their support for incorporation of the UNCRC and emphasised that a joined up approach across legislation, policy and practice is required.

Child Poverty Action Group (CPAG) in Scotland

“Legislation alone cannot implement children’s rights in Scotland – there are a number of activities that must be taken by national and local government, as well as many others, that will contribute towards implementing those rights.

One in four children in Scotland live in poverty, which means that their rights are not being realised – most prominently in regard to articles 26 and 27. In the absence of significant policy change, the percentage of children in poverty is likely to continue to increase in the coming years, with the Scottish Government’s own forecasts indicating that it will reach 38% by 2030/31. That means a significant proportion of our children have their life chances impacted. Poverty not only impacts in relation to articles 26 and 27 – the result is that children are less likely, for example, to achieve academically and less likely to be able to relax and play in the same way as their peers (articles 28 and 31).

In order to help implement these rights fully, we need not only to incorporate those rights but to redouble our efforts to tackle child poverty, for example through the Scottish Government’s Tackling Child Poverty Delivery Plan and through Local Child Poverty Action Reports – as well as by incorporating the right to benefit from social security”.

CEDAR Scotland Advisory Partnership (CSAP)

“To ensure children enjoy their full suite of rights requires a more effective and joined-up approach between local multi-agency Violence Against Women Partnerships, Community Planning Partnerships, Health and Social Care Partnerships, children’s services planning and child poverty leads at the local level.”

Children's Parliament

“Children identified that one of the principal ways to ensure more children have their rights fulfilled is to directly support them through legislation, policy and practice.”

⁴ <https://www.childrensparliament.org.uk/wp-content/uploads/Child-Poverty-CP-Report-2018.pdf>

Poverty Alliance

“While legislation is vital, it is clear that children’s rights cannot be secured through legal measures and that a range of other policy interventions and activities are required to ensure that all children and young people can access their rights.

For example, 240,000 children in Scotland are currently living in the grip of poverty, meaning that a number of their rights (principally Articles 26 and 27 of the UNCRC) are not being realised. Living in the grip of poverty can also play a contributing factor towards a number of other rights (e.g. Article 12, Article 28 and Article 31) not being realised.

While legislative actions to further implement children’s rights will have a positive impact on children living in poverty, it is clear that taking further non-legislative action to tackle child poverty – and meet the ambitious poverty reduction targets set by the Child Poverty (Scotland) Act 2017 – is also essential if children’s rights are to be fully met. This includes action to reduce the cost of living, action to boost wages through increasing the numbers of workers receiving at least the real Living Wage, and action to ensure the adequacy of social security support for families”

Befriending Networks and its members

“Incorporation needs to sit alongside an anti-poverty strategy as without tackling poverty many of the inequalities will simply remain.”

Conclusion

The incorporation of the UNCRC is a significant step in respecting, protecting and fulfilling the human rights of children and young people in Scotland.

This **draft** document is an **initial assessment** of the impact of incorporating the United Nations Convention on the Rights of the Child into Scots Law and Scottish Government will continue to review and update this document where required during the parliamentary process. Any future iterations will reflect an increased understanding of these impacts as the amount of data and research available continues to grow.

This document, alongside the CRWIA, has attempted to set out an initial overview of the range of impacts the United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Bill will have on those groups in society who will be most affected by its implementation. The Bill sets out to have a positive impact on reducing poverty related inequality by putting children and young people at the centre of decision-making processes.

The Scottish Government welcome your views and evidence to help develop this impact assessment. If you are in regular contact with policy makers in the Scottish

Government please feel free to use your normal routes of engagement to provide further evidence or comments. If you are not in regular contact with policy makers in the Scottish Government or have any more general comments on both the assessment and mitigation activities please send them to:

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Sign off



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