Bankruptcy and Diligence (Scotland) Bill

Business and Regulatory Impact Assessment

April 2023

Scottish Government
Riaghaltas na h-Alba

Table of Contents

Title of proposal

1. Bankruptcy and Diligence (Scotland) Bill.

Purpose and Intended Effect

2. The Bankruptcy and Diligence (Scotland) Bill (the “Bill”) will bring forward stakeholder-led recommendations to introduce improvements to current debt solutions and debt recovery processes.

3. Its key aim is to help and improve the lives of people who are struggling with debt and serious mental health issues. In addition, amendments to the Bankruptcy (Scotland) Act 2016 (“the 2016 Act”) will correct errors and remove ambiguity in the operation of certain sections. At the same time, more efficient debt recovery processes will assist businesses and local authorities to collect debts from those who can pay.

Background

4. The Scottish Ministers committed to undertake a wide-ranging policy review of Scotland’s statutory debt solutions, specifically moratorium protection, bankruptcy, Protected Trust Deeds and the Debt Arrangement Scheme, with the aim of further enhancing and improving our system.

5. The policy review was organised into three stages. The first stage concluded with immediate changes being introduced through the Bankruptcy (Miscellaneous Amendments) (Scotland) Regulations 2021. These included important measures to improve access to bankruptcy by reducing or removing application fees for those in need of debt relief. The second stage was undertaken by stakeholder-led working groups. Their remit was to look at the operation of existing statutory debt solutions, aimed at providing recommendations and options for improvement.

6. In addition to this review the Scottish Parliament's Social Justice and Social Security Committee produced a report: Robbing Peter to pay Paul: Low income and the debt trap following an inquiry into low income and debt problems. The report urged the Scottish Government to implement a mental health moratorium.

7. A similar policy review of Scottish diligence measures was conducted through a stakeholder-led working group which was established to consider the feedback received from a public consultation in 2016. This working group consisted of stakeholders with a wide range of experience in diligence and the debt landscape.

8. The Scottish Government proposals in response to the working groups' recommendations were included in the public consultation published in August 2022.

9. This Bill largely brings together the areas requiring primary legislation from Stage 2 of the review of statutory debt solutions and the review of diligence. Other areas can be taken forward in secondary legislation or through guidance.

Objective

10. The purpose of the Bill is to bring forward stakeholder-led recommendations to introduce improvements to current insolvency solutions. As well as making technical changes to bankruptcy legislation, its aim is to help and improve the lives of people who are struggling with problem debt and serious mental health issues by introducing an enabling power which will provide the platform for future regulations to introduce a mental health moratorium.

11. It also brings forward stakeholder-led recommendations to improve existing debt recovery processes known as diligence and make them more efficient while maintaining protections for those who are subject to diligence. It looks to assist parties who are owed money to collect debts from those who can pay, whilst protecting those who are unable to pay.

Summary of main provisions in the Bill

- Mental Health Moratorium - introduction of an enabling power to permit the development of a new form of moratorium protection for a specific group of individuals, being those who are experiencing serious difficulties with their mental health as well as having problem debt
- Clarification of Bankruptcy Recall Legislation - minor amendments to these sections to clear current ambiguity for the recall of bankruptcy where Accountant in Bankruptcy (AiB) is the trustee
- Award of Bankruptcy – technical amendment which will correct a cross referencing error and make it clear that, under section 22(1)(b), all bankruptcies which meet the required criteria under the relevant subsection of section 2 of the 2016 Act, are to be awarded
- Gratuitous Alienations - technical amendment which will correct a cross referencing error in section 98(7) of the 2016 Act
- Time periods for appeal against decision by the AiB – minor amendments to insert into section 69 and 134 of the 2016 Act that the time period for an appeal to the sheriff against a determination by AiB must be made within 14 days
- Arrestment and Action of Furthcoming – introduce a new requirement for an arrestee to provide information if the arrestment was unsuccessful and the reason why, for example whether this was due to insufficient funds
- Diligence Against Earnings - introduce a new requirement for an employer to notify the relevant party if an arrestment is unsuccessful within 21 days after the arrestment schedule is served
- Diligence on the Dependence - requirement for a Debt Advice and Information Package ("DAIP") to be issued to a debtor in advance of the relevant court hearing stage

- Exceptional Attachment - extend the redemption period where attached assets are left in the dwellinghouse and removed at a later date prior to the auction
- Money Attachment - amend the hours during which money attachment may take place

12. Full details of the provisions can be found in the accompanying Policy Memorandum.

Rationale for Government intervention

13. The Scottish Government recognises the responsibility it has to take action to help the people of Scotland by ensuring its debt management and debt relief solutions are fit for purpose and are accessible to those who need help.

14. The package of measures outlined above can only be achieved through the introduction of primary legislation by the Scottish Parliament. Additionally, the proposals in the Bill are very much in line with the Scottish Government's National Outcomes, which form part of the Scottish Government's National Performance Framework.

15. It is assessed that the following National Outcomes are relevant to this Bill:

- **We tackle poverty by sharing opportunities, wealth and power more equally** – ensuring the diligence mechanisms and statutory debt solutions are designed and available to help people in severe financial difficulty and give them a fresh start
- **We have thriving and innovative businesses, with quality jobs and fair work for everyone** – ensuring the diligence mechanisms and statutory debt solutions (including bankruptcy processes) are fit for purpose and able to be clearly interpreted in order to help those who need them and to assist people to get back on their feet and contribute towards the economy

- **We have a globally competitive, entrepreneurial, inclusive and sustainable economy** – providing predictability and confidence for lenders by ensuring statutory debt solutions (including bankruptcy processes) and diligence mechanisms are interpreted consistently, are sustainable and meet the needs of the people of Scotland
- **We respect, protect and fulfil human rights and live free from discrimination** – ensuring statutory debt solutions are available to everyone and that everyone is treated consistently and with dignity and respect when accessing debt solutions, subject to diligence measures or otherwise involved in the bankruptcy process
- **We are healthy and active** – ensuring specific mental health protections are put in place and are available to those with problem debt who are also experiencing serious mental health issues in order to improve mental well-being and reduce inequalities

Consultation

Within Government

16. There has been full consultation across the Scottish Government. HMRC was a member of stakeholder-led working groups, and other relevant bodies were included in the public consultations. Additionally, the Scottish Courts and Tribunals Service was represented on the Diligence Working Group.

Public Consultation

Diligence Review

17. In 2015, AiB sought initial feedback from messengers-at-arms and sheriff officers on the effectiveness of current diligence provisions. This helped shape a diligence review undertaken by AiB in 2016 and formed the basis for a wider public consultation on diligence measures which closed in November 2016.

18. The Scottish Government then brought together a number of stakeholders, in 2018, to form a diligence working group. The group members were from a wide range of stakeholders with representatives from the insolvency profession, sheriff officers, the legal profession, courts, the banking sector, creditors and the debt advice sector. Their remit was to review and identify ways to improve the diligence landscape in Scotland to ensure that debt recovery mechanisms were fair and effective for the 21st century.

19. In March 2021, the Diligence Working Group issued a report with their recommendations to improve diligence. These recommendations have formed the basis for the diligence provisions within this Bill.

Wider Review

20. In April 2015, wide ranging bankruptcy reforms were introduced through the Bankruptcy and Debt Advice (Scotland) Act 2014. In 2019, the Scottish Government consulted with stakeholders to gauge how these reforms were working in practice. The Scottish Ministers then committed to undertake a wide-ranging policy review of Scotland’s statutory debt solutions, specifically moratorium protection, bankruptcy, Protected Trust Deeds and the Debt Arrangement Scheme.

21. In response to the pandemic, the first stage of the review was to consider changes which could be immediately implemented. This culminated in those changes being introduced through the Bankruptcy (Miscellaneous Amendments) (Scotland) Regulations 2021.

22. The second stage of the review was undertaken by three stakeholder-led working groups formed from a wide body of sector specialists with expertise in debt advice and the operation of statutory debt solutions. The members included money advice professionals, insolvency professionals, creditor bodies and academics. The working groups considered any improvements which could be made to the existing statutory debt solutions.

23. One of the groups considered the recommendations made by the then Economy, Energy and Fair Work Committee who had conducted a short, focused inquiry on Protected Trust Deeds in January 2020. A number of the recommendations made were addressed operationally through the PTD protocol which came into force on 1 October 2021. The group considered the remaining recommendations and agreed that the protocol should be allowed to operate for a reasonable period to gauge its effectiveness.

24. In March 2022, each working group issued a report of their recommendations. The Scottish Government considered those recommendations and subsequently, on 12 August 2022, published a consultation, 'Scotland's Statutory Debt Solutions and Diligence: Policy Review Response', in response to the second stage of the review and the diligence review. The consultation closed on 7 October 2022.

25. At the close of the consultation a total of 46 responses were received, of which 13 were from individuals and 33 were from organisations. On 26 January 2023, the Scottish Government published a summary of responses report.

Other Consultation

26. Further consultation has been undertaken by the Scottish Parliament through the recent inquiry into low income and debt conducted by the Social Justice and Social Security Committee. This inquiry included testimonies, via focus groups, from people on low incomes who have experience of debt. There was also evidence taken at Committee sessions from debt advisers, public sector and third sector organisations, creditors, regulators and the AiB. The Committee's final report "Robbing Peter to pay Paul: Low income and the debt trap" included a recommendation urging the Scottish Government to implement the mental health moratorium.

Business

27. We have not held face-to-face discussions with individual businesses. However, the reviews of diligence and the statutory debt solutions have been

stakeholder-led processes with each of the groups representing a broad spectrum of sector specialists and organisations who may be affected by this Bill including representatives from the creditor and business sector such as UK Finance, HMRC, ABCUL and TDX Group, and the public consultations were open to all those who wished to participate.

Options

28. There are two main options:

Option 1 – Do nothing

29. Under this option, the Bill will not be introduced and the legislation will remain as it is. The proposals were originally recommended by stakeholders to improve on the current statutory debt solutions and diligence processes in Scotland and help and improve the lives of people who are struggling with debt, which may be exacerbated by serious mental health issues. By not introducing the changes, in particular the mental health moratorium, stakeholders would consider the current protections not sufficient. It will also mean cross referencing errors and possible ambiguity in interpreting legislation which have been highlighted will remain uncorrected.

Option 2 – Introduce the draft Bill

30. Under this option, the provisions outlined and implemented though the Bill will be introduced, realising the changes to the law listed above.

Sectors and Groups Affected

- Debtors
- Creditors
- Insolvency practitioners
- The money advice sector

- Sheriff officers, officers of court and Messengers-at-Arms
- Accountant in Bankruptcy
- Local authorities
- Third sector
- Mental health profession
- The broader Scottish economy

Benefits

Option 1

31. Do nothing. The benefit of option 1 is that the status quo will be retained, with the effect that current practice and procedure for affected parties will not require to be amended.

Option 2

32. Introduce the draft Bill. There are significantly more benefits if option 2 is taken forward. The implementation of option 2 will see the introduction of an enabling power which will allow for regulations to create additional protections for debtors who are experiencing serious mental health issues in the form of a mental health moratorium. This will give them protection from creditors taking action to recover debts while they are focusing on treatment for, or recovery from, serious mental illness. The introduction of such a moratorium is seen as a positive step by stakeholders and those in the mental health sector. It is noteworthy that the Impact Assessment for the similar Breathing Space scheme in England and Wales found a significant net benefit to creditors – as those who engage with debt advice in general repay more of their debts. The technical amendments to existing bankruptcy legislation will benefit all parties who require to read and interpret the legislation and understand how it operates. This will reduce the likelihood of inconsistencies in interpretation of the existing legislation.

33. Creditors will also benefit from the new notification requirements in respect of arrestment and action of furthcoming and diligence against earnings, as they will be provided with additional information which may assist them in making decisions about how best (or whether) to pursue monies owed.

34. The amendment to exceptional attachment will also benefit debtors who will be afforded a longer period to pay the redemption fee for attached assets not removed immediately from the dwellinghouse. Further, debtors will benefit from being provided with a DAIP prior to the court hearing stage where diligence on the dependence is applied for. It is hoped that this measure will encourage debtors to seek help and advice.

35. The amendment to money attachment will streamline current procedures to the benefit of creditors. This will make the process of executing this diligence more convenient for creditors. This will also provide a saving for creditors as they will no longer face extra court costs if they seek permission from the sheriff to enforce the attachment outwith the prescribed hours.

Costs

Option 1

36. There are no immediately foreseeable cost implications of option 1. Notwithstanding, pursuit of option 1 will lead to a failure to realise the benefits of option 2, and there would be a risk of stakeholders feeling that the work they have done to provide recommendations to modernise the current system was being ignored.

Option 2

37. There will be minimal cost to the Scottish Government and organisations with the implementation of option 2 and the introduction of the Bill.

Mental Health Moratorium

38. The enabling powers for a mental health moratorium will have no immediate effect on sectors or groups. Development of future regulations that use these powers will require to be accompanied by a BRIA, and it would be at that point that the effect would be measured and presented.

39. There will be costs incurred by the Scottish Government in the development of a full mental health moratorium process. As the process has not yet been developed these costs cannot be quantified at present. However, estimates detailing parameters of and expected minimum and maximum cost are detailed in the Financial Memorandum.

Minor and technical amendments to bankruptcy legislation

40. These are technical changes to correct errors or address ambiguity in current legislation and will not result in additional costs.

Arrestment or Action of Furthcoming

41. The form the information is to be provided in will be standard and will be prescribed by the Scottish Ministers. While there will be time costs for the arrestee to complete the form, it is envisaged that these will be minimal.

42. It is not known how many bank arrestments are unsuccessful. There were approximately 223,000 non-earnings arrestments executed in the year 2021-22. If 30% of these were unsuccessful this would mean an estimated 66,900 would have been unsuccessful. Assuming 10 minutes to complete the form and staff costs of £15 an hour, this would imply a cost of £167,250 – this is likely to be a significant over-estimate. This cost would be spread across the banks. Sheriff officers have agreed to work with banks to minimise the costs.

Diligence Against Earnings

43. The form that information is to be provided on will be prescribed by the Scottish Ministers. While there will be time costs for the employer to complete the form it is envisaged that these will be minimal.

44. Figures provided by local authorities suggest less than 20% fail. There were approximately 58,000 earnings arrestments executed in the year 2021-22 meaning an estimated 11,000 fail. Assuming again the form requires 10 minutes of staff time at a cost of £15 an hour would suggest a total cost of £27,500. This is likely to be a significant over-estimate. This cost would be spread across all employers.

45. The court may order an employer to pay a financial penalty to a creditor in certain circumstances. A financial penalty will only impact on those employers who, without reasonable excuse, fail to provide the required information. There would be a time and resource cost for a creditor in making an application to the court for such an order where they do not receive the required information. It is not possible to quantify this.

Diligence on the Dependence

46. This will result in additional cost for publishing and distribution which will be incurred by AiB who are already responsible for the costs of printing and distributing the DAIP. These documents cost 18 pence each to print plus delivery to sheriff officers. In the last 5 years there have been approximately 1,800 diligence on the dependence applications. This change would therefore cost an estimated £324.

47. There are no significant cost implications for local authorities for the DAIP. Whilst there may be a small additional cost for the creditor in providing the debtor with a DAIP – and the level of that cost will depend on how that is done – this cost can be added to the debt, and is therefore recoverable from the debtor.

48. There are no significant cost implications for other parties. The DAIP is provided to creditors or their agents by AiB free of charge. Whilst there may be a

small additional cost for the creditor in providing the debtor with a DAIP – and the level of that cost will depend on how that is done – this cost can be added to the debt, and is therefore recoverable from the debtor.

Exceptional Attachment

49. This will have no impact on storage costs already incurred as there is no change to the minimum time an item is to be stored before auction.

Money Attachment

50. There are no additional costs to businesses or the Scottish Government.

Regulatory and EU Alignment Impacts

51. The provisions in the Bill have no impacts on the Scottish Government's regulatory features related to leaving the EU. See below for further commentary.

Intra-UK Trade

52. The Bill will make amendments to diligence procedures and technical amendments to existing bankruptcy provisions in Scotland while also bringing forward an enabling power to create a mental health moratorium.

53. The technical changes to bankruptcy legislation are to correct errors and remove ambiguity in existing sections of the 2016 Act, after bankruptcy has been awarded and will have no impacts on trade.

54. The diligence mechanisms to pursue a debt will be the same for creditors irrespective of where they are located in the United Kingdom.

55. The enabling power will allow secondary legislation to be brought forward creating a mental health moratorium process. The enabling power does not impact

on trade. Separate impact assessments will be prepared when the mental health moratorium regulations are subsequently laid.

56. Having considered the United Kingdom Internal Market Act 2020 and Common Frameworks I can confirm that this Bill will not impact on intra-UK trade.

International Trade

57. The Bill corrects errors in the 2016 Act, updates diligence procedures and statutory personal debt solutions in Scotland while creating an enabling power to bring forward a mental health moratorium for those who have serious mental health issues and problem debt. The measures in this Bill will have no impact on international trade and investment.

EU Alignment

58. The Bill and its associated policies will have no EU implications and there is no identified conflict with the Scottish Government's policy on EU alignment. There will be no impact on relations with significant international organisations.

Scottish Firms Impact Test

59. As previously mentioned, we held no face-to-face discussions with individual businesses.

60. The reviews of diligence and the statutory debt solutions have been stakeholder-led processes with each of the groups representing a broad spectrum of sector specialists and organisations who may be affected by this Bill.

61. There was strong support for the proposals put forward by the Scottish Government in its consultation Scotland's Statutory Debt Solutions and Diligence: Policy Review Response. At the close of the consultation a total of 46 responses were received, of which 33 were from organisations.

Competition Assessment

62. Having considered the Competition and Markets Authority competition assessment questions, I can confirm that these changes will apply equally to all who engage with the Bill. There should be no competitive advantage to any particular individual or group as a consequence of the introduction of the Bill.

- Will the proposal directly limit the number or range of suppliers? No
- Will the proposal indirectly limit the number or range of suppliers? No
- Will the proposal limit the ability of suppliers to compete? No
- Will the proposal reduce suppliers' incentives to compete vigorously? No

Consumer Assessment

63. If passed by the Scottish Parliament, the Bill will likely have a positive impact on consumers.

Test Run of Business Forms

64. Any new forms introduced by the Bill will be test run to ensure that they are easy to use and have minimal resource implications for the user.

Digital Impact Test

65. The Scottish Government has considered the extent to which technology will impact on future delivery.

66. The Bill provides an enabling power to bring forward regulations to create a mental health moratorium. The enabling power does not have any impact on technology and technological advances. The process of the moratorium will be set out in subsequent regulations and digital impacts will be considered further in relation to the regulations.

67. The technical changes to the 2016 Act are to correct errors and remove ambiguity in existing legislation and do not alter the transfer of information.

68. While diligence measures will require notification where an arrestment has been unsuccessful and will prescribe the content of the form it will not prescribe the method of sending/submitting this form. There is currently a requirement to provide information where an arrestment has been successful and it is expected the notification for an unsuccessful arrestment will adhere to a similar process.

69. A DAIP is additional information which will be provided to debtors encouraging them to seek advice when a creditor is seeking to execute diligence on the dependence and prior to a court hearing. For most other types of diligence executed it is a requirement for the creditor to provide the debtor with a DAIP. It is expected that the delivery of the DAIP when executing diligence on dependence will adhere to the same process as those other forms of diligence.

Legal Aid Impact Test

70. The Scottish Legal Aid Board anticipate that the Bill provisions are not likely to have much of an impact on the Legal Aid Fund. While the Bill seeks to introduce some new court/diligence procedures which may engage legal aid and some provisions may lead to a delay in recovery of sums due to the Legal Aid Fund, any impact is likely to be minimal.

Enforcement, Sanctions and Monitoring

71. The Bill includes provision for consequences of an employer or arrestee failing to provide the information required by the Bill. It provides that where an employer or arrestee fails without a reasonable excuse to disclose the required information, the sheriff may, on the application by the creditor, make an order requiring the employer or arrestee (as the case may be) to pay the creditor the lesser of the sum due to the creditor by the debtor, or the sum of £500. In the case of earnings arrestment, the sheriff may also order the employer to provide the creditor

with the prescribed form. Existing rights of appeal set out in the legislation are extended so that a party may appeal in respect of an order made by the sheriff regarding failure to provide the new information. The sanctions imposed by the Bill will therefore fall within the remit of the Scottish Courts and Tribunals Service.

Implementation and Delivery Plan

72. If approved by Parliament, the Bankruptcy and Diligence (Scotland) Bill will be brought into force in 2024. Following this, secondary legislation supporting the Bill will be drafted and brought forward.

73. AiB will publish the introduction of the Bill on its website. The Bill will also be incorporated in the legislation published on the legislation.gov.uk website. AiB will, where appropriate, prepare and publish, on their website, guidance to support stakeholders when implementing the new legislation.

Post-implementation Review

74. To evaluate the impact of the new legislation the Scottish Government will give an undertaking that AiB will carry out a review of these provisions after they have been in place for an appropriate amount of time. The Scottish Government will analyse statistical data supplied and feedback collated by AiB.

75. It will also continue its regular engagement with key stakeholders operating in the areas of debt advice, diligence, statutory debt solutions and mental health in order to review the operation of these provisions.

76. The Scottish Government will review the findings of this research and consider whether any changes are necessary to the legislation or the associated guidance in light of its findings. Any changes identified will be brought to the attention of the Scottish Parliament and Parliamentary committees where necessary. A final report detailing the findings and conclusion of the review will be published.

Summary and Recommendation

Summary of costs and benefits

77. The impacts, including costs, of this Bill on business and regulatory bodies are minimal as set out below:

Option 1 – Do nothing

78. Do nothing and retain the status quo, with the effect that current practice and procedure for affected parties will not require amendment.

79. This option would maintain the status quo for bankruptcy and diligence and there would be no power to bring forward secondary legislation to create a mental health moratorium. This option also leaves the current law in an unsatisfactory manner and prevents the opportunity to support those with a serious mental illness who have problem debt. This is undesirable.

Option 2 – Introduce the draft Bill

80. Progress the Bill which will include measures such as to:

- Introduce an enabling power which will allow for future regulations to create a mental health moratorium. The introduction of such a moratorium is seen as a positive step by stakeholders and professionals in the mental health sector.
- Make technical amendments to existing bankruptcy legislation to benefit all parties who require to read and interpret the legislation and understand how it operates. This will reduce the likelihood of inconsistencies in interpretation of the existing legislation and have no cost implications.
- Introduce new notification requirements in respect of arrestment and action of furthcoming and diligence against earnings to provide creditors with additional information to decide how best (or whether) to pursue monies owed.

- Provide debtors with a DAIP prior to the relevant court hearing stage in respect of diligence on the dependence to encourage a higher number of debtors to seek help and advice with problem debt.
- Extend the redemption period in exceptional attachment for items not removed immediately from the dwellinghouse (but removed at a later date prior to auction) to allow debtors extra time to pay the redemption fee.
- Streamline the current money attachment procedure to make the process of executing this diligence more convenient for creditors. This will also provide a saving for creditors as they will no longer face extra court costs if they seek permission from the Sheriff to enforce the attachment out with the prescribed hours.

81. This option contains an enabling power to bring forward secondary legislation to introduce a mental health moratorium so in itself has no immediate impact on the sectors and groups. The regulations made using this enabling power would require to be accompanied by a BRIA and it would be at that point that the impacts would be measured and set out.

82. There will be costs to employers and arrestees to complete returns confirming where an arrestment has been unsuccessful, however these costs are considered to be minimal.

83. A financial penalty will only impact on those employers who, without reasonable excuse, fail to provide the required information. There would be a cost for a creditor in making an application to the court for such an order where they do not receive the required information. It is not possible to quantify this.

84. Additional costs for publishing and distribution of the DAIP will be incurred by AiB who are already responsible for the costs of printing and distributing.

85. There may be a small additional cost for the creditor in providing the debtor with a DAIP – and the level of that cost will depend on how that is done – but this cost can be added to the debt, and is therefore recoverable from the debtor.

Recommendation

86. Following an analysis of the costs and benefits of each option, it is recommended that option 1 be dismissed, and option 2 be adopted.

Declaration and Publication

87. 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: Tom Arthur

Date: 24 March 2023

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