

**Consultation on section 38 of the
Human Trafficking and Exploitation
(Scotland) Act 2015**

**Duty to notify and provide
information about victims**

Consultation Analysis Report

April 2020



Scottish Government
Riaghaltas na h-Alba
gov.scot

Contents

About this report and Background	Page 3
Overview of Responses	Page 5
Process and Respondents	Page 12
Analysis of Responses	Page 15
Next steps	Page 38

Annex 1:	Victim and Survivor Questionnaire
Annex 2:	Online Survey
Annex 3:	Pilots
Annex 4:	List of respondents by organisation and attendees at consultation events
Annex 5:	List of bodies and information suggested in response to questions 3, 7, 9, 11 and 14

About this report

This report provides an analysis of responses to the Scottish Government’s consultation on section 38 of the Human Trafficking and Exploitation (Scotland) Act 2015¹(“the Act”): Duty to notify and provide information about victims. The consultation ran from 16 June 2019 to 06 September 2019.

The consultation paper can be accessed here:

<https://consult.gov.scot/justice/duty-to-notify-and-provide-information/>

Background

The only available data on the numbers of trafficking victims in Scotland are taken from the UK National Referral Mechanism (NRM)². The NRM is a framework for identifying potential victims of trafficking and ensuring they receive appropriate support and assistance. It was introduced in 2009 to meet the UK’s obligations under the Council of Europe Convention on Action against Trafficking in Human Beings.

Since the NRM’s introduction, recorded numbers of victims have increased across the UK. In Scotland there has been a 417% increase in referrals to the NRM in the last 7 reported years (see table below). Although not its primary purpose, the NRM is the only significant mechanism for accruing and processing data about trafficking and exploitation in the UK. For those victims that do not consent to enter the NRM, no data is recorded³.

Year	Female			Male			Total
	Adult	Minor	Age not recorded	Adult	Minor	Age not recorded	
2019	120	44	10	218	112	8	512
2018	67	22		108	31		228
2017	63	24		81	39		207
2016	54	21		49	26		150
2015	52	19		51	23		145
2014	48	14		38	11		111
2013	52	13		25	9		99

Section 38 of the Act places a duty on specified Scottish public authorities to provide information to Police Scotland about people who are, or appear to be, victims of human trafficking or of slavery, servitude and forced or compulsory labour. Once Police Scotland receive this information they must notify a third party – in practice this is likely to be done by collating the information and providing a regular report.

¹ <http://www.legislation.gov.uk/asp/2015/12/section/38>

² <https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms>

³ In Scotland. A similar duty to notify is in force in England and Wales.

The purpose of the duty to notify can be broken down into 3 main categories. Ultimately the collation and processing of data contained in notifications will help to achieve the original policy intention behind section 38 of the Act:

- To provide a more accurate picture of the scale and extent of trafficking in Scotland, to enable more effective targeting of enforcement activity and provision of support services.

However as time has moved on since the Human Trafficking and Exploitation (Scotland) Bill 2014 passed through Parliament, section 38 of the Act will now also feed into and meet the key outcomes of the Trafficking and Exploitation Strategy:

- Identify and support victims to safety and recovery;
- Identify perpetrators and disrupt their activity; and
- Address the conditions that foster trafficking

Part 4 of the Act introduced Trafficking and Exploitation Prevention Orders (TEPOs) and Trafficking and Exploitation Risk Orders (TEROs). These are orders that can be imposed on people who have committed, or might commit, a trafficking or exploitation offence prohibiting or requiring them to do certain things.

Although a person must have committed a trafficking or exploitation offence before a TEPO can be made, Police Scotland are able to apply to the Courts for a TERO if there is a risk that an adult may commit a trafficking or exploitation offence and there is a need to protect a particular person, or persons generally, from the physical or psychological harm which would be likely to occur if the adult was to commit a trafficking or exploitation offence.

The collation of the information proposed in this consultation may assist Police Scotland in applying for TEROs that will safeguard victims whilst further investigations are ongoing into any alleged criminal activity and subsequent prosecutions.

This consultation offered the opportunity to provide views on the following:

- Who should be named in Regulations as a Scottish public authority that will be subject to the duty;
- What information should be included in notifications both to and from the Police;
- Who the Police should pass information on to; and
- Which other bodies, who cannot be named in the Regulations, should be involved.

'Scottish public authority' for this purpose is defined as "any public body, public office or holder of public office whose functions are exercisable only in or as regards Scotland" ⁴
--

⁴ "Scottish public authority" means any public body (except the Parliamentary corporation), public office or holder of such an office whose functions (in each case) are exercisable only in or as regards Scotland in terms of section 126 (1) of the Scotland Act 1998.

Overview of Responses

Bodies to be named in Regulations

The Scottish Government is of the view, subject to this consultation exercise, that the Scottish public authorities listed below should notify Police Scotland about a person who is, or appears to be, a victim of an offence of human trafficking (section 1 of the Act) or of slavery, servitude and forced or compulsory labour (section 4 of the Act).

All 32 Scottish Local Authorities
All 14 Scottish Geographical NHS Boards
NHS 24
Scottish Ambulance Service
Scottish Fire and Rescue Service
Scottish Ministers for the purposes of including Marine Scotland
Scottish Ministers for the purposes of including Scottish Prison Service
Scottish Environment Protection Agency

Question 1 asked respondents if they agreed that the above authorities should be named in Regulations under section 38(1) of the Act.

- The vast majority of responses expressed support for naming all the listed organisations in Regulations. At least 92.5% of respondents agreed that they should be named.

The Scottish Government recognises that there are other access points to NHS services that potential victims of trafficking may use such as Dental Practice, Community Pharmacist and General Practice. The Scottish Government is of the view, subject to this consultation exercise, that voluntary notifications should be encouraged by these groups of professionals and their staff.

Question 2 asked respondents if they agreed that this group of professionals should be encouraged to submit voluntary notifications.

- The vast majority of responses expressed support for General Practice staff, Community Pharmacists and Dental Practice staff being encouraged to comply with the duty voluntarily. At least 96% of respondents agreed that they should be encouraged to submit voluntary notifications.

Question 3 asked respondents if there was any other Scottish public authorities that should be subject to the duty to notify.

- Around two thirds of respondents believed there are other bodies who should be named in Regulations.

Although the majority of responses expressed support with Scottish Government proposals in questions 1 to 3 some respondents used the opportunity to provide additional comments in support of their response. This was true of both responses in support of, and against, the proposals.

Key themes emerging from questions 1 to 3

- A risk that victims may not seek access to health care support and treatment if they know their details may be passed to the Police (but some victims and survivors disagreed);
- A risk of duplication of referrals due to the potential number of interactions a victim may have with named bodies;
- A risk that anonymity may be compromised outwith larger towns and cities;
- A need for clear links with other processes such as the NRM, child, and adult protection;
- A need for clear definitions of trafficking and exploitation types; and
- Other suggested bodies included those in Education, Health and Care Professionals, Justice, NGO and Third Sector, UK bodies and others

Process for compliance

In terms of the content of the Regulations it will be the Scottish public authority that is named and subject to the legal duty and not an individual person or role within that public authority. The Scottish Government recognises that a one size fits all approach will not be feasible in terms of implementation of the duty and is of the view, subject to this consultation exercise, that it will be for each public authority to determine how this duty will work in practice.

Question 4 asked respondents if they agreed that the bodies named in Regulations should establish their own processes for complying with the duty.

- Around two thirds of respondents believed that bodies named in Regulations should establish their own processes for complying with the legal duty.

Key themes emerging from question 4

- A risk of duplication of referrals due to the potential number of interactions a victim may have with named bodies;
- A need for clear guidance and training for those subject to the legal duty; and
- A need for clear definitions of trafficking and exploitation types

Information to be contained in a notification

A notification from a Scottish public authority to Police Scotland must not include information that identifies an adult, or enables an adult to be identified (either by itself or in combination with other information) unless the adult consents to the inclusion of that information. The Scottish Government is of the view, subject to this consultation exercise, that the anonymised information below should be included in a notification.

Gender
Nationality
Country of Origin
Location victim was recovered

Location reported exploitation took place
Has a referral been made to the Police
Reported to be a victim of a section 1 offence
If a victim of human trafficking did the trafficking involve: <ul style="list-style-type: none"> • Labour exploitation • Sexual exploitation • Domestic servitude • Commission of an offence • Removal of organs or tissue • Unknown • Other
Reported to be a victim of a section 4 offence

Question 5 asked respondents if they agreed that the above anonymised information should be included in a notification.

- The majority of responses expressed support for including the information listed above in a notification from a specified Scottish public authority to Police Scotland. At least 89% of respondents agreed that the information listed should be contained in a notification.
- Three quarters or more of responses from victims and survivors agreed that some of the information above should be passed onto the Police.

Once the consultation closed it became clear that there was an error with this question on the online platform. There was no option to answer yes or no for *reported to be a victim of a section 4 offence*.

The Scottish Government is of the view, subject to this consultation exercise, that the additional information listed below should be included in a notification (if available) if an adult consents to the inclusion of identifiable information.

Consent for additional information
Is the victim willing to be contacted by the Police
First name
Family name
Alias name(s)
Date of birth
Alias date(s) of birth
Is the victim a parent or carer
Other victims whereabouts
Safe phone number
Safe address
Safe post code
Does the victim have any additional needs
Details of persons responsible/perpetrators

Question 6 asked respondents if they agreed that the above information should be included if an adult consents

- The vast majority of responses expressed support for including the additional information listed above in a notification if an adult consents to the inclusion of that additional identifiable information. At least 91% of respondents agreed that the additional information listed should be included in a notification.

Question 7 asked respondents if they believed there was any further information that should be included in a notification

- Just under half of responses believed that there was other information that should be included in a notification from a specified Scottish public authority to Police Scotland.
- The majority of responses from victims and survivors said there was further information that should be included in a notification.

Key themes emerging from questions 5 to 7:

- There needs to be clear definitions of trafficking and exploitation types;
- A risk that anonymity may be compromised outwith larger towns and cities;
- The level of detail required when completing a referral; and
- Other suggested information to be included in a notification was details of perpetrators, children and dependents of the victim, medical history and equalities issues

Bodies that should receive information from Police Scotland
--

After receiving a notification Police Scotland must notify a third party about the person who is, or appears to be, a victim of an offence of human trafficking or of slavery, servitude and forced or compulsory labour.

The Scottish Government is of the view, subject to this consultation exercise, that Police Scotland should pass the information it receives to the bodies listed below.

All 14 Scottish Geographical NHS Boards
All 32 Scottish Local Authorities
British Transport Police
Europol
Gangmasters and Labour Abuse Authority
Home Office
Independent Anti-Slavery Commissioner
Interpol
Marine Scotland
Migrant Help
National Crime Agency
NHS 24
Scottish Ambulance Service

Scottish Environment Protection Agency
Scottish Fire and Rescue Service
Scottish Government
Scottish Prison Service
Trafficking Awareness Raising Alliance

Question 8 asked respondents if they agreed that the bodies listed above should receive a report from Police Scotland about a person who is, or appears to be, a victim of human trafficking or of slavery, servitude or forced or compulsory labour.

- The majority of responses expressed support for Police Scotland sharing information with the bodies listed. At least 89% of respondents agreed that Police Scotland should share information with the bodies listed.

Once the consultation closed it became clear that there was an error with this question on the online platform. There was no option to answer yes or no for *Marine Scotland or the Home Office*.

Question 9 asked respondents if there were any other bodies that they thought Police Scotland should notify about victims of a section 1 or section 4 offence.

- Just under half of respondents believed that there were other bodies which Police Scotland should notify about victims of a section 1 or section 4 offence.
- Nearly three quarters of victim and survivor respondents believed there were people that the Police should tell about them⁵

Key themes emerging from questions 8 and 9:

- Information coming out from Police Scotland should be both relevant and proportionate;
- A risk that anonymity may be compromised outwith larger towns and cities; and
- Other categories of bodies that were suggested to receive this information included the Business and Private Sector, Health and Care Professionals, Justice, Local Authorities, NGO and Third Sector, UK Bodies and others. Victims and survivors suggested community groups, housing associations, the public and people like TARA.

Information to be contained in a notification from Police Scotland

The Scottish Government is of the view, subject to this consultation exercise, that the anonymised information listed below should be contained in a notification from Police Scotland to others if an adult does not consent to providing information that may identify them.

Country of Origin
Gender

⁵ There were only 11 responses to this question

Has a referral been made to the Police
Location reported exploitation took place
Location victim was recovered
Nationality
Reported to be a victim of a section 1 offence
If a victim of human trafficking did the trafficking involve <ul style="list-style-type: none"> • Labour exploitation • Sexual exploitation • Domestic servitude • Commission of an offence • Removal of organs or tissue • Unknown • Other
Reported to be a victim of a section 4 offence

Question 10 asked respondents if they agreed that the anonymised information listed above should be included in a notification from Police Scotland to a third party

- The majority of responses expressed support that the anonymised information listed above should be included in a notification from Police Scotland to a third party. At least 79% of respondents agreed.

Question 11 asked respondents if there was any other information that they thought should be included in a notification from Police Scotland to a third party

- Around a quarter of responses believed that there is other information that should be included in a notification.

Question 12 asked respondents how frequently Police Scotland should pass information to a third party

- There was not a clear preference for how frequently information should be shared by Police Scotland. Responses in favour of quarterly reports either by calendar year or financial , monthly and other were quite evenly split.

Key themes emerging from questions 10 to 12

- A risk that anonymity may be compromised outwith larger towns and cities;
- Other suggested information to be included was details of perpetrators, children and dependents of the victim, port of entry to Scotland and age;
- Information coming out from Police Scotland should be both relevant and proportionate; and
- Information coming out from Police Scotland should be at a similar time to the release of NRM information or quarterly strategy meetings

Other bodies that the Scottish Government should work with

The Scottish Government is of the view, subject to this consultation exercise, that it would like to work with the bodies listed below, who cannot be named in Regulations, because they do not fall within the definition of ‘Scottish public authority’, and encourage them to voluntarily notify the Police about a person who is, or appears to be, a victim of human trafficking or of slavery, servitude and forced or compulsory labour.

Border Force
British Transport Police
Gangmasters and Labour Abuse Authority
Migrant Help
TARA ⁶

Question 13 asked respondents if they agreed that the bodies listed above should work with the Scottish Government to establish a system whereby information can be shared with Police Scotland in a similar way to the legal duty

- The vast majority of responses agreed that the bodies listed above should work with the Scottish Government to establish a system whereby information can be shared with Police Scotland in a similar way to the legal duty. At least 91% of respondents agreed.

Question 14 asked respondents if there were any other bodies that operate in Scotland that the Scottish Government should work with to notify Police Scotland

- Just under three quarters of responses believed that there are other bodies who operate in Scotland that the Scottish Government should encourage to notify Police Scotland about a person who is, or appears to be, a victim of a section 1 or section 4 offence.

Key themes emerging from questions 13 and 14:

- A risk that victims may not seek support if they know that their details may be passed to Police;
- The role of NGO’s in the identification process; and
- Other categories of bodies that were suggested to work with the Scottish Government included the Business and Private Sector, Education, Health and Care Professionals, Housing, Justice, Local Authorities, NGO and Third Sector, Religious Groups and others

⁶ It should be noted that due to internal restructuring Community Safety Glasgow TARA are now part of Glasgow City Council.

Process and Respondents

Process

Several sources of information have been used to inform this consultation. These were:

- **Public consultation survey**
The public consultation document and survey questions were available on the Government's engagement website, Citizen Space, from 16 June 2019 to 06 September 2019.
- **Consultation events**
The Scottish Government held 7 consultation events over summer 2019 in Glasgow, Edinburgh, Hamilton, Stirling, Inverness, Aberdeen and Dumfries. These were attended by over 200 individuals from a variety of backgrounds including public sector, NGO's, law enforcement and members of the public. Attendees could submit anonymous responses at these events.
- **Letters**
Respondents were free to provide their views on issues related to the consultation in a letter, rather than following the form of the consultation survey, if they preferred.
- **Victim & Survivor Questionnaire**
A questionnaire was developed with support providers to seek views from victims and survivors who were currently in the NRM or had been through this process. A copy of the questionnaire can be found at **Annex 1**. The Cabinet Secretary for Justice had a private meeting with 3 women who completed this questionnaire.
- **Online Survey**
A short online survey was shared with the Scottish Government Primary Care Leads Network⁷. The network provide operational and clinical advice on Primary Care issues. A copy of the questionnaire can be found at **Annex 2**.
- **Pilots**
The Scottish Government established a pilot of the duty between the City of Edinburgh Council, Border Force based at Glasgow Airport, and the National Human Trafficking Unit at Police Scotland. Please see **Annex 3** for further detail.

The analysis is based on the responses submitted to the consultation. Given the self-selected nature of the respondents, it is important to note that the views presented should not be seen as representative of the views of the wider population.

⁷ The network consists of Territorial Boards / Integration Authority Clinical & Managerial Leads.

Respondents

A total of 155 responses were received, broken down as follows:

Source	Responses from individuals	Responses from organisations	Unknown if individual or organisational response	Total
Citizen Space online consultation	16	52		68
Anonymous responses submitted at consultation events			17	17
Letters		7		7
Anonymous Victim & Survivor Questionnaire	39			39
Anonymous online survey ⁸			24	24
Total	55	59	41	155

Amongst responses that came from organisations, the following sectors were represented:

- Health;
- Health and Social Care Partnerships;
- Justice;
- Local Authority;
- Professional Bodies; and
- NGO & Third Sector

The “Health” category includes responses from some NHS boards and others providing a health service in Scotland.

The “Health and Social Care Partnerships” category includes responses exclusively from HSCPs located in the West of Scotland.

The “Justice” category includes responses from Police Scotland and other organisations involved in the law and its enforcement.

The “Local Authority” category includes responses from some of Scotland’s 32 local authorities.

The “NGO & Third Sector” category includes responses from both national and local third sector and voluntary organisations, some of whom work directly with potential victims of human trafficking and/or other victims of crime.

The “Professional Bodies” category includes responses from bodies and organisations that are responsible for the oversight, training, examination or regulation of professionals and the publication of guidance/codes of practice for their members.

A full list of respondents can be found at **Annex 4** which includes a more detailed breakdown of these categories.

Publication of Responses

Of the 75 responses received via Citizen Space and letters, 69 have been published on the Scottish Government website. Six respondents indicated that they did not want their response published. All other anonymous responses from the other sources of information have not been published. All responses have been included in this analysis, irrespective of whether or not they have been published.

Analysis of Responses

Bodies to be named in Regulations

Question 1: Do you agree that these bodies should be named in Regulations under section 38(1) of the Act?

Who	Yes	No	Total
All 32 Scottish Local Authorities (%)	76 (97)	2 (3)	78 (100)
All 14 Scottish Geographical NHS Boards (%)	73 (92.5)	6 (7.5)	79 (100)
NHS 24 (%)	72 (93.5)	5 (6.5)	77 (100)
Scottish Ambulance Service (%)	72 (93.5)	5 (6.5)	77 (100)
Scottish Fire and Rescue Service (%)	73 (95)	4 (5)	77 (100)
Scottish Ministers for the purposes of including Marine Scotland (%)	74 (96)	3 (4)	77 (100)
Scottish Ministers for the purposes of including Scottish Prison Service (%)	74 (96)	3 (4)	77 (100)
Scottish Environment Protection Agency (SEPA)	73 (96)	3 (4)	76 (100)

The vast majority of responses expressed support for naming all the listed organisations in Regulations. At least 92.5% of respondents agreed that they should be named.

The Scottish Fire and Rescue Service agreed that they should be named in Regulations.

The Scottish Prison Service agreed that they should be named in Regulations.

The majority of victims and survivors agreed that it should be part of someone's⁹ job to share information if they have concerns about someone.

It is interesting to note that NHS Health Scotland did not agree that the 14 geographical NHS Boards should be named but agreed to the inclusion of NHS24 and the Scottish Ambulance Service. NHS Ayrshire and Arran did not agree that the NHS Boards, NHS24 or the Scottish Ambulance Service should be named.

JustRight Scotland and the Anti-Trafficking Monitoring Group agreed that Local Authorities should be made subject to the duty but disagreed with all other options.

One individual disagreed with any of the bodies being named in regulations.

Question 2: Do you agree that those listed below should be encouraged to submit voluntary notifications?

Who	Yes	No	Total
Dental Practice Staff (%)	74 (96)	3 (4)	77 (100)
Community Pharmacists (%)	74 (96)	3 (4)	77 (100)

⁹ Social workers, prison officers, firefighter, paramedics, teachers, medical staff in hospitals

General Practice Staff (%)	75 (96)	3 (4)	78 (100)
----------------------------	---------	-------	----------

The vast majority of responses expressed support for General Practice staff, Community Pharmacists and Dental Practice staff being encouraged to comply with the duty voluntarily. At least 96% of respondents agreed that they should be encouraged to submit voluntary notifications.

Community Pharmacy Scotland agreed that Community Pharmacists should be encouraged to submit voluntary notifications.

The General Pharmaceutical Council welcomed proposals to encourage voluntary notifications from Community Pharmacists and their staff.

NHS Health Scotland agreed that this group of professionals should be encouraged to submit voluntary notifications.

The majority of responses received from the Scottish Government Primary Care Leads Network agreed that General Practitioners and their staff should be encouraged to submit voluntary notifications.

The vast majority of victims and survivors agreed that this group of professionals should be encouraged to share information with the Police.

Less than a quarter of victims and survivors said it would have stopped them talking to these people or seeking help if they knew their information was going to be passed to the Police.

It is interesting to note that it was two individuals and NHS Ayrshire and Arran that did not agree that these groups of professionals should be encouraged to notify voluntarily.

Question 3: Are there any other Scottish public authorities that you think should be subject to the Duty to Notify? Yes/No

	Yes	No	Total
Other Scottish public authorities (%)	42(61)	27(39)	69(100)

Around two thirds of respondents believed there are other bodies who should be named in Regulations.

Around two thirds of victims and survivors believed there are other people who should share information with the Police.

A high number of organisations, charities and other bodies were suggested in response to question 3. These can be split into 6 different categories as noted below. A fuller list of suggestions can be found at **Annex 5**. The majority of these are not Scottish public authorities and therefore cannot be named in Regulations.

- Education;
- Health and Care Professionals;

- Justice;
- NGO and Third Sector;
- Other; and
- UK Bodies

It is interesting to note the most common¹⁰ suggestions related to teaching staff in schools, colleges and universities, any authority associated with the farming and forestry industry and the housing sector including housing associations, private and social landlords and Airbnb.

When victims and survivors were asked if there was anyone else that should pass information on to the Police if they are concerned about the situation someone is in their questionnaire responses included the following responses:

- Border Force and Home Office staff;
- Everyone including neighbours and community groups;
- Professionals such as psychiatrists, social workers and charity workers; and
- Receptionist in brothel and the men that bought me

When survivors met with the Cabinet Secretary for Justice they were clear that raising awareness of spotting the signs of human trafficking and exploitation in education was important. Survivors also believed that housing is a sector where more could be done to raise awareness and share information.

Key Themes

Although the majority of responses expressed support with Scottish Government proposals in questions 1 to 3 some respondents used the opportunity to provide additional comments whether they were in support of Scottish Government proposals or not.

A risk that victims may not seek access to health care support and treatment if they know their details may be passed to the Police

Some respondents believed that placing a legal duty on Scottish public authorities, particularly the NHS & health services, places a risk that potential victims may not seek medical care and treatment or engage with health professionals if they know their details will be passed onto the Police. Some respondents argued that victims need a safe place to seek medical help without the fear of information being shared.

In contrast, when victims and survivors were asked if it would have stopped them seeking help from medical staff if they knew anonymous information was going to be passed to the Police two thirds responded no. Of those that said yes, some provided further comments by saying that if they had realised the reality of the situation at the time they would happily have involved the police.

A risk of duplication of referrals due to the potential number of interactions a victim may have with named bodies

¹⁰ Suggested more than 5 times

Some respondents were concerned that with numerous access points to the NHS, close working between health and social care staff in Local Authorities and the contracted services within the prison estate there may be the opportunity for duplication of referrals. This links to concerns raised throughout consultation responses about who is responsible for completing a referral when there are interactions with different organisations who are all subject to the legal duty. It is also linked to the concern that referrals take time and may put more pressure on existing services.

Responses from the Scottish Government Primary Care Leads Network also identified time as a barrier to General Practitioners and their staff submitting voluntary referrals as if it took too long this may discourage compliance.

A risk that anonymity may be compromised outwith larger towns and cities

Some respondents believed that victim anonymity could be at risk in smaller, rural communities by sharing their information and/or using an identifier to manage referrals in house. Some respondents believed that only anonymous information should be shared as if use of that information results in enforcement action this could effectively deter a victim from seeking help.

In contrast responses from victims and survivors were fully supportive of information relating to the location where they were found being shared with the Police.

A need for clear links with other processes such as the NRM, child, and adult protection

Some responses referenced the close link between the NRM and the legal duty under section 38 of the Act and that the processes for both will need to be clear. Other responses made links with child and adult protection procedures and legislation in force in Scotland and that the legal duty would need to work alongside these established processes.

Two respondents answered yes to Local Authorities being named and no to all other bodies on the basis that in terms of the National Referral Mechanism¹¹ (NRM) it is only Local Authorities in Scotland who are a First Responder and based in Scotland from the list of bodies suggested at Q1. One other respondent used this argument when answering no to the NHS Boards, NHS24 and the Scottish Ambulance Service being named as they are not NRM First Responders but this respondent was in support of the other bodies listed being named.

A need for clear definitions of trafficking and exploitation types

Some respondents suggested a need for clear definitions to allow front line staff to identify victims. Responses from the Scottish Government Primary Care Leads

¹¹ <https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms>

Network identified the need to educate and train staff as a potential barrier to submitting voluntary notifications due to the time required for this.

The Cabinet Secretary for Justice heard directly from survivors of sexual exploitation and Female Genital Mutilation. For them training for health care workers on spotting the signs and to treat the person as a whole and not just the immediate injury or health need may help health visitors and midwives to identify victims.

Respondent Quote:

“The advantage of naming the organisations upon whom there should be a duty to report is clarity, which we welcome in connection with the operation of the trafficking legislation.” (Law Society of Scotland)

Respondent Quote:

“We are clear in our guidance that doctors must disclose information when the circumstances merit their disclosure. However, we do caution that there may exist a risk on boards that vulnerable people are discouraged or forbidden by those exerting control over them from engaging with healthcare services.”
(General Medical Council)

Respondent Quote:

“We support the inclusion of several bodies in Regulations which employ our registrants, including local authorities, NHS Boards and the Scottish Ambulance Service. We agree in principle that a positive duty [on the above bodies] has the potential to assist the Scottish Government to meet the objectives of Action Area 1 and 2 of the trafficking and exploitation strategy.”
(The Health and Care Professions Council).

Respondent Quote:

“We agree that pharmacists (and pharmacy technicians) may be an access point to NHS services if a victim is not registered with a GP or if they do not wish to attend at A&E or other mainstream NHS services, and may therefore be able to identify people who may be potential victims of human trafficking. We therefore welcome your proposals to encourage voluntary notifications from this group of people and their staff. We note in question 2, there is only reference to community pharmacists, we believe there is a strong case for including pharmacy technicians also as they interact closely with vulnerable adults and children as part of their day-to-day activities”
(General Pharmaceutical Council)

Respondent Quote:

“There are resource implications for raising awareness of the duty to notify....A targeted approach could be more appropriate, whereby settings most likely to encounter victims of trafficking test implementation of the duty” (NHS Health Scotland)

Respondent Quote:

“Human Trafficking does not respect borders. There should be mechanisms to ensure that intelligence and information is shared to and from the Police and other bodies in England & Wales, and the Duty to Notify also apply to UK government departments that may operate in Scotland.” (Scottish Prison Service)

Victim and Survivor Quote:

“Yes. I was told not to talk to the police so speaking to someone – I would not have spoken. Now, I know better but then, it would definitely have stopped me speaking to nurses etc. I was seeing a nurse then and she was asking me but I was saying no as I was scared she may pass it on to the police.” (anonymous)

Victim and Survivor Quote:

“Everyone should pass information but the police should find a way to help victims escape. If I could do it (escape) I would but if I can't get out of the situation, police should find a way to help.” (anonymous)

Victim and Survivor Quote:

“Yes. Because doctors can understand patients conditions and feelings.” (anonymous)

Process for compliance

Question 4: Do you agree that bodies named in Regulations should establish their own processes for complying with the duty? Yes/No

	Yes	No	Total
Bodies should establish their own process (%)	50 (65)	27 (35)	77(100)

Around two thirds of respondents believed that bodies named in Regulations should establish their own processes for complying with the legal duty.

Of the 26 responses received from the Scottish Government Primary Care Leads Network 6 have plans, processes or pathways in place on spotting the signs of human trafficking and exploitation and what action to take. 14 have no plans in place. A further 4 have no plans in place but would take action such as contact social services, phone 101 or contact other NHS colleagues if concerns were raised. The final 2 gave no definitive answer.

Key Themes

Although two thirds of respondents expressed support with Scottish Government proposals in question 4 some used the opportunity to provide additional comments.

A risk of duplication of referrals due to the potential number of interactions a victim may have with named bodies

As with responses to questions 1-3 some respondents believed that there is a risk of duplication of referrals due to the potential number of interactions a victim may have with named bodies.

A need for clear guidance and training for those subject to the legal duty

A number of respondents who answered no to this question believed that there should be national guidance, templates and/or processes developed and designed by the Scottish Government in conjunction with the named bodies to ensure consistency. Some respondents believed that named bodies should also create their own internal processes to comply with the duty once the national guidance is in place. It was suggested by some respondents that compliance and quality assurance checks are built into any processes established.

A need for clear definitions of trafficking and exploitation types

Linked to the theme above and responses to questions 1-3 some respondents believed that in order for bodies to effectively comply with the duty there is a need for training to provide staff with clear definitions of trafficking and exploitation types in order to allow them to spot the signs and identify victims.

Respondent Quote:

“Due to the number and range of council employees who would be subject to the Duty, the form should be simple and light-touch, and designed with the user in mind” (Convention of Scottish Local Authorities (COSLA))

Respondent Quote:

“We are concerned that the laudable aim of sharing information in order to have a more robust picture of human trafficking and exploitation may not be met, and indeed undermined, if implemented too widely and too quickly without sufficient resource to support this. We are therefore recommending a more limited implementation of the legal duty in Scotland supported by regulations which is then monitored and evaluated over a period of time and then extended if the monitoring and evaluation results support this” (JustRight Scotland)

Respondent Quote:

“Human trafficking is a form of child abuse and as a result all professionals should follow existing child protection procedures. It is key that the Human Trafficking and Exploitation Act 2015 is closely aligned to current procedures for child protection, including in determining the roles and responsibilities of healthcare professionals. Reporting of possible trafficked children, following these procedures, would take the form of an Interagency Referral Discussion (IRD). IRD’s are based on information sharing principles, and each agency (Police, social work and healthcare professionals) meets in order to support the assessment of whether a child under the age of 18 is at risk of or suffering harm, in this case from Human trafficking. We recommend that this is included as part of the duty to notify procedure.” (Royal College of Paediatrics and Child Health Scotland)

Respondent Quote:

“In the event Scottish Government implement s.38, and in order to mitigate any potential negative effect, we will work with the Scottish Government and the sector to create and provide any additional guidance that they require. We are aware this will not remove the risk of the most vulnerable being unwilling to access services, but it will provide social workers with the necessary tools to minimise the risk of withdrawal in their interactions with this group” (Scottish Social Services Council)

Respondent Quote:

“There seems to be no provisions for monitoring or evaluation. If this duty to notify provision comes in, there should be continued monitoring to understand how effective it is.” (Law Society of Scotland)

Respondent Quote:

“The size and complexity of the NHS, along with the various access points for potential victims of trafficking presents a risk of duplication and over counting” (NHS Health Scotland)

Information to be contained in a notification
--

Question 5: Do you agree that the anonymised information below should be included in a notification (if it is available) from a specified Scottish public authority to the Police if the adult does not consent to provide information that may identify them?

Information	Yes	No	Total
Gender (%)	73 (92)	6 (8)	79 (100)
Nationality (%)	72 (91)	7 (9)	79 (100)
Country of Origin (%)	75 (95)	4 (5)	79 (100)
Location victim was recovered (%)	71 (90)	8 (10)	79 (100)
Location reported exploitation took place (%)	71 (89)	9 (11)	80 (100)
Has a referral been made to the Police (%)	74 (92.5)	6 (7.5)	80 (100)
Reported to be a victim of a section 1 offence	76 (96)	3 (4)	79 (100)
If a victim of human trafficking, did the trafficking involve:			
• Labour exploitation (%)	74 (95)	4 (5)	78 (100)
• Sexual exploitation (%)	77 (96)	3 (4)	80 (100)
• Domestic servitude (%)	77 (96)	3 (4)	80 (100)
• Commission of an offence (%)	76 (95)	4 (5)	80 (100)
• Removal of organs or tissue (%)	77 (96)	3 (4)	80 (100)
• Unknown (%)	76 (95)	4 (5)	80 (100)
• Other (%)	74 (94)	5 (6)	79 (100)
Reported to be a victim of a section 4 offence ¹²	15	0	15

The majority of responses expressed support for including the information listed above in a notification from a specified Scottish public authority to Police Scotland. At least 89% of respondents agreed that the information listed should be contained in a notification.

Three quarters or more of responses from victims and survivors agreed that some of the information above should be passed onto the Police.

Question 6: Do you agree that the additional information listed below should be included in a notification from a specified Scottish public authority to the Police if the adult consents to the inclusion of that additional identifiable information?

Information	Yes	No	Total
Consent for additional information (%)	70 (91)	7 (9)	77 (100)
Is the victim willing to be contacted by the Police (%)	71 (92)	6 (8)	77 (100)
First name (%)	71 (92)	6 (8)	77 (100)
Family name (%)	71 (92)	6 (8)	77 (100)
Alias name(s) (%)	70 (92)	6 (8)	76 (100)
Date of Birth (%)	72 (94)	5 (6)	77 (100)
Alias Date(s) of Birth (%)	71 (93)	5 (7)	76 (100)

¹² No % as base less than 50

Is the victim a parent or carer (%)	73 (95)	4 (5)	77 (100)
Other victims whereabouts (%)	69 (91)	7 (9)	76 (100)
Safe Phone Number (%)	71 (92)	6 (8)	77 (100)
Safe Address (%)	70 (92)	6 (8)	76 (100)
Safe Post Code (%)	71 (92)	6 (8)	77 (100)
Does the victim have any additional needs (%)	71 (92)	6 (8)	77 (100)
Details of persons responsible/perpetrators (%)	71 (92)	6 (8)	77 (100)

The vast majority of responses expressed support for including the additional information listed above in a notification if an adult consents to the inclusion of that additional identifiable information. At least 91% of respondents agreed that the additional information listed above should be included in a notification.

It is interesting to note that the majority of respondents who answered no to questions 5 and 6 were those working in Local Authorities, the NHS or support organisations that are directly or indirectly involved in the provision of support for victims of trafficking in Scotland.

Question 7: Is there any other information that you think should be included in a notification under section 38(1) of the Act? Yes/No

	Yes	No	Total
Other information should be included (%)	33 (49)	34 (51)	67 (100)

Just under half of respondents believed that there was other information that should be included in a notification from a specified Scottish public authority to Police Scotland.

A number of other types of information were suggested in response to question 7. These can be split into 6 different categories as noted below. A fuller list of suggestions can be found at **Annex 5**.

- Children and dependents of the victim;
- Details of perpetrators;
- Equalities issues;
- Information about other victims;
- Medical history; and
- Whether the victim had been trafficked previously.

Key themes

A need for clear definitions of trafficking and exploitation types

As with previous responses¹³ some respondents believed that organisations may be unaware of, or do not have, sufficient knowledge of the different exploitation types to submit accurate notifications.

¹³ Questions 1-3 and 4

A risk that anonymity may be compromised outwith larger towns and cities

Although the majority of respondents agreed that the information listed above should be included in a notification, 3 support organisations and 2 individual responses expressed concerns about the risks associated with gathering information relating to *location* because of the risk of anonymity being compromised.

In contrast responses from victims and survivors were fully supportive of information relating to the location where they were found being shared with the Police.

The level of detail required when completing a referral

Linked to the two key themes above some respondents suggested that additional details beyond the exploitation types are included in a notification. For example if the notification related to a case of labour exploitation information about the industry this occurred in could be included. Another respondent believed that justification for including information should be part of the notification process. Some suggested it should also be made clear that not all the information listed is required for a notification to be submitted.

Other suggested information to be included was children and dependents of the victim, details of perpetrators, equalities issues, information about other victims, medical history and whether the victim had been trafficked previously

Respondents from the third sector, health and Local Authorities believed that there was additional information that should be included in a notification. There was a clear suggestion for details of any children or dependents of the victim to be shared to ensure proper safeguarding procedures are put in place for that child or adult.

Information about current or historical medical issues should also be included to allow appropriate care and treatment, for example pregnancy and sexual health. Equalities issues such as sexuality and languages spoken should be included to ensure the correct level of support is provided.

A small number of respondents¹⁴ believed that including details of whether the victim had previously been a victim of trafficking may help to understand longer term outcomes.

Again a small number of respondents¹⁵ suggested information about the persons responsible should be included to establish location of crime and methods used by perpetrators. A theme that emerged at the consultation events was details about the port of entry or method used to enter Scotland should be included.

Of the victims and survivors that believed other information should be included in a notification to the Police this included details of name and addresses to help victims escape, presentation of individuals (do they look scared/upset), information about perpetrators and anything that will help.

¹⁴ Individuals and support agencies

¹⁵ Local Authority and support organisations

Respondent Quote:

“This requires to be clarified, especially if the information relates to an individual. An exact address, alongside other information, could lead to the individual being identified. Location collected by local authority area would be wide enough to prevent inadvertent identification of an individual but allow for ‘hotspots’ to be identified. Exceptions could be made for commercial addresses/venues” (TARA)

Respondent Quote:

“Location must be clarified as it is not currently clear how this information would enable a more accurate picture of the scale and extent of trafficking in Scotland or enable more effective targeting of enforcement activity and provision of support services” (Anti-Trafficking Monitoring Group (ATMG))

Respondent Quote:

“The information that has been suggested to be included seems very specific, raising concerns that it may identify the victim when they have not expressly consented to such information being released. We also wonder in some organisations just how accurate the information would be as those making the notification might well be unaware or have knowledge of the difference between the various types of exploitation that have been suggested are included.” (Law Society of Scotland)

Respondent Quote:

“We are of the view that the Scottish Government should consider setting out the statutory minimum information required in a notification within the regulations to ensure a degree of uniformity within the notifications made. This may also address some of the frequently raised issues mentioned in page six of the consultation.” (The Health and Care Professionals Council)

Bodies that should receive information from Police Scotland
--

Question 8: Do you agree that the bodies listed below should receive a report from Police Scotland about individuals who are or appear to be victims of a section 1 or section 4 offence?

Who	Yes	No	Total
Scottish Government (%)	74 (95)	4 (5)	78 (100)
All 32 Scottish Local Authorities (%)	70 (91)	7 (9)	77 (100)
All 14 Scottish Geographical NHS Boards (%)	70 (92)	6 (8)	76 (100)
Marine Scotland ¹⁶	12	1	13
NHS 24 (%)	69 (92)	6 (8)	75 (100)
Scottish Fire and Rescue Service (%)	68 (92)	6 (8)	74 (100)
Scottish Ambulance Service (%)	68 (92)	6 (8)	74 (100)
Scottish Prison Service (%)	68 (92)	6 (8)	74 (100)
Scottish Environment Protection Agency (SEPA) (%)	65 (89)	8 (11)	73 (100)
Trafficking Awareness Raising Alliance (TARA) (%)	71 (96)	3 (4)	74 (100)
Migrant Help (%)	71 (96)	3 (4)	74 (100)
Gangmasters and Labour Abuse Authority (GLAA) (%)	71 (96)	3 (4)	74 (100)
British Transport Police (BTP) (%)	70 (93)	5 (7)	75 (100)
National Crime Agency (NCA) (%)	71 (95)	4 (5)	75 (100)
Independent Anti-Slavery Commissioner (%)	73 (97)	2 (3)	75 (100)
Interpol (%)	71 (95)	4 (5)	75 (100)
Europol (%)	58 (95)	3 (5)	61 (100)

The majority of responses expressed support for Police Scotland sharing information with the bodies listed. At least 89% of respondents agreed that Police Scotland should share information with the bodies listed.

The Scottish Fire and Rescue Service, the Scottish Prison Service, the Gangmasters and Labour Abuse Authority and British Transport Police all agreed that they should receive a report from Police Scotland.

TARA also agreed that they should receive a report from Police Scotland but on an anonymous basis unless the report requires action to safeguard an individual.

Once the consultation closed it became clear that there was an error with this question on the online platform. There was no option to answer yes or no for *Marine Scotland or the Home Office*.

It is interesting to note that the majority of respondents who answered no to question 8 were those working in Local Authorities, the NHS or support organisations that are directly or indirectly involved in the provision of support for victims of trafficking in Scotland.

¹⁶ No % as base less than 50

Question 9: Are there any other bodies that you think Police Scotland should notify under section 38(4) of the Act? Yes/No

	Yes	No	Total
Other bodies that should receive information (%)	28 (42)	38 (58)	66 (100)

Just under half of respondents believed that there were other bodies which Police Scotland should notify about victims of a section 1 or section 4 offence.

Nearly three quarters of victim and survivor respondents believed there were people that the Police should tell about them.¹⁷

Key Themes

Information coming out from Police Scotland should be both relevant and proportionate

Some respondents commented that only information about high level patterns and trends should be shared with the bodies listed above. Others argued that information should only be shared with an organisation if it provides support to victims or has a role in apprehending perpetrators. Some respondents expressed concerns that information may be used for other law enforcement purposes such as immigration offences. Others believed that information should be shared on a case by case basis.

A risk that anonymity may be compromised outwith larger towns and cities

Despite the vast majority of respondents agreeing that the bodies listed above should receive a report from Police Scotland many used the opportunity to suggest that reports should be anonymous and not disclose any identifiable information. As with previous questions¹⁸ there were concerns expressed about including specific information about *location* in any published report.

Other bodies that should receive information

A high number of bodies were suggested in response to question 9. These are similar to the groups of professionals suggested in response to question 3 with the addition of Business and Private Sector and specific teams/departments of Local Authorities.

- Business and Private Sector;
- Health and Care Professionals;
- Justice;
- Local Authorities;
- NGO and Third Sector;
- Other; and
- UK Bodies

¹⁷ There were only 11 responses to this question

¹⁸ Questions 1-3, 4 and 5-7

It is interesting to note that most organisations in these categories were only mentioned once or twice but the Crown Office and Procurator Fiscal Service, Border Force and the general public were each suggested on 3 or more occasions. A fuller list is provided at **Annex 5**.

The main reasons for sharing information with these groups of professionals was to help identify potential victims and ensure they are offered support, to help these agencies understand the issue of trafficking in their sector/area and to put in place preventative measures to help combat this crime.

Victims and survivors suggested community groups, housing associations, the public and support organisations.

Respondent Quote:

“AGAIN to substantiate our YES responses We do not think all agencies noted would need to know in every circumstance. Information shared should be considered and proportionate and with clear purpose. More general thematic information could be shared and only individualised when deemed necessary.”
(Highland Violence Against Women Partnership)

Respondent Quote:

“EU Commission. This can help the EU identify the countries within the EU where victims are sourced. They can take preventative measures to trafficking”
(Anonymous Individual)

Respondent Quote:

“Lord Advocate and Procurator Fiscal Service - Assists in a wider understanding of the issue when prosecuting cases.” (Hope for Justice)

Respondent Quote:

“While we accept that information passed from Police Scotland would be anonymised, we have concerns that it may still lead to enforcement action by Border Force. Many of Scotland’s local authorities have numerically and proportionately small migrant populations particularly of nationalities that feature highly in the human trafficking statistics. The possibility of an immigration enforcement action being taken by the UK Border Force on the basis of intelligence provided by Scottish local authority staff cannot therefore be discounted. This is particularly the case in situations where staff would have a Duty to Notify, but no support through the NRM had been triggered” (COSLA)

Respondent Quote:

“This will depend on what is contained in the report. It would be appropriate if it is only raw data i.e. number of referrals, country of origin or where located etc. It would not, however, be appropriate to share information if it uniquely identified an individual. More specific information should be shared when it is determined by the police to be legitimate, proportionate and reasonable to share in a report” (East Ayrshire Health and Social Care Partnership)

Victim and Survivor Quote:

“Depends what someone has gone through, but only support organisations, and doctor if they need to see someone.” (anonymous)

Victim and Survivor Quote:

“Police should go to specific communities e.g. Albanian community, to raise awareness.” (anonymous)

Victim and Survivor Quote:

“Police should tell organisations like TARA. Housing organisations, both social housing and private should check people getting the house aren’t traffickers or exploitation people in their property. Housing is everything.” (anonymous)

Information to be contained in a notification from Police Scotland

Question 10:

Do you agree that the anonymised information below should be included in a notification from Police Scotland to a third party if the adult does not consent to provide information that may identify them?

Information	Yes	No	Total
Gender (%)	60 (83)	12 (17)	72 (100)
Nationality (%)	59 (83)	12 (17)	71 (100)
Country of Origin (%)	60 (83)	12 (17)	72 (100)
Was the victim under the age of 18 (%)	59 (84)	11 (16)	70 (100)
Location victim was recovered (%)	57 (84)	16 (16)	73 (100)
Location reported exploitation took place (%)	57 (79)	15 (21)	72 (100)
Reported to be a victim of a section 1 offence	62 (87)	9 (13)	71 (100)
If a victim of human trafficking, did the trafficking involve:			
• Labour exploitation (%)	62 (87)	9 (13)	71 (100)
• Sexual exploitation (%)	63 (87.5)	9 (12.5)	72 (100)
• Domestic servitude (%)	62 (87)	9 (13)	71 (100)
• Commission of an offence (%)	63 (87.5)	9 (12.5)	72 (100)
• Removal of organs or tissue (%)	63 (87.5)	9 (12.5)	72 (100)
• Unknown (%)	62 (87)	9 (13)	71 (100)
• Other (%)	63 (87.5)	9 (12.5)	72 (100)
Reported to be a victim of a section 4 offence (%)	53 (85.5)	9 (14.5)	62 (100)

The majority of responses expressed support that the anonymised information listed above should be included in a notification from Police Scotland to a third party. At least 79% of respondents agreed.

It is interesting to note that respondents who answered no to question 10 were those working in Local Authorities, the NHS or support organisations that are directly or indirectly involved in the provision of support for victims of trafficking in Scotland.

Question 11:

Is there any other information that you think should be included in a notification under section 38(5) of the Act? Yes/No

	Yes	No	Total
Other information should be included (%)	15 (23)	50 (77)	65 (100)

Around a quarter of respondents believed that there is other information that should be included in a notification.

Some other types of information were suggested in response to question 11. These are similar to the suggestions at question 7. They can be split into 3 different categories as noted below. A fuller list of suggestions can be found at **Annex 5**.

- Children and dependents of the victim;
- Details of perpetrators; and
- Miscellaneous

Question 12:

How frequently do you think the Police should pass information to a third party? Please select only one option or state one other time period.

Frequency	No of Responses (%)
Monthly	10 (14)
Quarterly (calendar year)	15 (20)
Quarterly (financial year)	18 (24)
Bi-annually	5 (7)
Annually	8 (11)
Another time period (please state only one)	18 (24)
Total (%)	74 (100)

There was not a clear preference for how frequently information should be shared by Police Scotland. Responses were quite evenly split between quarterly (calendar and financial), monthly and other.

Key Themes

A risk that anonymity may be compromised outwith larger towns and cities

Despite 79% and above of respondents agreeing that the information listed at question 10 should be included in a notification some respondents expressed concerns that if the information shared from the Police to a third party was not anonymised this could potentially identify a person when consent had not been provided. As with earlier questions it is information relating to location that caused most concern. Some respondents despite answering yes to question 10 then added additional comments that they only wish anonymised information to be shared.

Other suggested information to be included was details of perpetrators, children and dependents of the victim and miscellaneous

Some respondents would like to see information about perpetrators being shared by the Police such as the methods used to recruit and control, and details of the perpetrator profile. Information about children and dependents was also thought to be important to ensure that appropriate adult and child protection measures were put in place, particularly for young adults.

A variety of miscellaneous information such as age of the victim, how and when the exploitation stopped and what ports of entry to Scotland were used was also suggested.

Information coming out from Police Scotland should be both relevant and proportionate

There was no clear preference for how often information should be shared by the Police. However there was a general consensus amongst respondents that any information sharing should be both relevant and proportionate. A number of respondents were clear that if there is an immediate concern information should be shared instantly.

Anonymous responses from the consultation events showed a clear preference for quarterly reports either by calendar or financial year frequency.

Information coming out from Police Scotland should be at a similar time to the release of NRM information or quarterly strategy meetings

Some respondents believed that the information should be shared at the same time as the release of NRM statistics so that the information can be compared. Police Scotland responded by saying information should be shared at the same time as the Trafficking and Exploitation Strategy Action Area group led by Police Scotland meets to discuss progress against Action Area 2 commitments.

Respondent Quote:

“For what purpose is this information going to agencies? as per previous response, if this is non identifiable, generic, anonymised, and therefore non-operational, and for generic intel, what is expected of these agencies? How can they support without details. Police would receive info to help build and intelligence picture, that would be more beneficial than individual anonymised info” (Dumfries and Galloway Public Protection Committee)

Respondent Quote:

“Gender/Nationality/Country of origin of the trafficker responsible for the section 1 or 4 offence - Again, as long as this information cannot uniquely identify the individual concerned.” (East Ayrshire Health and Social Care Partnership)

Respondent Quote:

“We believe the frequency should be quarterly (financial year), however if there’s an immediate concern about potential human trafficking activity or about the safety of an individual then it should be as soon as is possible.” (Community Pharmacy Scotland)

Respondent Quote:

“Frequency should be reviewed regularly, particularly if there is an increase in potential victims of human trafficking or exploitation.” (Inverclyde Health and Social Care Partnership)

Respondent Quote:

“Needs to be timeous to be effective” (Healthcare Improvement Scotland)

Respondent Quote:

“Age groups - it could be useful to have explicit guidance for 16 and 17 year old victims and how they could be supported” (NHS Ayrshire & Arran)

Respondent Quote:

“We think this is difficult to respond yes or no. Again we think that the information should be disclosed should there be themes or trends emerging which affect particular services or communities. Disclosure of this may help them determine resource allocation, community development approaches, safety planning and ongoing monitoring and information gathering to disrupt criminality and prevent further victimisation.” (Highland Violence Against Women Partnership)

Respondent Quote:

“HFJ considers the frequency will very much depend on the quality and use of the information provided. Patterns of exploitation do change over time so it would be important to collate monthly and also annual data sets. Police Scotland should also be resourced to produce this information.” (Hope for Justice)

Other bodies that the Scottish Government should work with

Question 13: Do you agree that the Scottish Government should work with these bodies to establish a system whereby information can be shared with the police in a similar way to the statutory duty under section 38 of the Act?

Who	Yes	No	Total
Border Force (%)	76 (100)	0	76 (100)
Gangmasters and Labour Abuse Authority (%)	77 (100)	0	77 (100)
British Transport Police (%)	77 (100)	0	77 (100)
TARA (%)	71 (93)	5 (7)	76 (100)
Migrant Help (%)	67 (91)	7 (9)	74 (100)

The vast majority of responses agreed that the bodies listed above should work with the Scottish Government to establish a system whereby information can be shared with Police Scotland in a similar way to the legal duty. At least 91% of respondents agreed.

The British Transport Police and the Gangmasters and Labour Abuse Authority agreed that they should work with the Scottish Government to establish a system whereby information can be shared with Police Scotland in a similar way to the legal duty.

Of the 29 victim and survivor respondents who answered question 10 of the survivor questionnaire 19 said that it would not have stopped them seeking help from TARA, Migrant Help and the Anchor Service if they knew anonymous information was going to be passed to the Police. 3 gave no definitive answer, 3 didn't know and 4 said yes it would have stopped them seeking help.

Question 14: Do you think that there are any other bodies that operate in Scotland that the Scottish Government should encourage to notify the police about a person who is or appears to be a victim of a section 1 or section 4 offence? Yes/No

	Yes	No	Total
There are other bodies (%)	49 (72)	19 (28)	68 (100)

Just under three quarters of respondents believed that there are other bodies who operate in Scotland that the Scottish Government should encourage to notify Police Scotland about a person who is, or appears to be, a victim of a section 1 or section 4 offence.

A high number of bodies were suggested by respondents that the Scottish Government should work with to encourage notifications. This list is very similar to bodies suggested at questions 3 and 9. The main categories are below with a fuller list at **Annex 5**:

- Business and Private Sector;
- Education;
- Health and Care Professionals;
- Housing;
- Justice;
- Local Authorities;
- NGO and Third Sector;
- Other; and
- UK Bodies

The main reasons given for sharing information with these groups of professionals is front line staff may be in a position to identify potential victims and offer support, or they may work in environments where traffickers are active and spot indicators of trafficking related activity.

It is interesting to note that education establishments, housing, religious organisations and the DWP were the most common¹⁹ suggestions.

It is interesting to note that Healthcare Improvement Scotland (HIS) are a body that were frequently mentioned in response to questions 3, 9 and 14. HIS responded to the consultation and suggested they are encouraged to submit notifications (as well as the Care Inspectorate) due to both agencies role in scrutiny and improvement, and also their public facing and engaging roles.

Key Themes

A risk that victims may not seek support from NGOs if they know their details will be passed to Police

Of the respondents who did not agree that TARA and Migrant Help should be encouraged to notify the Police this was because of a belief that victims may not approach or engage support and assistance from these organisations if they knew their information was going to be passed to the Police.

It is interesting to note that the majority of respondents who did not agree that TARA and Migrant Help should share information with Police Scotland are directly or indirectly involved in the provision of support for victims of trafficking in Scotland.

The role of NGO's in the identification process

Some respondents believed that it is not the role of an NGO to notify the Police about someone who may be a victim of human trafficking but to build trust and provide support. This is linked to the key theme above but also due to the sharing of information that may lead to immigration enforcement action or apprehension of traffickers as seen in response to questions 8 and 9.

¹⁹ Each group was suggested on 5 or more occasions

Respondent Quote:

“As a support provider TARA are concerned that being under any form of obligation to undertake duty to notify to Police Scotland, albeit anonymous, would negatively impact on vulnerable women approaching our service for support.”
(TARA)

Respondent Quote:

“We do not think it is necessary for TARA /migrant help to be subject to duty to notify. The majority of victims they work with agree to the NRM and so numbers would be small. In addition, they work with victims to build trust and engage with the police in their own timeframe. They work with victims using trauma informed approach and so for transparency they would need to be clear from the outset of engagement where all information victims give them goes and that information will be passed to the police with their consent, or anonymously. This may result in victims not engaging with TARA/migrant Help” (NHS Greater Glasgow & Clyde Psychological Trauma Service)

Respondent Quote:

“The first 3 bodies are covered by the duty to notify in the Modern Slavery Act so it would seem prudent for there to be a way in which information shared under this duty is also shared on a voluntary basis with Police Scotland.” (JustRight Scotland)

Respondent Quote:

“I consider that the possibility that the sharing of such data may result in enforcement action effectively deters many individuals who are suffering unthinkable abuse from approaching Social Workers and other care professionals for help and that such systems should be quite separate and apply the same criteria for the sharing of sensitive personal information without the agreement of the persons concerned, as exists for other people.” (Ian Johnston) (publish with name)

Respondent Quote:

“Any employer who suspects Human Trafficking e.g. this may be in the supply chain or from observation when out working.

Trafficking often involves fraudulent activity in and around the benefits or banking system to manage the proceeds of trafficking:

Post Office delivery personnel may observe activities or mail which is irregular.

Bank staff who observe coercive or irregular behaviour in terms of multiple bank accounts.

Department of Work and Pensions” (Scottish Prison Service)

Next Steps

The Scottish Government is very grateful to all those who took the time to respond to this consultation and engaged in the consultation process, particularly victims and survivors.

Overall the majority of responses expressed support for Scottish Government proposals.

Future legislation will take into account the views and concerns expressed in response to this consultation. Please note that due to the fast moving response to COVID-19 and its impact on public services the Cabinet Secretary for Justice has agreed to delay legislative implementation of the duty. It is unlikely to come into force before 01 April 2021 at the earliest.

However if you suspect any human trafficking behaviour or activity within your workplace or identify a potential victim you can still report this, or seek further advice, using the methods below:

National Referral Mechanism for First Responders

<https://www.modernslavery.gov.uk/start>

Modern Slavery Helpline

<https://www.modernslaveryhelpline.org/scotland>

Police Scotland

101 – non emergency

999 – emergency

Contact the National Human Trafficking Unit at

SCDNationalHumanTraffickingUnit@Scotland.pnn.police.uk

Trafficking Awareness Raising Alliance – support for adult victims trafficked for the purposes of commercial sexual exploitation

<https://www.glasgow.gov.uk/TARA>

Migrant Help – support for all other adult victims

<https://www.migranthehelpuk.org/Pages/Category/slavery-and-human-trafficking>

COSLA guidance for Local Authority Staff

<http://www.migrationscotland.org.uk/resources/human-trafficking-exploitation-guidance>

Scottish Government Guidance for NHS Staff

<https://www.gov.scot/publications/human-trafficking-exploitation-health-workers-need-know/>

VICTIM AND SURVIVOR QUESTIONNAIRE

The Scottish Government developed a questionnaire with support providers to seek views from victims and survivors who were currently in the NRM or had been through this process. This approach was taken to alleviate, or confirm, one of the risks identified during the consultation process: that victims may be reluctant to seek access to support, particularly medical care and treatment, if they knew that their details were being passed to the Police.

The text of the questionnaire and responses are below. Responses were provided on an anonymous basis from clients receiving support from TARA, Migrant Help and JustRight Scotland.

The Scottish Government would like to find out what you think about people like social workers, paramedics, prison officers and the fire service passing on information to the Police about you and the situation you were found in.

If you do not consent to your personal details being passed on this can be done anonymously.

Question 1:

If you were trapped in a situation would you wish anonymous information about you to be passed on to the Police so that they could try and help you out of that situation?

Yes	30
No	0
Total	30

Question 2:

We think it should be part of someone's job to tell the Police about someone who might be a victim of human trafficking and exploitation. Do you think the people below should pass information on if they have concerns about someone?

	Yes	No	Total
Social workers	34	0	34
Prison officers	22	3	25
Firefighter	26	5	31
Paramedics	30	3	33
Teachers	27	5	32
Medical staff in hospitals	33	1	34

Question 3:

We would also like to encourage people like GPs, pharmacists and dentists to tell the Police about someone who might be a victim of human trafficking and exploitation.

Do you think GPs, pharmacists and dentists should pass information on if they have concerns about someone?

	Yes	No	Total
GPs	34	1	35
Pharmacists	32	0	32
Dentists	28	2	30

Question 4:

Would it have stopped you talking to these people or seeking help from them if you knew anonymous information was going to be passed on to the Police about you?

Yes	4
No	14
No definitive answer	6
Total	24

Question 5:

Can you think of anyone else that should pass information on to the Police if they are concerned about the situation you are in?

Yes	17
No	4
No definitive answer	4
Total	25

Question 6:

Do you agree that the information below should be passed onto the Police?

	Yes	No	Total
Your sex	32	1	33
Your age	34	0	34
Where you come from	33	1	34
Where you were found	35	0	35
What happened to you	33	0	33
If you've spoken to the Police already	25	2	27
If there is anyone else involved	19	6	25

Question 7:

Do you think there is any other information about you or other people that should be shared with the Police?

Yes	21
No	4
Total	25

Question 8:

When the Police receive this information it will help them to understand better what you have experienced and where criminals are exploiting vulnerable groups and individuals like you in Scotland.

Once the Police have this information we would like them to tell other people so that the right support and assistance can be offered to other victims and so that the Police can investigate if someone is committing a crime and try to stop them.

We hope that the information that the Police receive will help us know more about how big a problem human trafficking is in Scotland and if there are any specific areas or communities where we need to do more to help people like you and disrupt criminal behaviour.

Who do you think the Police should tell about people like you?

Yes	8
No	0
Don't know	3
Total	11

Question 9:

We would like to know if it would have stopped you seeking help from TARA, Migrant Help and the Anchor Service if you knew anonymous information was going to be passed to the Police?

Yes	4
No	19
No definitive answer	3
Don't know	3
Total	29

Question 10:

We would like to know if it would have stopped you seeking help from medical staff if you knew anonymous information was going to be passed to the Police?

Yes	7
No	19
No definitive answer	2
Don't know	1
Total	29

ONLINE SURVEY

A short online survey was shared with the Scottish Government Primary Care Leads Network. The network provide operational and clinical advice on Primary Care issues. The survey consisted of 7 questions. Responses were provided on an anonymous basis.

Question 1: Should General Practitioners and their staff be encouraged to submit voluntary notifications?

Yes	24
No	2
No definitive answer	2
Total	28

Question 2: Do you see any barriers to this?

Yes	24
No	3
Total	27

Question 3: What plans, pathways or processes do you currently have in place for General Practitioners and their staff on spotting the signs of human trafficking and exploitation and what action to take?

Plans in place	6
None	14
None but would take action	4
No definitive answer	2
Total	26

Question 4: Would you be willing to share your plans with the Scottish Government?

Yes	3
No	1
No plans to share	9
Yes if we had plans	1
Not applicable	12
Total	26

Question 5: Do you have any evidence of potential victims of trafficking seeking help from General Practice?

Yes - current and historic	3
No evidence	24
No definitive answer	1
Total	28

Question 6: Would you be willing to share this with the Scottish Government?

Yes	4
Not applicable	16
No definitive answer	2
Total	22

Question 7: Do you know that the Trafficking Awareness Raising Alliance and Migrant Help are funded by the Scottish Government to provide support and assistance to adult victims of human trafficking and of slavery, servitude and forced or compulsory labour?

Yes	3
No	21
Total	24

PILOTS

In February 2018 a local trial implementation of the duty to notify process began with the City of Edinburgh Council and the National Human Trafficking Unit (NHTU) at Police Scotland.

City of Edinburgh Council delivered substantial training and awareness raising activity with staff in a range of contexts, and established a small coordination team for routing duty to notify referrals to the police.

Police Scotland developed an online portal for these referrals.

Monthly meetings between the Scottish Government, Police Scotland and City of Edinburgh Council were held to monitor progress. After the first three months of the trial implementation, a decision was made to extend the trial to provide a more robust evidence base before national implementation of the duty.

There were two early referrals but these proved not to be cases of human trafficking and/or exploitation. There were no further referrals. While low level of referrals would be in line with reporting levels from local authorities in England under their equivalent duty, reasons for the lack of referrals were explored to improve identification in future roll-out. Initial thoughts were that this may be because of a lack of awareness amongst staff about new processes to follow, a downward trend in victims being recovered in Edinburgh or that as concerns were already raised through other well established channels they may not fall under the scope of duty to notify.

The pilot was extended in September 2018 to include Border Force at Glasgow Airport and the Gangmasters and Labour Abuse Authority. Over the next year 54 referrals were submitted to the NHTU from Border Force. No referrals were received from GLAA. This has allowed the notification process to be tested.

The key aims of the pilots were to:

- To test out the process and types of information to be collected through the Duty;
- To establish the impact on staff completing the referrals;
- To estimate the volume of referrals;
- To establish the frequency of referrals received by Police Scotland;
- To test the quality of referrals received by Police Scotland;
- To test the ease of recording the information by Police Scotland and extrapolating it to comply with section 38(4) of the Act (passing information onto a third party);
- To test the frequency that information will be passed on by Police Scotland; and
- To establish the resources required by Police Scotland to manage all aspects of the Duty

At the close of the consultation the Scottish Government met with the City of Edinburgh Council, Border Force and the NHTU to evaluate the pilots.

Key Learning and Feedback provided was:

- Corporate buy in and proper investment will be required when the duty comes into force;
- Messaging around the duty needs to be clear to ensure it is interpreted correctly;
- No financial or IT costs/resources were incurred for the pilots;
- Staff time required to deliver training and raising awareness sessions was quite substantial within City of Edinburgh Council;
- Staff time required to submit referrals on the online portal was manageable for the number of referrals submitted. This may not be the case once the duty comes into force;
- Raising awareness has to be a repeated process to change behaviour and attitudes;
- Consideration of who will be expected to comply with the duty is needed. Are social workers the right people as they are not usually the first point of contact a victim may have with a local authority worker (e.g. concierge staff, bin refuse collector, environmental wardens);
- Frustration by some front line staff in Border Force that the information that was being used was very sanitised;
- Concerns around the sharing of personal information in terms of data protection legislation;
- The online portal was not user friendly due to login processes and lack of help/guidance for filling in fields;
- No call markers on police systems to know if 101 calls were being used at the same time as the pilots were being carried out to allow a comparison of use/preferred method of reporting; and
- Reviewing the process as the pilot continued allowed changes to be made to improve the process

LIST OF RESPONDENTS BY ORGANISATION²⁰

Health
Castlemilk Health Centre
Community Pharmacy Scotland
Healthcare Improvement Scotland
Highland Violence Against Women Partnership
NHS Ayrshire and Arran
NHS Greater Glasgow & Clyde Psychological Trauma Service
NHS Health Scotland
NHS Greater Glasgow and Clyde
Health and Social Care Partnerships
East Ayrshire Health and Social Care Partnership
East Renfrewshire Health and Social Care Partnership
Glasgow City Health and Social Care Partnership
Inverclyde Health and Social Care Partnership
North Ayrshire Health and Social Care Partnership
Justice
British Transport Police
Gangmasters and Labour Abuse Authority
Law Society of Scotland
Police Service of Scotland
Scottish Fire and Rescue Service
Scottish Prison Service
The Scottish Children's Reporter Administration
Local Authority
Aberdeen City
Angus
Clackmannanshire
Dumfries and Galloway
Dundee City
Falkirk
Renfrewshire
Shetland
South Lanarkshire
Stirling
The City of Edinburgh
West Lothian

²⁰ Bodies that did not wish their response to be published have not been included in this breakdown.

NGO & Third Sector
Aberdeen Cyrenians
ACVO TSI Aberdeen
Hebrides Alpha Project , Eilean Siar
Hope for Justice
JustRight Scotland
Scottish Community Safety Network
The Anti-Trafficking Monitoring Group, c/o Anti-Slavery International
The Salvation Army
The TARA Service
Victim Support Scotland
Wellbeing Scotland

Professional Bodies
Care Inspectorate
Convention of Scottish Local Authorities (COSLA)
General Medical Council
General Pharmaceutical Council
Royal College of Paediatrics and Child Health Scotland (RCPCH)
Scotland Excel
Scottish Social Services Council
Social Work Scotland
The Health and Care Professions Council

LIST OF ORGANISATIONS REPRESENTED AT CONSULTATION EVENTS²¹

Justice
Community Justice Scotland
Police Scotland
SACRO
Scottish Children's Reporter Administration
Scottish Courts and Tribunal Service
Scottish Fire and Rescue Service
Scottish Prison Service

Local Authorities
Aberdeen
Dumfries and Galloway
Dundee
East Dunbartonshire
Edinburgh
Falkirk
Glasgow
Highland
Inverclyde

²¹ Some organisations may not be included due to the registration sheet for Stirling being destroyed prematurely and due to registration details provided included personal rather than professional contact details.

North Lanarkshire
North Ayrshire
Renfrewshire
Scottish Borders
South Lanarkshire
West Dunbartonshire

NGO & Third Sector
Aberdeen Council of Voluntary Organisations
Action for Children
Alliance Scotland
Apostleship of the Sea
Citizens Advice Scotland
City Hearts
Cyrenians
Highlife Highland
Hope for Justice
Migrant Help
NSPCC
Scottish Business Resilience Centre
Scottish Community Safety Network
TARA
Victim Support Scotland

Professional Bodies
COSLA
General Medical Council
Scotland Excel

Scottish Government
Chief Nursing Office
Child Protection Policy
Health and Social Care Policy
Marine Scotland
Victims and Witnesses Policy

LIST OF ORGANISATIONS SUGGESTED AT QUESTION 3

Education
Colleges (ESOL)
Education Scotland
Teaching staff in Higher and Further Education
Universities

Health & Care Professionals
Care Inspectorate
Community Health and Care Professionals
Healthcare Improvement Scotland
Opticians
Sexual Health/Midwives/Health Visitors

Justice
Community Justice Scotland
Crown Office and Procurator Fiscal Service
Port Authorities
Scottish Children Reporters Administration

NGO & Third Sector
Action for Children
Barnardos
Childline
Citizens Advice Bureau
NSPCC
SHAKTI
Streetworks
Women's Aid

Other
Any authority associated with farming and forestry
Housing Associations
Registrar General
Religious Establishments and Faith Groups
Scottish Charitable Incorporated Organisations
Transport Scotland
Utility Companies

UK Bodies
DWP
HM Coastguard
Her Majesty's Revenue and Customs

LIST OF OTHER INFORMATION SUGGESTED AT QUESTION 7

Children and dependents of the victim
Age, gender and location of dependent children
Is the victim a parent or carer
Is the victim pregnant
Name and date of birth of dependent children
Victim of child criminal exploitation

Details about perpetrators
Act and means used by perpetrators
Premises used by perpetrators
Vehicles of persons responsible
Control measures of traffickers - passport held, financial, physical threat, family/individual

Equalities Issues
Disabilities
Immigration status
Interpreter required
Languages spoken and how to communicate with the victim
Preferred gender of contact
Repatriation choice – where does the victim want to reside
Sexuality of the victim

Information about other victims
Other persons at risk either in UK or beyond
Other victims

Medical
Disabilities
Drug and alcohol dependencies
Mental health and capacity
Physical health

Whether the victim had been trafficked previously
Has the victim been assisted to return home previously
Has the victim been in the NRM before
Places of transit
Port entering country/method of entering country
Possession of ID
What journey did the victim take
What support agencies are victims engaging with
Why do they not want to enter the NRM
What was personal incentive
Indicators of previous trafficking/exploitation

LIST OF ORGANISATIONS SUGGESTED AT QUESTION 9

Business & Private Sector
Confederation of British Industry (CBI)
Scottish Enterprise
The Scottish Trade Unions Congress (STUC)

Health & Care Professionals
Allied professionals such as Occupational Health
Care Inspectorate
Community Pharmacists
Dentists
General Practitioners
Healthcare Improvement Scotland
Mental Welfare Commission
Opticians

Justice
Community Justice Scotland
Crown Office and Procurator Fiscal Service
Crown Prosecution Service
Scottish Children's Reporter Administration

Local Authorities
Adult and Child Protection
Integrated Joint Boards
Social Workers

NGO & Third Sector
Aberlour
Citizens Advice Bureau
Encompass Network
Hope for Justice
Red Cross
Scottish Council for Voluntary Organisations
Scottish Refugee Council
Scottish Women's Aid
Victim Support Scotland

Other
EU Commission
Euro Just
Farming Organisations
General Public
Housing Associations
Television Researchers
Youth and Community organisations

UK Bodies
All relevant UK Commissioners
Border Force
Department for Work and Pensions (DWP)
Director of Labour Market Enforcement
Her Majesty's Revenue and Customs (HMRC)
International Modern Slavery and Migration Envoy

LIST OF OTHER INFORMATION SUGGESTED AT QUESTION 11

Children and dependents of the victim
Is the victim a parent or carer
Adult and child protection issues

Details of perpetrators
Gender, nationality and country of origin of trafficker
Methods used by the perpetrators to recruit and control

Miscellaneous
Age of victim
Criminal history of victim
How the victim came to the attention of the referring agency
Information about referring agency (specific team/department)
Is the victim attending any education establishment
Port of entry to Scotland
Victims preferred outcome
When and how the exploitation stopped

LIST OF ORGANISATIONS SUGGESTED AT QUESTION 14

Business & Private Sector
Business Regulators
CBI
Scottish Enterprise
STUC

Education
Schools, Colleges and Universities

Health & Care Professionals
Care Commission
Care Inspectorate
General Practitioners
Healthcare Improvement Scotland
Private and Independent Dentists

Housing
Air BnB
Caravan Parks
Housing Associations
Rental Agencies
Social Landlords

Justice
Community Justice Scotland
Crown Office and Procurator Fiscal Service
Crown Prosecution Service
Scottish Children's Reporter Administration

Local Authorities
Licensing
Registrars

NGO & Third Sector
Any Government or NHS funded body working in this area
Asylum Services
BAME Groups
Community Councils
Drug and Alcohol Addiction Services
Foodbanks
Homeless Shelters
Learning Difficulties Services
Money Advice Services
Rape Crisis Scotland
Salvation Army
Scottish Council for Voluntary Organisations
Scottish Refugee Council
Scottish Women's Aid
Third Sector Interface
Victim Support Scotland

Other
Banking and Financial Institutions
Euro Just
Faith Groups, places of worship and religious organisations
Fisheries
Interpreters
Post Office (delivery staff)
General Public
Training organisations (food hygiene, construction tickets, drink aware)
Utility Companies
Wheatly Group

UK Bodies
All relevant UK Commissioners
Border Force
Director of Labour Market Enforcement
DWP and Job Centre Plus
HMRC
HOIE



Scottish Government
Riaghaltas na h-Alba
gov.scot

© Crown copyright 2020

OGL

This publication is licensed under the terms of the Open Government Licence v3.0 except where otherwise stated. To view this licence, visit nationalarchives.gov.uk/doc/open-government-licence/version/3 or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: psi@nationalarchives.gsi.gov.uk.

Where we have identified any third party copyright information you will need to obtain permission from the copyright holders concerned.

This publication is available at www.gov.scot

Any enquiries regarding this publication should be sent to us at

The Scottish Government
St Andrew's House
Edinburgh
EH1 3DG

ISBN: 978-1-83960-690-8 (web only)

Published by The Scottish Government, April 2020

Produced for The Scottish Government by APS Group Scotland, 21 Tennant Street, Edinburgh EH6 5NA
PPDAS727026 (04/20)

W W W . g o v . s c o t