

Child Rights and Wellbeing Impact Assessment Results (CRWIA)

**Job Start Payment -
The Scotland Act 1998 (Transfer of Functions
to the Scottish Ministers etc.) Order 2020**

August 2020



Scottish Government
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CRWIA title: Job Start Payment - The Scotland Act 1998 (Transfer of Functions to the Scottish Ministers etc.) Order 2020

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Summary of policy aims and desired outcomes

Job Start Payment (JSP) is a new benefit which will be provided on an entitlement basis to young people moving into employment. Funding will therefore be demand-led. It will consist of a one-off, flat rate cash payment for eligible young people of £250, £400 if the applicant has a dependent child or children.

The intention of JSP is to provide additional financial resource to help children and young people with the costs of starting a new job. Recipients can spend the money as they see fit. It may, for example, help meet some of the costs of work clothing, travel, lunches, child care etc.

It is hoped that by removing these financial pressures the longer term outcomes for children and young people on low incomes will be improved by helping them to take up and retain employment. It is expected that this will help reduce the risk of them becoming unemployed or economically inactive when they are older, which in turn could improve their physical and mental health outcomes.

JSP aligns closely with wider Scottish Government policies, in particular the Fairer Scotland Action Plan¹; the Tackling Child Poverty Delivery Plan²; Fair Start Scotland's³ employability support; and the Independent Care Review⁴. It also supports our Strategic Objectives of Wealthier and Fairer; Smarter; and Healthier.

JSP also plays a part in achieving our National Outcomes and will specifically contribute towards the following:

- We have a globally competitive, entrepreneurial, inclusive and sustainable economy;
- We are well educated, skilled and able to contribute to society;
- We have thriving and innovative businesses, with quality jobs and fair work for everyone;
- We are healthy and active;
- We respect, protect and fulfil human rights and live free from discrimination; and
- We tackle poverty by sharing opportunities, wealth and power more equally.

¹ Fairer Scotland Action Plan - <https://www.gov.scot/publications/fairer-scotland-action-plan/>

² Tackling Child Poverty Delivery Plan - <https://www.gov.scot/publications/child-chance-tackling-child-poverty-delivery-plan-2018-22/>

³ Fair Start Scotland - <https://www.startscotland.scot/fair-start-scotland>

⁴ Care Review - <https://www.carereview.scot/>

Executive summary

This summary of the JSP Child Rights and Wellbeing Impact Assessment (CRWIA) was informed by a range of evidence including desk based research, analysis of consultation responses, stakeholder engagement and feedback. We have also heard directly from children and young people who may be eligible to receive JSP when it has been launched.

As a result of feedback received we have made some amendments to JSP which we expect to have further positive impacts for eligible children and young people. These changes are set out within the Scottish Government's response to the JSP consultation. Some of these improvements have been set out below.

It should also be noted this CRWIA is one of a package of impact assessments to accompany JSP policy, and should be read in conjunction with the others. These are:

- Business and Regulatory Impact Assessment (BRIA) – which focuses on the costs and benefits of the policy to businesses and the third sector;
- Equality Impact Assessment (EQIA) – which considers the potential impact of the policy on each of the protected characteristics which are also applicable to children and young people (for example age, disability, or race etc.);
- Island Community Impact Assessment (ICIA) – which considers the potential impacts of the policy on people living in island and remote communities; and
- Fairer Scotland Duty Assessment – which considers socio-economic inequality issues such as low income etc.

JSP is expected to have:

Positive impacts on eligible children and young people who receive an award. They will be positively affected as they will receive a one-off cash payment of either £250 or, if they have children, £400. This recognises that people with children may face increased costs, for example for childcare, when moving into work. The children of such JSP recipients may be indirectly impacted in that their parents will be able to take up employment opportunities as a result of the award.

Neutral impacts on children and young people who are not entitled to JSP. The circumstances of children and young people who are not entitled to assistance will not be impacted either positively or negatively by the introduction of this policy.

We appreciate that many stakeholders would have wished the eligibility for JSP was even wider. However, any further changes to JSP would need either, and in some case both, legislative changes (requiring the approval of both the Westminster and Scottish Parliaments) and service design and delivery alterations (requiring technical system changes and further testing which would require diversion of resources currently dedicated to development of the Scottish Child Payment (SCP)). In order to avoid

considerable risks and delays to both JSP and SCP launch dates, Ministers have decided that on balance it is better to deliver JSP safely and securely now. This will ensure that a large number of young people can benefit from this support at a time when economic recovery will be of paramount importance.

Background

The Scottish Government has worked closely with the UK Government to introduce JSP for the purpose of assisting people to “*obtain and retain employment*”. The powers that will be used by Social Security Scotland to deliver JSP are those under section 2 of the Employment and Training Act 1973 which are being transferred to Scottish Ministers in accordance with Article 2 of the Scotland Act 1998 (Transfer of Functions to the Scottish Ministers etc.) Order 2020. As a result, no changes can be made to the Order without first seeking the approval of both the Westminster and Scottish Parliaments.

Eligibility

Once launched, a young person must meet all of the criteria below to be eligible to receive JSP:

- **Application timeframe** – applications must be made after a job offer has been received, and within 3 months of that date.
- **Job offer** – the applicant must have received an offer of paid employment which must average 12 hours or more per week over a 4 week period.
- **Residency** – the applicant must be ordinarily resident in Scotland on the day of the job offer, although they may subsequently move out of Scotland in order to take up the job offer.
- **Age** – the applicant must be aged between 16 and 24 years (i.e. they can apply up to their 25th birthday); if the applicant is a care leaver they must be between 16 and 25 years old (i.e. they can apply up to their 26th birthday).
- **Qualifying benefit** – the applicant must have been out of paid work for at least 6 months when they receive a job offer. This will be evidenced by the applicant having been in receipt of one of the qualifying benefits*. If the applicant is a care leaver they need only be not in paid work and in receipt of a qualifying benefit at the time of the job offer, i.e. care leavers do not need to have been in receipt of a qualifying benefit for 6 months.

*Qualifying benefits are:
Income-based Jobseeker’s Allowance; Income Support; Income-related Employment and Support Allowance; and Universal Credit.

An applicant is a care leaver if they have spent time in care but stopped being looked after on, or after, their 16th birthday. This could have been either a foster, residential, secure or formal kinship care placement.

If a young person receives a JSP payment they will not be able to receive another JSP payment within the next two years.

In order to help maximise the take-up of JSP, we will ensure our communication services are accessible to the people we need to reach by providing information in plain English, and in a range of formats. This will set out what people are entitled to expect from Social Security Scotland in advance of making an application, and what evidence they will need to provide to support their application.

Public Consultation

The consultation on Social Security in Scotland which ran from 29 July 2016 to 28 October 2016 sought feedback on the proposed introduction of new financial provision for young people starting work. Of the total 521 responses to the consultation, the JSP section (at that time known as Job Grant) received 131 responses (80 from organisations and 51 from individuals). Almost all respondents agreed we should introduce this new benefit. The responses to this consultation were independently analysed and the results were published on 22 February 2017⁵. At that time we also published 'A New Future for Social Security' this set out the Scottish Government's Response to the consultation⁶.

A further consultation specifically on JSP⁷ then ran between January 2019 and April 2019, and included the draft CRWIA. This gave children, young people, and organisations that represent them a further opportunity to comment on the potential impacts of more detailed proposals. The consultation received a total of 96 responses representing a broad range of sectors (52 from organisations and 44 from individuals) including from Elgin Youth Development Group, Citadel Youth Centre, CELCIS, The Prince's Trust, YouthLink Scotland, One Parent Families Scotland, Child Poverty Action Group. These organisations specifically work with children and young people. Their views were integral to ensuring that JSP policy supports children's rights and wellbeing.

The responses to this consultation were also independently analysed and the results were published in July 2019⁸. This engagement informed our understanding of how job offers are made to children and young people, the ideal length of the application window, and the best way to communicate about JSP. We have used these insights to inform the service design of JSP

⁵ Analysis of written responses to the consultation on social security in Scotland -

<https://www.gov.scot/publications/analysis-written-responses-consultation-social-security-scotland/>

⁶ A New Future for Social Security -

<https://www.gov.scot/binaries/content/documents/govscot/publications/factsheet/2017/02/social-security-scottish-government-response/documents/sg-response-social-security-consultation-pdf/govscot%3Adocument/SG%2Bresponse%2Bto%2Bthe%2Bsocial%2Bsecurity%2Bconsultation.pdf>

⁷ Consultation on Job Grant, Scottish Government 2019 - <https://www.gov.scot/publications/consultation-job-grant/pages/17/>.

⁸ Job Grant: Analysis of Consultation Responses, Scottish Government 2019 - <https://www.gov.scot/publications/job-grant-analysis-consultation-responses/>.

as well as our communication plans to support its promotion and implementation.

On 18 December 2019 the Scottish Government published its JSP consultation response⁹ which set out the changes made to JSP policy in response to the feedback received. While those changes will not meet the wishes of everyone who responded, they will ensure that it will be easier for children and young people to meet the eligibility criteria and to apply for, and receive, a JSP payment.

A survey about JSP was also carried out at the same time as the consultation (between 15 April to 12 May 2019) to seek the views of children and young people about the benefit, their experiences of applying for jobs, and their preferences about applying for and receiving a payment. Around three quarters of the 96 stakeholders who responded to the survey were aged 16 to 21. The survey was promoted through stakeholder organisations and social media channels, and provided us with further insights about the proposed policy on groups of people who share protected characteristics.

We also held seven consultation workshops (in March 2019) with children and young people across the country. Local delivery leads from Social Security Scotland helped to identify children and young people to participate in the workshops. These were well attended and included children and young people from a mixture of socio-economic backgrounds and experiences including care leavers, parents, people with disabilities, and people with experience of the criminal justice system. These workshops were hosted by Young Scot, the Scottish Youth Parliament, the Prince's Trust, the Bridge's Project, Aberdeen Foyer, Moving On Shetland and Works+. Whilst not all of these organisations are focused specifically on children and young people they do support many children and young people as part of their services.

User research was also undertaken involving 226 participants in over 15 locations across Scotland to inform the development of the business processes which Social Security Scotland will use to deliver JSP. The evolving designs were continually tested to make sure they were as user friendly as possible. Children and young people from groups who share characteristics protected by equalities legislation were involved in the process.

Finally, meetings also took place with individual stakeholder organisations, such as the Scottish Prison Service, Interfaith Scotland, The Prince's Trust, Child Poverty Action Group, BEMIS, Inclusion Scotland, and others to understand better the impact on particular groups.

It is widely acknowledged that JSP will meet its policy intention of supporting a smoother transition into employment for children and young people on low

⁹ Scottish Government Response to Job Grant Consultation - <https://www.gov.scot/publications/scottish-government-response-consultation-job-grant/pages/4/>

	<p>incomes. In addition, the consultation and engagement activity has helped to inform a number of further improvements to the policy and service design to address some of the issues raised during earlier consideration.</p> <p>After we start to make payments we will continue to take on board feedback from service users in order to enhance IT systems and ensure that Social Security Scotland staff have the information they need in order to provide a high level of service. This will contribute to ensuring the service delivered has dignity, fairness and respect at its heart.</p>
<p>Scope of the CRWIA, identifying the children and young people affected by the policy, and summarising the evidence base</p>	<p>JSP is a new benefit which will be available to children and young people in Scotland who are on certain low income benefits, and who need help with the initial costs of starting a new job.</p> <p>As an entitlement associated with employment, take-up forecasts will naturally fluctuate depending on the economic needs and employment rates at any point in time. Throughout the policy and service design development stages that took place prior to the coronavirus pandemic, it was estimated that around 5,000 young people would benefit from JSP every year as they make the transition from unemployment to being in work, of whom we estimate 1,500 would have children. Our forecasts projected this would result in an annual expenditure of approx. £2 million.</p> <p>We are aware these forecasts will alter, particularly in light of the increase in household claims for Universal Credit in Scotland (from a historic average of 20,000 to over 110,000 between 1 March and 7 April 2020¹⁰) as a result of the coronavirus pandemic. In addition, the Office for National Statistics recent indicators for the 'UK economy and society: 2 July 2020'¹¹ sets out that between 19 June and 26 June 2020 "<i>job adverts across all industries remained around half of their 2019 average</i>". As a result, we would expect the initial launch phase of JSP to receive fewer applications for support, but as the economy recovers we anticipate supporting a higher volume of young people. We would also expect the new UK wide Kickstart Scheme to have a positive impact on young people finding jobs and, therefore, becoming eligible to receive JSP.</p> <p>Why is JSP needed?</p> <p>Between October 2018 and September 2019, the unemployment rate for young people aged 16-24 in Scotland was 9.1%, significantly higher than the rate of 3.9% for the total population¹².</p>

¹⁰ Scottish Government News release 21 April 2020 - <https://www.gov.scot/news/additional-110-000-universal-credit-claims-since-coronavirus-outbreak/>

¹¹ Office for National Statistics (ONS) - <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/conditionsanddiseases/bulletins/coronavirustheconomyandsocietyfasterindicators/2july2020>

¹² Annual Population Survey, ONS, Oct '18-Sep '19. Available at: <https://www2.gov.scot/Topics/Statistics/Browse/Labour-Market/Publications/youngpeoplelabmark>.

	<p>Evidence¹³ shows that people aged 16-19 from the most deprived areas in Scotland (SIMD decile 1) are least likely to be in employment, education or training. For instance, 84.7% of people aged 16-19 from this SIMD decile are either in employment, education or training in Scotland, compared with 96.7% for 16-19 year olds from the least deprived areas (SIMD decile 10).</p> <p>Young people who are not in education, training or employment tend to have worse physical and mental health outcomes than other young people. There is a considerable body of evidence¹⁴ to suggest that being unemployed when young leads to a higher likelihood of lower pay, higher unemployment, fewer life chances and poorer health in later life. These effects, which seem to be stronger for younger people and those with lower educational attainment, can also be caused by periods of poor quality or precarious work.</p> <p>JSP aims to support young people moving into employment by helping them meet some of the initial costs of starting work. It is hoped that removing this financial pressure will ensure that young people are supported to take up and retain employment, reducing the risk of them being unemployed or economically inactive in later life.</p>
<p>Children and young people's views and experiences</p>	<p>The survey mentioned above, received an exceptionally positive response. Of the 96 respondents, 86% felt that JSP was either a 'very good' or 'good' idea. The results also showed that most children and young people would apply online for jobs and for JSP. The survey also provided evidence that children and young people would mainly use JSP awards for transport, work clothes, and food and drink.</p> <p>Accessibility – as with all Scottish social security benefits, the JSP application process has been designed with users in mind. While most children and young people intend to apply online using mobile devices we understand from wider stakeholder engagement that digital solutions will not always be the best delivery model for everyone. This is particularly the case where there are digital connectivity challenges e.g. in island or rural communities. As a result Social Security Scotland will deliver JSP with a range of application channels including online, telephone, and paper form. This is important as it will allow the client to apply in whatever way best meets their specific needs as there will always be some people who need additional support due to digital exclusion, disability, or difficulty in communicating.</p> <p>Application timeframe – the survey showed that 41% of respondents were dissatisfied with the originally proposed application window of 14 days before and after the job start date. In light of this feedback, we decided to extend the application window to last 3 months from the date of the job offer. This should help to maximise take-up and to enable a potential applicant to establish a pattern of employment over a number of weeks. This should</p>

¹³ Annual Participation Measure for 16-19 year olds in Scotland 2019, Skills Development Scotland, Aug 2019 - https://www.skillsdevelopmentscotland.co.uk/media/45904/2019_annual-participation-measure-report.pdf

¹⁴ Youth unemployment produces multiple scarring effects - <http://blogs.lse.ac.uk/politicsandpolicy/multiple-scarring-effects-of-youth-unemployment/>.

enable them to decide with greater confidence whether the job is likely to meet the eligibility criteria.

Payments in instalments – while the consultation analysis indicates that the majority of the respondents agreed with the proposed format of JSP, some suggested providing JSP in instalments. However, the introduction of payments in instalments would not only increase the cost and complexity of administration cost, it would also make JSP more complicated to apply for which is likely to affect take-up. This would not be consistent with the principle that the Scottish social security system is to be efficient and to deliver value for money. As a result, we do not intend to introduce payment in instalments. Instead our approach has been to make the eligibility criteria and the application process as straightforward as possible for all applicants.

Children and young people who are not in receipt of a qualifying benefit – the most common concern raised in responses to the consultation was that children aged 16 or 17 years old are often not eligible for the necessary qualifying benefits, and as a result will not be entitled to JSP. The majority of 16 and 17 year olds will be in education or further training and so are not within the target group for JSP.

JSP is intended to smooth the transition into work for young people on low incomes. It is therefore important that we are able to verify the applicant's entitlement quickly and efficiently. The use of low income benefits as a qualifying criterion allows Social Security Scotland to verify the young person's entitlement through the sharing of data with DWP. Without this information it would be significantly more time consuming and complex to implement JSP.

Eligibility for many of the qualifying benefits is restricted by the UK Government to those aged 18 and over. Similarly, 16 and 17 year olds who are being cared for by a local authority, or are being supported by the authority after leaving care, will not be eligible for qualifying benefits. That said, some 16 and 17 year olds can be eligible to receive out of work benefits where, for example, if they have limited capability for work, are responsible for a child, or are estranged from their parents. In these circumstances the young person may be entitled to support if they meet all of the other eligibility criteria.

We have explored the possibility of enabling a young person aged 16 or 17 to be eligible for JSP based on a number of other criteria suggested by stakeholders. However, the complexity these changes would add to the administration of the benefit and would be disproportionate. Furthermore, some of the alternative supporting evidence proposed would only verify that the young person had previously been part of a household living on a low income, and not necessarily that the young person was not in employment when they applied for JSP. As a result, we do not intend to widen eligibility further at this stage instead our approach has been to make the eligibility criteria and the application process as straightforward as possible for all applicants.

Key Findings, including an assessment of the impact on children's rights, and how the measure will contribute to children's wellbeing

Key Findings

United Nations Convention on the Rights of the Child (UNCRC)

- **Article 2 (Non-discrimination)** – JSP policy recognises that children and young people (including those aged 16 and 17 years) are at a disadvantageous position in the labour market because of their age as the National Minimum Wage rate for young people under 25 is lower than those who are 25 and over. This policy seeks to positively support children and young people to help address that disparity. JSP also recognises the needs of this client group may vary as they move into employment depending on their own individual circumstances. Recipients can therefore spend the money as they see fit, which will promote respect for children and young people's autonomy.
- **Article 3 (best interests of the child)** – The policy intention is to smooth the transition into employment for young people on low incomes, and thereby help improve the health and wellbeing of those who receive it. Eligible children and young people who receive a payment will be positively affected. Younger children, whose parents are awarded payment, may be indirectly positively affected. Young people aged 16 and 17 may be less likely to be eligible because of restrictions on eligibility for qualifying benefits. In addition, Social Security Scotland who will administer JSP, will do so not only within the established standards expected; but also within their ethos of treating clients with dignity, fairness, and respect. The latter is demonstrated by the absence of conditions attached to the award in terms of what it can be spent on.
- **Article 12 (respect for the views of the child)** – Children's views have been taken into account in developing JSP. For example, in 2018, the Scottish Government ran two workshops, held and facilitated by Young Scot and the Prince's Trust, with young people to hear from them directly about the issues that affect them when moving into work. Furthermore, the survey, mentioned above, was tailored for children and young people and was carried out from 15 April to 12 May 2019. It gave young people the opportunity to express their views on JSP.
- **Article 18 (parental responsibility and state assistance)** – JSP provides a higher amount to those who are responsible for a child. The increased amount acknowledges the additional financial pressures experienced by a parent and helps those recipients who are parents to fulfil their parental responsibilities. Since starting new employment can lead to improved longer term financial security, it is hoped the positive effects of this parental support will be felt over the longer term.
- **Article 26 (social security)** – Starting new employment can lead to improved longer term financial security, mental health and wellbeing.

However, the costs associated with starting a new job can often be expensive which puts strain on low income individuals. JSP will ensure that these individuals will receive appropriate financial support during this transition, supporting them to retain employment and reducing the risk of them being unemployed or economically inactive in later life. JSP benefits eligible children and young people in their own right. Furthermore, children who are the responsibility of JSP recipients may also indirectly benefit.

- **Article 27 (adequate standard of living)** – JSP is intended to help smooth the transition into work for young people on low incomes, reducing the risk of them being unemployed or economically inactive in later life. Being in employment enables individuals to more readily achieve an adequate standard of living for themselves.

Wellbeing

Wellbeing sits at the heart of the Getting It Right For Every Child (GIRFEC)¹⁵ approach and reflects the need to tailor the support and help that children, young people and their parents are offered to support their wellbeing.

Wellbeing indicators (Safe, Healthy, Achieving, Nurtured, Active, Respected, Responsible, Included) are set out in the Children and Young People (Scotland) Act 2014. Of the eight indicators, JSP policy positively relates to the six below:

- **Healthy** – having the highest attainable standards of physical and mental health, access to suitable healthcare and support in learning to make healthy, safe choices. JSP is designed to help smooth the transition into work for children and young people on low incomes. By supporting them into long-term, settled work, the risk that they will be unemployed or economically inactive in later life is reduced. Therefore JSP could contribute to improved health amongst those 16 and 17 year olds who receive it.
- **Achieving** – being supported and guided in learning and in the development of skills, confidence and self-esteem, at home, in school and in the community. By supporting children and young people into employment, JSP may increase opportunities to develop their work skills. Recipients may also experience increased confidence and self-esteem by being in employment and economically active.
- **Nurtured** – having a nurturing place to live, in a family setting with additional help if needed or, where this is not possible, in a suitable care setting. JSP provides a higher amount to those who are responsible for a child. This additional help recognises that people with children may face increased costs, for example for childcare when moving into work. It is hoped the positive effects of this parental

¹⁵ GIRFEC - <https://www.gov.scot/policies/girfec/wellbeing-indicators-shanarri/>

	<p>support will be felt over the longer term, since starting new employment can lead to improved longer term financial security.</p> <ul style="list-style-type: none"> • Active – having opportunities to take part in activities such as play, recreation and sport which contribute to healthy growth and development, both at home and in the community. JSP is intended to help children and young people become economically active and as a result may indirectly help them and their families take part in leisure and social activities, short breaks, or to participate in sports and hobbies. JSP is intended to help clients with the costs they face when starting work, including transport and clothing. Recipients may choose to use their award towards the cost of a bike, or outdoor clothing to help them in their commute. • Responsible – having opportunities and encouragement to play active and responsible roles in their schools and communities and, where necessary, having appropriate guidance and supervision and being involved in decisions that affect them. JSP in helping clients take up and retain employment, may help them develop responsible roles in their workplace and wider community. • Included – having help to overcome social, educational, physical and economic inequalities and being accepted as part of the community in which they live and learn. Unemployed young people face financial barriers which can cause isolation. The financial support offered by JSP to help those children and young people into work may help reduce those barriers. Employment can improve social networks and social inclusion.
<p>Monitoring and review</p>	<p>‘Evaluating the Policy Impact of Devolved Benefits’ was published on 27 November 2019¹⁶ and sets out the strategy for monitoring and evaluating the impact of benefits including JSP. This evaluation process includes the impact of the benefits system in achieving the Scottish Government’s objectives, particularly whether social security has been an investment in people, has reduced poverty, and has achieved value for money.</p> <p>Monitoring and evaluation of JSP will include equalities management data collected as a continuous process when the benefit is delivered. Where any unintended negative consequences are identified we will take steps to rectify them.</p> <p>Audit Scotland will also monitor and report on the delivery of the social security system, including Social Security Scotland.</p>

¹⁶ Devolved benefits: evaluating the policy impact - <https://www.gov.scot/publications/evaluating-policy-impact-devolved-benefits/>

CRWIA Declaration	
Authorisation: Stage 3	
Policy lead Chris Graham, Unit Head Social Security Policy Division	Date 31 July 2020
Deputy Director or equivalent Ann McVie, Deputy Director Social Security Policy Division	Date 31 July 2020



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