
The Scottish Government's response to the report of the Scottish Expert Advisory Panel on the Collaborative Economy

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FOREWORD

When the Scottish Government established the Scottish Expert Advisory Panel on the Collaborative Economy in April 2017, we challenged the Panel to identify how Scotland could capture the benefits of the collaborative economy and overcome regulatory, economic and social challenges. I very much welcome – and am grateful for – what the Panel has achieved in a short space of time. The Panel’s report, published in January 2018, has already influenced the Scottish Government’s vision for the collaborative economy and I am excited about the opportunities it holds for each and every one of us.

The collaborative economy brings together individuals and communities in new and innovative ways. As the Panel highlights, the scale of opportunity for Scotland is substantial, particularly given some of the geographic challenges that we face and the potential benefits it can bring for tourism and transport outside urban areas.

It is my ambition that the collaborative economy successfully contributes to the Scottish Government’s overarching purpose to create a fairer, more equal Scotland. A socially responsible collaborative economy that builds upon and embeds our Fair Work values is central to achieving this and will deliver the greatest benefits to all in Scotland. Consumers will have the confidence to spend in the knowledge that they are protected; workers will be empowered with the right skills and knowledge; and businesses will be supported to innovate and compete in an ever evolving marketplace.

“ It is my ambition that the collaborative economy successfully contributes to the Scottish Government’s overarching purpose to create a fairer, more equal Scotland.”

To help realise this vision, the Scottish Government is pleased to announce the launch of ShareLab Scotland. This fund will help new collaborative platforms to deliver social and economic value for the people of Scotland, while actively shaping our collaborative economy. In particular, we welcome proposals that contribute to Scotland’s renewable energy and sustainable transport ambitions, especially where they provide consumers with greater choice, a sense of empowerment and help those in vulnerable situations.

I wish to thank all the members of the Panel for their commitment and engagement in this work shown by all members of the Panel, especially Helen Goulden, whose steadying hand ensured that the Panel delivered its stretching remit. I also appreciate the constructive engagement from a diverse range of organisations and individuals on what is and remains a very complex area. As the Scottish Government takes forward the Panel’s recommendations, I call on all stakeholders to continue to work together.

I look forward to working with all of you to shape and deliver the collaborative economy that Scotland wants.

A handwritten signature in black ink, appearing to read 'Jamie Hepburn', with a long horizontal flourish extending to the right.

JAMIE HEPBURN MSP

Minister for Business, Fair Work and Skills



EXECUTIVE SUMMARY

The collaborative economy connects individuals and communities through online platforms, allowing goods and services to be shared without the need for ownership. There is huge potential for the collaborative economy to contribute to the fairer, more socially responsible economy that we want for Scotland. Other countries are already realising this: a majority of the 150 sharing platforms in the Netherlands are social enterprises who have embedded the goal of having a positive social impact into their organisations.

The Scottish Expert Advisory Panel on the Collaborative Economy was formed in April 2017. The Panel's purpose was to provide advice and expertise to ongoing policy development on the collaborative economy and to make recommendations to Scottish Ministers on how Scotland can position itself to take advantage of the many opportunities of the collaborative economy. The Panel also considered how Scotland could overcome any regulatory, economic and social challenges.

This report sets out the Scottish Government's response to the Panel's recommendations. It outlines how we will build on our current actions in areas such as peer to peer accommodation, workers' rights, crowd-funding, regulation and consumer protection to fulfil our ambitions for Scotland. Delivering wider public and social value is at the heart of our vision for Scotland's collaborative economy. The Scottish Government's new ShareLab Scotland fund will support organisations to develop and test collaborative platforms that deliver social and economic benefits to individuals and communities in Scotland.

When acting within a system of fair competition, empowered consumers support inclusive and sustainable economic growth. They enable businesses to innovate and grow in response to consumer need. The Panel makes recommendations around the rights and responsibilities of participants in the collaborative economy, both as providers and consumers. We are funding

Citizens Advice Scotland to raise awareness of the rights of consumers, providers and others working in the sector and will work with Trading Standards Scotland to identify any limitations in consumer protection.

Fair work values, such as opportunity, security, respect and having an effective voice, are central to a more inclusive labour market – including in the collaborative economy. The Panel makes recommendations aimed at improving the quality of employment opportunities in the collaborative economy. The Scottish Government will engage with the Fair Work Convention, trade unions and platform hosts to help employers in the collaborative economy understand and embed Fair Work values.

As well as considering consumers and providers who are directly engaged in the collaborative economy, we must not stifle the creativity and innovation Scotland is recognised for. This means ensuring that our operating environment and regulations are proportionate, consistent, accountable, transparent and targeted.

We understand the calls for new controls over the short-term letting of residential properties in some areas of the country and welcome the Panel's consideration of this issue. We must strike the right balance for our local economies and communities. We have to ensure that residents can find the right homes and that they can afford to live, and enjoy living, in their neighbourhoods. We also need to help tourists find places to stay. This is a complex issue but it is one that a number of cities globally have been tackling and we will make sure Scotland comes up with solutions to fit its distinct needs, whilst learning from other places.

To do this, we have established a Short Term Lets Delivery Group that is working across the Scottish Government to identify solutions to short term lets. The group will look at the existing powers local authorities have to deal with the opportunities and challenges, including those relating to planning and anti-social behaviour. We continue to work closely with the City of Edinburgh Council to explore how we can pilot solutions in Edinburgh and other local authorities, as recommended by the Panel.

We are committed to taking forward the Panel's recommendations and engaging with a wide range of stakeholders, including communities, to shape and deliver a collaborative economy that works for all of Scotland.



BACKGROUND

The Cabinet Secretary for the Economy, Jobs and Fair Work established the independent Scottish Expert Advisory Panel on the Collaborative Economy in April 2017 to make recommendations to Scottish Ministers on how Scotland can position itself to take advantage of the opportunities of the collaborative economy and overcome any regulatory, economic and social challenges.

Helen Goulden, Chief Executive, The Young Foundation was Chair of the Panel and the other members of the Panel were:

- Jonathan Coburn, Social Value Lab
- Claire Mack, Scottish Renewables
- Polly Purvis, ScotlandIS
- Patrick Robinson, Airbnb
- Malcolm Roughead, VisitScotland
- Ewan MacDonald-Russell, Regulatory Review Group
- John Schmidt, Arnold & Porter Kaye Scholer LLP
- Douglas Shand, PwC
- Grahame Smith, STUC
- Benjamin Bell, Uber (replaced Andrew Byrne, Uber)

Dr Jamie Coleman, Codebase was initially a Panel member but stepped down due to work commitments.

The [Panel's report](#) was published on the Scottish Government's website on 29 January 2018. The Scottish Government also published a supporting document setting out the [evidence and analysis](#) that informed its work over the course of its work in 2017.



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KEY RECOMMENDATIONS IN THE COLLABORATIVE ECONOMY

1.1. Shaping the collaborative economy that Scotland wants

The Panel identified a need for Scotland to work with new market entrants to develop businesses and platforms that create fair work and wider economic, social and environmental benefits. The Panel recommended that:

- Finance should be directed toward collaborative platforms that deliver fair work, social value and inclusive economic growth.
- Government and public sector incentivise procurement from inclusive forms of the collaborative economy.
- Investors from social finance sectors should be brought together to innovate and scale new socially responsible platforms in Scotland.

Scottish Government response

The Scottish Government supports the Panel's view that the collaborative economy can bring significant benefits to consumers, competition and the economy; encourage more efficient use of currently under-used resources; and allow individuals to benefit from more flexible working arrangements and new ways of supplementing their incomes. We agree with the Panel's assessment that Scotland should be proactive in shaping how the collaborative economy operates with a focus on platforms that deliver fair work and contribute to inclusive growth.

The Scottish Government's economic goal is to see Scotland ranked in the first quartile of countries in the world on productivity, wellbeing, equality and sustainability. To help achieve this, the Scottish Government made a commitment that Scotland would be at the forefront of the digital economy. As part of this in 2013 we launched a "Business Excellence Partnership", which to date has invested £8.7 million in promoting the digital maturity of Scotland's businesses. This includes Digital Tourism Scotland which is a public and private sector partnership project running across Scotland to improve the digital skills and capabilities of tourism businesses.

In addition, £9.5 million has been made available through the Partnership to support a programme, managed by Skills Development Scotland, to tackle digital skills shortages across Scotland. This programme includes support to CodeClan, an industry-led digital skills academy which opened in Edinburgh in 2015. By December 2017, 200 CodeClan graduates had secured technology related jobs on completion of their courses. Scotland is also home to at least two incubators – CodeBase and TechCube – which help drive investment in tech start-ups; many of which could become part of the collaborative economy.

We have also taken action to start building the pool of collaborative platforms with the launch of ShareLab Scotland, a new Scottish collaborative platform fund. The fund will support organisations to develop and test collaborative digital platform models that will look to address challenges in sustainable energy and transport and deliver benefits to individuals and communities in Scotland. It will be delivered by Nesta, a social innovation charity, who have experience of delivering similar projects elsewhere in the UK. These include the [LiftShare](#) project, which is testing how a variety of community transport services can work together, and [ShareSomewhere](#), which applies the peer to peer accommodation model to sharing underused community spaces. Nesta has also recently announced support to [HomePointr](#) in Falkirk, a social enterprise which aims to improve access to suitable housing options by connecting referral agencies with housing providers via an online platform.



The ShareLab Scotland fund was launched by the Scottish Government in July 2018 <https://www.nesta.org.uk/project/sharelab-scotland>. Grants of £15,000 – £33,000 are available to help early stage projects develop collaborative digital platforms that will benefit individuals and communities in Scotland. The Fund is being delivered by Nesta and, in addition to funding, organisations will receive mentorship and advice to develop and grow their idea. Nesta will also provide help to identify partners who may be willing to support a pilot and explore other funding opportunities. The learning from the fund will provide insights for future developments in this area.

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Scotland is recognised as a model of good practice for social finance. Responsive forms of finance, which adapt to the needs of organisations, come from a network of social investment intermediaries (such as Social Investment Scotland); specialist and mainstream lenders, and enterprising grant-making foundations. We note the Panel’s recommendation about the potential role of social finance investors to support new socially responsible platforms and we will look for opportunities to further engage the sector in this area.

In relation to procurement, we are already working to identify “pathfinder” projects that drive innovation. Current examples of how procurement can support innovation include [Non Domestic Energy Efficiency Frameworks](#) and also [Civ Tech](#)[®], where public organisations set civic challenges which smaller businesses are encouraged to tackle using innovative solutions. The Scottish Government’s aim is to deliver innovation in procurement which will address public sector challenges. We will continue to work with our partners and use the flexibilities in the public procurement rules to enable us to do this.



Transport Scotland’s CivTech challenge was *How can we utilise technology to improve on the detection and prevention of road defects?* Road Intelligence’s solution was to develop an app that collects road defect information of entire road networks simply by driving on it. Processing mass data through carefully built algorithms allows for very precise and accurate defect detection, heat maps and actionable intelligence. This avoids the need for time consuming and costly ‘eyes on the road’.



Next steps

- We will use the learning from ShareLab Scotland, a new Scottish collaborative platform fund, to provide insights for future developments in this area.
- We will work with the social finance sector and other investors to consider how to support innovation and delivery at scale for socially responsible collaborative platforms.
- We will continue to use procurement to support and drive innovation which encompasses collaborative models.

1.2. Recognising good practice

The Panel highlighted the range of collaborative platforms and operating practices. Some demonstrate good practice while others fall well short of responsible business practice. The Panel noted the development of TrustSeal which has an industry led set of good practice principles, and recommended that the Scottish Government should take an active role in encouraging TrustSeal or an equivalent to focus on regulatory recognition, particularly with a view to providing clarity on local rules and regulations.

Scottish Government response

We note the Panel's recommendation on including regulatory recognition as a principle of good practice. We commissioned Involve to organise two public engagement workshops on the collaborative economy. These took place in Glasgow and Edinburgh in October 2017 and the findings from the workshops were presented to the Panel. The workshops considered the measures that platforms operating in the collaborative economy can use to build trust and consumer confidence in their services. Overall, the display of Kitemarks or evidence of adhering to industry codes of practice had the highest level of confidence among workshop participants.

Sharing Economy UK presented to the panel on TrustSeal which they established in partnership with the Oxford University SAID business school. TrustSeal is a kitemark for the collaborative economy and has a set of good practice principles which provide minimum standards for sharing economy businesses. Through these principles, TrustSeal aims to convey a sense of trust and good standing in the market with both providers and consumers of services. The Association of Scotland's Self Caterers (ASSC) and the UK Short Term Accommodation Association (STAA) have also developed and aligned their Codes of Conduct (see section 3).



Next steps

- We will explore how to use regulatory recognition in the work on collaborative platforms' rights and responsibilities (see 1.4) and how this can be developed into a Kitemark or Code of Practice.

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1.3. Mapping the collaborative economy in Scotland

The Panel highlighted that the collaborative economy is data rich and that advances have been made to guide public and policy choices and improve user experience. However, it noted a lack of up to date datasets to show the impact of the collaborative economy on Scotland's economy and communities. The Panel recommended setting up an observatory to collect, aggregate, analyse and publish a variety of datasets that show the ongoing impact of collaborative economy platforms in Scotland.

Scottish Government response

The Scottish Government recognises the important role data plays in public policy making and delivering wider societal and economic benefits for all. Our Open Data Strategy set out our ambition for making data open and accessible to anyone. Good use of data can provide structure to decision making, reduce duplication, ensure open and fair markets, support precision (such as the dis-aggregation of statistics) where required, and save lives, money and time. For example, open data was used to ensure defibrillators in Trafford were positioned in areas where people are most at risk of heart attacks. Indicators including mortality rates, obesity levels, rates of cardiovascular disease, and levels of physical activity were used to decide where to place the defibrillators in the area.

The Panel made its recommendations particularly in light of the lack of the evidence base available in the short term rental sector, which encompasses peer to peer platforms, to inform and develop any regulatory or other action that might be necessary (see section 3). We are continuing to engage with the Open Data Institute (ODI) on its work in the [peer to peer accommodation sector](https://theodi.org/article/a-year-spent-understanding-the-role-of-data-in-the-peer-to-peer-accommodation-sector/)¹ and the wider collaborative economy. For example, this considered how platforms working with data about a local area could create economic opportunities and benefits for communities. ODI looked at peer-to-peer accommodation platforms working with data about physical activities but also highlight the range of other data that could be connected from local public services and community activities to shops and cinemas. We are also keen to explore whether there are any potential synergies with the data-driven innovation being undertaken in the Edinburgh and South-East Scotland City Region City Deal.

¹ <https://theodi.org/article/a-year-spent-understanding-the-role-of-data-in-the-peer-to-peer-accommodation-sector/>



Next steps

- The Scottish Government has established a Delivery Group to take advantage of the opportunities and overcome the challenges presented by short term lets in Edinburgh and other parts of Scotland. The group will continue to engage with the Open Data Institute to develop a data observatory pilot on short term lets.
- We will explore ways to increase data availability in relation to the wider collaborative economy, such as local government, platform, infrastructure and other economic data, including the possible synergies with the data-driven innovation being undertaken in the Edinburgh and South-East Scotland City Region City Deal.

1

1.4. Consumer and provider understanding

The Panel highlighted the need for consumers and providers to be aware of their rights and responsibilities in the collaborative economy. The Panel recommended that:

- Government should provide resources to develop a secure place for people to access accurate information about their rights and responsibilities, including giving career advice to young people.
- Government should identify the dispute resolution available to consumers and any gaps in current provision.
- Platforms should provide information regarding employment status for those working in the collaborative economy.

Scottish Government response

The successful growth of the collaborative economy in Scotland needs to be built on trust: consumers need to trust that they will receive a quality service and have clear routes to redress when problems occur; workers in the sector need to trust that they will be afforded appropriate rights and protections; and providers must take greater responsibility for continuing to build this trust.

We support the Panel's recommendation about the need to ensure that consumers and providers are aware of their rights and responsibilities. This is key to ensuring those engaging in the collaborative economy are informed and empowered, and providers can support this and are accountable when things go wrong. There is a role for government and platforms to ensure that information is accessible and unambiguous to consumers and providers. Citizens Advice Scotland (CAS) highlighted in its submission to the Panel that there are a number of reasons why there may be particular consumer issues in the collaborative economy, especially in relation to safety, information and redress. Using its Consumer Helpline evidence, CAS highlighted problematic areas, including scams, redress, consumer protection and the employment status of workers. As the Panel highlighted, awareness and compliance of health and safety guidelines in peer to peer accommodation is of particular importance to ensure guests are protected (see section 3).

However, to grow the collaborative economy in Scotland in line with our ambitions, we must go beyond simply raising awareness of the rights and responsibilities of participants and providers. The key to future growth in the collaborative economy is an active focus on building marketplace trust. We need to make it easier for consumers and workers to trust both the platform they are engaging with, and the people they are connecting with. Sharing Economy UK's TrustSeal demonstrates how such an approach can build trust in collaborative platforms, providing security for people using their platforms and putting processes in place for when problems occur. As the use of collaborative platforms grows, we need to develop a deeper understanding of the market and use this intelligence to help improve trust, responsibility and accountability.

The growth of the collaborative economy has blurred the lines between providers and consumers. We need to ensure that consumer protections and redress routes keep pace with these developments, including where consumers interact directly with other consumers.



Next steps

- We will fund CAS this financial year to develop and deliver materials to raise awareness of rights and responsibilities for consumers, providers and those working in the sector, including a social media campaign.
- We will work with Trading Standards Scotland to understand the limitations of current consumer protection in the collaborative economy, particularly consumer-to-consumer transactions, and identify the potential actions needed to address these limitations.
- We will pilot new approaches to increase trust and transparency in the collaborative economy in Scotland, including: testing how users can easily access trust and quality ratings of collaborative platforms; the creation of a simple feedback system to allow users, providers and workers in the sector to engage more easily; and exploring how to gather intelligence in new ways, including from social media, to provide a fuller picture of how the market is operating.



2.1. Regulation failing to keep up with innovation

The Panel highlighted the fluidity of digital industries and the challenge to ensure that regulation allows businesses to grow while protecting consumers, providers and users. It noted challenges with enforcing regulations, and the potential for public engagement to inform decisions on regulation.

The Panel recommended:

- On-going dialogue between industry, stakeholders and regulators, including learning other countries' experiences.
- Assessing the medium and long term skills requirements of the regulatory sector to regulate a more algorithmically based economy.
- Trialling a 'regulatory sand box' approach to assess the impact and practicalities of regulation.

Scottish Government response

As recognised by the Panel, the Scottish Government has taken steps to create a regulatory environment focused on supporting economic growth. Our Better Regulation agenda applies to voluntary and statutory regulation and aims to reduce burden on business by implementing five principles: proportionate, consistent, accountable, transparent and targeted only where needed.

We welcome and agree with the Panel's view on the opportunities which voluntary measures present. The Scottish Government's approach supports that at the outset of any policy development, non-regulatory and voluntary options must be considered. A voluntary approach can often be more cost effective and secure greater collaboration in from industry.

2



The Association of Scotland's Self-Caterers (ASSC) developed a new Code of Conduct in September 2017 aimed at improving standards in the industry and encouraging best practice. All ASSC members are obliged to meet the Code. In developing the Code, the ASSC worked collaboratively with the UK Short Term Accommodation Association (STAA) whose own Code of Conduct contains a range of measures designed to boost consumer protection, support enforcement, maintain residential amenity and drive local business growth.

A voluntary system can be established more quickly than the development of primary or secondary legislation, and is therefore an ideal environment to test new standards.

A partnership approach is important to develop and deliver regulations with the support and assistance of the regulators and the regulated, to identify regulatory barriers to growth and solve these where we can. In line with this approach, following the initial discussions of the Scottish Government Short Term Lets Delivery Group with the City of Edinburgh Council, we will ask the Regulatory Review Group to facilitate discussions with key stakeholders. This action by Regulatory Review Group will deliver a scoped and prioritised set of proposals, wholly aligned with Scotland's regulatory reform journey.

We consider there is potential in a regulatory sandbox approach proposed by the Panel. As highlighted by the Panel, the finance market has seen a progressive and sensible route to engaging with regulation and regulators using this approach. Such testing grounds can provide the opportunity to develop and test regulatory frameworks in response to new business models that enable companies to grow and innovate but continue to ensure consumer protection.

As identified in section 3, there is an opportunity to explore a sandbox approach to experiment with measures in relation to short term lets in Scottish cities, particularly in Edinburgh.

We agree with the Panel's recommendation to maximise the value of digital collaborative platforms by engaging internationally. We recognise the value that this has already brought to work in this area. For example, ShareNL, the initiators of Amsterdam Sharing City and a key player in the Sharing Cities Alliance, presented evidence to the Panel. The Sharing Cities Alliance is currently made up of 13 cities from across the world where learning is shared between cities to help adapt and shape policy, overcome challenges. The Alliance started with New York City, Amsterdam, Seoul, Copenhagen and Toronto in May 2017. Other cities that have joined are: The Hague, Dallas, Washington D.C., Barcelona, Gothenburg, Malmö, Singapore and Tel Aviv. It provides a safe place to collaborate and exchange research and policies, and to jointly work on new legislation when dealing with issues from the rise of large platforms. Scotland has an opportunity to learn from global good practice, including around responses to the growth in short term accommodation.



Next steps

- To ensure Scotland remains recognised as one of the leading countries in Europe for better regulation, we will review lessons from other countries and use these to deliver the fair and socially responsible collaborative economy that we want for Scotland.
- The Scottish Government will continue to work closely with the Regulatory Review Group to actively improve the regulatory landscape and reduce unnecessary burdens on business.
- The Short Term Lets Delivery Group will work with the Regulatory Review Group to facilitate discussions with key stakeholders on any regulatory proposal relating to the management of short term lets including its consideration of whether a “sandbox approach” can be used to trial this in Edinburgh.



3.1. Bringing the benefits to more existing Scottish businesses outside urban areas

3.2 Create and promote more diverse tourist experiences across Scotland

The Panel highlighted the growing economic value of tourism to Scotland. It also noted the importance of self-catering properties in Scotland's tourist accommodation offer and the expansion of providers through peer to peer platforms.

The Panel recommended:

- The tourism industry should continue current initiatives to improve digital literacy and use of digital marketing.
- There should be more support for peer to peer tourist experiences such as tour guiding and dining, given the increased global demand for these and the opportunity to spread benefits to less visited areas of Scotland.

Scottish Government response

We welcome the recognition by the Panel not only of the crucial contribution that the visitor economy currently makes to Scotland's growth, but also the opportunities and challenges that the collaborative economy can create, now and in the future, across all of Scotland.

3



The work of, and evidence gathered by, the Panel has been augmented by complementary research on “The collaborative economy and Scottish tourism”². Commissioned by Scottish Enterprise, the Scottish Tourism Alliance and the Scottish Government, this report considers the five tourism-related sectors of accommodation, transport, food & meals, tours & activities and on-demand domestic service. It examines to what extent these sectors have already developed in Scotland and the key opportunities such as transport sharing, meal sharing and tailored recommendations and tours from local experts, that the collaborative economy might bring to the Scottish tourism sector, as well as insight and background from the industry to help shape any future regulatory policy.

The Scottish Government already recognises the importance and diversity of “place” across Scotland’s communities. It has committed to promoting inclusive growth and to working with the industry to address the issues of seasonality and support for pressures in some areas that have come from our increasing tourism success. The Rural Tourism Infrastructure Fund for example – which will see £6 million invested over the next two years from 2018 – will support a wide range of improvement projects across rural Scotland: from parking to campsites, these projects provide an opportunity to ensure our most scenic destinations remain as iconic destinations.

The current tourism sector in Scotland is overwhelmingly an industry composed of small and medium enterprises (SMEs). To maximise inclusive growth in such an SME-dominated sector (who can sometimes find it difficult to scale up), the Scottish Government recognises the need for development such as transport infrastructure, recreational opportunities and the historic environment to ensure tourism spreads throughout each area. There has also been considerable investment in VisitScotland and the other enterprise, culture and heritage bodies to support business and infrastructure. This includes a capital increase for VisitScotland from £600k in 2017-18 to £2.25m in 2018-19 to enable increased investment in their estate and “Scotland Is Now”. A phased approach to development is feasible and can help bring in future investment from public, private, third sector and increasingly from community- or crowd-funding (see section 5).

² <http://www.evaluationsonline.org.uk/evaluations/Browse.do?ui=browse&action=show&id=637&taxonomy=SEC>, 01 February 2018

There is potential to further increase innovation and the entrepreneurial base within Scotland by using digital platforms. They allow providers to offer a wider range of activities, experiences and accommodation to our visitors, utilising currently under-used assets or rapidly-developing assets which require less capital investment than traditional businesses. This potential for expansion should not displace or eliminate traditional activities such as accommodation providers that do not use peer-to-peer digital platforms or digital opportunities for visitor engagement.

People are at the heart of tourism, both as consumers and as providers. Inter-personal and service skills will continue to be prized within the industry. However, the need for digital skills within the industry will continue to grow, hand in hand with the need for the infrastructure that enables digital capability. This was already confirmed by 'Strengthening Digital Capabilities' emerging as one of the four National Strategic Priorities from the 2015 refresh of the Scottish Tourism Alliance "Tourism Strategy 2020"³.



Working with our visitor economy agencies, the Scottish Government continues to support Digital Tourism Scotland - a £1.2 million, three year public and private sector partnership project running until 2019. The partnership aims to improve the digital skills and capabilities of tourism businesses and by the end of June 2018, had already delivered 429 workshops to over 5,200 delegates. There have also been seven industry events with over 1,100 delegates.

82 per cent of businesses that have engaged with the project have said they are now more likely to introduce digital processes.

³ [http://scottishtourismalliance.co.uk/uploads/TS2020_Mid_Term_Review_2016/TS2020_Mid_Term_Review_-_Key_Messages_\(Mar_16\).pdf](http://scottishtourismalliance.co.uk/uploads/TS2020_Mid_Term_Review_2016/TS2020_Mid_Term_Review_-_Key_Messages_(Mar_16).pdf)

3

Scotland's refreshed Digital Strategy⁴ was published in March 2017 and outlines our plans for ensuring that we put digital at the heart of everything we do. Enhancing Scotland's connectivity is a key aspect. Although broadband and mobile connectivity is a reserved matter, the Scottish Government has invested significant amounts to ensure our communities can have the connections they need. The £400 million Digital Scotland Superfast Broadband programme has delivered fibre broadband access to 95% of premises across the country. A further £600 million will be invested to deliver the initial phase of our "Reaching 100%" programme by 2021.

Access to mobile services is just as important, particularly in rural areas. Our Scottish 4G Infill Programme is designed to push coverage over and above commercial deployment, addressing long-standing not-spots.

⁴ "Realising Scotland's full potential in a digital world: A Digital Strategy for Scotland", <http://www.gov.scot/Publications/2017/03/7843/downloads>



Next steps

- The Scottish Government will work with its visitor economy agencies to inspire the sector to deliver sustainable growth through digital and data driven innovation right across the country. We will help individual enterprises to consider their individual growth opportunities through the changing demands of travellers in the future.
- The Scottish Government and its visitor economy agencies will continue to support the one-door approach in delivering Digital Tourism Scotland, building on the training and support delivered to date and continuing until June 2019.
- We are already working with the tourism industry to develop a single economic narrative that will inform our post-2020 Tourism Strategy. This will address the potential future demand of different kinds of tourist 'experiences' such as new transport options like ride-sharing, food, dining and, accommodation.
- As part of preparatory work for the post-2020 Tourism Strategy, the Scottish Government and its partners will continue to work with the industry to highlight the importance of digital to the continued development of the sector, and the contribution that increased digital uptake could make to Scotland's broader economic goals.
- The Scottish Government will ensure that the data and evidence gained from Digital Tourism Scotland and other businesses in the visitor economy continues to influence the wider digital agenda and reflects tourism as a key economic sector.

3.3. Health and safety in peer to peer accommodation

3.4 Enforcement of health and safety regulation

The Panel highlighted the paramount importance of health and safety in peer to peer accommodation and the responsibilities of hosts, platforms and regulators. The Panel noted that enforcing health and safety regulations within the collaborative economy presents unique challenges, including local authority resources to regulate peer to peer accommodation.

The Panel recommended:

- There should be parity in health and safety regulation for all short term rental accommodation that is not the owner's primary residence.
- A single code of conduct should be agreed by industry associations for all accommodation providers where the owner is also resident.
- All platforms in Scotland should ask guests about health and safety concerns in properties they have stayed in and platforms should follow these up.
- Local government and regulators should use predictive analytics to target enforcement in areas most at risk.

The Scottish Government welcomes the emphasis that the Panel has placed on ensuring the health and safety of all guests in peer to peer accommodation.

Together with the Scottish Fire and Rescue Service and other key partners, we are working with communities and businesses to ensure they are equipped to prevent fires happening and minimise injury and damage should a fire occur. We also work with partners to ensure regulation is applied consistently, fairly and proportionately.



Fire safety law applies equally to traditional accommodation providers and peer to peer accommodation providers. The Scottish Government has published revised **Practical Fire Safety Guidance for Existing Premises with Sleeping Accommodation**. This revised guidance is more user-friendly and reflects developments in the growth of peer to peer accommodation.

We welcome the work that has been carried out to date by the Association of Scotland's Self Caterers and the UK Short Term Accommodation Association in aligning their Codes of Conduct. The codes clarify the responsibilities of short-term let operators, give guests confidence that a property is safe to stay in, and give local authorities a robust tool to tackle any problems.

As highlighted in section 1 we will pilot new approaches to increase trust and transparency in the collaborative economy in Scotland, including the creation of a feedback system for users and platforms and exploring how to gather intelligence in new ways, including from social media. As part of this we will look to encompass how health and safety concerns can also be highlighted through these mechanisms.



Next steps

- We will continue to work with industry associations, platforms, local authorities, regulators and other stakeholders on implementing the Panel's recommendations in this area, including introducing a mechanism to capture and act on concerns of guests using peer to peer accommodation.
- In setting out an approach to establish a data observatory, the Short Term Lets Delivery Group will identify opportunities to use predictive analytics to target enforcement action.

3.5. Separating peer to peer rental from running a business

3.6 Impact on local communities

The Panel highlighted the challenge in separating occasional providers of accommodation through digital platforms and those who are generating significant income. The Panel noted the balance needed between preserving communities and accommodating tourists, and the challenge of distinguishing between issues with peer to peer accommodation and wider concerns about tourism.

The Panel recommended:

- Collecting an evidence base to assess restrictions on short term residential rentals.
- Exploring a seasonal system in central Edinburgh, where the rules are more permissive during periods of large tourist demand.
- Experimenting with a number of measures to tackle these issues, such as a community code of conduct and increasing community participation in decision making.

Scottish Government response

The Scottish Government agrees that peer to peer accommodation expands the range, choice and flexibility of accommodation for tourists in Scotland. However, as the Panel highlights, a number of issues and challenges have been raised in relation to peer to peer accommodation, and short term lets more broadly. Concerns relate to anti-social behaviour and noise nuisance, and the loss of a sense of community and amenity in areas where a reducing number of properties are occupied by residents.

Scotland's economy benefits hugely from tourism but it should not be at the expense of local communities. We need to find a way to continue to welcome visitors while ensuring that local residents can live and work in our cities and rural communities. We have an opportunity to learn from the successes and failures of global responses to the growth in short term accommodation. Our approach must balance the importance of ensuring a safe, quality experience for visitors with a proportionate regulatory environment. We recognise that Scotland has a varied geographic mix of urban and rural settings and that the opportunities and challenges in one area may be quite different elsewhere.

There are already measures in place to enable local authorities to deal with issues. The Antisocial Behaviour etc. (Scotland) Act 2004 enables local authorities to deal with antisocial noise and behaviour in short-term lets. In addition, in March 2011, the Scottish Government introduced legislation to help local authorities tackle nuisance behaviour caused by occupants of short-term lets. The Antisocial Behaviour Notices (Houses Used for Holiday Purposes) (Scotland) Order 2011, enables local authorities to serve a notice on a landlord of a property where there has been antisocial behaviour by a person using a property for holiday purposes, or their visitors, while it is being used. Such a notice can be served on the landlord and any known person who acts for the landlord, and means that action can be taken even if the occupant is only resident for a short period of time.

In relation to the planning system, where a householder proposes to change the use of existing residential accommodation, the requirement for planning permission will depend on the circumstances of each individual case. That is why it remains a matter for the relevant Planning Authority, such as the local authority, to determine whether there has been a material change of use and to take account of all the circumstances of each individual case.

However, we recognise that there are the calls in Edinburgh and in some parts of Scotland for new controls over short-term letting of residential properties. This includes concerns about the impact on the availability of housing stock in ownership and for long term let as homes in the private rented sector. We have therefore established a cross Scottish Government Short Term Lets Delivery Group on which will continue to work with the City of Edinburgh Council and other key stakeholders including data specialists. The group will:

- Build the evidence base around short term lets and their impact, positive and negative. It will set out an approach to pilot a data observatory on short term lets.
- Identify the existing powers local authorities have to deal with short term lets, including those around planning and anti-social behaviour. It will identify whether further measures are required.
- Explore ways to pilot solutions in Edinburgh and other local authority areas, including whether a “sandbox approach” can be used to trial any proposed regulatory solutions in Edinburgh.

3

As the Panel highlighted, there is a need to build the evidence base in this area to seek to quantify the impacts that short term lets are having. There is no single, official or definitive source of data on the supply of short lets in Scotland. This is because of the diverse nature of this sector, some of which is 'formal' commercial visitor accommodation but much of which is not formally recorded, particularly those where owners are sharing part of their home, or where owners do not register their property for commercial use. In light of this, the Scottish Government commissioned scoping research into short-term lets in January 2017. Following this, the Panel had the opportunity to hear a wide range of evidence and we have been liaising with the Open Data Institute on their work around how a data observatory might bring together data to further identify both the positive and negative impacts of the sector.

We note the Panel's recommendations around community engagement. The Scottish Government is committed to supporting communities to do things for themselves, and to make their voices heard in the planning and delivery of services. Better community engagement and participation leads to the delivery of better, more responsive services and better outcomes for communities. Any proposed changes to regulation on short term lets would be subject to consultation.



In relation to business rates the Scottish Government has accepted the recommendation of the Barclay review that to be entered in the valuation roll, and thereby be liable for non-domestic rates rather than council tax, second homes and owners or occupiers of self-catering properties must provide evidence of actual letting for 70 days alongside the existing intention to let for 140 days in the year. The Scottish Government is currently consulting on the recommendations of the Barclay Review and in parallel will continue to engage with local authorities and other interested stakeholders to inform how best to specify this measure and deliver it by 2020.



Next steps

- We will continue to explore the existing powers that local authorities have to address the challenges around short term lets and determine if further measures are required. We will work closely with the City of Edinburgh Council on this and will consider any proposals that they or other local authorities may have to pilot solutions, as proposed by the Panel. We will consider whether a “sandbox approach” can be used to trial any proposed regulatory solutions in Edinburgh.
- We will work with data specialists, the City of Edinburgh Council and the wider tourism and hospitality industry to build the evidence base around the quantifiable impacts of short term lets and the impact on local longer-term housing stock availability. We will set out an approach to pilot a data observatory in light of this.
- We will seek to ensure that communities are fully engaged in discussions and that their views are heard in this work.



4.1. Fair work

4.2 Employment Status

4.3 Voice and collective bargaining

The Panel highlighted how the collaborative economy has changed the world of work. It highlighted the debate around employment status and the definitions of employee, worker and self-employed. The Panel considered the ‘gig economy’ where digital platforms let people access casual or freelance work, dominated by lower skilled labour. The Panel took a wide perspective of rights and responsibilities while recognising that ride sharing, taxi and private hire plays a significant role in this sector.

The Panel recommended:

- The principles of fair work in the Scottish Government’s Fair Work Framework to underpin the approach to the gig economy.
- Platforms to address gaps for genuinely self employed workers in illness and injury cover, and platform workers to have an effective voice.
- The work of the Panel to continue by bringing together the Scottish Government, the Fair Work Convention, trade unions and platforms.
- Workers in the collaborative economy to have a voice to influence their working conditions and pay.

Scottish Government response

The Scottish Government welcomes the Panel’s recommendations which seek to improve the quality of work in the collaborative economy and enhance the rights and protections of its workers.

The world of work is changing and it is clear that employment practices and the legislative framework need to adapt at a similar pace to ensure workers’ rights are protected and enhanced. While employment law is reserved to the UK Government, the Scottish Government is continuing to use all the levers available to us to ensure that our labour market is successful, resilient, inclusive and fair.

4

Scotland's Labour Market Strategy⁵ sets our vision for “a strong labour market that drives inclusive, sustainable economic growth, characterised by growing, competitive businesses, high employment, a skilled population capable of meeting the needs of employers, and where fair work is central to improving the lives of individuals and their families”.

The Strategy highlights action to ensure that every person, regardless of background, has the opportunity to access quality and inclusive education, training and lifelong learning. This in turn will enable every person to participate in the labour market and in the wider society.

While technology is helping to create new jobs and occupations and opening up flexible working options that can benefit workers, there is a concern about the quality of the jobs.

The Scottish Government recognises that current protections for some gig economy workers are inadequate and leave many workers exposed to uncertainty over income even when they have been working for an employer for an extended period of time. We recognise that they provide limited rights in terms of sick pay, holiday pay, maternity/paternity leave, the risk of no work being offered, or work that is offered being subject to availability. Such conditions fail to realise the value and potential of people in the workforce.

It is our view that all workers are entitled to a degree of protection through law, as well as to be treated fairly and have a voice in the workplace, even when that workplace is an online platform. And as Nesta⁶ highlights, we are now seeing individual workers using the same technology as platforms to connect, support each other and take collective action for themselves, rebalancing power in favour of the worker. This is a very positive step.

We fully support the Panel's recommendation that the Fair Work Framework should underpin work in the collaborative economy and are committed to working with the Fair Work Convention, trade unions, platforms and other stakeholders such as the Association of Independent Professionals and Self-Employed, to help mainstream Fair Work within this growing sector.

⁵ <https://beta.gov.scot/publications/scotlands-labour-market-strategy/>

⁶ Disrupting the disruptors: <https://www.nesta.org.uk/feature/10-predictions-2018/disrupting-the-disruptors-the-collaborative-economy-changes-direction/>

The Scottish Government's position is that all workers should be afforded suitable and appropriate protections in accordance with the spirit of our social obligations rather than simply to ensure compliance with the law. As the Panel has noted, the UK Government has committed to addressing the ambiguity of employment status following a recommendation from the Taylor Review. It is vital that any consequential changes to employment status should focus on improving clarity for workers and should seek to extend and improve statutory rights and protections for those in precarious work. The Scottish Government will engage with the UK Government to ensure that any proposed changes to employment law will enhance protections for workers in Scotland.



Next steps

- We have committed to developing a Fair Work Action Plan by the end of 2018 to deliver our ambition for Scotland to be a Fair Work Nation by 2025.
- In developing the Fair Work Action Plan, the Scottish Government will engage with the Fair Work Convention, trade unions and platform hosts to help employers within the collaborative economy understand and embed the dimensions of Fair Work in their organisations. The Fair Work Action Plan will include actions specific to the collaborative economy.
- To support the process of embedding fair work in the collaborative economy, we will invite the Fair Work Convention to consider using its convening remit to engage with stakeholders involved in platform working to assess the implications of the gig economy for fair work and the implications of fair work for the gig economy.
- We will continue to work with the Scottish Trades Union Congress to support the training and education of workers, focusing on those involved in precarious employment. In 2018/2019, funding will be provided through the Trade Union and Fair Work Modernisation Fund for organisations in the collaborative economy which apply the Fair Work Framework.
- The Scottish Government will work collaboratively with trade unions and partners to develop online guidance for workers seeking to gain clear and accurate information about their employment status, protections and rights.



The Panel highlighted the growth of the collaborative finance sector and the role it can play in helping individuals and businesses to access capital, contributing to inclusive growth. It noted the benefits of crowdfunding to community and arts projects and identified that the growth of the collaborative finance market has seen a progressive and sensible route of engagement with the FCA working with platforms and the UK Crowdfunding Association. The Panel recommended testing how 'matched' crowdfunding can be used to support citizen-led innovation and community projects.

Scottish Government response

Crowdfunding is an emerging source of finance involving open calls to the public, generally via the internet, to finance projects through donations, sometimes in exchange for a reward, product pre-ordering, lending, or investment. Any organisation can launch a crowdfunding campaign: SMEs, artists, innovative start-ups, communities and social entrepreneurs may all benefit from different forms of crowdfunding.

Crowdfunding can offer more than just financial benefits. It can give access to a large number of people who may be interested in a project or business who could provide valuable insights and information. Crowdfunding can be a way of testing wider views and support for a project or concept.

Angus Council presented to the Panel in August 2017. Its partnership with Crowdfunder was noted as an innovative one which supports Angus community organisations, businesses, individuals and social enterprises. Since its launch in August 2015, the Crowdfund Angus portal has supported 40 local projects and raised over £159,488 to the period August 2017.

We note the Panel's recommendation in relation to testing how 'matched' crowdfunding can be used as a mechanism to support citizen-led innovation and community projects. We consider that the development of new Business Improvement Districts, where businesses work together to invest in local improvements in an area, provide opportunities to further explore matched crowdfunding in the tourism sector.

5

Our enterprise agencies have been looking to expand the sources of funding available to grow SMEs that often struggle to secure funding via traditional lending. In the first initiative of its kind in Scotland, the Scottish Investment Bank, the investment arm of Scottish Enterprise, is providing £2.75 million in a joint initiative with Lending Crowd. Lending Crowd provides a peer to peer platform that links private sector investors with SMEs. The Scottish Investment Bank and Scottish Enterprise also held series of Crowdfunding Options seminars across Scotland in November 2017 to increase awareness of the crowdfunding market in Scotland.



Next steps

- In light of the opportunities offered by the development of new Business Improvement Districts, we will work with communities and stakeholders to test how matched crowdfunding can support citizen-led innovation, community projects and the wider tourism sector.



The Panel highlighted the public appetite for digital collaborative platforms that promote good causes. It identified opportunities for innovation including scaling community transport and more socially orientated business models. The Panel indicated that despite a supportive ecosystem and tradition of community co-operation there has been relatively limited experimentation to create social value.

The Panel recommended:

- Action to accelerate the development of mission-led businesses and social enterprises using collaborative platforms.
- Continued action in line with Scotland's Social Enterprise Strategy 2016-26 to develop new approaches to support peer to peer collaborations between social enterprise, such as sharing assets and resources.

Scottish Government response

The Scottish Government welcomes the focus that the Panel put on the role that the collaborative economy can play in supporting a more inclusive and socially responsible economy. We note the Panel's positive view of the existing ecosystem to support this and its recognition of Scotland's strong ethos of community collaboration. We support the Panel's view that there is an opportunity to encourage and further support experimentation of new technologies to take advantage of this and deliver public benefits in Scotland.

As highlighted in section 1.2 we have already taken action to start building the pool of collaborative platforms with the launch of a new Scottish collaborative platform fund. ShareLab Scotland will support organisations to develop and test collaborative digital platform models that benefit individuals and communities in Scotland.

In the energy sector we are seeing crowdfunding being used to support community owned renewable energy generation through community share offers.



BroomPower community hydroscheme, which began generating electricity in November 2017, is a community renewables scheme for the Lochbroom area of the Scottish North West Highlands. Funding for the design and build of the hydroscheme was primarily raised through the sale of community shares. After four months of fundraising, the scheme reached its target of £900,000 in September 2016. The hydro is owned and run by Lochbroom Community Renewables Ltd, a Community Benefit Society, set up by Ullapool Community Trust (UCT) to identify and run renewable energy projects. It is staffed entirely by volunteers. The surplus from the BroomPower scheme will be paid into a Community Benefit Fund to support projects across the Ullapool Community Trust area.

As an outward facing nation, Scotland is keen to share its experience of supporting social enterprises with others. This was one of the factors which led to the launch of the Social Enterprise World Forum in Scotland in 2008.

In its tenth anniversary year, the Social Enterprise World Forum will return to Edinburgh in September 2018 with the Scottish Government being the main sponsor of the event. The conference track on “Big Economic Issues” will provide an opportunity to discuss the Collaborative Economy in the context of Social Enterprise and hear from experts in the field.



Next steps

- We will work with the organisers of the Social Enterprise World Forum to showcase our work on the collaborative economy.
- We are exploring further how we can support peer to peer collaborations between social enterprise using collaborative technologies such as the CivTech challenge.



CONCLUSION AND NEXT STEPS

Helen Goulden, the Panel's Chair, highlighted the wide ranging remit and the relatively short period that the Panel had to consider a number of complex issues in a fast moving and changing landscape. Yet the Panel's report and recommendations clearly show the very careful consideration that it gave to its brief and the issues it considered.

We have gained from the vast knowledge and evidence gathered by the Panel through its engagement with a wide range of organisations and individuals. This work has made a significant contribution to the Scottish Government's thinking around what the collaborative economy means for Scotland. It has influenced how we will position ourselves to take advantage of the opportunities it provides while addressing challenges.

In its report, the Panel placed particular importance on the opportunity that we have in Scotland to shape the collaborative economy in the way we want and to realise the significant benefits this can have. These include not only the growth of our tourism sector and new transport solutions, but also wider opportunities to help tackle social challenges and address areas of unmet demand such as health and social care.

The other clear focus of the report was the need to create the right operating environment. We need to continue to encourage and support innovation, ensuring that we have the right digital infrastructure and skills in place. We also need to be responsive to the pace of change in our regulatory framework. We must ensure that the needs of people and communities are not overlooked and that where there are potential concerns, such as those seen through short term lets, that any negative impacts are evaluated and addressed.

Importantly for workers in the collaborative economy, platforms must embrace Fair Work values and participants must be fully informed of their rights and responsibilities. For individuals engaging in the collaborative economy whether as consumers or providers, they too must be informed and empowered to take action when things go wrong.

This report has set out the range of activities already underway in Scotland in relation to the Panel's recommendations, along with our next steps. In particular:

- We have launched ShareLab Scotland – a Scottish collaborative platform fund which will open to Expressions of Interest in summer 2018.
- We have established a cross Scottish Government Short Term Lets Delivery Group to look at the existing powers local authorities have and to determine if further measures are required.
- The group will consider what mechanisms might be developed to enable a pilot on short term lets in Edinburgh or other local authorities as recommended by the Panel, and explore whether a “sandbox approach” can be used to trial any proposed regulatory solutions in Edinburgh.
- We will work to build the evidence base around the quantifiable impacts of short term lets and the impact on local longer-term housing stock availability, and set out an approach to pilot a data observatory.
- We will fund Citizens Advice Scotland in 2018-19 to raise awareness of the rights and responsibilities of consumers, providers and those working in the sector.
- We will work with Trading Standards Scotland to consider any limitations of current consumer protection in the collaborative economy and any actions to address these.
- We will pilot new approaches to increase trust and transparency in the collaborative economy in Scotland, including a mechanism to capture and act on concerns of guests using peer to peer accommodation.
- We have committed to developing a Fair Work Action Plan by the end of 2018 to deliver our ambition for Scotland to be a Fair Work Nation by 2025. The Plan will include actions specific to the collaborative economy.
- To ensure Scotland remains recognised as one of the leading countries in Europe for better regulation, we will look to international experience to deliver the fair and socially responsible collaborative economy that we want for Scotland.



- We will continue to work closely with the Regulatory Review Group to actively improve the regulatory landscape and reduce unnecessary burdens on business.
- Building on success to date around improving the digital skills and capabilities of tourism businesses, we will work with our visitor economy agencies to continue to support Digital Tourism Scotland.
- In developing the post-2020 Tourism Strategy, the Scottish Government and its partners will continue to work with the industry to highlight the importance of digital to the continued development of the sector and to Scotland's broader economic goals.
- In light of the opportunities offered by the development of new Business Improvement Districts, we will work with communities and stakeholders to test how matched crowd-funding can support citizen-led innovation and community projects and the wider tourism sector.
- We are exploring how we can further support peer to peer collaborations between social enterprise using collaborative technologies such as the CivTech challenge.

The Panel's work has provided us with a strong foundation on which we will build a collaborative economy that works for all. We call on partners to continue to work together to develop and grow the collaborative economy in Scotland. In doing so, we will adapt and respond to ensure that we benefit from the opportunities to create a fairer, more equal Scotland centred on inclusive economic growth.



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