

A consultation to establish a consumer body for Scotland

July 2018

Foreword



In 2016, this government promised in its manifesto to create a consumer body to represent the interests of consumers in Scotland. Today, we set out our proposals for this body, and commit to put consumers at the centre of public policy and decision-making in Scotland.

The reason for this commitment is simple.

We are determined to build a fairer Scotland, one where inequality is reduced and inclusive economic growth is the norm. That's why we have made fairness for workers a priority, and are building a social security system that emphasises dignity and respect for its users. To be complete, this tapestry must also include consumer fairness. That means tackling some of the systemic issues that harm consumers or contribute to unequal outcomes, such as those who live in poverty routinely paying more for essential goods and services.

This work is vital on one level because our citizens are all consumers and must be treated fairly. On another, it is because we cannot increase fairness across Scotland without economic growth, and growing our economy requires businesses that are willing to invest, and consumers who have the confidence to spend. Both depend on high levels of trust. Consumers and businesses must trust governments to prevent systematic unfairness and apply rules fairly, and consumers and businesses must trust one another: consumers must expect that businesses will treat them well, and businesses must expect that good service will be rewarded.

The result of increasing this trust should be businesses with the confidence to invest and innovate, and improved service, greater value for money and better buying choices for consumers. And because all consumers are citizens, better consumer outcomes should create a wider benefit of citizens with more trust in institutions, and more confidence that their decisions and actions can have an impact.

In turn, active citizens can influence how consumers behave, which can change business behaviour and support societal fairness. While price and convenience will rightly always influence buying choices, citizens can also be motivated by wider considerations. There is growing evidence that customers want to support businesses that are committed to sustainable environmental practices, pay the living wage, or support local communities. Recognising and encouraging the overlap between consumers and citizens is one way of ensuring individuals can become full participants in building the fairer country we all want.

These goals will guide our consumer policy development going forward. As always, the Scottish Government is only one part of a complex system. To be successful, we must develop a consumer body and a consumer policy that builds on the strengths of that system – that means working with enforcement agencies, regulators, and other consumer agencies. This consultation is an opportunity for a genuine dialogue, and I hope that everyone with an interest in solving the challenges we all face as consumers will take part.

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

Consultation aim

This consultation seeks your views on how the Scottish Government can best use powers on consumer advocacy and advice. As we set out in the following sections, although these powers are narrow, consumers are too important to the health of our economy and the trajectory of fairness for our ambitions to be similarly limited.

A key aim of our work is to establish Consumer Scotland so that there is a dedicated, evidence-led approach to identifying and understanding consumer harm and inequality in Scotland. However, we also accept that the body will only be as effective as the policy environment that surrounds it. For this reason, the consultation has two distinct parts:

- Section 1 – our proposals for establishing a body called Consumer Scotland, which will carry out in-depth investigations into areas of most pressing harm to consumers in Scotland, and use its findings to advocate for specific and practical solutions;
- Section 2 – general Scottish Government policy for consumers, including providing more holistic advice services, improving the impact of consumer advocacy, and increasing the consideration of consumer interests in public policy-making, potentially through development of a statutory duty for public authorities in Scotland.

These sections represent our analysis of how we can best enhance the existing consumer landscape. This does not mean that our recommendations are the only solutions, and we are open to additional proposals or improvements to those we set out here. This formal consultation is also only one part of the work we will be taking forward to ensure the views of those who know consumer issues best or are most affected by them are heard. In the coming months, we will continue to hold meetings and conduct user research to ensure we build the fullest picture possible.



CONSUMER SPENDING
**ACCOUNTS FOR
TWO THIRDS**
OF SCOTTISH ECONOMY



16% OF PEOPLE
IN SCOTLAND ARE
OVER-INDEBTED

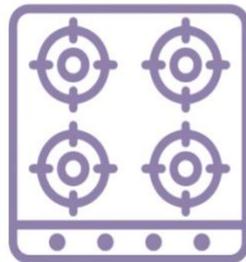


26.5% OF SCOTTISH HOUSEHOLDS
ARE IN FUEL POVERTY



**MORE THAN HALF OF SCOTTISH ADULTS
ARE POTENTIALLY FINANCIALLY VULNERABLE**

**16% OF SCOTTISH
HOUSEHOLDS
ARE NOT CONNECTED TO
THE GAS NETWORK**



Context

When consumers suffer harm, it is essential that they are empowered to exercise their rights to redress, and that, where this harm is widespread or goes unresolved, there are systems in place to tackle the offending behaviour and prevent it in the future. At present, these roles are fulfilled by Citizens Advice Scotland (CAS), which delivers statutory functions to provide advice to individual consumers and campaigns for better consumer outcomes generally; the Consumer and Markets Authority (CMA) and Trading Standards services, which enforce consumer law; and a range of ombudsmen, which work to resolve consumer disputes.

This is a complex landscape, which sometimes makes it difficult for consumers to know where to turn and for consumer organisations to collaborate and share information.

Many aspects of consumer protection needed to address this are reserved to Westminster, including the regulation of the sale and supply of goods and services, guarantees, hire-purchase and trade descriptions. We do not propose to stray into these areas. However, following passage of the Scotland Act 2016, the Scottish Government gained powers in relation to:

- the provision of consumer advocacy by, or with the agreement of, a public body.
- the provision of consumer advice by, or with the agreement of, a public body.

In addition, provision was made for the Scottish Government to allocate levy funds from the energy and postal sectors to fund consumer advocacy and advice in Scotland in those sectors.

These powers mean we can influence how the consumer voice is represented to regulators, policy makers and industry and allow us to provide publicly funded assistance to help individuals understand and exercise their consumer rights. In addition, there are many key markets in Scotland – such as legal services, water, education and health – which are devolved and where policy decisions or unscrupulous trading practices can have profound impacts on consumers.

Finally, the Scottish Ministers also now have the power in certain circumstances, acting jointly with the Secretary of State, to refer a market for investigation by the Competition and Markets Authority if they have reasonable grounds for suspecting that one or more features of the market are preventing, restricting or distorting competition in the supply or acquisition of specified goods or services. Using this power requires the cooperation of the UK Government, but it still offers a means for Scottish Ministers to draw attention to and seek remedies for market issues of particular concern in Scotland. We will therefore ensure that Ministers are able to make use of it where appropriate.

As the foregoing paragraphs make clear, the division of responsibility for protecting consumers is complicated, and any action the Scottish Government takes to improve consumer outcomes must and will respect the areas of consumer protection which remain reserved to the UK Government. However, the devolution of even limited

powers has provided scope to develop a consumer policy that focuses on creating two things: a culture that prioritises consumer fairness, and more effective mechanisms to redress unfairness where it occurs.

Questions

1. Do you have any comments on the consumer landscape in Scotland?

Consumer Scotland

In 2015 we established the independent Working Group on Consumer and Competition Policy in Scotland to advise how the Scottish Government could best use devolved consumer powers. Broadly summarised, its main findings were that the current landscape does not have a central, galvanising point to develop a clear, objective picture of the harm consumers experience in Scotland, and consequently, to target resources where help is most needed. For the same reason, while there is much good practice, there is not yet a mechanism to analyse the wide array of data on consumer harm to fully understand its causes. Finally, the Working Group noted that there is not a dedicated organisation whose sole focus is to spearhead the actions needed to redress consumer issues even where their impact and causes are understood.

In its report¹, the Working Group recommended establishing a public consumer body, which would take on the statutory functions currently held by CAS to deliver consumer advocacy and represent the consumer voice. It would also take responsibility for ensuring consumers have access to advice and redress services; for promoting competitive markets; and for championing models of regulation that focus more on consumers.

Since the Working Group reported, the complexity of challenges consumers face has, if anything, increased. From the uncertainties inherent in Brexit, to the disruption and urgent questions of data protection and privacy posed by rapid advances in technology, consumers face more difficult choices and a wider array of information than ever. There are also still many challenges facing consumers in complex markets, such as energy and telecoms and, in Scotland, these can be exacerbated by specific issues, such as a greater proportion of citizens living in rural areas, that require a more targeted intervention.

Nonetheless, we recognise that we must be certain that creating a body takes into account the existing landscape and has real capacity to deliver meaningful change for consumers. The scope of our powers will make it difficult for us to compel change in reserved areas or markets, and there is a network of strong consumer protection organisations, from national regulators to local trading standards services and advice providers, that already work hard to ensure consumer interests are safeguarded.

Since the Working Group's report, we have explored how we can best recognise this work and add value. We have concluded that addressing consumer challenges in Scotland requires developing a mechanism to:

- synthesise the abundance of evidence and data of consumer harm produced by the wide range of consumer-focused organisations;
- identify the most serious or pressing issues leading to consumer detriment; and
- develop and champion evidence-based solutions to tackle those issues.

We propose establishing Consumer Scotland to take on this role.

¹ <http://www.gov.scot/Publications/2015/11/4010>

Consumer Scotland in practice

Consumer Scotland will be an investigatory body, focused on tackling issues where there is a high level of consumer detriment, and which will require concerted and often collaborative action to address. Unlike a traditional consumer advocacy organisation, it will focus on proposing specific solutions rather than highlighting the existence of harm. These solutions will be developed after robust and forensic analysis of the extent of the harm to consumers, its underlying causes, and the impacts of potential interventions.

It will conduct only a small number of in-depth inquiries at any given time to ensure that each receives thorough and expert consideration. Following investigation, the body will, where appropriate, make recommendations for action on behalf of consumers. Because the reasons for consumer harm are often multifaceted, the recommendations will cover government, regulators, enforcement agencies, and industry.

First and foremost, the body must be established with the right infrastructure and tools to allow it to perform this role well. In particular, we propose that Consumer Scotland will:

- **Be an independent body, established by statute and at arms-length from the Scottish Government.** It will be vital that it has the credibility to challenge our own policies and to direct its investigations where the evidence leads.
- **Be staffed by experts.** Its credibility will depend on the strength of its evidence and arguments, and we will ensure that, particularly in complex regulated markets, it is staffed by those who know the issues best.
- **Be user-focused.** Often, policies are designed for consumers. Building on the experiences of initiatives like the Customer Forum in water, which brings the consumer voice into regulatory processes as complex as setting prices, we will ensure that consumer panels are integrated into the investigation process.
- **Have the capacity to drive change.** It will be underpinned by statutory powers to gather evidence, and for its recommendations in devolved areas to be taken account of.

In addition to the right tools and resources, the right focus will also be essential. Consumer Scotland's impact will hinge on its ability to launch investigations where its input is most needed. It must therefore:

- **Be selective.** Its value will result from its in-depth examination of intractable or complex issues that cause serious harm – the body must use set criteria to evaluate which projects merit further investigation, for example, based on the number of consumers harmed or the impact of on-going work from other organisations.
- **Be Scotland focused.** To avoid duplicating the work of UK organisations, Consumer Scotland will only take on an investigation where there is specific evidence of harm to consumers in Scotland – perhaps because the area is devolved, because the scale of harm is markedly more severe in reserved

markets, or because there are specific cultural or geographic conditions that require a different regional response.

- **Be transparent.** The body must develop a robust and collaborative process for evaluating consumer harm and taking investigations forward.

While we will not constrain the body before its establishment by setting out in detail how it will evaluate evidence and choose projects for investigation, we will use the intervening time to ensure that we have created the conditions to support its role. In particular, the Ministerial Taskforce's work on a consumer scoreboard will act as a forerunner to the process of gathering and assessing consumer harm across Scotland.

The following illustrate the potential scope of issues that could be considered:

- **Legal services** – a key strand of work of the recent review into legal services was to undertake specific research into the extent of the unregulated legal services market in Scotland and investigate any impacts on consumers, as well as developing a better understanding of the structure of the legal services market. Had Consumer Scotland existed, this could have been an area ripe for an in-depth investigation.
- **Parcel deliveries** – there is longstanding detriment suffered by consumers in rural or highland areas, who sometimes pay up to 50% more for delivery charges than consumers across the UK. While the Scottish Government has led action to tackle this, such as developing a statement of principles for use by retailers, the problem persists. A consumer body dedicated solely to Scottish issues could fully explore the underlying causes and propose practical solutions for reducing consumer detriment to businesses and regulatory authorities.
- **Explorations of the effectiveness of the wider consumer protection system in Scotland** – effective consumer protection depends on strong links between agencies across the landscape, for example between those which provide advice for individuals and those which enforce consumer law. Stakeholders agree that these links are not as strong as they could be, and that there are different levels and standards of services across the country. A consumer body could help to set a strategic direction, for example by developing guidance on what adequate enforcement and advice services entail, or to use its evidence of consumer harm in Scotland to help trading standards services balance competing enforcement priorities

Where reserved issues are involved, in keeping with devolved powers, Consumer Scotland will advocate only for solutions that are directly linked to addressing consumer harm. The credibility of the body and the strength of its evidence-led approach should ensure that its findings are taken into account. In devolved markets, we will explore how statutory powers can ensure that Consumer Scotland's recommendations are taken into account by those they target. In reserved areas, Consumer Scotland would be able to alert Scottish Ministers where they have found sufficient evidence of a market failure. Ministers will have the option of using that analysis to support any request they decide to make, along with the Secretary of State, for the Competition and Markets Authority to carry out a second stage market investigation.

Collaboration and complementarity

The strength of the body's relationships will underpin its success, especially where consumer issues arise in areas that the Scottish Government does not have powers to act. In both reserved and devolved markets, we will build strong links with regulators, enforcement agencies and redress providers – where possible within competence, we will supplement these with formal arrangements, and where not, through informal arrangements such as memoranda of understanding. This will create a strong network of linked activities:

- evidence from other consumer organisations, such as Trading Standards Services, will feed into Consumer Scotland's wider analysis of consumer harm in Scotland as well as to the specific inquiries it takes forward;
- where Consumer Scotland does not take an issue forward for investigation that still requires remedial action, these organisations will still be able to campaign on them as they deem appropriate;
- organisations with specific expertise, such as regulators and the CMA, will be consulted while developing and conducting the pipeline of investigations, and, where appropriate, invited to contribute to inquiries, thus reducing duplication and ensuring the correct expertise are employed; and
- Consumer Scotland's work to assess and understand the whole picture of consumer harm will ensure it is well-placed to alert organisations to emerging trends of detriment.

These linked functions will be particularly important to ensure Consumer Scotland and Citizens Advice Scotland work well together. While we propose that Consumer Scotland is established with statutory powers to investigate and gather evidence, we propose that CAS will also maintain its advocacy powers, allowing it to continue to use its unparalleled client evidence base to highlight consumer concerns to governments and regulators. This will ensure that creating a public consumer body does not have the unintended consequence of diminishing the consumer voice.

Their roles will be distinct but complementary. CAS will continue to advise individual consumers, and by aggregating this evidence, to highlight trends of consumer disadvantage, and to alert Consumer Scotland where this disadvantage is tipping over into consumer harm. CAS will also bring its evidence base to input into a range of ad hoc consumer activity, such as working groups and regulatory and policy consultations. Ahead of Consumer Scotland's launch, we will work closely with CAS to understand and improve the impacts of its consumer advocacy and to ensure that both its role and Consumer Scotland's are clearly demarcated.

We recognise that even a dedicated public body will struggle to truly represent consumer outcomes and that this will be impossible if we do not get its design, relationships and remit right. This design must include making sure it has the potential to adapt to changing needs and circumstances. We therefore urge you to help us shape these so that we collectively build a body that can have measurable and positive impact for consumers now and in the future.

Questions

2. Do you agree with the proposed functions of Consumer Scotland?
3. Which powers and duties would you like Consumer Scotland to have, in order to carry out its proposed role?
4. What are the criteria that would constitute a specifically Scottish consumer issue?
5. Which criteria might Consumer Scotland consider when assessing the level of harm needed to be reached before an investigation is pursued?
6. Are there additional functions you think Consumer Scotland should have to allow it to deliver impacts for consumers in the current landscape?
7. Are there any additional functions Consumer Scotland should have that will enable it to adapt and respond to future consumer challenges?

Scottish Government action

The Working Group raised concerns – around the fragmentation of the landscape, and the need for stronger links between enforcement, advice and redress – that our proposals for Consumer Scotland will not address. However, when Government and frontline experts are both open to change and collaboration, the impacts can be transformative. In this section, we set out how we will work with those who know the landscape best to enhance:

- consumer and wider advice services;
- consumer advocacy; and
- the role of the consumer interest in Scottish public policy and decision making.

Consumer advice

Consumer advice provision must keep pace with the world we live in, and consumers must know where to turn when they need help. This means offering advice in a range of settings and formats, and responding appropriately to support those who are particularly vulnerable and to enable those who can or want to help themselves. Advice services must also align more closely with complaint resolution services and enforcement agencies, so that individual harm can be used to prevent detriment to others.

Discussions in the last two years have revealed that there is work to do to fully realise this system. The Scottish Government has commissioned a pilot project, which aims to unite the online complaints tool, Resolver, with existing telephony services with Citizens Advice Direct. The result should be a more seamless complaint journey ensuring that the service is accessible to all who need it. Strong links have been developed with local Trading Standards Services, and over the coming months, we will be evaluating the pilot to understand where and how it adds value, and how this can be replicated on a larger scale.

We want to supplement the learning from the pilot with the views of those who use and deliver advice services. In particular, we seek views on how advice services currently interact with enforcement and complaint services, and what more could be done within the powers of the Scottish Parliament to ensure that we make the most of the data gathered from advice to prevent further harm.

Finally, we are progressing a wider review of Scottish Government funded advice services. From November 2018, we will take responsibility for levy-funded debt advice, and we continue to fund advice in a range of vital areas, including welfare and general money advice. The complexity of the advice landscape makes uniting these strands challenging, but we are working to ensure that the Scottish Government funding arrangements offer a linked system so that users experience a more person-centred service, and advice providers receive more security and stability.

As we enter the next phase of our work, we will be exploring how our own mechanisms for funding advice services can focus more on outcomes rather than

targets and encourage long term, innovative thinking and collaboration. This includes evaluating how we commission and oversee advice, and whether we should pursue new, more holistic methods of doing so, such as an independent commissioning body, or more collaborative funding partnerships.

Questions

8. What are your views on the current consumer advice system? How could it be strengthened?
9. What are your views on how the Scottish Government could improve how it commissions and funds advice to individuals?

Consumer advocacy

Effective consumer advocacy can drive solutions to even the most intractable consumer problems. However, as the Working Group noted, the current model of advocacy is not always effective. There are several reasons for this:

- The range of issues consumers face is becoming more varied – the poverty premium, faulty white goods and power imbalances across complex markets are just some of the issues consumer advocates must try to counteract.
- The volume and sources of data on consumer harm are increasing, making it harder to develop a full picture.
- In complex markets, it can be difficult for organisations to develop or coordinate the expertise needed not only to highlight consumer harm, but also to propose solutions.

In this environment, it is easy for the consumer voice to be lost or for harm to go unnoticed. Our plans for Consumer Scotland, as outlined in the previous section, should be a significant driver of improvements in this area. However, consumers are experiencing harm now, and even in the future, advocacy will remain a powerful tool for issues where Consumer Scotland does not act.

We have therefore begun a review of consumer advocacy to understand which interventions most effectively drive change. We accept that there is no single solution, and it is likely that a range of approaches is needed. New models are already being pioneered –the Water Industry Commission for Scotland, Scottish Water and CAS have co-established a Customer Forum, which brings the consumer voice into complex regulatory issues, such as price reviewing. This shifts the relationship from an adversarial one to a more proactive, collaborative one where consumer needs and views are embedded in decision-making. We will continue to explore these models through our own work, and to support new initiatives through Consumer Scotland.

Finally, we have established a Ministerial Taskforce on Consumers and Markets, which brings expertise together and will act as a coordinating mechanism until Consumer Scotland is established. It met for the first time in February 2018, and already it is driving forward work on issues such as exploring the potential for a single priority register for vulnerable consumers. It is also developing a consumer

scoreboard to build a picture of consumer harm in Scotland, so that we can target interventions where they are most needed.

Questions

10. How can consumer advocacy develop greater capacity to bring change for consumers?

Consumer duty

Consumer and public authority action are linked – our own policies can materially impact the lives of consumers, and consumer willingness to embrace our policies can materially impact their success. We must therefore do more to ensure we consider consumers from the very start of our policy-making.

Failing to do so can be costly. The National Audit Office² concluded that the Department of Energy and Climate Change's Green Deal design not only failed to deliver any meaningful benefit, it actually increased suppliers' costs – and consequently consumers' energy bills – in meeting their obligations through the Energy Company Obligation. The National Audit Office stated there was a need to be realistic about consumers' and suppliers' motivations when designing schemes in future.

Many of our most important priorities, from increasing energy efficiency to encouraging business to pay the living wage to protecting our environment from harmful plastics depend on consumer co-operation. Equally, when we make policies that limit competition in a particular field, or increase prices or reduce the help available to consumers, we run the risk of increasing individual hardship and collective mistrust of institutions. We want to avoid these mistakes, and are developing a range of mechanisms that could ensure consumers receive full consideration when developing new policies.

We are seeking views on whether these efforts should be formalised by a statutory duty for Scottish Government and public bodies carrying out devolved functions to consider consumer impacts when developing policies and taking strategic decisions. This is early stage thinking, and we recognise that careful implementation would be needed to ensure it had a tangible impact and did not create an undue burden on public authorities. We would therefore explore in partnership how best to implement such a duty, including through existing means.

Questions

11. What are your views on whether there should be a duty on public authorities to consider the impacts on consumers of policies or decisions?

12. Beyond those actions set out in this section, how should Scottish Government use its resources and powers to improve outcomes for consumers?

² National Audit Office <https://www.nao.org.uk/report/green-deal-and-energy-company-obligation/>

Question summary

1. Do you have any comments on the consumer landscape in Scotland?
2. Do you agree with the proposed functions of Consumer Scotland?
3. Which powers and duties would you like Consumer Scotland to have, in order to carry out its proposed role?
4. What are the criteria that would constitute a specifically Scottish consumer issue?
5. Which criteria might Consumer Scotland consider when assessing the level of harm needed to be reached before an investigation is pursued?
6. Are there additional functions you think Consumer Scotland should have to allow it to deliver impacts for consumers in the current landscape?
7. Are there any additional functions Consumer Scotland should have that will enable it to adapt and respond to future consumer challenges?
8. What are your views on the current consumer advice system? How could it be strengthened?
9. What are your views on how the Scottish Government could improve how it commissions and funds advice to individuals?
10. How can advocacy develop greater capacity to bring change for consumers?
11. What are your views on whether there should be a duty on public authorities to consider the impacts on consumers of policies or decisions?
12. Beyond the actions set out in section 2, how should Scottish Government use its resources and powers to improve outcomes for consumers?

Responding to this consultation

We are inviting responses to this consultation by 28 September 2018.

Please respond to this consultation using the Scottish Government's consultation platform, Citizen Space. You can view and respond to this consultation online at <https://consult.gov.scot/energy-and-climate-change-directorate/establish-a-consumer-body>

You can save and return to your responses while the consultation is still open. Please ensure that consultation responses are submitted before the closing date of 28 September 2018.

If you are unable to respond online, please complete the Respondent Information Form (see "Handling your Response" below) and send by post to:

Erin McCreadie
Directorate for Energy and Climate Change
Scottish Government
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

or by email to: consumerandcompetition@gov.scot

Handling your response

If you respond using Citizen Space (<http://consult.gov.scot>) you will be directed to the Respondent Information Form. Please indicate how you wish your response to be handled and, in particular, whether you are happy for your response to be published.

If you are unable to respond via Citizen Space, please complete and return the Respondent Information Form (attached in annex) included in this document. If you ask for your response not to be published, we will regard it as confidential, and we will treat it accordingly.

All respondents should be aware that the Scottish Government is subject to the provisions of the Freedom of Information (Scotland) Act 2002 and would therefore have to consider any request made to it under the Act for information relating to responses made to this consultation exercise.

Next steps in the process

Where respondents have given permission for their response to be made public, and after we have checked that they contain no potentially defamatory material, responses will be made available to the public at <http://consult.gov.scot>. If you use Citizen Space to respond, you will receive a copy of your response via email.

Following the closing date, all responses will be analysed and considered along with any other available evidence to help us. Responses will be published where we have been given permission to do so.

Comments and complaints

If you have any comments about how this consultation exercise has been conducted, please send them to consumerandcompetition@gov.scot

A consultation on a bill to establish a consumer Body for Scotland

RESPONDENT INFORMATION FORM

Please Note this form **must** be completed and returned with your response.

To find out how we handle your personal data, please see our privacy policy:

<https://beta.gov.scot/privacy/>

Are you responding as an individual or an organisation?

- Individual
- Organisation

Full name or organisation's name

Phone number

Address

Postcode

Email

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

- Publish response with name
- Publish response only (without name)
- Do not publish response

Information for organisations:

The option 'Publish response only (without name)' is available for individual respondents only. If this option is selected, the organisation name will still be published.

If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again

in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

No



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This publication is available at www.gov.scot

Any enquiries regarding this publication should be sent to us at
The Scottish Government
St Andrew's House
Edinburgh
EH1 3DG

ISBN: 978-1-78851-932-8 (web only)

Published by The Scottish Government, July 2018

Produced for The Scottish Government by APS Group Scotland, 21 Tennant Street, Edinburgh EH6 5NA
PPDAS420246 (07/18)

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