

Social Security Administration and Tribunal Membership (Scotland) Bill

[As Amended at Stage 2]

Revised Financial Memorandum

Introduction

1. As required under Rule 9.7.8B of the Parliament's Standing Orders, this supplementary Financial Memorandum is published to accompany the Social Security Administration and Tribunal Membership (Scotland) Bill (introduced in the Scottish Parliament on 27 April 2020) as amended at Stage 2.
2. This Revised Financial Memorandum has been prepared by the Scottish Government. It does not form part of the Bill and has not been endorsed by the Parliament. It should be read in conjunction with the original Financial Memorandum published to accompany the Bill as introduced.
3. The purpose of this Revised Financial Memorandum is to set out the expected costs associated with the provisions now included in the Bill following the amendments made at Stage 2. This document addresses those provisions with anticipated or potential cost implications, both those included in the Bill as introduced and those inserted by amendments. Text has been added or amended as necessary to reflect the amendments made to the Bill at Stage 2 and these changes are indicated by sidelining in the margin.

Context

4. The overarching policy objectives of the Bill are:
 - To allow for the appointment of persons to act on behalf of a child where there is no person with legal authority who is willing and able to so act;
 - To allow for the appointment of a person to act on behalf of an adult who does not lack capacity but due to difficult circumstances wishes for an appointee to act on their behalf;

- To introduce provisions in relation to all appointments of persons to act on behalf of a child or individual by Scottish Ministers, and to extend those appointments to include assistance under top up regulations at section 79 of the 2018;
- To enable the Scottish Ministers to withhold health information where its disclosure would cause serious harm to an individual;
- To introduce powers for the Scottish Ministers to make provision in regulations about the investigation of offences in relation to top up assistance created under section 79 of the Social Security (Scotland) Act 2018 ('the 2018 Act');
- To create statutory fraud offences in relation to the types of top up assistance created under section 79 of the 2018 Act;
- To extend the duty on Scottish Ministers to inform about possible eligibility under section 53 of the 2018 Act to include assistance under top-up regulations at section 79 of the 2018 Act;
- To modify the power to make regulations under schedule 5 of the 2018 Act, to widen the category of qualified persons whose clinical judgment, based on the appropriate guidance, will be accepted in relation to a diagnosis of terminal illness for the purpose of entitlement to Disability Assistance;
- To introduce powers for the Scottish Ministers to make provision in regulations about circumstances in which Ministers may suspend payment of ongoing types of assistance under the 2018 Act;
- To introduce powers for the Scottish Ministers to prescribe circumstances in which an individual who has an ongoing entitlement to assistance may be paid a nil amount of that assistance;
- To enable the Scottish Ministers, by regulations, to transfer to the First-Tier Tribunal (FTT) for Scotland some or all of the competence and jurisdiction of the sheriff courts in relation to the recovery of top up assistance created under section 79 of the 2018 Act; and
- To enable other types of judges to be temporarily authorised to sit in the FTT and the Upper Tribunal.

Background

5. The full background to each of the policy changes is set out in the Policy Memorandum.

Costs on The Scottish Administration Social Security

6. A full consideration of the impact of the devolution of Social Security powers was set out in the Financial Memorandum which accompanied the 2018 Act.¹ Further information on the whole of life costs and benefits of the Social Security programme over a thirty year timeframe are set out in detail in the Social Security Programme Business Case² published on 12 February 2020.

7. The costs in this Bill were not drawn out in either of the documents above. Changes to social security legislation should consider three potential cost impacts:

- The potential impact on benefit expenditure
- The potential impact on social security implementation costs
- The potential impact on Social Security Scotland's ongoing delivery costs

8. The Scottish Fiscal Commission (SFC) has a statutory duty to provide independent and official forecasts of Scottish GDP, devolved tax revenues and devolved social security expenditure. Under the Scottish Fiscal Commission Act 2016, the SFC may also produce forecasts on other “fiscal factors”, defined as “anything which the Scottish Ministers use to ascertain the amount of resources likely to be available for the purposes of sections 1 to 3 of the Public Finance and Accountability (Scotland) Act 2000.” The Protocol for engagement between the Scottish Fiscal Commission and the Scottish Government³ notes that the SFC may produce forecasts where it considers the policy, or policies, to have a “non-negligible impact on receipts or expenditure.”

9. Having considered the measures in the Bill, the SFC chose not to produce forecasts for it on the basis that the Bill is not expected to change the SFC's forecasts from those published in February 2020. All the

¹ [Social Security \(Scotland\) Bill Financial Memorandum](#)

² [Social Security Programme Business Case](#)

³ [Protocol for Engagement with the Scottish Government](#)

measures are expected to have an immaterial effect on benefits expenditure in particular.

Appointees for Children

Appointees for Adults with Capacity and Non-Disclosure of Harmful Information

10. Allowing for appointees for children and adults with capacity will not impact on total benefit spend forecasts. The change aligns with the current DWP rules and therefore the impact is built into the funding which the Scottish Government will receive through the Block Grant Adjustment for the relevant benefits.

11. The total estimated costs for developing the application process, including staff costs, case management system development, digital portal systems development and process and technology development is £60 million⁴. It is difficult to attribute a specific position of that total cost directly to appointee applications. However, it may be reasonable to expect the costs directly attributable to appointee applications to be a relatively small proportion of the total cost.

12. By way of context, the Scottish Parliament Information Centre (SPICe) estimated that the number of children subject to informal care is between 7,000 and 13,000 and if an estimated 9% of these have a disability (as per NRS census data for 2011), this would represent between 630 and 1,170 who may fall in to this category. Of those, not all will necessarily have an appointee. This compares with the 2021/22 estimate of Child Disability Payment (CDP) clients of 47,000, so a very small proportion of overall activity as CDP is one of several benefits to be delivered by Social Security Scotland.

13. The provisions for appointees for adults with capacity are primarily aimed at protecting rights of clients where Social Security Scotland receives information from a medical practitioner to support an application that they have deemed harmful and should not be shared with the individual. The Department for Work and Pensions (DWP) does not hold information in relation to how many applications it receives where harmful information is

⁴ [Social Security Programme Business Case](#) - page 73; Table 5.6

withheld. However, the Scottish Government understands that this happens rarely.

14. If a high estimate of 5% of applications (based on overall Personal Independence Payment and Attendance Allowance terminal illness caseload) is applied, this could result in up to 350 terminally ill clients having an appointee in place at any given time. The actual number would be likely to be much lower and in line with DWP experience since the client may not agree to an appointee and some may already have a legal representative in place.

15. This compares with an associated caseload of over 400,000, which also illustrates that the costs associated with this are likely to be very low in relation to the overall costs of processing applications for adults with disability and will apply to both social security implementation costs and Social Security Scotland's running costs.

Appointment of Person to Act on Behalf of Individual

16. Section 1A of the Bill inserts section 85A into the 2018 Act in relation to appointment of a person to act on behalf of a child. Sections 1B(3) and (4) of the Bill insert new provisions into the 2018 Act (in new sections 85A and 85B) which create new rights for individuals to request that the Scottish Ministers consider whether to make, or terminate, an appointment in respect of an individual in certain circumstances.

17. Section 1B(6) inserts new section 85D into the 2018 Act, which creates an associated right for individuals, or other persons with an interest in the welfare or financial affairs of the individual, to apply to the First-tier Tribunal for Scotland for an independent review of a decision made by the Scottish Ministers in pursuance of a request under section 85A or 85B. As a new process, it has not been possible to ascertain exactly how many such cases will be brought forward per year.

18. While First-tier Tribunals are a familiar process for Social Security Scotland, clients and representatives, and the Scottish Courts and Tribunal Service already hears devolved social security appeals, hearings upon decisions in relation to appointees will be a new process. Based on projections currently being made for social security benefit appeals, it has been estimated that cases could be heard at a cost per case of £3,000 per day.

19. The cost per case is based on projections currently being made for social security benefit appeals and includes costs such as administrative staff resource, members' fees and expenses, hearing costs (venues, security, interpreters and tribunal parties' expenses), office running costs such as postage/photocopying, corporate overheads and Upper Tribunal costs.

20. While these cases will be heard in the existing social security chamber, cases related to the appointment of an individual will be a new type of case and additional costs for the introduction of appeals in relation to appointments could potentially arise. This could include the development of new digital systems or changes to existing digital systems if required, recruitment and set-up of additional staff resource, and additional management resource should the volume of cases require it and training of members. As noted below, costs associated with this Bill are expected to be covered within existing funding arrangements or met by recharge from SCTS to Social Security Scotland.

Top Up Assistance: Offences

21. The provisions within this Bill will amend section 79 of the 2018 Act and allow the Scottish Ministers, by regulations, to make provision regarding statutory offences in relation to forms of assistance provided for under section 79 of the 2018 Act. The Bill also creates a new default position so that, where no contrary provision is made in regulations, the offences in sections 71 to 73 of the Act apply in the context of top-up assistance provided under section 79 of the 2018 Act. This will ensure consistency where appropriate between these forms of assistance and those forms of assistance provided for under Chapter 2 Part 2 of the 2018 Act. It is also consistent with the Scottish Government's responsibilities under the Scottish Public Finance Manual (SPFM).

22. The provisions relating to the creation of statutory fraud offences for top up benefits do not significantly impact on forecast demand-led benefit expenditure for top up benefits, because without statutory fraud offences it was still expected that normal good practice in claim evaluation and over-claiming would apply. It does however allow the Scottish Government to take action to detect, investigate and take enforcement action (which includes recovery of overpayments and prosecution where appropriate) for fraudulent claims. It also provides the benefit of the associated deterrent

effect which is expected to have a net positive effect on the Scottish Government's budget position.⁵

23. The DWP estimates that in financial year 2018-19 around 1.2% of total benefit expenditure was overpaid due to fraud.⁶ For Universal Credit, the main qualifying benefit for the Scottish Child Payment (SCP) – the first form of assistance to be introduced under section 79 of the 2018 Act, the rate of overpayment due to fraud is estimated to be 5.8%. Total forecast benefit expenditure for SCP is £184 million⁷ in the first full year of roll-out to all children aged under 16 (2023-24). This forecast was based on the assumption that the statutory fraud offences provisions would exist.

24. Levels of overpayments due to fraud may reasonably be estimated to range between 1% and 6% of actual benefit expenditure. It is expected that this value could be significantly higher without the associated deterrent effect provided by having statutory fraud offences in place; therefore the Bill may help to limit losses due to fraud. Therefore, if statutory fraud offences were not in place and a 3% increase in benefit expenditure were assumed as a result, this would lead to an increase in costs of approximately £5.5 million per year based on 2023-24 benefit forecasts for SCP. That would rise to approximately £7.4 million for an estimate of 4%.

25. The creation of fraud offences will require supporting fraud prevention, detection, and management and delivery costs within Social Security Scotland. This function is required for all benefits which will be administered by Social Security Scotland.

26. The costs of developing a fraud function have been built into the total Social Security implementation programme forecast costs and are estimated to be in the region of £10 million. These costs are built into the "Enabling Capabilities" line of Table 5.6 in the Social Security Programme Business Case⁸, the total value of which is £141 million.

27. The total cost is to deliver fraud services to support £4 billion of benefit expenditure, of which £184 million, (approximately 4.6%), is forecast to

⁵ [Scottish Public Finance Manual - Fraud](#)

⁶ [Department for Work And Pensions - Fraud and Error in the Benefits System: Estimates 2018-19](#) - Page 3

⁷ <https://www.fiscalcommission.scot/forecast/supplementary-costing-scottish-child-payment/>

⁸ [Social Security Programme Business Case](#) - page 73; Table 5.6

relate to SCP at full roll out. Therefore, while it is difficult to attribute a specific proportion of that total cost to external fraud detection specifically for SCP and “top-up” benefits, it may be reasonable to expect the costs directly attributable to SCP fraud to be a relatively small proportion of the total cost. As SCP will account for approximately 4% of overall benefit expenditure at full roll out, pro-rata this would represent approximately £405,000 of the £10 million total cost of developing a fraud function.

28. It is not anticipated that the creation of the fraud offences for SCP and other top up benefits will result in additional ongoing resource requirements or administration costs for Social Security Scotland beyond those already identified.

Duty to Inform About Possible Eligibility - Top Up Assistance

29. Section 6A of this Bill extends the duty on Scottish Ministers to inform about possible eligibility under section 53 of the 2018 Act to include assistance under top-up regulations at section 79 of the 2018 Act.

30. This provision does not change eligibility for Scottish benefits, nor does it materially affect the operations of Social Security Scotland, as it simply extends an existing duty. It is, therefore, not anticipated to give rise to any additional cost.

Widening the Category of Qualified Persons Whose Clinical Judgment Will Be Accepted in Relation to a Diagnosis of Terminal Illness

31. Accepting terminal diagnosis from appropriate healthcare professionals which will now include registered nurses will not impact on current benefit expenditure forecasts. The SFC forecasts of Child Disability Payment already assume the processes are aligned with the current DWP rules; in addition, the SFC does not expect this to make a material difference to its forecasts.

32. The implementation cost for this change is built into the total Social Security Implementation Programme forecast cost as set out in the Social Security Business case. There is just one form being developed which any appropriate healthcare professional may complete. The set up costs for this process (development, accessing and submission of the form) will not be affected as a result of extending the types of healthcare professional able to perform this function.

33. With regards to training, it is the Chief Medical Officer guidance itself which will support all appropriate healthcare professionals in reaching their judgement; this has already been developed. Support which Social Security Scotland will offer to clinicians, for example a helpline, are equally necessary for registered medical practitioners as registered nurses and consequently the inclusion of registered nurses creates no additional costs. Similarly, it is not anticipated that there will be an additional ongoing administration cost to Social Security Scotland beyond the resource already identified for the processing of applications.

Suspension of Assistance

34. The provisions within this Bill will amend section 51 of the 2018 Act and allow the Scottish Ministers, by regulations, to make provision in relation to the suspension of payment of on-going forms of assistance provided for under Part 2, Chapter 2. The Bill introduces schedule 11 to the Act, which contains safeguards to limit the availability of the power to suspend assistance in accordance with regulations and to provide individuals whose assistance has been suspended with a right to require the Scottish Ministers to review their decision to suspend the assistance.

35. The circumstances in which the regulations may provide for the Scottish Ministers to suspend payment of assistance are as follows: (a) where the individual has failed to supply relevant information upon request from the Scottish Ministers within a specified period; (b) where Ministers have made arrangements for another person to receive assistance on the individual's behalf, and Ministers are satisfied that it is no longer appropriate to pay that person; and (c) where the individual has requested that the Scottish Ministers temporarily stop payment of assistance. Regulations made under section 51 will ensure that upon the lifting of the decision to suspend assistance, the individual will become immediately entitled to the assistance that they otherwise would have received during the period of suspension.

36. The provisions relating to the suspension of benefits do not significantly impact on forecast demand-led expenditure for benefits, because the power to suspend payment of assistance is narrow in its scope. It does however allow the Scottish Government to take action to suspend payment where the individual fails to provide information to Scottish Ministers, and there is a likelihood that the individual may no longer meet the conditions of entitlement. This is expected to have a net positive effect on the Scottish Government's budget position. It is also consistent with the

Scottish Government's responsibilities under the Scottish Public Finance Manual (SPFM).

37. The total estimated costs for developing the application process, including staff costs, case management system development, digital portal systems development and process and technology development is £60 million.⁹ It is difficult to attribute a specific portion of that total cost directly to the suspension of assistance. However, it may be reasonable to expect the costs directly attributable to suspension of assistance to be low and contained within the total cost.

Non-Payment of Assistance

38. The Bill amends schedules 2 (carers assistance), 5 (disability assistance), 7 (employment injury assistance) and 9 (housing assistance) of the 2018 Act to allow the Scottish Ministers to set in regulations that the value of assistance paid under those schedules may be £0, in circumstances where the individual is resident and present in a particular place, or that the individual is in receipt of another type of assistance (under the 2018 Act or any other) during the period of the individual's entitlement, or in such other circumstances as may be set out in the regulations. Such provision may only be made where Scottish Ministers consider that it would be in the interests of the individual to pay assistance with a value of £0, rather than not being entitled at all.

39. These provisions are intended to ensure that an individual may not be paid all or part of a specified form of assistance, despite fulfilling the eligibility criteria. This would typically be used, for example, where an adult who is entitled to disability assistance under the Act, paid in consequence of having a need for care as a result of a disability, is hospitalised. In these circumstances, as a result of care being provided in hospital, payment of disability assistance would otherwise lead to duplication of public funds.

40. The purpose of the amendment is also to ensure that an individual may remain entitled to passported benefits, where entitlement to those benefits is based on the individual being entitled to or paid a specific form of assistance. This ensures consistency with the existing practice relating to disability benefits paid under the reserved social security system, and it is

⁹ [Social Security Programme Business Case](#) - page 73; Table 5.6

not anticipated that this will result in any additional expenditure or spillover costs under Scotland's Fiscal Framework.

41. As with suspensions, the total estimated costs for developing the application process, including staff costs, case management system development, digital portal systems development and process and technology development is £60 million.¹⁰ It is difficult to attribute a specific portion of that total cost directly to the non-payment of assistance. However, it may be reasonable to expect the costs directly attributable to non-payment of assistance to be low and contained within the total cost.

First-Tier Tribunal's Jurisdiction

42. Section 7C of the Bill repeals section 68 of the 2018 Act and inserts a new section 87A which provides that the Scottish Ministers may, by regulations, transfer to the First-tier Tribunal for Scotland some or all of the competence and jurisdiction that a sheriff has in relation to the recovery of assistance given in error under section 63, or in regulations under Part 3 of the 2018 Act. This essentially re-states the power in section 68 of the Act, while extending it to allow regulations also to make provision in connection with recovery of top-up assistance.

43. All tribunals administered by SCTS are funded by the relevant policy areas within the Scottish Government. It was always the intention to transfer some or all of the jurisdiction and competence in relation to recovery of money owed under section 63 of the 2018 Act from the sheriff court to the FTT and the only additional caseload beyond that already anticipated would be those cases solely related to the recovery of assistance paid under Part 3 of the 2018 Act. It has been estimated that cases could be heard at a cost per case of £3,000 per day. As below, any costs associated with this Bill are expected to be covered within existing funding arrangements or met by recharge from SCTS to Social Security Scotland.

Enabling Other Types of Judges to be Temporarily Authorised to Sit in the First-Tier Tribunal (FTT) and the Upper Tribunal

44. The Bill itself will not give rise to any immediate financial implications but the use of the mechanism which they provide for, will. The provisions within the Bill have the purpose of broadening the pool of people who may be appointed to particular roles. Irrespective of this, someone will have to

¹⁰ [Social Security Programme Business Case](#) - page 73; Table 5.6

take on these roles and be remunerated accordingly. The choice therefore is who to appoint rather than whether the work is required to be done.

45. The Tribunals provisions in the Bill widen the list of judicial office holders eligible to be temporarily authorised to sit in the Upper Tribunal and enable temporary authorisation to sit in the First-tier Tribunal. The need for the ability to temporarily authorise this wider group flows from decisions already taken to expand the work of the Social Security Chamber in the Scottish Tribunals. It is anticipated that the President of the Scottish Tribunals will request that these provisions are used to permit members within the reserved tribunal system, including salaried full-time members, to sit within the devolved Social Security Chamber and may result in additional spending above that currently associated with fee-paid Scottish Tribunal members. The terms and conditions for members in the reserved tribunal system are different from the terms offered to devolved tribunal members and include higher daily fees and salaries, pensions for legal members and occupational holiday and sick pay.

46. Those who are temporarily authorised to sit in the devolved system (i.e. salaried reserved judges) will retain their existing Ministry of Justice (MoJ) terms and conditions and continue to be paid by Her Majesty's Courts and Tribunal Service (HMCTS) however, the Scottish Administration will meet the costs of those appointed in this way for their prescribed period of appointment to Scottish Tribunals. Costs will only be incurred if it becomes necessary to make such appointments.

47. Under section 18 of the Tribunals (Scotland) Act 2014, the temporary authorisation is for a period as prescribed by Scottish Ministers. At the end of the prescribed period, the authorisation can be extended, as business requires. A First-tier Tribunal Judge in the reserved tribunal system has an annual salary of £112,542 with a total cost a total cost of £184,907 p.a., including National Insurance and employer's pension contribution. This does not include any other expenses or allowances that the judge might receive (e.g. travel and subsistence costs if working away from their principal hearing centre).

48. To ensure that the devolved Social Security Chamber is adequately resourced to deal with the forecast in appeals from 2021 onwards, approximately five salaried members may be required. By comparison, the total cost of a fee paid devolved legal Tribunal member for the equivalent number of working days as a full time salaried member would be £94,160

p.a.. This equates to a difference in cost of up to £90,747 per salaried member authorised on a yearly basis at current rates. Therefore, the potential additional cost relating to this provision would be between £0 and approximately £455,000 p.a., depending on how many salaried members are required up to the stated potential requirement of five such appointments.

49. It is not anticipated that there would be any additional administration cost to Social Security Scotland in this form of appointment beyond the resource already identified for resourcing the Chamber.

Risks

50. Temporary authorisation of a reserved member to sit in the Scottish Tribunals presents risks associated with costs and the possibility of creating full time comparators for the purposes of a part time workers` less favourable treatment claim or an equal pay claim, both in Scottish Tribunals and across the wider tribunal and judicial system in Scotland. In particular, the higher pro rata rate of daily fee and the continuance of pension arrangements for reserved legal members creates risk of successful legal challenge as regards other devolved tribunal members, including legal members and Chamber Presidents in Scottish Tribunals, members of devolved tribunals which are yet to transfer to Scottish Tribunals and other part time judicial office holders appointed by the Scottish Ministers.

51. The Scottish Government has considered that any difference in terms of appointment as between transferring reserved and part time members is capable of being objectively justified in the event of legal challenge. It believes that the work to be undertaken by reserved tribunal members who transfer in is not likely to be the same, of equal value or broadly similar to that which other members of Scottish Tribunals undertake. In addition, it is satisfied that there is currently no legal member in the devolved system with the requisite skills or experience to undertake the roles which are needed in the Social Security Chamber.

52. If, however, a successful legal challenge is made in consequence of the Scottish Government using the ability to temporarily authorise reserved salaried members, it may need to consider extending pensions to legal members of Scottish Tribunals, including current Chamber Presidents. If Scottish Ministers opt to extend pension provisions to Chamber Presidents, it is likely to lead to a cost of approximately £500k per year.

Costs to The Scottish Courts and Tribunals Service (SCTS)

53. All tribunals administered by SCTS are funded by the relevant policy areas within the Scottish Government. For 2021/22, the estimated forecast of expenditure for the Social Security Chamber is £7.86m. Costs associated with this Bill are expected to be covered within existing funding arrangements or met by recharge from SCTS to Social Security Scotland, including any additional costs arising from the transfer of competence and jurisdiction from the Sheriff Court to the First-tier Tribunal in relation to the recovery of money owed or the hearing of disputes in relation to appointees.

Costs on Local Authorities

54. It is not anticipated that there will be any new costs falling on any local authorities as a result of any of the provisions within the Bill.

Costs on Other Bodies, Individuals and Businesses Extending Responsibility for Diagnosis of Terminal Illness to Registered Nurses

55. Accepting terminal diagnosis from registered nurses aligns with current DWP processes, therefore any associated cost is already being met by Health Boards. As such, there is no anticipated new additional cost or resource implications for Health Boards as the same people who currently perform the function of diagnosing terminal illness will continue to do so once Disability Assistance is devolved.

Creating Statutory Fraud Offences

56. SCP eligibility is linked to reserved qualifying benefits. Therefore, it is anticipated that the majority of SCP fraud cases referred to the Crown Office and Procurator Fiscal Service or Police Scotland will relate to collaborative investigations with DWP, where the fraud also relates to the reserved, qualifying benefit. The duration of, and activity related to, investigations vary considerably depending on the allegation type and complexity of the case.

57. Therefore, there is not yet any available analysis of the cost to investigate and pursue an individual case relating solely to SCP offences. It is anticipated that any new additional costs as a result of the creation of fraud offences for SCP may be minimal, due to the connection to the reserved benefit case. It is not possible at this stage to estimate what the additional cost to the Crown Office and Procurator Fiscal Service or Police Scotland relating to fraud offences for any future top up benefit that may be

This document relates to the Social Security Administration and Tribunal Membership (Scotland) Bill as amended at Stage 2 (SP Bill 68A)

introduced at a later date. The Scottish Government is at present unable to quantify the financial impact on the COPFS or Police Scotland, however it will continue consulting with both organisations to develop appropriate analysis as plans evolve in this area.

This document relates to the Social Security Administration and Tribunal Membership (Scotland) Bill as amended at Stage 2 (SP Bill 68A)

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[As Amended at Stage 2]

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