

# Proposed Sanitary Products (Free Provision) (Scotland) Bill

## Page 2: About you

Are you responding as an individual or on behalf of an organisation?

on behalf of an organisation

Which of the following best describes you? (If you are a professional or academic, but not in a subject relevant to the consultation, please choose "Member of the public".)

*No Response*

Please select the category which best describes your organisation

Third sector (charitable, campaigning, social enterprise, voluntary, non-profit)

Please choose one of the following; if you choose the first option, please provide your name or the name of your organisation as you wish it to be published.

I am content for this response to be attributed to me or my organisation

Please insert your name or the name of your organisation. If you choose the first option above, this should be the name as you wish it to be published. If you choose the second or third option, a name is still required, but it will not be published.

Shelter Scotland

Please provide details of a way in which we can contact you if there are queries regarding your response. Email is preferred but you can also provide a postal address or phone number. We will not publish these details.

## Page 7: Your views on the proposal

Q1. Which of the following best expresses your view of the proposed Bill?

Partially supportive

Q1. Which of the following best expresses your view of the proposed Bill?

**Please explain the reasons for your response**

Shelter Scotland is fully supportive of the aims and objectives of the proposed Bill, to enable universal provision of sanitary products. Shelter Scotland works with many people in poverty or experiencing some form of housing crisis which can often have both short and long term financial implications. No woman or girl should have to go without sanitary products because they cannot afford them, nor should they have to sacrifice other items, such as food, heating, or paying their housing costs, to purchase them. We are concerned that the provision of sanitary products via a card-based system may present some barriers to some of the people we work with, and as such we would like to see further consideration given over whether this is the most effective means of providing sanitary products for free to those who need them, and if so, how some of these barriers may be overcome.

## Page 8: Universal provision of sanitary products

Q2. Do you think a universal, card-based system (modelled on the c-card system for free condoms) would be an effective means of providing sanitary products for free to those who need them?

Unsure

**Please explain the reasons for your response**

Shelter Scotland are supportive of the aims of a universal, card-based system, but believe further consideration needs to be given to whether a card system is the most effective means of providing sanitary products for free to those who need them. We received varied responses from our frontline staff in terms of how well the people they support would be able to engage with such a system. Many were favourable of the universal, card-based system, supporting it because they believed those who in need would be able to access products in a dignified and discreet manner, without judgment. Others were concerned that a card system would be embarrassing for women, and presented an unnecessary barrier for people who might be in need of help. One adviser described carrying a card as "a deterrent...a symbol of shame, singling those out who can't afford sanitary products". A specific issue around the requirement for a postcode via the C-Card system was raised for which, if a card system was pursued, we would like to see a resolution. A postcode requires an address or awareness of postcodes, which is not always possible for street homeless women. The distribution point was raised as key to the success of any scheme, in ensuring that women felt comfortable enough to go along and use the points and that they were easy to access.

Q3. Which of the following best expresses your view in relation to a card-based system?

The card should be available to anyone; card-holders should have unlimited access to free sanitary products

**Please explain the reasons for your response.**

Shelter Scotland believe the card should be available to anyone: this means there is no concern over knowing or proving eligibility or income, which can be a barrier for some people. It also removes stigma, having a universal scheme removes embarrassment for those who cannot afford to buy products themselves. It gives people the chance to access services on some else's behalf – for example for a neighbour, friend or family member who may be too embarrassed to attend, or who may be unable to attend because of physical or mental health reasons, or caring responsibilities. This would allow people considered to earn more than a 'low income', or who aren't in receipt of benefits, to access products if required, for example if they had had a large financial outlay that month or struggling for another reason. We foresee this as being a big benefit for those who are waiting six weeks for their first Universal Credit payment, or who have had their benefits sanctioned. Making the card available to everyone will also ensure that it is not just income as a barrier that should be taken account of, but also if a female is in an abusive or controlling relationship where a partner will not allow access to money, or similarly for younger people who may be in need for different reasons. A scheme would have to be monitored to ensure that no one was abusing the system, but we believe that those able to pay would continue to do so, and that providing the card to everyone removes any barriers to those who are in

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need. Shelter Scotland believe card-holders should have access to unlimited sanitary products: this will allow people to pick up more than one month at a time, and allow people to get as much as they need for their personal circumstances or menstrual flow. Each person requires a different amount of products and some people may find it difficult to predict how many products will be needed in any one month, particularly if you're picking up for a full family, and there is a risk that people would feel humiliated into answering personal questions to justify the amount they need. It may be that some sensible, generous limit can be imposed to try to prevent people stockpiling products at home, and to help avoid waste, but consideration should be given to how this can be done without providing any barriers to people in genuine need.

Q4. Do you have a view on which locations would be most suitable for dispensing free sanitary products (e.g. GP surgeries, pharmacies, community centres, health clinics)?

We investigated thoughts on a number of venues as distribution points. The most popular proposals were GP surgeries, pharmacies, and health clinics, and educational establishments were also mentioned though this is covered elsewhere in the proposals. Community centres, homeless accommodation such as B&Bs and hostels, and foodbanks were also considered to be key distribution points.

We received other suggestions of locations which might also be suitable for dispensing free sanitary products, too, including:

- A whole host of public services, including local authority offices, libraries and job centres
- Supermarkets and local shops, with the thought that this might work alongside their community projects
- Public toilet facilities, including in shopping centres. This was thought to be particularly useful to fill a gap in provision in emergency situations or at times when other facilities are closed (for example, weekends)
- Train and bus stations
- Work places
- Other third sector organisations, like housing association offices, and agencies like Shelter Scotland, who have community hubs, homeless day services, resettlement projects, support agencies and rehabilitation projects.

Distribution points should be in accessible places where people already go, there is a need to limit sending people to several different places. Distribution points need to be in places where people feel safe and free from judgement.

Consideration needs also to be taken of access issues, exploring options for postal delivery if necessary, for example for those who are agoraphobic or who have mobility issues. In addition, suitable alternatives need to be considered for the many rural communities in Scotland where many suggested distribution points may not be available and where the cost of transport may be high.

## Page 11: Schools, colleges and universities

Q5. Do you agree that there should be specific obligations on schools, colleges and universities to make sanitary products available for free (via dispensers in toilets)?

Yes

### **Please explain the reasons for your response**

Shelter Scotland is supportive of the provision of free sanitary products in educational establishments. In schools this is particularly important as many young people will not have access to other services, and having them freely available removes the embarrassment of having to ask for products. Young people are likely to be more reliant on financial support from their parents or guardians and therefore are less able to purchase products themselves, thus making them more vulnerable if they are in a family situation where they're unable to communicate their needs. We also believe it will help avoid missed education due to a lack of sanitary products. We already know that living in poverty, and experiencing housing crisis, can affect school attendance. For example, homeless children in temporary accommodation miss an average of 55 days of school each year (Mitchell F, Neuburger J, Radebe D and Raye A, Living in limbo: survey of homeless

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households living in temporary accommodation, Shelter, 2004). As such, any action that can help improve school attendance and remove barriers is crucial. One of our staff members shared their personal experience of this: "I remember once, in my early teens, having to go home from school because my period started unexpectedly. The school reception staff were really suspicious and I didn't feel I could share with them so said I felt unwell. I missed most of a day's school because sanitary products weren't available. This should never happen - school is hard enough as it is." With regards to the obligation being placed on colleges and universities, it was felt that students at college or university may be able to access products at another distribution point. However, on principle, sanitary products should be available for free to those who require it: sanitary products are a basic, essential human need and, as one respondent put it, "periods are not a lifestyle choice".

## Page 12: Personal experience (questions 6 and 7 are for individual respondents only)

Q6. Have you ever struggled to access or afford sanitary products during menstruation? (e.g. financial barriers, unexpected circumstances, health issues)

**Please explain or give an example of your experience if you feel able to do so.**

Question 6 and 7 were not answered because they relate to individual respondents only.

Q7. If sanitary products were available for free, which of the following would apply to you?

**Please explain the reasons for your response**

Question 6 and 7 were not answered because they relate to individual respondents only.

## Page 14: Financial implications

Q8. Taking account of both costs and potential savings, what financial impact would you expect the proposed Bill to have on:

	Significant increase in cost	Some increase in cost	Broadly cost-neutral	Some reduction in cost	Significant reduction in cost	Unsure
(a) Government and the public sector (e.g. local authorities, the NHS)	X					
(b) Colleges and universities	X					
(c) Businesses (including suppliers/retailers of sanitary products)						X
(d) Individuals (including consumers of sanitary products)					X	

Q8. Taking account of both costs and potential savings, what financial impact would you expect the proposed Bill to have on:

products)						
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**Please explain the reasons for your response**

8. (a) – (c) All the sub-questions in question 8 are dependent on who is funding the provision of free sanitary products. 8. (a) There is likely to be a significant increase in costs for the Government and public sector, if they are funding the provision of free sanitary products. However, savings may be seen in other areas of budget where it reduces stress and anxiety for households who are currently struggling to foot the bill themselves. 8. (b) Universities and colleges are likely to see a significant increase in cost if they were to have an obligation to provide free sanitary products and fund this provision themselves. However, pilots could be carried out to determine actually how much uptake there would be for free products to help decide if this was the best distribution method. 8. (d) We cannot predict the level of uptake for such a scheme. We would anticipate, if there was a universal card system, that many individuals would not participate if they didn't feel they had a genuine need, but instead would continue to purchase products in the same way they do currently. However, for individuals in need, there would be a significant saving and it could make a huge difference to the lives of some families. Many of the people we work with have a very limited budget. "When you are on a low income, either on benefits or in a low paid job, each penny of saving makes a difference. The money that is spent on sanitary products each month could be spent on food." "it is a monthly cost and soon adds up especially if there is a number of females within the family unit" "my clients are on very low incomes, each penny accounted for, £5-10 per month would be significant to them" "many of our service users/clients have no recourse to public funds or have little or no income/spare income to be able to afford these products" "The homeless and people on low income/benefits can strike yet another worry and expense off their list; especially if they have children who may need products too" "This is a monthly expense for most women we work with and the saving could be used for other essential items" "sanitary products are not cheap, and the stigma of not having access to products can cause isolation" "my client was sanctioned and her 14 year old daughter got her period during this time. My client had to steal sanitary products for her daughter"

Q9. Are there ways in which the Bill could achieve its aim more cost-effectively (e.g. by reducing costs or increasing savings)?

N/A

## Page 16: Equalities

Q10. What overall impact is the proposed Bill likely to have on equality, taking account of the following protected characteristics (under the Equality Act 2010): age, disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex, sexual orientation?

Positive

**Please explain the reasons for your response**

The proposed Bill would improve equality between males and females, removing the additional cost burden on women who have to purchase sanitary products currently. It will also have a positive impact on young women in school or college who otherwise may not be able to attend their educational establishment, and as such should increase access to education and training for females.

Q11. In what ways could any negative impact of the proposed Bill on equality be minimised or avoided?

We do not foresee any negative impacts of the Bill on equality.

## Page 18: Sustainability

Q12. Do you consider that the proposed Bill can be delivered sustainably i.e. without having likely future disproportionate economic, social and/or environmental impacts?

Unsure

**Please explain the reasons for your response:**

The Bill may have economic impacts but Shelter Scotland consider the principle of free access to sanitary products for those who need it as taking priority over any such considerations. It is hard to calculate any such impact without knowing the extent of uptake. Learnings from pilots and from initial roll outs of the scheme will help inform thinking to balance any disproportionate impacts.

## Page 19: General

Q13. Do you have any other comments or suggestions on the proposal?

Shelter Scotland welcome the opportunity to respond to the consultation on ending period poverty.

Shelter Scotland helps over half a million people every year struggling with bad housing or homelessness through our advice, support and legal services. And we campaign to make sure that, one day, no one will have to turn to us for help.

We're here so no one has to fight bad housing or homelessness on their own.

Every day we support people living in poverty, struggling with the cost of housing and with daily living expenses, including basics and necessities like nappies, food, heating, and sanitary products, or women who have told us they're using toilet paper because they cannot afford specialist products.

We consulted Shelter Scotland advisers and support workers to collate their feedback on ending period poverty, from the experiences of the people they support.

We hope that actions arising from this consultation will kick start the roll out of further support to ensure women and girls everywhere in Scotland will have dignified access to sanitary products as and when needed, without stigma.