

# 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 If you choose the second or third option, a name is still required, but it will not be published.

Girlguiding 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?

Fully Supportive

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

**Please explain the reasons for your response**

Introduction:

As the leading charity for girls and young women in Scotland we're committed to ensuring every girl has the opportunity to achieve our full potential. We were delighted to be asked to support the campaign to End Period Poverty and have actively engaged our members in this work by:

- Gathering their views and encouraging them to speak out on this issue
- Encouraging our volunteers to make sanitary products available at unit meeting places
- Encouraging our members to collect sanitary products and other toiletries for their local foodbank

To help inform our consultation response we surveyed our members and supporters to find out more about their experiences and views on period poverty.

Our survey received 76 responses, over 90% of which were from members age 30 and under. We realise with a small sample size our survey can only offer a snapshot into this important issue that affects individuals from a wide-range of backgrounds and perspectives, with diverse and far-reaching consequences.

However we are excited to have this opportunity to share our views and hope the consultation will generate further research and an open discourse on how periods and period poverty affect the lives of girls and women.

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Girlguiding Scotland is fully supportive of the proposed bill to introduce a universal system of free provision of sanitary products and to create a duty for relevant bodies such as schools, colleges and universities to provide free sanitary products.

Girlguiding Scotland believes making free sanitary products easily available to everyone who needs them will not only create economic benefits but also support girls & young women's participation in education and extracurricular activities and help to end the stigma around periods.

In terms of the prevalence of period poverty our survey found that:

- 25% of respondents had experienced period poverty themselves or had friends or family who had experiences period poverty at least occasionally. The majority (20%) said this was an occasional experience, while 5% said it happens 'a few times of year' or 'every or most months'.

In addition the vast majority of respondents had some experience of being 'caught out' and finding themselves without sanitary products when they need them:

- Nearly a quarter (24%) said this happened 'every or most months' while 99% reported that this had happened to them at least occasionally.

We acknowledge that with a limited sample size our findings can only offer a snapshot into the prevalence of period poverty and would welcome further research on the impact of period poverty. In particular we welcome the research Plan UK has carried out to map the prevalence of period poverty across the UK which found one in ten girls struggle to afford sanitary products. \*

\* Plan International UK: 1 IN 10 GIRLS HAVE BEEN UNABLE TO AFFORD SANITARY WEAR, SURVEY FINDS – 13th October, 2017

Our members highlighted a wide-range of benefits such a bill could create for public life in Scotland:

- 89% agree free sanitary products would help make sure girls and young women don't miss out on school or college
- 91% agree free sanitary products would help girls and young to participate in after-school activities and extracurricular activities
- 89% agree free sanitary products would help to reduce stigma around periods

We also asked our members to think about the benefits the proposed bill could create in their own, everyday lives and the lives of their peers. We found:

- 87% said access to free sanitary products would save them money
- 75% said access to free sanitary products would make them feel more comfortable talking about periods with family, friends and peers
- 67% said access to free sanitary products would make them feel more comfortable taking part in extracurricular activities like sport, youth clubs, and volunteering while they had their period
- 63% said access to free sanitary products would make them feel more comfortable going to school or college while they had their period

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

Here are comments from some of our members on why they believe everyone who needs them should be able to access free sanitary products:

"Periods are a natural process which no woman chooses and yet women are sometimes forced to choose between buying period products or buying food. A box of tampons can cost upwards of £2.99, depending on the choice available in the local area. Many women will need multiple boxes a month, which will quickly add up especially with multiple people experiencing periods in the same household. Which can be an expense a lot of households just can't afford."

Girlguiding Scotland member, age 23

"Sanitary products are as necessary as food to some women and young girls, this is an issue which should be just as concerning as a child not having breakfast."

Girlguiding Scotland member, age 22

"In 2017 girls shouldn't be missing out on opportunities because they can't afford basic toiletries."

Girlguiding Scotland member, age 22

"We need to break stigma, and make sanitary products as easy to get as free condoms."

Girlguiding Scotland member, age 30

"That periods cause enough pain and issues already, especially to young people who have just started and aren't used to them. Not having sanitary products because they can't afford them is only adding to the problem. Young girls are missing school due to their period which, if they miss school frequently, could have a big impact on their education and their life in general."

Girlguiding Scotland member, age 19

## 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?

Yes

**Please explain the reasons for your response**

We are broadly supportive of proposals for a universal, card-based system providing access to sanitary products for those who need them. Our survey found 57% of members supported this idea while 28% were unsure whether this would be an effective system while 15% did not think this would be an effective way of providing access to free sanitary products. Members who were familiar with the c-card scheme felt this system worked well and could be applied to sanitary products and highlighted the need for any system to be open, easily accessible and avoid adding any additional stigma to those making use of it. "I believe there should be a no questions asked sanitary product system - similar to the current "C-Card" condom system. I think this availability would increase confidence levels and the opportunities taken by young girls in difficult situations."

Girlguiding Scotland member, age 20 However some members expressed concern that a card-based system may not go far enough to tackle stigma and that some girls and women may still miss out if they don't have the confidence to register. "The card based system would not cause the cultural change we need. It would be similar to the free contraception policy and would mean only those with access, awareness of and confidence will reach those services. This would still affect vulnerable, remote or younger members of society." Girlguiding Scotland member, age 26

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

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

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

We support the card-based scheme and believe that ease-of-access is fundamental to its success. We therefore support a universal system offering unlimited access to sanitary products for those who need them. Our survey found 60% of survey participants supported a card-based system that was open to anyone who wanted a card without having to meet eligibility criteria. Further comments from our members highlight that they believe a universal system will help to address the stigma associated with period and period poverty and that whatever system is implanted it is essential it reaches those most in need. "I don't believe that the government can provide to one group of women and not the rest. Period poverty affects every woman not just the ones who are visibly in need." Girlguiding Scotland member, age 18 "Period poverty is unfair and unnecessary - everyone deserves fair access to this most vital health product." Girlguiding Scotland member, age 17 "Sanitary products are essential for so many people (not just women and girls but trans and non-binary people as well) and they should be free and accessible." Girlguiding Scotland member, age 21 "It is those who are truly struggling to afford them and having to use alternatives which should be focused on." Girlguiding Scotland member, age 22

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)?

Girlguiding Scotland supports proposals to make free sanitary products to be easily accessible in the places where girls and young women spend much of their everyday lives such as schools, colleges and universities.

Our survey found:

- 99% of respondents said having sanitary products at schools and colleges would be very or somewhat helpful
- 99% of respondents said having sanitary products at GPs, health centres and clinics would be very or somewhat helpful
- 96% of respondents said having sanitary products at sports centres, leisure centres, libraries and community centres would be very or somewhat helpful
- 92% of respondents said having sanitary products at sports centres, leisure centres, libraries and community centres would be very or somewhat helpful

In addition our members recommended a wide variety of other spaces where access to free sanitary products may be helpful including bus and train stations, airports, supermarkets, shopping centres and all public bathrooms.

As part of our efforts to support the campaign end period poverty and ensure our young members feel happy and comfortable at unit meetings we have been encouraging our volunteers to provide sanitary products at the unit meeting place.

## 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**

Girlguiding Scotland supports the proposal to create a specific obligation for schools, colleges and universities to make free sanitary products available for free as we believe education is a fundamental right for all young people and all young people have a right to feel safe and happy at school, college and university. As mentioned above 99% of survey respondents agreed making free sanitary available at schools and colleges would be helpful. We also recognise the anecdotal evidence cited in the consultation paper suggesting period

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poverty may contribute to absenteeism and would welcome further research around this link. Feedback from our own members suggests that stigma may make it difficult for girls to be open about problems they have related to their period – including their ability to afford sanitary products. • 68% of respondents said they did not feel comfortable talking about periods with staff at school or college compared to just 13% who did • More than half (52%) said they would not feel comfortable telling school staff that they were struggling to afford sanitary products • Even amongst friends 39% of respondents said they would not feel comfortable speaking about problems affording sanitary products These figures suggest many girls may be struggling in silence and feel unable to approach school staff for support due to the stigma of period poverty. We acknowledge the findings of Plan UK and echo their calls for action around the stigma around periods as well as addressing the cost of sanitary products – for example by ending restrictions allowing girls to use toilets during lessons and encouraging a school culture where pupils can speak to school staff about periods and any challenges they are experiencing. Encouragingly, when thinking about their own everyday lives and experience 63% of our survey respondents said access to free sanitary products would make them feel more comfortable going to school or college while they had their period while 75% said access to free sanitary products would help them to feel more comfortable to talk about periods with family, friends and peers. An accessible and anonymous approach like making free supplies available in school and college bathrooms could make it easier for anyone who needs sanitary products to access them without worrying about embarrassment or stigma. That it's a real problem that needs to be tackled - politicians need to use their unique position to provide concrete change and ensure that girls don't have to lose out on education and life just because of a biological function that they have no control over." Girlguiding Scotland member, age 16 That periods cause enough pain and issues already, especially to young people who have just started and aren't used to them. Not having sanitary products because they can't afford them is only adding to the problem. Young girls are missing school due to their period which, if they miss school frequently, could have a big impact on their education and their life in general. Girlguiding Scotland member, age 19 For those of us who have problems with periods, sanitary products are not the only cost we endure to cope with them. Would also be helpful in schools and places where women are perhaps struggling to have access to a change of underwear. Girlguiding Scotland member, age 30

## 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.**  
NA (responding as an organisation)

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

**Please explain the reasons for your response**  
NA (responding as an organisation)

## 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:

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

**Please explain the reasons for your response**

Predicting the potential cost impact goes beyond the scope of our survey and research and we aware there will be organisations and bodies much who are better placed than us to address cost implications to government, schools and colleges and businesses. We are better placed to speak to the cost implication for individuals. 67% of our survey respondents indicated they would expect to make use of free sanitary products regularly (24%) or occasionally (43%) suggesting that the proposals would result in a cost reduction for them. We also recognise the growing body of research highlighting just how much individuals can expect to spend on sanitary products with recent research finding the average woman spends more than £18,000 on sanitary products over the course of her lifetime\*. \* Huffington Post: Women spend more than £18,000 on having periods in their lifetime, study reveals - 3rd September, 2015

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

Again we feel this goes beyond the scope of our expertise and research with our members.

## 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**

We believe this proposed bill would have a positive impact by: • Helping to end the stigma around period poverty and periods more generally • Tackling a barrier that may prevent or have a detrimental impact on girls' experience of education and other opportunities such as extra-curricular activities including participation in youth groups and sports clubs • Making it easier for anyone who requires sanitary products to access them via a convenient accessible and inclusive system and in spaces where they already spend much of their time (schools, colleges, universities etc) We welcome the provisions set-out in the consultation paper acknowledging that period poverty constitutes a discriminatory practice, disproportionately impacting of women and girls. We also welcome recognition of the additional barriers young women and girls of school age face as they are unlikely to have access to their own income and recognition that individuals with disabilities may be at an increased risk of period poverty. In addition to the economic benefits the proposed bill offers, our members

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felt it could also be instrumental in reducing stigma and increasing participation. Our survey found: • 89% of respondents agreed free sanitary products would mean girls are less likely to miss out on school, college or university • 90% of respondents agreed free sanitary products would make it easier for girls to participate in extra-curricular experiences like sports and youth clubs • 89% of respondents agreed free sanitary products would help to reduce stigma and embarrassment around periods "Periods are something that most women experience regardless of wealth. Each individual has different experiences regardless of wealth. I think it is just important to raise awareness and improve perceptions of periods in general. I think greater understanding, awareness, openness and flexibility will improve 'period poverty' though since it isn't only detrimental to the less wealthy I think it would be better phrased as 'period positivity' as women (and men alike) should be embraced as individuals and periods should not be viewed negatively." Girlguiding Scotland member, age 23 "It is unfair that girls are still disadvantaged by something that is a natural part of being female and shocking the government is making a profit on periods. We need to make periods normal and socially accepted to reduce stigma and make girls feel included every day of the month." Girlguiding Scotland member, age 22 "Not having access to sanitary products is a barrier to equality for girls who may not be able to partake in activities, especially sports, and this leads to a wider gap between boys and girls." Girlguiding Scotland member, age 20 I think the stance on considering sanitary products on a luxury item is wrong: it is a necessity for some women and young adults and even those who aren't classed as low income or on benefits can struggle to afford them: they could be able to afford food or tampons one month, but not both. Letting girls/women know that this issue is something that is understood and they can be supported with would help a great deal to help combat embarrassment and stigma, but also money worries and stress. Girlguiding Scotland member, age 22

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

We believe the measures put forward in the proposed bill should be implemented in a way that is accessible and inclusive to help end the stigma surrounding periods and ensure that free sanitary products reach all who need them.

For this reason we support a universal approach that does not require recipients to prove eligibility criteria. We also support the proposed bill's recognition that some transgender individuals experience menstruation and that the provisions of any bill must apply to these communities.

Sanitary products are essential for so many people (not just women and girls but trans and non-binary people as well) and they should be free and accessible."  
Girlguiding Scotland member, age 21

## 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?

Yes

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

We believe the measures put forward in the proposed bill should be implemented in a way that is accessible and inclusive to help end the stigma surrounding periods and ensure that free sanitary products reach all who need them. For this reason we support a universal approach that does not require recipients to prove eligibility criteria. We also support the proposed bill's recognition that some transgender individuals experience menstruation and that the provisions of the bill must apply to these communities. Sanitary products are essential for so many people (not just women and girls but trans and non-binary people as well) and they should be free and accessible." Girlguiding Scotland member, age 21

## Page 19: General

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

In addition to the questions covered in the consultation we asked members if they could tell the Scottish Parliament one message about period poverty what would they say.

Here are some of their messages:

"That it's a real problem that needs to be tackled - politicians need to use their unique position to provide concrete change and ensure that girls don't have to lose out on education and life just because of a biological function that they have no control over."

Girlguiding Scotland member, age 16

"In 2017 girls shouldn't be missing out on opportunities because they can't afford basic toiletries."

Girlguiding Scotland member, age 22

"We need to break stigma, and make sanitary products as easy to get as free condoms."

Girlguiding Scotland member, age 30

"That everyone should be allowed access to suitable products.... not just cheap inefficient ones!"

Girlguiding Scotland member, age 30

"Periods are a natural process which no woman chooses and yet women are sometimes forced to choose between buying period products or buying food. A box of tampons can cost upwards of £2.99, depending on the choice available in the local area. Many women will need multiple boxes a month, which will quickly add up especially with multiple people experiencing periods in the same household. Which can be an expense a lot of households just can't afford."

Girlguiding Scotland member, age 23

"Period poverty is real. Don't ignore it."

Girlguiding Scotland member, age 22

"I think that periods are a very important part of girls lives and they should be taken more seriously by places of education, and places really should provide free product support to anyone who needs them."

Girlguiding Scotland member, age 17

If we can provide free condoms it should be a no brainer to provide free menstrual products. Period products aren't a luxury!

Girlguiding Scotland member, age 19

"That it should no longer be a taboo subject and we should face this genuine issue that girls have."

Girlguiding Scotland member, age 17

"That periods cause enough pain and issues already, especially to young people who have just started and aren't used to them. Not having sanitary products because they can't afford them is only adding to the problem. Young girls are missing school due to their period which, if they miss school frequently, could have a big impact on their education and their life in general."

Girlguiding Scotland member, age 19