

Proposed Sanitary Products (Free Provision) (Scotland) Bill

Page 2: About you

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

an individual

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".)

Student (at school, college or university)

Please select the category which best describes your organisation

No Response

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 If you choose the second or third option, a name is still required, but it will not be published.

Farahnaz Robinson

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 opposed

Please explain the reasons for your response

Whilst I am generally very supportive of all measures to combat poverty and inequality, I feel like the

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

proposed Bill is problematic on a number of levels. I will outline my reasons below: 1) I do not believe that the only way to combat this issues is through legislation, and I think ultimately legislation will be a lengthy, costly affair that may end up as a tick-box exercise that ultimately may not work. I think it would be a better use of resources, and may be more effective, to either create a charity dedicated to the cause or partner with a extant charity that can help distribution of free sanitary goods. My issue is that institutions such as schools already are buckling under the burden of numerous different social initiatives, and teachers are already under pressure to provide pastoral care and administrative services in addition to providing their education services. I do not think that it would be fair to place additional legislative responsibility upon them to organise and manage distribution of sanitary goods. I do, however, believe that institutions should be encouraged to provide free sanitary products in a respectful and dignified way as a gesture of goodwill and community. 2) I appreciate that life on the poverty-line can lead to women having to choose between food or sanitary goods. I understand that for some women it will literally be a choice of one or the other. But for the vast majority of women, this is not a real choice that they have to make. A pack of 32 tampons at Asda or Superdrug (for example) is just £1. That is enough to last for more than one period. I therefore think that economically, it makes little sense to alleviate such issues by legislative means. Especially if it will be to fund disposable products. I think it would be better to consider distributing re-usable sanitary goods. Distributing re-usable, sanitary devices such as Mooncups, reusable sanitary pads, and period pants (links all given below) is a much better choice. Not only does it tackle the problem of women having to keep topping up on period supplies, but it also has a positive environmental impact. Lastly, these products pose a much lower risk of Toxic Shock Syndrome in women and therefore has a positive health impact. I would strongly recommend you look into this.

<http://www.mooncup.co.uk/?gclid=Cj0KCQjwIMXMBRC1ARIsAKKGuwgeaOWaaVUp9ZhvngXPzDZBYktKhu>
<https://www.earthwisegirls.co.uk/reusable-sanitary-towels-c-1.html> https://www.shethinx.com/collections/period-panties?gclid=Cj0KCQjwIMXMBRC1ARIsAKKGuwVbf3Y4vrY409DoVdrZDrgzBGIV-bGo5mcfACwi4_fEn86AeeHqkYaAk9cEALw_wcB 3) This is a minor issue, but I think that likening period products to condoms weakens the argument. Pregnancy poses a larger societal issue than menstruation. It makes sense for governments to provide contraceptives, as ultimately this saves costs. Lack of access to sanitary goods does, obviously, pose some risks to individuals. For example, social self-seclusion, lack of confidence, and (most importantly) women use the same tampon or other sanitary product for too long thereby posing a health risk to themselves. This is a much stronger argument - to talk about the social exclusion and possibility of Toxic Shock Syndrome avoids individuals derailing the conversation and choosing to focus on the condom issue.

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

Yes, I think it is a very dignified way of doing it since it provides anonymity. Furthermore, it is good that the c-card system can be used at multiple locations - therefore, if someone feels embarrassed about utilising local services (for fear that they may be recognised), they can go to another location. Furthermore, it means that women would be able to access sanitary products regardless of how much they travel.

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

The card should be available to anyone; its use should be restricted (e.g. by limiting the number of products that may be claimed each month)

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

Please explain the reasons for your response.

I think ideally, the system would be available to anyone. However, this is obviously subject to whether funding is available to do so. I do think that the number of products claimed each month should be restricted. However, this number can be kept relatively high. For example, I don't see why anyone would need more than 2 boxes of tampons (each box containing 32 tampons). Likewise, I don't see why someone would need more than 30 sanitary pads for one period. I understand that some women will want to bulk-up so they don't need to come every month, but there needs to be a system in place to ensure that supplies do not run out, and that all those who need them have access. This is partly why for my previous objection, I said that not enough emphasis is being put on re-usable period products. Provision of menstrual cups, reusable sanitary pads, and period panties alleviates many problems. Firstly, these are products that do not need to be frequently replaced - women therefore do not need to revisit every month to top-up on supplies. Secondly, I believe that since the number of these products needed would be lower, it will be easier to manage and organise these resources. Thirdly, these products are better health-wise for women. As I said previously, they have been shown to have lower risk of Toxic Shock Syndrome. Fourthly, this is environmentally the best option - the amount of plastic and packaging on tampons and sanitary products is environmentally problematic. There needs to be a society-wide transition towards sustainable products and this is a means of enabling that. Many women are reluctant to experiment with these re-usable products because they are more expensive, and they do not want to risk spending £10+ on a product that may not work for them. However, reviews of these products have generally been good, so I think that merits their distribution. I do, however, believe there should still be provision of tampons in addition to re-usable products. However, emphasis should be placed on sustainability.

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)?

I think that all the above are good options for dispensing free sanitary products. Schools and universities would also be good candidates for dispensing free sanitary products BUT I do not think that the responsibility of organisation and management of supplies should be forced upon them. I am very wary of how much pressure public services are under at the moment, and I think it would ultimately be unfair for them to be mandated to manage this additional workload. Organisation/management of this endeavour should either be outsourced, or completely voluntary.

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)?

No

Please explain the reasons for your response

As stated before, this should not be an obligation. It will be completely unfair to mandate responsibility of this endeavour onto our public education institutions. Either outsource this responsibility, or open it up as a voluntary service. I think it unjustifiable to add extra pressure onto our teachers and education bodies for this issue. That having been said, I do think educational institutions should be encouraged to volunteer towards the endeavour.

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)

Yes, occasionally

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

As a teenager I did not feel brave enough to ask my parents for sanitary goods, and often did not have enough pocket money to buy products. During university, I did occasionally struggle to buy sanitary products. However, this was ultimately a budgeting issue. Never at any point did I think that it was the responsibility of others to provide sanitary products for me. And, to be completely frank, since the cost of sanitary goods is so low (as stated previously 32 tampons can be bought for £1), it is not a particularly large financial burden. The number of women who will face a choice between food or a box of tampons is very few, and whilst this is a hardship no person should face, I do not think it warrants legal action. Encouraging businesses and institutions to provide free sanitary products would be amazing, and I do think this could positively impact women. I think every woman can think of instances where they either forgot to pack sanitary supplies or ran out, and had to improvise whilst in public. Therefore, it would undoubtedly be beneficial to encourage institutions and businesses to voluntarily provide sanitary goods. However, I do not think it is either fair or necessary to mandate this through legislation.

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

I would not expect to claim free products

Please explain the reasons for your response

I am not well off. But I feel like I am in a comfortable financial situation. I would not want to place a burden on others, or to risk taking supplies that others may need. I would therefore not expect to have access to free sanitary goods. However, if my period came unexpectedly or if I ran out of supplies when in public then having easily accessible free sanitary goods would be an absolute God-send. I'd love it if businesses, such as restaurants and cafes, would consider providing such products as a gesture of goodwill. It would be nice to encourage them to do so.

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				

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

(d) Individuals (including consumers of sanitary products)			X			
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Please explain the reasons for your response

I think that legislating free provision of sanitary goods would have very little economic impact. Sanitary goods are cheap, and therefore likely to not add too much strain on local authorities or the NHS economically. However, I am worried about the additional workload or stress it may put on individuals working within the affected sectors. As said previously, I think it puts unfair pressure on people who are already working in areas such as education and healthcare - it increases their workload for comparatively little benefit. Likewise, as sanitary products are financially accessible to the majority of women, it does not seem to be a Bill worth pursuing. I think it would be far more effective to undertake this project as a Charity endeavour. To put things into perspective, as stated previously, 1 box of 32 tampons is £1. The number of individuals who would need to analyse whether that £1 should be spent towards food or sanitary products is extremely low. I do not see a problem with relying on charity endeavours for distributing sanitary goods to those women who do have these financial constraints. However, I do not see any real benefit to spending so much time, money, and effort to pass through legislation which is likely to end up being a tick-box exercise. I would urge yourselves to consider a means of distributing sustainable, re-usable, sanitary products to women without focussing on legislature. I believe this would have a far more positive impact, as it would not risk placing additional burden on our public services and would still help those who require sanitary goods.

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

Distribution of re-usable sanitary goods.

Re-usable sanitary goods prevent re-stocking issues, is easier to manage, and is more convenient for those who need the products (they won't need to keep coming back each month).

I would suggest getting in contact with various companies, such as Mooncup, and seeing whether they would partner with your project.

This company, for example: <https://lunapads.com/about-us> , already donate re-usable sanitary products to low income individuals. To partner up with a company such as Lunapads would therefore be a sensible option.

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?

Neutral (neither positive nor negative)

Please explain the reasons for your response

On the one hand, it affords dignity to a portion of women who otherwise may struggle meeting their menstruation needs. However, and I have personal experience of this, legislature that affects such a small portion of the population is often used to derail conversations pertaining to feminism and equality. I understand this issue differs to the Tampon Tax, but I will use it as an example. When the Tampon Tax was being debated, my male friends would often tell me that women were just looking to get "more stuff for free" and one friend said "well, what's next? Free toilet roll for everyone?" To a certain extent, I understand what they meant. Yes, issues like the Tampon Tax had a symbolic function, to highlight the disparity

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between 'necessary products' such as men's razors, and 'luxury items' such as tampons. However, for many people, it seemed like the issue was verging on the ridiculous. A 5% tax on a pack of 32 tampons (which cost £1 Asda or Superdrug own brand) = 5p. Assuming 12 periods a year, that is 60p. Assuming a woman menstruates for 35 years, that is cumulatively £21. It is such a small amount of money that it risks derailing conversations about equality. Whilst that extra 5p inevitably may affect a small portion of women, for the majority it is economically a small issue. Whilst it does signify some symbolic disparity between men and women, it is easy to derail as an argument (as shown above). I feel like there are so many more pressing issues that need to be addressed first with regards to equality, gender, and social issues. This is one of the very last issues I would be pressing ahead with. I think issues such as extending statutory paternity leave (at present it is just 1-2 weeks) would have a much greater impact on women and society in general. I think the amount of resources that have been spent debating tampons over the past couple of years would have been better spent trying to support issues such as WASPI, or combatting disparity in IVF/conception services between heterosexual and LGBTQIA+ individuals. It concerns me that so much emphasis is being given on legislation of sanitary goods, when there are so many more pressing issues, and when there are so many better ways of alleviating the issues. Setting up a charity or forming an alliance with a pre-existing charity, spreading news about period poverty so it is in public consciousness, and encouraging individuals to voluntarily provide free sanitary products will be much more effective than legislature. I really do oppose this Bill.

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

Focus on health and environmental benefits of providing re-usable sanitary supplies. Focus on minimising risks of Toxic Shock Syndrome. Focus on alleviating the stress of having to top up sanitary supplies on a monthly basis, by distributing products that can be used for more than one month.

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?

No

Please explain the reasons for your response:

As seen in my previous responses, I think this is unsustainable if delivered as a piece of legislature. It will inevitably become dated, or treated as a tick-box exercise. It will increase individual workload or stress within the public sector, as schools or other institutions will be mandated to organise or manage the distribution of free sanitary goods. However, I believe that providing re-usable sanitary supplies is the most sustainable way of alleviating the above problems.

Page 19: General

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

I really hope you consider pursuing a charity route, and do not dedicate too many resources on making this a legislative Bill. I hope you can use the momentum of publicity on the Tampon Tax and period poverty to help foster goodwill services amongst institutions, and partner up with sustainable sanitary

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

product distributors in order to help women. However, it is a waste of resources to keep fighting for this Bill if it does not initially pass.