

## Members' Library Service Request Form

Date of Document	01/08/22
Originator	Service Manager, Policy, Improvement and Partnerships; Community Planning Officer; Equalities and Tackling Poverty Officer
Originator's Ref (if any)	
Document Title	Provision of Free Period Products

Please indicate if access to the document is to be “unrestricted” or “restricted”, with regard to the terms of the Local Government (Access to Information) Act 1985.

Unrestricted	<input checked="" type="checkbox"/>	Restricted	<input type="checkbox"/>
--------------	-------------------------------------	------------	--------------------------

If the document is “restricted”, please state on what grounds (click on grey area for drop-down menu):

For Publication
-----------------

Additional information:

Authorised By	Sharon Saunders
Designation	Head of Communities
Date	08/08/22

For Office Use Only:	
Library Reference	104/22
Date Received	08/08/22
Bulletin	Aug22

**REPORT TO:** MEMBERS' LIBRARY SERVICE

**MEETING DATE:** August 2022

**BY:** Head of Communities

**SUBJECT:** Provision of Free Period Products

---

## **1 PURPOSE**

- 1.1 The purpose of this report is to inform elected members of the council's approach to meeting its responsibilities under the Period Products (Free Provision) (Scotland) Act 2021.

## **2 RECOMMENDATIONS**

Members are asked to note:

- 2.1 the duties and responsibilities of the council under the Period Products (Free Provision) (Scotland) Act 2021 as summarised in paragraphs 3.1-3.5
- 2.2 the proposed arrangements for providing free period products in public buildings and to individuals as set out in paragraphs 3.10 – 3.12
- 2.3 the estimated budget as set out in paragraph 3.16 and that the Council may be able to bid for additional funding if the £95,000 allocation is projected to be over-spent (paragraphs 3.17-3.18)
- 2.4 the Statement of Exercise of Functions set out in paragraph 3.19

## **3 BACKGROUND**

### **The Legislation**

- 3.1 The Period Products (Free Provision) Scotland Act 2021 places duties on local authorities and education providers to *'ensure period products are generally obtainable free of charge (in accordance with arrangements established and maintained by the local authority) by all persons who need them.'*

- 3.2 Detailed Guidance has been provided on the Act ([Period Products \(Free Provision\) \(Scotland\) Act 2021: guidance – September 2021 - gov.scot \(www.gov.scot\)](#)). This states that:

*‘There must be no judgement as to the need, no limit to the amount of products an individual can take, nor attempts to ‘ration’ products. Individuals don’t need a reason to access the products, above and beyond the fact that they menstruate, however individual needs in terms of period products could vary considerably due to the reason for the need arising, including:*

- a) a period starting unexpectedly or forgetting to bring a product from home*
- b) ongoing need due to low income*
- c) ongoing need for another reason*
- d) higher than average need due to a medical condition.’*

- 3.3 Respect for dignity is central to the Act so that *‘Period products should be obtainable in a way that respects the dignity of individuals obtaining them.’* Individuals should not need to ask someone for products, justify why they need them or justify the amount that is needed.
- 3.4 The local authority *‘is required to provide for a reasonable choice of different period products to be available, although the full range of products {tampons, sanitary towels and articles which are reusable} does not have to be available in all locations or through all delivery methods.’*
- 3.5 The Act requires local authorities to undertake consultation on the arrangements they propose to put in place to fulfil their duties (see paragraph 3.9) and then to publish a *‘Statement on Exercise of Functions that summarises the arrangements that will be put in place to meet the duty.’* The statement is to be published by 15<sup>th</sup> August 2022.

### **Experience to date**

- 3.6 Since 2018, as a prelude to introducing legislation on the provision of free period products, the Scottish Government has funded local authorities to deliver on national commitments to provide free period products in schools and community settings. The council used this funding to deploy a range of methods to make supplies of products available. These included:
- Schools providing period products supplied by Hey Girls<sup>1</sup>
  - Period products supplied by Hey Girls being made available in libraries, GP practices, council owned community centres and council offices and buildings
  - Supplying products through third sector organisations
  - Trialled provision of shopping vouchers/gift cards
  - Provided funding to the Benefits Team to provide a top up payment for period products with Scottish Welfare Fund Crisis Grants.

---

<sup>1</sup> [hey girls | Award Winning Period Product Social Enterprise](#)

- 3.7 An evaluation of the scheme the council operated found that there was a low uptake of products from public buildings. This was due to:
- the COVID 19 pandemic with public building closures
  - people did not realise they could take the products for free
  - lack of choice in products made available
  - the products (limited to Hey Girls) were not the brand preferred by the public.
- 3.8 It was also found that public buildings were not equipped for distributing bulk supplies of products due to lack of storage space. There were inconsistencies across communities in access to products with some locations ensuring products were on display and accessible and others (including some GP practices) having products out of sight and requiring people to ask for them, going against the principle to uphold dignity.
- 3.9 The council ran a consultation exercise on period products provision with communities and a separate survey for schools (for young people, staff, parents and carers) between December 2021 and January 2022. This identified barriers and unequal opportunities accessing products, for example availability in rural locations and associated transport costs to collect products from larger towns. For schools, there was a low take-up of products due to the impact of COVID 19 and school closures, young people, and parents/carers did not realise the products were free, and products weren't always in locations that protected dignity. Other key findings were:
- Most people felt comfortable taking products when freely available, however in schools, privacy and discretion were particularly important factors
  - Public toilets in community building and schools were the preferred places to access products but other methods of access were identified such as home delivery and online vouchers
  - Discrete locations are preferred and to be available in women's, men's and accessible toilets
  - Asking for products was identified as a barrier to uptake. For example, *"I think they need to be sent by post or placed in an area such as toilets so that a person doesn't need to ask for them. Unfortunately there is stigma firstly around periods and secondly around asking for something free"*
  - Supermarket vouchers received support with reservations around it being associated with poverty if it was printed, and accessibility if only digital
  - Environmental sustainability is important to many respondents
- 3.10 The conclusion, from our experience to-date of providing period products, and the results of the consultation exercise, indicate that a dual approach to making free period products available in a way that respects the dignity of individuals obtaining them is needed:

- Providing supplies of free products across public buildings and schools to ensure people have access to products when a period starts unexpectedly or they don't have a product with them and
- Providing access to supplies of products for home use, principally through the provision of shopping vouchers, thereby providing ease of access and maximum choice.

### **Proposed arrangements for meeting the requirements of the Act**

3.11 To meet the requirement to provide products in public buildings/our premises/schools:

- Adapt all current period product vending machines in schools and council public buildings (e.g. public toilets, council offices) to be free-vending machines. This will require re-procurement of the current contract for washroom provision. It should be noted that Scotland Excel is putting a new Washroom Solutions Procurement Framework in place from October 2022 to provide local authorities and schools with a mechanism to procure a range of products, including the provision of period products.
- Establish an "opt-in" scheme for non ELC public buildings (such as community centres and village halls) to be provided with a proportionate supply of products.
- Provide ongoing communication to ensure that the council and all schools, promote the availability of free products in a way which promotes dignity and equality, including information on the council website and the period product location app.

3.12 To meet the need for supplies of period products for people with an *'ongoing need due to low income or for another reason'* we will:

- Provide shopping vouchers for access to supplies of products from supermarkets, or Hey Girls home delivery for reusable products. The voucher trial showed that this is a popular method of providing people with access to free products ensuring dignity and maximising choice.
- Continue with the allocation of funds to the Benefits service to provide an additional payment to supplement Crisis Grant payments and to other services working with vulnerable groups.

### **Funding**

3.13 The Scottish Government has allocated the council £95,000 in 2022/23 to meet its obligation to provide free period products in schools, in public buildings and to the public. Whereas previous years' funding had been split between community provision and 'schools' (£52,000 for community provision and £43,000 for school provision) the 2022/23 provision brings the two funding streams together into a single allocation. In order to

facilitate a coordinated approach and to simplify procurement and other arrangements it is proposed that the full Scottish Government funding be allocated to the Policy, Improvement and Partnerships budget.

3.14 To date, administering the provision of period products has been carried out by the Equalities Officer with regards to community provision whilst the Education service, with the support of the Equalities Officer has managed school provision. The Policy, Improvement and Partnerships team has taken the lead in evaluating current provision, consulting on future provision and preparing this proposal. It is therefore proposed that the management/ administration of both school and community provision should be the responsibility of the Policy, Improvement and Partnerships team. Responsibilities will include:

- Managing the scheme for community and schools provision
- Coordinating the procurement, purchase and distribution of shopping vouchers/gift cards and the procurement and distribution of Hey Girls re-usable products
- Liaising with Facilities Management and Procurement to ensure the provision of the new washroom contract in council buildings and schools
- Liaising with schools to ensure equitable provision of products
- Monitoring and reviewing processes and product access
- Make payments/ managing budgets
- Reporting to Senior Management/COSLA/Scottish Government
- Update web pages communications/promotion of Universal Access/updating webpages and locations of free period products
- Attendance at relevant national meetings/work groups.

3.15 As is allowed under the Scottish Government guidance on the funding it is proposed that a proportion of the funding for period products should be allocated to cover staffing costs and administration.

3.16 The table below provides an estimate of a full year spend of the £95,000 Scottish Government allocation. These are broad estimates at this stage as they are dependent on the cost of procurement of the washroom provision to include free-vending machines and, as yet unknown, demand for shopping vouchers.

**Estimate of Full Year Spend of £95,000 allocation for Period Products**

	<b>Estimate costs (£)</b>
Scottish Welfare Fund and allocations for vulnerable groups	12,000
Hey Girls Home Delivery Packs for Schools and community provision	14,000
Shopping Vouchers/ gift cards	24,000

Products in public buildings and schools	26,000
Staffing costs	12,000
Contingency	7,000
<b>Total</b>	<b>95,000</b>

- 3.17 It should be noted that in a letter issued to local authorities on 4<sup>th</sup> July 2022 the Scottish Government has said it will be open to bids from local authorities for additional funding across the period 2022/23 – 2025/26.

*This additional funding will be made available to support delivery only where evidence shows full funding allocations have been (or are projected to be) fully spent as a result of increased uptake or for relevant ‘one-off’ costs, for example costs associated with implementation of the Act or changed delivery approaches.*

*An additional ‘access to free period products’ fund will be open to bids from October 2022 to local authorities, colleges and universities for the funding period 2022/23. Bids must be received by the end of December 2022 at the latest to be considered for this financial year, with the same deadlines likely to be applied for 2023/24, 2024/25 and 2025/26.*

- 3.18 Therefore expenditure in 2022/23 (such as procurement of new contracts, one off costs for conversion of vending machines) will be closely monitored to assess whether it might exceed the current allocation and could form the basis for a bid for additional funding in 2022/23 before the December 2022 deadline. Thereafter, projected future years’ expenditure will be assessed to determine whether additional funding bids should be made in future years.

### **Statement of Exercise of Functions**

- 3.19 As highlighted above (para 3.5) under the Period Products (Free Provision) (Scotland) Act 2021 the Council is required to publish a Statement of Exercise of Functions. Based on the proposal detailed above it is proposed that the Statement should be:

***East Lothian Council will ensure that people who need access to supplies of period products can do so.***

***We will endeavour to allow for choice, including provision of reusable and environmentally friendly products, protection of dignity and the promotion of equality for anyone who needs to access period products in East Lothian.***

***Following the piloting of various methods of providing free period products in schools and the community, and consultation with the general public, young people, parents and carers in late 2021/ early 2022 the Council has decided to follow a dual approach to ensuring people have access to free period products:***

- ***Providing supplies of free products across public buildings and schools to ensure people have access to products when a period starts unexpectedly or they don't have a product with them***  
***and***
- ***Providing access to supplies of products for home use, principally through the provision of shopping vouchers/gift cards, thereby providing ease of access and maximum choice.***

***East Lothian Council will raise awareness across our communities of the availability of free period products in a way that respects dignity, through ongoing communications and promotion.***

## **4 POLICY IMPLICATIONS**

- 4.1 This report outlines how the council can meet its duties and responsibilities under The Period products (Free Provision) (Scotland) Act 2021.

## **5 INTEGRATED IMPACT ASSESSMENT**

- 5.1 The subject of this report has been through the Integrated Impact Assessment process and no negative impacts have been identified.

## **6 RESOURCE IMPLICATIONS**

- 6.1 Financial – as detailed in paragraphs 3.13, and 3.16 – 3.18 above
- 6.2 Personnel – as detailed in paragraphs 3.14 and 3.15 above
- 6.3 Other – the Education Service and schools will be engaged with, and involved in, supporting the provision of period products in schools. The Procurement and Facilities Management Services will be engaged with, and involved in, supporting the procurement of the new washroom solutions contract to include free-vending machines.

## **7 BACKGROUND PAPERS**

- 7.1 [Period Products \(Free Provision\) \(Scotland\) Act 2021 \(legislation.gov.uk\)](https://www.legislation.gov.uk)
- 7.2 [Period Products \(Free Provision\) \(Scotland\) Act 2021: guidance – September 2021 - gov.scot \(www.gov.scot\)](https://www.gov.scot).
- 7.3 Access to Free Period Products – Funding Allocation for Local Authorities 2022/23; Letter to Chief Executive and Directors of Finance, from Scottish Government, 7<sup>th</sup> December 2021



7.4 Access to Free Period Products – Access to Evidence-Based Additional Funding 2022/23 – 2025/56; Letter to Chief Executive and Directors of Finance, from Scottish Government, 4<sup>th</sup> July 2022

<b>AUTHOR'S NAME</b>	Paolo Vestri / Stephanie Kerr / Linda Alexander
<b>DESIGNATION</b>	Service Manager Policy, Improvement and Partnerships Community Planning Officer Equalities & Tackling Poverty Officer
<b>CONTACT INFO</b>	<a href="mailto:pvestri@eastlothian.gov.uk">pvestri@eastlothian.gov.uk</a> <a href="mailto:skerr@eastlothian.gov.uk">skerr@eastlothian.gov.uk</a> / <a href="mailto:lalexander@eastlothian.gov.uk">lalexander@eastlothian.gov.uk</a>
<b>DATE</b>	3 <sup>rd</sup> August 2022

# **Supporting Good Decisions**

**Promoting Equality and Human Rights;  
Reducing Poverty; and  
Protecting the Environment**

## **Integrated Impact Assessment Form**

# Integrated Impact Assessment Form

## Promoting Equality and Human Rights; Reducing Poverty; and Protecting the Environment

<b>Title of Policy/ Proposal</b>	Public Provision of Free period products
<b>Timescale for Implementation</b>	August 2022
<b>I/A Completion Date</b>	
<b>Completed by</b>	Linda Alexander, Lucy Higginson, Steph Kerr and Paolo Vestri
<b>Lead officer</b>	Paolo Vestri

### Section 1: Screening

#### 1.1 Briefly describe the policy/proposal/activity you are assessing.

To ensure that everyone living, working, studying or visiting East Lothian has reasonable, convenient, and dignified access to period products, free of charge, as and when they are required, as part of a local authority duty to:

‘Ensure period products are generally obtainable free of charge (in accordance with arrangements established and maintained by the local authority) by all persons who need them.’

This duty is placed on Local authorities by the Period Products (Free Provision) Scotland Act 2021 to make period products obtainable free of charge for anyone who needs them.

[Period Products \(Free Provision\) \(Scotland\) Act 2021: guidance – September 2021 - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/period-products-free-provision-scotland-act-2021/guidance-September-2021/pages/1-1-introduction.aspx).

In doing so we must:

‘make no judgement as to the need, no limit to the amount of products an individual can take, nor attempts to ‘ration’ products. Individuals don’t need a reason to access the products, above and beyond the fact that they menstruate, however individual needs in terms of period products could vary considerably due to the reason for the need arising, including:

- a) a period starting unexpectedly or forgetting to bring a product from home
- b) ongoing need due to low income
- c) ongoing need for another reason
- d) higher than average need due to a medical condition.’

To date a range of methods were deployed to ensure supplies of products were available using the funding provided by the Scottish Government. These included:

- Schools providing period products supplied by Hey Girls<sup>1</sup>
- Period products supplied by Hey Girls being made available in libraries, GP practices, council owned community centres and council offices
- Supplying products through third sector organisations
- Trialled provision of shopping vouchers
- Funding provided to the Benefits Team to make a top up payment for period products with Scottish Welfare Fund Crisis Grants.

## 1.2 What will change as a result of this policy?

Everyone who needs to use period products will be able to access them in an easy and accessible way that provides dignity, upholds privacy, with no judgement or questions asked.

Availability will be clearly communicated and locations advertised. [New app to access free period products - gov.scot \(www.gov.scot\)](http://www.gov.scot)

This is a timely introduction as the cost of period products is a significant strain of income for some families. This will help mitigate the impact of poverty, and support young adults to stay in school.

## 1.3 Deciding if a full Impact Assessment is needed.

Please answer the following questions:

	Yes	No
1. The policy/ proposal has consequences for or affects people e.g. how they can access a service?	x	
2. The policy/proposal has potential to make a significant impact on equality and human rights, socio-economic disadvantage, the	x	

<sup>1</sup> [hey girls | Award Winning Period Product Social Enterprise](http://heygirls.org.uk)

council's role as a corporate parent, or the council's commitment to tackling climate change?		
3. The policy/proposal is likely to have a significant environmental impact as defined by the Environmental Impact Assessment (Scotland) Act 2005?		x
4. The policy/ proposal involves a data processing activity (storage / collection of personal data) that is likely to result in a high risk to individuals as determined by Article 35 of the General Data Protection Regulation?	x	

- If you have answered yes to questions 1 and 2 above, please proceed to complete the Integrated Impact Assessment. If you have answered No then an IIA does not need to be completed. Please keep a copy of the screening paperwork.
- If you have answered yes to question 3, you will need to consider whether you need to complete a Strategic Environmental Assessment.
- If you have answered yes to question 4, you will need to consider whether you need to complete a Data Protection Impact Assessment. Please seek further advice from the Team Manager Information Governance.

---

## Section 2: Integrated Impact Assessment

### 2.1 Have those who are directly affected by the policy had the opportunity to comment on new proposals?

Between December 2021 and January 2022 the council ran a consultation exercise on period products provision with communities and a separate survey for schools (for young people, staff, parents and carers), ELC Libraries and Area Offices. We also carried out consultations with East Lothian Council libraries and Area Offices during this time.

### 2.2 What information/data have you used to inform the development of the policy to date?

#### Participation Statement

Activity	Findings
<p><b>In December 2020</b> – The PIP team conducted a review of community buildings to identify where needed more period poverty stock.</p>	<p>This review revealed that most buildings still had ample supply of stock, partly due to building closure due to the Covid pandemic and people not taking products before the buildings were closed. Conversations with staff around why there was limited up take of the products suggested that people weren't familiar with the Hey Girls brand and that they didn't realise the products were free to take.</p>
<p><b>In October 2021</b> – via the Consultation Hub, ELC Library staff were asked about their experience of managing period products in public toilets. There were 8 responses to this from 7 East Lothian libraries.</p>	<p><b>When asked “How was the uptake of the free period products?”</b></p> <ul style="list-style-type: none"> <li>• 4 people responded “Bad - we still have some of the products left” and</li> <li>• 4 people responded “Okay - slow uptake but they did go”</li> <li>• No one said “good or very good”</li> </ul> <p><b>When asked “Where did you display the promotional material?”</b></p> <ul style="list-style-type: none"> <li>• 6 stated the women’s toilets</li> <li>• 1 stated in the men’s</li> <li>• 7 stated in accessible toilets</li> <li>• 5 stated in the baby change facilities</li> </ul> <p><b>When asked Did you display promotional material anywhere else in the building?</b></p> <ul style="list-style-type: none"> <li>• In the main part of the library</li> <li>• At entrance to building</li> <li>• In main foyer</li> <li>• At the side of the front counter</li> <li>• As we don't have public toilets in the</li> </ul>

	<p>branch the information was placed in the library itself</p> <p><b>When asked “How do you think it would work best for people to access free period products from your building?”</b></p> <p>Key themes in response to this were:</p> <p><b>Discretion</b></p> <ul style="list-style-type: none"> <li>• Discreet vending machine type box for people to access in the toilet corridor</li> <li>• We keep supplies in toilets and main entrance, seems to work well as not everybody feels confident to ask a member of staff. We've found this worked well for us and has not been mistreat or abused</li> <li>• Leaving them in the toilet, as it is less embarrassing for females to come and ask. We do have posters up within that area</li> </ul> <p><b>Ease of access</b></p> <ul style="list-style-type: none"> <li>• We have them displayed near the entrance as we have no public facilities</li> <li>• We keep the box in the main library as our toilet is used a lot, and felt some older children my just take them to throw about in the park, we have a poster in the toilet stating where you can get the products</li> <li>• It seems to work perfectly well we have the supplies discretely at the side of the front desk. We have a display posters well signposted</li> </ul> <p><b>Promotion</b></p> <ul style="list-style-type: none"> <li>• Advertise it better</li> <li>• More advertisements in branch but also in public because I don't think people know you can get free products</li> </ul> <p><b>When asked “Any other comments/ suggestions or questions?” The replies were:</b></p> <ul style="list-style-type: none"> <li>• Since we have been closed for a while it is difficult to judge the uptake, but maybe demand will increase</li> </ul>
<p><b>In January 2022</b> – via the Consultation Hub, ELC Area Office staff were asked about their experience of managing period products in public toilets. There were 5 responses to this from 2 Area Offices.</p>	<p><b>When asked “How was the uptake of the free period products?”</b></p> <ul style="list-style-type: none"> <li>• 2 people responded “Good – they went fast”</li> <li>• 2 people responded “Bad - we still have some of the products left”</li> <li>• 1 person responded “Okay - slow uptake but they did go”</li> </ul>

	<p><b>When asked “Where did you display the promotional material?”</b></p> <ul style="list-style-type: none"> <li>• 4 stated the women’s toilets</li> <li>• 2 stated in accessible toilets</li> <li>• 3 stated in the baby change facilities</li> <li>• 1 stated they didn’t display any promotional material</li> </ul> <p><b>When asked Did you display promotional material anywhere else in the building?</b></p> <ul style="list-style-type: none"> <li>• No one replied that they did</li> </ul> <p><b>When asked “How do you think it would work best for people to access free period products from your building?”</b></p> <p>Key themes in response to this were:</p> <p><b>Discretion</b></p> <ul style="list-style-type: none"> <li>• Continue to advertise in toilets and have product available to pick up rather than having to ask</li> <li>• In the toilets as that's where they will need them</li> <li>• Best in the toilets</li> </ul> <p><b>When asked “Any other comments/ suggestions or questions?” The replies were:</b></p> <ul style="list-style-type: none"> <li>• There's not a lot of people in the building at the moment due Covid most people are working from home.</li> </ul>
<p><b>In November 2021</b> - the gift card scheme was trailed with 3<sup>rd</sup> sector and ELC partners</p>	<p><b>Feedback on the gift card scheme so far includes comments from those who benefited from the voucher (via Fundamental Foods)</b></p> <p>“The voucher is handy and I can pick the stuff I like”</p> <p>"I love it I can get the gid stuff, thank you"</p> <p>"It's great you can buy any toiletries with the voucher it really helps me "</p>
<p><b>In December 2021</b> – the Period Product consultation was held which aimed to identify the needs of local people around period product provision</p>	<p><b>Key findings:</b></p> <ul style="list-style-type: none"> <li>• 70% of respondents were between 25-54 years old with 45-54 year olds being the largest group.</li> <li>• 13.04% collect products for other people, as carers or parents.</li> </ul>



	<ul style="list-style-type: none"> <li>• Close to 100% prefer pads and tampons, however a variety of products are preferred, including reusable ones.</li> <li>• Most felt comfortable taking products when freely available, however in schools privacy and discretion are particularly important.</li> <li>• Preferred places to access products are chemist, supermarkets, local shops while public buildings, doctors surgeries, health centres and charity buildings were only slightly less favoured. People also indicated a preference for access to products online and receiving them by post showing that a range of options to access products will have to be available to the public.</li> <li>• Asking for products is a barrier to uptake: “I think they need to be sent by post or placed in an area such as toilets so that a person doesn't need to ask for them. Unfortunately there is stigma firstly around periods and secondly around asking for something free”.</li> <li>• Discrete locations are preferred and to be available in women's, men's and accessible toilets.</li> <li>• The digital voucher received support with reservations around it being associated with poverty if it was printed, and accessibility if only digital: “I don't need to, but very concerned about how this would affect low income people, particularly asylum seekers and homeless people - it is definitely not an accessible option for everyone”.</li> <li>• Environmental Sustainability is important to many respondents.</li> <li>• Free product association with poverty may be a barrier to uptake.</li> </ul>
<p><b>In April 2022</b> – the Hey Girls Home Delivery Pack trial was reviewed</p>	<p>Recipients of the products highlighted the choice and quality of the products. One recipient commented that they were delighted with these products (period pants) being suitable for their teenage daughter.</p>

The surveys identified barriers and unequal opportunities accessing products, for example availability in rural locations and associated transport costs to collect products from larger towns. For schools, there was a low take-up of products due to the impact of COVID 19 and school closures, young people, and parents/carers did not realise the products were free, and products weren't always in locations that protected dignity. Other key findings were:

An evaluation of the scheme the council operated in 2020 - 2021 found that there was a low uptake of products from public buildings. This was due to:

- the COVID 19 pandemic with public building closures
- people did not realise they could take the products for free
- lack of choice in products made available; the products (limited to Hey Girls) were not the brand preferred by the public

It was also found that public buildings were not equipped for distributing bulk supplies of products due to lack of storage space. There were inconsistencies across communities in access to products with some locations ensuring products were on display and accessible and others (including some GP practices) having products out of sight and requiring people to ask for them, going against the principle to uphold dignity.

The council ran a consultation exercise on period products provision with communities and a separate survey for schools (for young people, staff, parents and carers) between December 2021 and January 2022. This identified barriers and unequal opportunities accessing products, for example availability in rural locations and associated transport costs to collect products from larger towns. For schools, there was a low take-up of products due to the impact of COVID 19 and school closures, young people, and parents/carers did not realise the products were free, and products weren't always in locations that protected dignity. Other key findings were:

- Most people felt comfortable taking products when freely available, however in schools, privacy and discretion were particularly important factors
- Public toilets in community building and schools were the preferred places to access products but other methods of access were identified such as home delivery and online vouchers
- Discrete locations are preferred and to be available in women's, men's and accessible toilets
- Asking for products was identified as a barrier to uptake. For example, "I think they need to be sent by post or placed in an area such as toilets so that a person doesn't need to ask for them. Unfortunately there is stigma firstly around periods and secondly around asking for something free"
- Super market vouchers received support with reservations around it being associated with poverty if it was printed, and accessibility if only digital
- Environmental sustainability is important to many respondents

### **2.3 What does the evidence/ research suggest about the policy's actual or likely impact on equality groups and those vulnerable/ or experiencing socio-economic disadvantage?**

<b>Evidence</b>	<b>Comment</b>
Which groups are in particular need of this service?	Women, girls, transmen, individuals and families experiencing poverty.
What level of service uptake/ access is there from	Service uptake for direct access to products has been achieved through partnership work with Foodbanks,

protected and vulnerable groups?	ELC Benefits Team, GP and Health Centres and products in public buildings such as ELC Area Offices and Libraries. We are aware that the financial “top-up” to enable people to buy their own products have been particularly welcomed from people accessing ELC Benefits Team and partner 3 <sup>rd</sup> sector organisations (Musselburgh CAB, Volunteer Centre EL and Fundamental Foods).
Can you identify positive outcomes for service users	The cost of period products being mitigated by the free products will have increased income for other necessities such as food, fuel and clothing. Coupled with being able to access products discreetly and without question can arguably be said to have decreased stress and anxiety. In discussion with the Education service we know that the availability of products will have supported some children to remain in school.
What is the service user experience of those from protected or vulnerable groups?	<p>Feedback on the gift card scheme included comments from those who benefited via Fundamental Foods:</p> <p>"the voucher is handy and I can pick the stuff I like "</p> <p>"I love it I can get the gid stuff thank you"</p> <p>"It's great you can buy any toiletries with the voucher it really helps me "</p> <p>ELC Benefits Team reported that feedback from people in receipt of the Scottish Welfare Fund was very positive.</p> <p>Negative experience from one user of free products in a GP surgery raised privacy and equality concerns and led to provision in GP surgeries being dropped.</p>
What opportunity have those from protected groups had to co-produce or comment on the service/ plans?	The 2021/22 survey set out a range of different approaches and options and asked how best to ensure product availability met need, is accessible, timely and upheld privacy.

## 2.4 How does the policy meet the different needs of groups in the community?

Equality Groups	Comments
Older people, people in the middle years	A range of products will be available, including online, and voucher trial which allows a choice of products for different flow. Older women and transmen managing the menopause may require specific products for heavier flow.
Children and young people children	Young people will be able to access products through school provisions.
Women, men and transgender people (includes issues relating to pregnancy and maternity)	Products will be available in women's, gender neutral and accessible toilets as well as online and through community organisations.
Disabled people (includes physical disability, learning disability, sensory impairment, long-term medical conditions, mental health problems)	Products will be available in accessible places, however in relation to communications about availability, we need to ensure that Blind and visually impaired people know where to access products locally as well as ensure that online systems are accessible. We will also ensure that relevant organisations and groups are sufficiently informed to inform service users.
Minority ethnic people (includes Gypsy/Travellers, migrant workers)	<p>In discussion with MECOPP (Minority Ethnic carers of people project) to ensure access to products, we learned that Gypsy Travellers are signposted to Enjoy leisure to access products currently. MECOPP also indicated that a local boxing club is also used to collect products.</p> <p>Local authority staff are able to signpost and support people new to the area to access the products as required. As for all groups the Pickupmyperiod app, vouchers, libraries and hey girls online application etc enable self-determination, choice and privacy.</p> <p>To ensure people have knowledge of the availability of free products, communications will need to take in to account community languages and IT support. All information on the East Lothian Council website is available in other languages and includes recite tools.</p>
Refugees and asylum seekers	

People with different religions or beliefs (includes people with no religion or belief)	Through the survey we learned that some cultures and religions prefer not to use tampons (although this may be a personal preference) therefore a choice of products will be available.
Lesbian, gay, bisexual and heterosexual people	N/A
People who are unmarried, married or in a civil partnership	N/A
<p><b>Those vulnerable to falling into poverty</b></p> <ul style="list-style-type: none"> <li>• Unemployed</li> <li>• People on benefits</li> <li>• Lone Parents</li> <li>• Care experienced children and young people</li> <li>• Carers (including young carers)</li> <li>• Homeless people</li> <li>• Those involved in the community justice system</li> <li>• People with low literacy/numeracy</li> <li>• Families with 3 or more children</li> <li>• Those with a child/ children under 1</li> </ul>	<p>The programme is designed to support those most vulnerable to experiencing poverty. This includes through:</p> <ul style="list-style-type: none"> <li>• Automatic provision of period product funding for households accessing crisis grants</li> <li>• Working with food banks to provide products and vouchers which allow choice</li> <li>• A range of publically accessible options for those unable to access the internet, or who do not have a permanent registered address</li> <li>• Working with community partners to ensure that groups are able to access products in a stigma and shame free manner</li> </ul>
<p><b>Geographical communities</b></p> <ul style="list-style-type: none"> <li>• Rural/ semi rural</li> </ul>	We have worked with partners across the county to ensure availability across all geographic communities. Online ordering allows rural households to order products to their

<p>communities</p> <ul style="list-style-type: none"> <li>• Urban Communities</li> <li>• Coastal communities</li> <li>• Those living in the most deprived communities (bottom 20% SIMD areas)</li> </ul>	<p>home without accruing travel costs.</p>
<p><b>People with communication needs:</b></p> <ul style="list-style-type: none"> <li>• Gaelic Language Speakers {refer if necessary to the Council’s Gaelic Language Plan}</li> <li>• British Sign Language (BSL) users {refer if necessary to the Council’s BSL Plan}</li> <li>• English as a Second Language</li> <li>• Other e.g. Deafblind, Plain English, Large Print</li> </ul>	<p>As mentioned in relation to specific groups we need to ensure that communications and application processes are accessible. Local radio will be used to advertise product availability. Where products are placed in public buildings braille and large print should be in place too.</p>

**2.5 Are there any other factors which will affect the way this policy impacts on the community or staff groups?**

Staff time from other services including UBS, Procurement, and Business Support, will be required to roll out this provision.

**2.6 Is any part of this policy/ service to be carried out wholly or partly by contractors?**

If yes, how have you included equality and human rights considerations into the contract?

New contracts for free product vending machines may be supplied by contractors if they cannot be supplied by our own facilities management staff.

**2.7 Have you considered how you will communicate information about this policy or policy change to those affected e.g. to those with hearing loss, speech impairment or English as a second language?**

This is covered in the previous section.

**2.8 Please consider how your policy will impact on each of the following?**

**Equality and Human rights**

- Promotes / advances equality of opportunity e.g. improves access to and quality of services
- Promotes good relations within and between people with protected characteristics and tackles harassment
- Promotes participation, is inclusive and gives people control over decisions which affect them
- Preserves dignity and self-respect of individuals (does not lead to degrading treatment or stigma)
- Builds support networks, resilience, community capacity

**Comments:**

The availability of free period products and its universality will meet the Equality and Human rights of those who need products. The survey and engagement with foodbanks and other organisations has enable us to ensure that the way the products are communicated, accessed and taken is inclusive and upholds dignity and self-respect.

Products and communications must be done in a way that upholds dignity and respects the individual. In rolling out the scheme, staff will be provided with information regarding the placement and guidance/behaviours required as products are collected. We have been made are aware that some outlets have challenged and created barriers to those needing products, leading to some people feeling embarrassed and stigmatised. It is important that staff adhere to the guiding principles from the Period Poverty Legislation.

**Socio-Economic Disadvantage / reducing poverty**

- Maximises income and/or reduces income inequality
- Helps young people into positive destinations

- Aids those returning to and those progressing within the labour market
- Improves employability skills, including literacy and numeracy
- Reduces the costs of taking part in activities and opportunities
- Reduces the cost of living

Comments :

As mentioned the availability of free products allows families to save on this cost, which can be significant for some households, and use this money for food, energy and clothing etc. The availability of products also enables people to continue taking part in activities and opportunities, either in that the money can be directed towards health and wellbeing activities, or to keep young people in school and other education avenues.

- Tackling Climate Change**
- Reduces the need to travel or increases access to sustainable forms of transport
  - Minimises waste / encourages resource efficiency / contributes to the circular economy
  - Ensures goods / services are from ethical, responsible and sustainable sources
  - Improves energy efficiency / uses low carbon energy sources
  - Protects and/or enhances natural environments / habitats / biodiversity
  - Promotes the transition to a low carbon economy
  - Prepares and/or adapts communities for climate change impacts

Comments:

The Hey Girls products, including period cups and reusable period pants are reusable, which meets the points listed. Hey Girls carbon offset delivery of their products. Digital access via Hey girls and voucher/gift card means products can be either sent out or collected in one place whilst doing the shopping, thus saving on multiple journeys.

- Corporate Parenting and Care Experienced Young People**
- Impacts on care experienced young people
  - Provides opportunities or reduces opportunities to participate in activities which are designed to promote the wellbeing of young people
  - Adversely affects the wellbeing of young people



- Adversely impacts on outcomes for care experienced young people

Care experienced young people will be able to access products in schools and public buildings or via shopping vouchers/ gift cards

### Section 3. Action Plan

What, if any changes will be made to the proposal/ policy as a result of the assessment?

Changes to be made	Expected outcome of the change	Resources Required	Timeline	Responsible person
Extension of accessible communications	Ensuring all groups have access to information about availability of free period products		By October 2022	Linda Alexander

#### For consideration of the Head of Service

Can you identify any cumulative impacts on equality groups or vulnerable people arising from this policy, when considered alongside other changes across other services?

**No additional cumulative impacts identified beyond those detailed within this Integrated Impact Assessment.**

#### Sign off by Head of Service

Name: Sharon M Saunders, Head of Communities

Date: 08 August 2022