

Period Products (Free Provision) (Scotland) Bill

Financial Memorandum

Introduction

1. As required under Rule 9.3.2 of the Parliament's Standing Orders, this Financial Memorandum is published to accompany the Period Products (Free Provision) (Scotland) Bill, introduced in the Scottish Parliament on 23 April 2019.

2. The following other accompanying documents are published separately:

- statements on legislative competence by the Presiding Officer and Monica Lennon MSP, the member who introduced the Bill (SP Bill 45–LC);
- Explanatory Notes (SP Bill 45–EN);
- a Policy Memorandum (SP Bill 45–PM).

3. This Financial Memorandum has been prepared by the Non-Government Bills Unit (NGBU) on behalf of Monica Lennon MSP, the member who introduced the Bill. It does not form part of the Bill and has not been endorsed by the Parliament.

Background

4. The Period Products (Free Provision) (Scotland) Bill aims to ensure that all who menstruate can access period products, at no cost, as and when they are required. It is intended to remove any barriers which stop women, girls and trans people accessing period products – items which are essential to the health, hygiene and wellbeing of those who menstruate.

5. By ensuring that products are made available for free on a universal basis, the problem of 'period poverty' – where individuals struggle to afford

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period products – will be tackled. In addition, the Bill will further widen access to period products by requiring educational institutions to make them available for free in on-site toilets. This is intended to address the issue of women, girls and trans people being unable to afford or access products whilst at school, college or university, with evidence suggesting that educational attendance and performance can be negatively affected by this issue.

Main provisions of the bill

6. The Bill will:

- place a duty on Scottish Ministers to ensure that period products are made available free of charge on a universal basis;
- require education providers to make these products available free of charge in on-site toilets; and
- enable the duty to provide free period products to be extended, by regulations, to other public-service bodies.

Costs on the Scottish administration

7. The universal provision of free period products, as required by Part 1 of the Bill, will clearly have financial implications in terms of the setting up and administration of the scheme, the procurement of the products, and potential staffing required for the distribution of products.

8. Although the Bill places this duty on Scottish Ministers, it is assumed that most costs will fall largely on partner organisations such as local authorities, health boards and other partners who will likely administer the scheme. It is presumed that funding to cover these costs will be provided to these bodies by the Scottish Administration as is currently the case with the Scottish Government's recently launched schemes to provide free period products to low-income households and in educational establishments.

9. To fund this scheme, the Scottish Government announced in August 2018 that £0.5 million had been awarded to the charity FareShare to provide free period products to low-income households. The Scottish Government estimated that this scheme would reach approximately 18,800 people across Scotland.¹ In addition to this provision, in January 2019 the Scottish Government announced a further £4 million of funding to local

¹ <https://news.gov.scot/news/providing-free-sanitary-products-1>

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authorities to expand the provision of free period products in local communities.² Although the current scheme will benefit a number of those on a low income, the proposals contained within the Bill will enable a much wider provision, benefiting many more people living in relative poverty in Scotland.

Background calculations

10. To project the costs associated with this proposal it is first necessary to analyse the cost of period products themselves as well as the volume of products likely to be required.

Cost of period products

11. The cost of period products can vary widely depending on the type and brand. Prior to the launch of the current Scottish Government provision, a pilot study took place in Aberdeen in which period products were distributed free of charge to people of low income, and in some schools, colleges and universities, funded by the Scottish Government. Community Food Initiatives North East (CFINE), which ran the scheme, recorded the unit prices for products as follows.

Table 1: Average prices (Aberdeen pilot)³

Product	Price range per unit	Average price per unit
Supermarket own towel	4-8p	6p
Branded towel e.g. Always, Bodyform	9-14p	11p
Supermarket own tampon	4-5p	4p
Branded tampon e.g. Tampax, LiLets	10-14p	12p

12. The average unit price was around 9p per item, with CFINE also noting the available reusable products, with menstrual cups costing between around £16 and £20 per cup, and reusable towel starter packs for

² <https://news.gov.scot/news/expanding-access-to-free-sanitary-products>

³ Access to Sanitary Products Aberdeen Pilot: Evaluation Report, para 3.5, table 12. Available at: <http://www.gov.scot/Publications/2018/05/2049/3>.

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between £14 and £19.⁴ Menstrual cups can last up to 10 years and reusable towels up to five years, making them more cost effective in the long run when compared with disposable period products. Comparative sales figures are not available for these products; however, anecdotal evidence indicates significant growth in their use in recent years.⁵

13. The Scottish Government, in estimating the costs of providing free period products in schools, colleges and universities, used a unit price range of 5p, 8p and 10p per product, whilst acknowledging that prices could be lower, or even considerably higher.⁶

14. For the purposes of this document, a unit price of 9p will be used. This was the average cost of products during the pilot in Aberdeen.

Menstruating days

15. Menstruation usually starts around the age of 13⁷ and the average age of menopause is 50 years old.⁸ The number of women and girls in Scotland within this age-range (using data from mid-2015) is estimated to be around 1,336,100.⁹

16. The average length of a menstrual cycle is 26.8 days¹⁰ meaning that the average number of menstrual cycles is 13.6 each year. Since the average length of a period is five days¹¹ (normally ranging from three to seven days), the average menstruating person has 68 menstruating days each year.

⁴ Access to Sanitary Products Aberdeen Pilot: Evaluation Report, para 3.5.

⁵ <https://metro.co.uk/2017/01/18/why-arent-we-buying-tampons-anymore-6387887/> and <https://www.bbc.co.uk/news/business-45667020>

⁶ Minutes of Access to Free Sanitary Products Working Group, 31 January 2018: [https://beta.gov.scot/publications/foi-18-00322/FOI1800322%20documents%20numbers%20161-](https://beta.gov.scot/publications/foi-18-00322/FOI1800322%20documents%20numbers%20161-196.pdf?inline=true)

[196.pdf?inline=true](https://beta.gov.scot/publications/foi-18-00322/FOI1800322%20documents%20numbers%20161-196.pdf?inline=true) (Page 41)

⁷ <http://biobank.ctsu.ox.ac.uk/crystal/field.cgi?id=2714>

⁸ <http://biobank.ctsu.ox.ac.uk/crystal/field.cgi?id=3581>

⁹ <https://www.nrscotland.gov.uk/files/statistics/population-estimates/mid-15-cor-12-13-14/15mype-cahb-tab1.xlsx>.

¹⁰ <http://biobank.ctsu.ox.ac.uk/crystal/field.cgi?id=3710>

¹¹ <https://www.nhs.uk/conditions/periods/fertility-in-the-menstrual-cycle/>

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Numbers of products used

17. People typically require around three to six products per menstruating day (an average of 4.5) and have, on average, 68 menstruating days a year, so each person will use, on average, around 306 products a year.

18. In Scotland, therefore, the total number of products used annually can be estimated to be 409 million.¹²

Projected cost of the proposed universal scheme

19. As noted above, the Scottish Government funded a trial in Aberdeen between September 2017 and February 2018, in which products were distributed to participants at CFINE foodbanks and by other third sector organisations. It was then extended to trial 'universal' provision open to all participating schools, colleges and universities. An evaluation of the pilot is available online.¹³

20. Although this trial was extended to offer 'universal' provision it cannot be used to project costs for a nationwide scheme as distribution points were limited and only specific low-income areas were targeted.

21. To calculate the projected costs of a universal system it is first necessary to calculate the cost for every female within the appropriate age range to be provided with disposable period products. This baseline figure can then be used to calculate costs for different levels of usage. By multiplying the average number of period products used in Scotland each year by the average unit cost of 9p per period product it can be projected that it would cost around £37 million¹⁴ to provide period products to every woman and girl in Scotland between the age of 13 and 50.

22. Under Part 2 of the Bill, period products will be provided free of charge in schools, universities, and colleges. Based on Scottish Government figures, there are approximately 155,500 girls within the relevant age-range attending schools, and 254,500 women attending

¹² 1,336,100 multiplied by 306. This figure does not take account of those who opt for reusable products such as menstrual cups or reusable pads as there is no robust statistical information available.

¹³ Access to Sanitary Products Aberdeen Pilot: Evaluation Report: <http://www.gov.scot/Publications/2018/05/2049/3>

¹⁴ 409 million (see paragraph 17) x £0.09 (paragraph 13) = £36,810,000.

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universities and colleges in Scotland.¹⁵ It is reasonable to assume that these pupils and students will not make use of the universal scheme during term time (38 weeks/year for schools; 33 weeks/year for colleges and universities) but will do so during school holidays or university or college vacations. This is equivalent to taking 275,145¹⁶ people out of the relevant population group, reducing the total from 1,336,100 to 1,060,955.¹⁷ This, in turn, reduces the total cost of providing that group with period products from around £37 million to around £29 million.¹⁸ In the following section this figure will be used as a basis to calculate the estimated actual cost of introducing a universal scheme based on different levels of uptake.

Estimated uptake of scheme

23. Although the details of the scheme are to be left to the Scottish Government, the universal system should work on an opt-in basis where women, girls and trans people who wish to access free products can do so. The system should not be means-tested, so in principle anyone who uses period products would be eligible; however, it is anticipated that only a small proportion will choose to do so. Products will continue to be widely available for sale, and it is expected that many people who can afford to buy without difficulty will continue to do so, and that those who make use of the scheme will generally be those on lower incomes.

24. Based on the Scottish Government's statistics on poverty and inequality for 2016/17,¹⁹ around 19.2% of Scotland's female population (around 204,000) are within the relevant age-range (13-50) and living in

¹⁵ <https://beta.gov.scot/binaries/content/documents/govscot/publications/foi-eir-release/2018/03/foi-18-00322/documents/ece8d529-7bb8-4b81-9b66-99c6d8a851b3/ece8d529-7bb8-4b81-9b66-99c6d8a851b3/govscot:document/?inline=true/> (Page 40)

¹⁶ $(155,500 \times 38/52) + (254,500 \times 33/52) = 275,145$.

¹⁷ The national scheme recently announced by the Scottish Government is based on a target population of 1,181,000 women and girls between the ages of 13 and 50, adjusted to exclude those in education. This information was provided to SPICe by the Scottish Government.

¹⁸ $1,060,955 \times 68 \text{ menstruating days per year} \times 4.5 \text{ products used} \times \text{£}0.09 \text{ per product} = \text{£}29,218,700$.

¹⁹ <https://beta.gov.scot/publications/poverty-income-inequality-scotland-2014-17/pages/4/>

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relative poverty (before housing costs) and 23.4% (248,000) are within that age-range and living in relative poverty (after housing costs).²⁰

25. It would be reasonable to treat this group (menstruating women not in full-time education and living in relative poverty) as the “target” population for the universal scheme.²¹ Depending on how the scheme is delivered, possible take-up levels within this target population might range from (say) 25% to 75%. On this basis, the table below shows likely costs (for products) on the basis of overall uptake levels of 5%, 10% and 20% (of the menstruating population not in full-time education).²²

Table 2: Cost of providing period products based on projected uptake of scheme²³

Projected uptake: percentage (number) of menstruating	Annual cost of products (rounded to the nearest £100,000)
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²⁰ 60% of women in Scotland are in couples, of whom 16% live in relative poverty (before housing costs) and 19% (after housing costs) (source: Ch13). For the remaining 40%, it can be assumed that poverty-levels match those of single working-age women, of whom 24% live in relative poverty (before housing costs) and 30% (after housing costs) (source: Ch27/Ch28). The overall level of relative poverty (before housing costs) for women in Scotland can therefore be calculated as: $(60\% \times 16\%) + (40\% \times 24\%) = 19.2\%$; and the level of relative poverty (after housing costs) as: $(60\% \times 19\%) + (40\% \times 30\%) = 23.4\%$. Multiplying these percentages by 1,060,955 (paragraph 20) gives an estimated 203,703 menstruating women not in full-time education and living in relative poverty (before housing costs) and 248,263 in relative poverty (after housing costs).

²¹ The current Scottish Government provision is based around official statistics for those living in “severe poverty” after housing costs rather than “relative poverty”.

²² 25% uptake from a cohort representing either 19.2 or 23.4% of the menstruating female population is an overall uptake rate of 4.8% or 5.9%; 75% uptake from that cohort is an overall uptake rate of 14.4% or 17.6%. In choosing the 5%, 10% and 20% figures, allowance has been made for a small level of uptake from those not in relative poverty.

²³ Each cost figure can be arrived at either by multiplying the relevant percentage by the £29 million figure (paragraph 21), or by multiplying the relevant number by 306 (paragraph 16) and £0.09 (paragraph 13).

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population not in full-time education	
5% (53,048)	£1,500,000
10% (106,096)	£2,900,000
20% (212,191)	£5,800,000

26. On this basis, the annual product cost of the universal scheme is expected to be between £1.5 million and £5.8 million.

27. The current non-statutory provision of free sanitary products, recently launched by the Scottish Government, has two strands; one aimed at tackling poverty, and one aimed at providing wider access. The Scottish Government assumes that 20% of the menstruating population will take advantage of the first strand but has projected that this cohort will only take around 5% of the products they need.²⁴ This results in the equivalent of 11,810 individuals making use of that strand of the current scheme for 100% of their needs.²⁵

28. The Scottish Government anticipates that around 35% of those identified as living in severe poverty would make use of the free provision under the second strand of the scheme, and would do so for 100% of their needs; this equates to around 57,750 people.²⁶ Accordingly, the Scottish Government assumption is an uptake equivalent to 69,560 people using free products for all of their needs.

29. It has been assumed for the purposes of this Memorandum that all of those projected in the above table to make use of the free provision proposed in the Bill will do so for 100% of their needs. Recognising that the actual figure may be lower (e.g. 50%) is equivalent to allowing for a proportionately lower level of take-up (e.g. 5% of the target cohort using the universal scheme for 100% of their product-needs is equivalent to 10% of that cohort using it for 50% of their needs). Given how wide is the range of

²⁴ No information is available as to why the Scottish Government thinks that people who access free products in this way will only do so for such a small proportion of their needs.

²⁵ 1,181,000 (menstruating population used in SG projection) x 20% x 5% = 11,810.

²⁶ 165,000 (population in severe poverty used in SG projection) x 35% x 100% = 57,750 (source: information provided to SPICe by the Scottish Government).

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take-up levels used in Table 2 above, it is considered that this range already makes sufficient allowance for the possibility of people not using free products for all of their needs.

Set-Up and running costs

30. As the specific detail of the scheme is to be left to the Scottish Government, it is difficult to project what the initial set-up costs will be as these will be dependent on the approach taken.

31. It is assumed that organisations such as health boards, community centres, local pharmacies, and other community services may be used as a means of distributing free period products to those who need them and that there will be initial set-up costs associated with this. These could include such things as recruitment exercises should new staff members be required, or the expansion of current job roles to include new duties, the purchase of equipment, or the lease of vehicles for delivery purposes etc.

32. Similarly, it is difficult to define what the associated running costs of the scheme will be as these will vary in each organisation depending on their size and situation. It is assumed, however, that there will be some administrative demands on staff, although these should be minimal.

33. A possible indicator of what a national statutory scheme's set up and running costs might be can be found in the Scottish Government's projections for its current period products scheme. As previously discussed, the Scottish Government announced £4 million of funding in January 2019 to provide free period products beyond their current provision along similar lines to that proposed in the Bill.

34. As noted above, the Scottish Government's current provision has two strands, one aimed at tackling poverty, and one aimed at providing wider access. An annual amount of £472,000 has been allocated for the first strand and £2.31 million for the second – a total of £2.78 million. The Scottish Government has costed this on the basis of (the equivalent of) 69,560 individuals using the provision for 100% of their needs. Assuming each person uses 306 products per year at a unit cost of 9p, that implies £1.92 million expenditure annually on products – leaving £866,000 on

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running costs.²⁷ The Scottish Government has also allocated £536,000 for one-off set-up costs.²⁸

35. A universal scheme is likely to have similar set-up and running costs regardless of the number of people using it (although the product costs will of course vary in proportion to uptake). Therefore, even though the number of people expected to use the scheme calculated for the purpose of this Memorandum (106,096 – mid-range estimate) is substantially higher than that assumed by the Scottish Government (69,560), it is reasonable to assume that set-up costs and annual running costs will be similar – i.e. around £0.54 million and £0.9 million respectively.

36. The Scottish Government has already allocated funding to support the provision of free period products across Scotland and this new system is in the process of being rolled out. Therefore, the projected costs for the set-up and running of the scheme should not be viewed as entirely “new” expenditure as a result of the Bill because the Scottish Government has already allocated funds for equivalent provision on a non-statutory basis.

Costs on local authorities

37. The Bill requires free period products to be provided in toilets in every school in Scotland. These products should be provided in each appropriate toilet within buildings and other premises routinely accessed by pupils. Most Scottish schools are funded and operated by local authorities and therefore the bulk of the costs associated with this duty will fall on those authorities.

Current Scottish Government provision

38. In addition to the £4.5 million funding previously discussed to provide free period products to those on a low income the Scottish Government has also provided £5.2 million funding for the free provision of period products in schools, colleges and universities.²⁹ Whilst the Scottish Government has provided this funding and should continue to do so when it is on a statutory basis, the duty is placed on education authorities and for this document it is

²⁷ $69,560 \times 306 \times £0.09 = £1.916m.$ (£472k + £2.31m) - £1.916m = £866k.

²⁸ Source: information provided by Scottish Government officials to SPICe and NGBU.

²⁹ <https://news.gov.scot/news/students-to-get-free-access-to-sanitary-products>

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assumed that the costs will therefore be met by local authorities (and other relevant bodies).

Population of menstruating pupils in Scottish Government funded schools

39. According to papers of the Scottish Government's Free Sanitary Products Working Group, there are 139,500 female secondary school pupils in Scottish Government funded schools and 10,000 female secondary-age pupils in independent schools. It also states that there are 6,000 menstruating 11 and 12-year olds in primary schools (based on the average number of pupils that age who are likely to be menstruating). The latter figure appears to relate to all primary schools in Scotland, so (assuming the independent school sector accounts for a similar proportion, 7%, at primary level) is likely to involve around 5,580 menstruating pupils in local authority primary schools and 420 in independent schools. There are therefore an estimated 145,080 menstruating pupils in Scottish Government funded schools.³⁰

Usage levels

40. In determining how much it would cost to provide free period products in educational establishments, the Scottish Government produced figures based on different potential levels of usage. Using these figures, and an estimated unit price of 9p per period product, an annual cost per pupil can be estimated.

41. Based on the average term time of 38 weeks, with five days in each week spent at school, this would equate to 7.1 periods per year³¹, which (at an average of five menstruating days per cycle) results in 5,150,340 menstruating days.³² Using the average unit cost of 9p per period product and assuming an average of 4.5 products being used per day, it can be projected that it would cost around £2 million each year to provide period

³⁰ Source:

<https://beta.gov.scot/binaries/content/documents/govscot/publications/foi-eir-release/2018/03/foi-18-00322/documents/ece8d529-7bb8-4b81-9b66-99c6d8a851b3/ece8d529-7bb8-4b81-9b66-99c6d8a851b3/govscot:document/?inline=true/> (Page 40)

³¹ $13.6 \text{ (cycles per year)} \times 38/52 \times 5/7 = 7.1$

³² $145,080 \times 7.1 \times 5 = 5,150,340$

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products throughout the school year to every menstruating school pupil in Scottish Government funded schools.³³

Uptake and cost of provision

42. It is difficult to determine what the likely uptake rate for the provision of free products in schools will be as information from schools already providing products is not readily available.

43. While there is no definitive way to project the number of pupils who will make use of the free provision it could be argued that the provision of free period products will be mainly taken up by those from families with a low income. Based on the Scottish Government's statistics on poverty and inequality for 2015/16, around 190,000 children in Scotland (19%) live in relative poverty (before housing costs) and 260,000 (26%) live in relative poverty (after housing costs).³⁴

44. A Young Scot survey of young people on access to period products found that around 25% had experienced difficulty, for a range of reasons, in accessing period products.³⁵ This is broadly in line with the statistics on poverty and inequality mentioned above. According to COSLA, the Scottish Government is planning for an uptake rate of 35%, a rate COSLA considers should be higher.³⁶

45. Based on the poverty and inequality statistics discussed above, as well as the Young Scot Survey and information from COSLA, uptake levels of 20%, 25%, 35% and 50% of menstruating pupils in local authority schools (145,080) are therefore considered below. A 50% uptake level has been included in this part of the analysis as, unlike adults, there may not be an established habit of purchasing period products, therefore the idea of obtaining period products free of charge at school may become the "normal" thing to do for many whether they live in poverty or not.

³³ $5,150,340 \times 4.5 \times \text{£}0.09 = \text{£}2,085,888$

³⁴ <https://www.gov.scot/publications/poverty-income-inequality-scotland-2015-16/pages/2/> (Ch 1)

³⁵ <https://www.youngscot.net/access-to-sanitary-products-in-scotland/>

³⁶ http://www.cosla.gov.uk/sites/default/files/documents/18-05-25_item_03_asp_leaders.pdf

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46. On the other hand, pupils are only at school (with direct access to free products provided in school toilets) for part of the day, so are likely to rely on another source of products during the remainder of the day. This factor suggests that the effective uptake level may be towards the lower end of the range outlined in the table.

Table 3: Cost of providing period products based on projected uptake of scheme³⁷

Uptake level (percentage of menstruating pupils in Scottish Government funded schools)	Cost of products per academic year
20%	£420,000
25%	£525,000
35%	£735,000
50%	£1,000,000

47. Based on the above table, the cost of providing free period products to menstruating pupils in all Scottish Government funded schools is expected to be between £0.4 million and £1 million per academic year. This is the cost of the products alone.

48. As already discussed, the Scottish Government has allocated a £5.2 million fund to provide free period products in schools, colleges, and universities. It is assumed that the same distribution model will be used to facilitate this proposal. Therefore, there should be minimal costs associated with the transition to a statutory system. Similarly, with regards to staff time to administer the system, as one is already in place in Scotland, and staff are already routinely monitoring and replenishing period products along with other things such as toilet paper, there should be little or no additional costs associated with this proposal. Any additional costs that do arise are likely to be relatively small and should be able to be absorbed within current local authority budgets.

49. When the Scottish Parliamentary Corporate Body (SPCB) introduced a similar scheme to provide free period products to Scottish Parliament building users, the Facilities Management Office absorbed the costs of ordering products and the task of re-stocking supplies was simply made

³⁷ Uptake levels have been multiplied by the £2 million figure (paragraph 40).

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part of the regular duties carried out by cleaning staff during rounds and absorbed within this budget.

Costs on other bodies, individuals and businesses

50. Section 5 of the Bill will have cost implications for universities and colleges as well as for independent schools.

Universities and colleges

51. The Bill provides that free period products will be provided in toilets in every university and college in Scotland. These products should be provided in each appropriate toilet within buildings or other premises routinely accessed by students.

52. Using the methodology set out above an estimate of costs on colleges and universities can be determined. As discussed in the previous section, under the current Scottish Government provision, schools, universities and colleges have been allocated £5.2 million of funding from the Scottish Government to provide free period products and it is assumed that this funding would continue should the Bill be passed.

Population of menstruating students

53. According to papers of the Scottish Government's Free Sanitary Products Working Group, there are there are around 118,000 female college students in Scotland and 136,500 in higher education institutions.³⁸ The total number of menstruating students in colleges and universities can therefore be estimated around 254,500.

Usage levels

54. Based on the average term time of around 33 weeks per year this would equate to 8.6 periods³⁹ which, assuming 5 menstruating days per period would result in 10,943,500 menstrual days.⁴⁰ Compared to school pupils, students are more likely to spend time on campus at weekends, for

³⁸ Minutes of Access to Free Sanitary Products Working Group, 31 January 2018: <https://beta.gov.scot/publications/foi-18-00322/FOI1800322%20documents%20numbers%20161-196.pdf?inline=true> (Page 40)

³⁹ 13.6 (cycles per year) x 33/52 = 8.6.

⁴⁰ 254,500 (from paragraph 52) x 8.6 x 5 = 10,943,500.

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example in libraries, student accommodation, student unions, campus sports facilities etc. For this reason, it is assumed that students will, on average, spend around 6 days out of 7 on campus.⁴¹ This equates to 9,380,143 menstrual days.⁴² Using the average unit cost of 9p per period product and assuming an average of 4.5 products being used per day, it can be projected that it would cost around £3.8 million each year to provide period products to every woman attending university or college in Scotland.⁴³

Uptake and cost of provision

55. Using the methodology set out in the previous section an uptake range of 20%, 25%, 35% and 50% of menstruating students in colleges and universities (254,500) is considered below. As noted in relation to schools, the fact that many students are only on-campus for part of the day⁴⁴ may mean that they will rely on the free products provided in toilets for only some of their needs – and hence that effective uptake will be towards the lower end of the range outlined.

Table 4: Cost of providing period products based on projected uptake of scheme⁴⁵

Uptake level (percentage of menstruating students in colleges and universities)	Cost of products per academic year (rounded to the nearest £100,000)
20%	£800,000
25%	£900,000
35%	£1,300,000
50%	£1,900,000

⁴¹ Research suggests that around 36% of Scottish university students live in their family home rather than in student accommodation. (Similar research is not available for colleges.) Source:

https://www.suttontrust.com/wp-content/uploads/2018/02/Home_and_away_FINAL.pdf, table 4.

⁴² $10,943,500 \times 6/7 = 9,380,143$.

⁴³ $9,380,143 \times 4.5 \times £0.09 = £3,798,958$.

⁴⁴ Depending on whether they live in halls of residence or other university-run accommodation (where free products would be available), or in private-rented accommodation or at home.

⁴⁵ Uptake levels have been multiplied by the £3.8 million figure (paragraph 53).

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56. Based on the above table, the cost of providing free period products to menstruating students in Scotland's colleges and universities is expected to be between £0.8 million and £1.9 million per year. This is the cost for products alone.

57. As the Scottish Government has already allocated £5.2 million funding to support the provision of free period products in Scottish schools, universities and colleges, it is assumed that systems are already in place to deliver this, and that these can continue to be used to facilitate this proposal. There should therefore be minimal costs associated with the transition to a statutory system. Similarly, with regards to staff time to administer the system, as this is already in place in Scotland, and as evidenced by the free period products scheme at the Scottish Parliament, there should be little or no additional costs associated with this proposal as staff are already routinely monitoring and replenishing period products along with other things such as toilet paper. Any that do arise are likely to be relatively small and could be absorbed within current budgets.

Independent schools

58. Using the methodology set out above an estimate of costs on independent schools can be determined. The member expects that the institutions themselves would either absorb the costs within existing budgets or recoup them via increases in fees.

Population of menstruating pupils

59. As discussed in paragraph 36, according to papers of the Scottish Government's Free Sanitary Products Working Group, there are around 10,420 menstruating pupils in independent schools in Scotland.⁴⁶

Usage levels

60. As previously discussed, the Scottish Government has produced figures based on different potential levels of usage. Using these figures,

⁴⁶ Minutes of Access to Free Sanitary Products Working Group, 31 January 2018: <https://beta.gov.scot/publications/foi-18-00322/FOI1800322%20documents%20numbers%20161-196.pdf?inline=true> (Page 40)

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and an estimated unit price of 9p per period product, an annual cost per pupil can be estimated.

61. Based on the average term time of 38 weeks per year this would equate to 10 periods⁴⁷ which, assuming five menstruating days per period, would result in 521,000 menstrual days.⁴⁸ Like students at college or university, pupils at independent schools are more likely to be on campus at weekends, for example attending additional classes, taking part in sports, etc. There are also 19 independent boarding schools in Scotland where pupils will spend the majority of their time on campus.⁴⁹ Assuming for this reason, an average attendance of six out of seven days, the number of menstrual days equates to 446,571.⁵⁰ Using the average unit cost of 9p per period product and assuming an average of 4.5 products being used per day, it can be projected that it would cost around £181,000 to provide period products to every menstruating pupil attending independent schools in Scotland.⁵¹

Uptake and cost of provision

62. It is difficult to determine what the likely uptake rate for the provision of free products in independent schools will be. It can be argued that the uptake level will be lower than that of Scottish Government funded schools because families able to afford school fees are less likely to be in relative poverty. On the other hand, pupils at independent schools are more likely to be boarding and so on-site throughout the day (during term-time), making it more realistic to assume that those who do use free products will do so for 100% of their needs on menstruating days. Uptake levels of 10%, 25%, and 35% of menstruating pupils in independent schools (10,420) are therefore considered below.

Table 5: Cost of providing period products based on projected uptake of scheme

Uptake level (percentage of menstruating pupils at Scottish independent schools)	Cost of products per academic year (rounded to the nearest £1,000)
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⁴⁷ 13.6 (cycles per year) x 38/52 = 9.9.
⁴⁸ 10,420 (from paragraph 58) x 10 x 5 = 521,000.
⁴⁹ <http://scotlandsboardingschools.org.uk/schools/>
⁵⁰ 521,000 x 6/7 = 446,571
⁵¹ 446,571 x 4.5 x £0.09 = £180,861.

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10%	£18,000
25%	£45,000
35%	£63,000

63. Based on the above table, the cost of providing free period products to menstruating pupils in all independent schools in Scotland is expected to be between £18,000 and £63,000.

64. In addition to the costs of providing these products there would also be some staff costs associated with this proposal. These costs, however, are expected to be minimal and could be absorbed within current budgets. As previously discussed, when the SPCB introduced a similar scheme to provide free period products to Scottish Parliament building users, the Facilities Management Office absorbed the costs of ordering products and the task of re-stocking supplies was simply made part of the regular duties carried out by cleaning staff during rounds and absorbed within this budget.

Other public-service bodies

65. Section 6 of the Bill enables the Scottish Government to extend, by regulations, the duty to provide free period products to other public-service bodies.

66. It is not known to which organisations, if any, the Scottish Government would extend this duty. Actual costs incurred will vary widely according to the size and circumstances of the organisations affected, and on what provision they are already making (in the absence of a statutory duty). In any case, as use of this power is optional, any costs that are incurred by a specific organisation would be better regarded as costs of the regulations applying the duty to that organisation, and not as part of the cost of this Bill.

Example of similar project

67. In May 2018 the Scottish Parliamentary Corporate Body (SPCB) agreed to provide free period products within the Scottish Parliament. Following this decision, period products were made available in 42 toilets across the parliamentary campus, including in public areas.

68. The Scottish Parliament directly employs 512 staff, 53% of whom are women (274). Other building users who can also benefit from this scheme include 46 female MSPs, and 280 female MSP staff. There are also a

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further 1,672 passholders who regularly access the building. This number encompasses Scottish Government staff, Police Scotland, members of the media, contractors and regular visitors. A breakdown of these individuals by gender is not currently available, however, it is reasonable to assume that around half (836) of these are female. The total number of people who could potentially benefit from the provision of free period products is therefore around 1,436.⁵²

69. In addition to the staff who work in the building, free period products have been provided in the toilets in the Main Hall which can be accessed by members of the public. It is assumed, however, that female visitors will only take products on an occasional basis and that this will not contribute significantly to overall demand.

70. Final costings for the first year are not yet available; however, the projections are as follows.

Table 6: Projected costs to provide free period products at the Scottish Parliament⁵³

Expense type	Cost
Set-up costs	£152
Cost of products (@£198/month)	£2,376
Total projected cost (first year)	£2,500

71. Cost projections assumed that each of the 42 collection points would need to be completely restocked once a month. This equates to 1,600 period products, at a unit cost of around £0.12 per product, resulting in a monthly cost of around £200. Taking the initial set up costs (the purchase of boxes for the provision of products, signage etc.) into account, projected costs for the full year are expected to be around £2,500.⁵⁴

72. Since the policy was launched the monthly costs of replenishing stock have remained generally consistent, with each box needing to be completely re-stocked around once a month. This indicates that

⁵² Number of female MSP, MSP Staff, female SPCB staff added to 50% of the other passholders (who are not tracked by gender).

⁵³ Information provided to NGBU by the Scottish Parliament’s Facilities Management Office.

⁵⁴ Initial set up costs of £152 + (monthly refill costs of £198 x 12) = £2,528.

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approximately 1,600 products are being used each month and that initial cost projections were accurate.

Summary of costs

73. In summary, based on the above projections, it can be estimated that the member's proposals could result in the following costs. It should be noted that except for the costs projected for independent schools it is assumed that funding will be provided by the Scottish Government, as is the case with the current provision of free period products. As previously discussed, the Scottish Government is currently funding a scheme to provide free period products to those on low incomes as well as a separate scheme to provide products to those attending schools, colleges, and universities. The table below therefore details the current Scottish Government funding commitments as well as the projected costs associated with the Bill.

Table 7: Summary of costs

Aspect of proposal	Affected body	Current Scottish Government funding	Anticipated annual costs associated with the Bill
Part 1: universal scheme	Scottish Government	£4.5 million ⁵⁵	£2.4 million – £6.7 million ⁵⁶
Section 5: provision in schools, colleges and universities	Local authority-run schools	£5.2 million	£420,000 – £1 million
	Universities and colleges		£800,000 – £1.9 million
	Independent schools	No current provision	£18,000 – £63,000

⁵⁵ This includes the original commitment of £0.5 million to provide free period products to those on a low income via the FareShare network and the £4 million additional commitment provided to Local Authorities to expand provision beyond educational establishments to the wider community.

⁵⁶ These figures include the projected annual running costs of around £0.9 million as well as the projections for annual product costs, but do not include the estimated £0.54 million set-up costs.

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Total		£9.7 million	£3.6 million – £9.7 million
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Possible savings

74. It is difficult to quantify any savings that may be achieved as a result of the Bill. There are some areas of spending, however, that may be reduced if period products are made available free of charge to those that need them. It should also be noted that some retailers may experience a slight drop in sales of period products as some individuals switch from purchasing products from their local supermarket, pharmacy etc. to accessing free products via the scheme. As previously discussed, however, the Scottish Government has already introduced a similar provision on a non-statutory basis, so any additional impact attributable to the Bill is likely to be minimal.

75. One possible saving may be in the field of education. Research suggests one in 10 girls in the UK are unable to afford period products and 49% have missed school because of their period.⁵⁷ The Education Institute of Scotland note that easy access to period products is fundamental to the health and wellbeing of pupils and that “there are likely to be attendance impacts ... if learners have fewer absences and are not distracted, anxious or uncomfortable when they have their periods.”⁵⁸ Although it is difficult to quantify the financial impact, it is likely that minimising absences, and the consequent impact on attainment levels, will have an effect on the amount of support that schools and colleges need to provide. The suggested impact on attainment may also increase future opportunities that women, girls and trans people have in life which may result in better jobs or pay resulting in a knock-on effect on social security spending.

76. One of the most extreme potential consequences of period poverty is Toxic Shock Syndrome (TSS). TSS is a very rare but potentially life-threatening condition which can, in some cases, be caused by inappropriate use of period products such as using a product for much longer than is recommended by the manufacturer. As those suffering from period poverty are likely to need to use products for longer than is

⁵⁷ <https://plan-uk.org/media-centre/plan-international-uks-research-on-period-poverty-and-stigma>

⁵⁸ <https://www.eis.org.uk/images/period%20poverty/Distributing.pdf> (Page 3)

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recommended for financial reasons, they are at risk of this condition. Cases of TSS in the UK are extremely rare with an average of only 40 cases per year.⁵⁹ Statistics relating to TSS in Scotland are not available. However, based on population it can be projected that around three cases occur in Scotland each year,⁶⁰ though it should be noted that it cannot be assumed that all these cases will be as a result of period products. The provision of free period products could therefore impact upon this figure resulting in a small cost saving to the NHS in Scotland.

⁵⁹ <http://www.bbc.co.uk/newsbeat/article/38962250/recognising-the-symptoms-of-toxic-shock-syndrome-saved-my-life>

⁶⁰ 40 cases per year x 8.4% (Scottish population as a % of the wider UK) = 3.

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Financial Memorandum

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