

Proposed Disability Commissioner (Scotland) Bill

Introduction

A proposal for a Bill to establish a Disability Commissioner for Scotland

The consultation runs from 12 May 2022 to 3 August 2022

All those wishing to respond to the consultation are strongly encouraged to enter their responses electronically through this survey. This makes collation of responses much simpler and quicker. However, the option also exists of sending in a separate response (in hard copy or by other electronic means such as e-mail), and details of how to do so are included in the member's consultation document.

Questions marked with an asterisk (*) require an answer.

All responses must include a name and contact details. Names will only be published if you give us permission, and contact details are never published – but we may use them to contact you if there is a query about your response. If you do not include a name and/or contact details, we may have to disregard your response.

Please note that you must complete the survey in order for your response to be accepted. If you don't wish to complete the survey in a single session, you can choose "Save and Continue later" at any point. Whilst you have the option to skip particular questions, you must continue to the end of the survey and press "Submit" to have your response fully recorded.

Please ensure you have read the consultation document before responding to any of the questions that follow. In particular, you should read the information contained in the document about how your response will be handled. The consultation document is available here:

[Consultation Document](#)

[Privacy Notice](#)

I confirm that I have read and understood the Privacy Notice which explains how my personal data will be used.

On the previous page we asked you if you are UNDER 12 YEARS old, and you responded Yes to this question.

If this is the case, we will have to contact your parent or guardian for consent.

If you are under 12 years of age, please put your contact details into the textbox. This can be your email address or phone number. We will then contact you and your parents to receive consent.

Otherwise please confirm that you are or are not under 12 years old.

No Response

About you

Please choose whether you are responding as an individual or on behalf of an organisation.
Note: If you choose "individual" and consent to have the response published, it will appear under your own name. If you choose "on behalf of an organisation" and consent to have the response published, it will be published under the organisation's name.

on behalf of an organisation

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

No Response

Please select the category which best describes your organisation

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

Optional: You may wish to explain briefly what the organisation does, its experience and expertise in the subject-matter of the consultation, and how the view expressed in the response was arrived at (e.g. whether it is the view of particular office-holders or has been approved by the membership as a whole).

Inclusion Scotland is a 'Disabled People's Organisation' (DPO) – led by disabled people ourselves. Inclusion Scotland works to achieve positive changes to policy and practice, so that we disabled people are fully included throughout all Scottish society as equal citizens.

We do this by:

Influencing decision-makers, ensuring that disabled people are involved in developing effective solutions for policy and practice that reflect our expertise by experience and meet our needs and aspirations.

Supporting disabled people to be decision-makers themselves, promoting the equal representation of disabled people as policymakers and our right to make decisions about our own lives.

Developing capacity, awareness, and engagement, of disabled people, disabled people's organisations, and the organisations and institutions that affect our lives.

Inclusion Scotland has a network of 51 Disabled People's Organisation (DPO) members, and many partners, with reach to over 10,000 individual disabled people via our newsletter, e-bulletin, social media channels and membership. Inclusion Scotland has built up a strong reputation as an independent, non-party political, representative voice of disabled people across Scotland.

Inclusion Scotland welcomes the opportunity to respond to the proposals for a Disability Commissioner for Scotland. We discussed the proposals internally and received a range of views on the idea of a Disability Commissioner from strong support from those who felt, if the right person were appointed, that a Disability Commissioner could act as a much needed catalyst and focal point for positive change for disabled people right through to those who saw the proposals as another layer of bureaucracy in an already crowded landscape that might not achieve any significant improvements in terms of equality for disabled people.

In this context we felt that it was vital that we listened to our membership on the matter. We carried out an online survey to gather member's views of the proposals and an analysis of the 67 responses we received from members therefore shapes our response to the proposals. Additional comments from within our staff team have also been added for balance and detail.

Please choose one of the following:

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

Please provide your Full Name or the name of your organisation. (Only give the name of your organisation if you are submitting a response on its behalf).

(Note: the name will not be published if you have asked for the response to be anonymous or "not for publication". Otherwise this is the name that will be published with your response).

Inclusion Scotland

Please provide details of a way in which we can contact you if there are queries regarding your response. Email is preferred but you can also provide a postal address or phone number.

We will not publish these details.

Aim and approach - Note: All answers to the questions in this section may be published (unless your response is "not for publication").

Q1. Which of the following best expresses your view of the proposed Bill? (Please note that this question is compulsory.)

Partially supportive

Please explain the reasons for your response.

The current context

Inclusion Scotland has recently published the Scottish Civil Society Shadow report to the United Nations which outlines the available evidence about the key issues still facing disabled people in Scotland today. Our report shows that in many areas of life in Scotland we have failed to make real progress in terms of equality for disabled people, and in some areas we have even gone backwards.

Disabled people still face many barriers and discrimination in their everyday lives, in areas such as education, housing, social care support, social security and employment. They are almost half as likely to be employed as non-disabled people, and 50% less likely to hold any formal qualifications. Disabled workers are more likely to be in low paid work and according to available data are paid on average 12.2% less than their non-disabled peers .

Many disabled people in work have to leave their jobs when they acquire an impairment, or a condition worsens, and they do not get the support or workplace adjustments they need. Research has shown that loss of employment opportunities contributes to disabled people living in poverty and results in demoralising rejection, increased pessimism, under-confidence, and poor mental health.

Social care support for disabled people across Scotland was a system in crisis long-before Covid-19. Cut back to the bone by austerity, and already under pressure due to the UK's decision to leave the European Union, the system collapsed during lockdown.

Inclusion Scotland carried out an online survey throughout April 2020 to find out what impact the Covid-19 pandemic was having on disabled people. Over 800 disabled people and their carers responded. Around 30% of respondents said that the social care support that they receive was either stopped completely or reduced during lockdown, sometimes overnight and without warning. People were left in desperate situations as a result. Survey respondents told us they were forced to sleep in their wheelchair or left

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unable to get out of bed. Others told us they were unable to wash and dress themselves and keep up with basic household chores.

Our DPO partners also provided similar evidence at a local and regional scale. Glasgow Disability Alliance reported that almost 2000 disabled people in Glasgow had their care reduced or completely withdrawn during lockdown— many with no notice and no follow up.

In relation to housing despite national and local work to improve the picture there is still a chronic shortage of accessible and adapted housing suitable for disabled people in Scotland. Recent research has shown that over 17,000 wheelchair users are living in unsuitable homes and this unmet need is set to increase by 80% by 2024, based on current health trends which project a sharp rise in the number of wheelchair users.

The recent year-long statutory inquiry by the Equality and Human Rights Commission into accessible and adapted housing for disabled people in Scotland found that disabled people were demoralised and frustrated by the housing system due to a severe shortage of accessible and adapted houses across all tenures.

Already much more likely to be living in poverty disabled Scots are currently caught in the middle of the cost-of-living crisis. They are facing this on top of the extra costs many already experience from simply living as disabled people, and are at significant risk of financial hardship, fuel and digital poverty, food insecurity and destitution as inflation is predicted to hit 10 per cent later in the year.

Energy costs for powering essential equipment that disabled people need such as hoists, beds, breathing equipment, dialysis machines, powered chairs and monitors were already expensive. Households including a disabled person are having to make choices about using this essential equipment, heating their home, or eating properly.

Nearly half (49%) of all those living in poverty in the UK, are either disabled people or live in a household containing a disabled person. The official measure of poverty (households living on less than 60% of median income) fails to take into account the additional costs associated with disability. In 2018 Scope found that Scots disabled people spent on average £632 a month on disability-related expenses (e.g., taxis, increased use of heating, special equipment, care costs, etc) These are the highest excess costs in the UK.

Once these costs are taken into account fully, half a million (500,000) Scottish disabled people and their families are living in poverty, 48% of the total of all people in Scotland living in poverty, despite making up only 22% of the population.

COVID-19 has meant that 2020 delivered thousands of additional deaths of disabled people globally, and intensified social isolation and mental ill-health, personal and community poverty, and economic and social instability and insecurity for disabled people. While it has also seen communities rally to support local disabled residents and neighbours, the advent and impact of Coronavirus and the consequences of the ensuing pandemic have revealed the trenchant inequalities in Scotland for disabled people that existed before COVID-19 arrived.

Our own research , and that of other Disabled People's Organisations , has shown that disabled people and their families were harder hit by Covid-19, not only because they may be at greater risk of severe illness – but equally or more so – because Covid-19 has 'supercharged' the existing inequality they already face and made new inequality likely.

The increased risk of poor outcomes for disabled people was magnified with the reduced access to routine health care and rehabilitation services, disruption to routine, more pronounced social isolation, poorly tailored public health messaging, inadequately constructed mental health services, and a lack of emergency preparedness that was accessible and inclusive.

Disabled people tell us that negative attitudes toward disabled people have worsened during the pandemic. The rhetoric of political leaders and the media around who was at risk from the virus and who would be prioritised for treatment at the start of the pandemic made disabled people feel expendable and unwilling in some cases to go to hospital.

As we are now dealing with variants of the virus disabled people previously on the shielding list feel abandoned and ignored in public health messaging as protections such as mask wearing and social distancing are relaxed leaving some disabled people trapped in their own homes, unable to go back to

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work or having to make unsupported decisions about their own risk from the virus. There does not seem to be a clear logic in terms of risk of the virus and access to anti-viral medication and many disabled people are asking why measures such as mask wearing, and clean air filters are not mandatory in order to protect those most vulnerable to the virus.

The pandemic accelerated moves to online services, but disabled people were still less likely to use the internet and are still excluded because of a lack of technology, connectivity and confidence, and alternatives to digital.

Active travel measures like 'Spaces for People' schemes accelerated during the pandemic to accommodate social distancing have created new access barriers for some disabled people, with blue badge parking spaces being removed to make way for cycle lanes, buses no longer able to stop at kerb-sides and use ramps to help disabled people enter and exit buses, floating bus stops that can be dangerous for disabled people to access and there being fewer dropping off points for disabled people who need to use taxis.

Disabled people have told us that Spaces for People schemes are in effect creating 'no-go' areas for them in some city centres including Edinburgh and Glasgow. These issues are only likely to worsen as efforts intensify to respond to climate change by policy making that reduces emissions.

Members views about a Disability Commissioner

In this current context where there are a myriad of poverty, pandemic or climate-related barriers and rights infringements, overlaid on long-standing issues for disabled Scots it is perhaps unsurprising that most respondents (87%) to our survey (see above) agreed that there should be a Disability Commissioner in Scotland – 72% strongly agreed (48 respondents) and 15% agreed (10 respondents). Four respondents (5%) said that they strongly disagreed or disagreed with the idea for a Disability Commissioner and five respondents (7%) said they neither agreed nor disagreed with the idea.

Q2. Which of the following best expresses your view on whether there is a need for a specific, dedicated commissioner focussing solely on people with a disability?

Partially supportive

Please give the reasons for your response

Proponents felt that a Disability Commissioner would act as an important first point of contact for disabled people with an issue relating to disability – at present many felt that disabled people don't know where to go to for advice and support when they have a problem. Whilst there are sources of advice and support in existence, these can be patchy, underfunded and not known about and mainstream sources of advice and support can lack the necessary expertise.

Those in support of the proposals also felt that a Disability Commissioner would be a 'champion' for disabled people's rights and would help ensure that disabled people are treated fairly and not discriminated against. In short, they felt that (if the right person were appointed) that the Disability Commissioner would give disabled people 'a voice' as the following comments from respondents show:

"Disabled people in Scotland very often do not know who the first point of contact for help should be and how to access help. The commissioner would be a much needed focal point"

"Disabled people have few champions fighting their corner. This step is long overdue."

"Disabled people need to have a champion, and that Commissioner should also have lived-experience as a disabled person, proving that disability does not preclude ability to get jobs done"

"The best way to ensure that all communities are included in equal capacity at a high level is by providing accurate representation, and the opportunity for a specific voice."

"When it is one person's responsibility to get things done (provided they are the right person) then they do

Q2. Which of the following best expresses your view on whether there is a need for a specific, dedicated commissioner focussing solely on people with a disability?

- if responsibility is shared amongst agencies then they deprioritise it."

"I'm surprised to hear that there isn't one already. If you are making decisions about disabled people you must consult disabled people. So this is really important."

"We need someone to help us speak out louder. To make a platform where our rights can be heard and no longer lost in a maze of confused authorities who don't understand."

"Having a totally independent from government organisation is vital. This would be a psychological as well as practical help to disabled people."

However, even supportive respondents voiced some concerns about how a Disability Commissioner would operate within the existing landscape and whether a Commissioner would have enough 'clout' to effect real change. For example the Equality and Human Rights Commission, Scottish Human Rights Commission and the Children's Commissioner already occupy this area and have legal powers, which may increase with the proposed Bill to incorporate human rights into Scots law.

Other respondents felt that more information about how the Commissioner would work and what would be covered in its remit was needed.

There was consensus amongst supportive respondents that the Disability Commissioner should be a disabled person themselves and must be fully independent of Scottish Government and the organisations the Commissioner would be scrutinising as the following comments from respondents make clear:

"I do wonder about the interface between this new organisation and the existing organisations that represent equal rights, and whether it will have enough 'clout'."

"But ONLY if the proposed Disability Commissioner is genuinely independent of the Government and all other related organisations and provided the individual is themselves disabled, with relevant insights and experiencing the same barriers and prejudices that the rest of us are!"

"The commissioner must be independent from government, including not being a political appointment."

"I would like to think that a Disabled person would be considered for this position, and that they would be driving its policies."

"I think overall it's a good idea but would like more information as to how it will work and what the role will look like"

Respondents who disagreed with the idea of a Disability Commissioner gave the following reasons:

- It will be another 'talking shop'
- The existing legislative landscape to protect and promote disabled people's equality isn't good enough – this needs to be fixed first
- One person is not enough there needs to be a national authority
- Disabled people need well resourced services not a commissioner

"This is a job for the boys! A talking shop."

"Are we sure that this is a good use of funding? We need well resourced services not a commissioner."

"Existing legislation, focusing on disability is either, weak, flawed, or often simply does not exist. Don't put the cart before the horse"

"One person is not enough for the work involved. And who is this person? Who appoints him/her? What is their experience of disability?"

"There is no point going into much more detail as the consultation is a fait-accompli. It wouldn't surprise me if the Commissioner has already been told the post is being created for them through the normal channels. And 90% plus of disabled people will never hear of the Commissioner or feel any benefit from having a Commissioner."

"I'm not sure if a commissioner would be any more effective at holding government to account than a

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coalition of DPO's. I'm not hearing inclusion or universal design. I look at other countries and I see disability bodies not individuals, representative of all aspects of disability and promoting universal design for all. This needs more vision."

Respondents who neither agreed nor disagreed with the proposals gave the following reasons:

- A Disability Commissioner is tokenistic and wouldn't make a difference
- Would rather see existing mechanisms strengthened.
- There is the potential for an ineffective Disability Commissioner to maintain inaction.

"I believe a disability commissioner is a tokenistic suggestion to glaze over the much needed policy changes and support required for disabled people to live their lives fully, independently and accessibly. What is needed is intentional and real coproduction and design of policies by disabled people."

"I would rather that the Equality Act and other legislation was strengthened and easier to use as an individual. I think that the outline of what a Disability Commissioner would do is weak"

"It depends what power they have. At best they could drive positive change. At worst they could be a fig leaf for inaction - lots of talk, positive processes, but absolutely no impact on disabled people's lives whatsoever. Nothing in the proposal indicates which of the two it would be"

Respondents who disagreed with the idea of a Disability Commissioner said they would like to see the following instead:

- Implementation and strengthening of existing law and policy.
- A national disability authority.

"Make sure the laws that are in place are adhered to and those breaking them being punished. E.g., using disabled spaces illegally, street furniture blocking the paths of wheelchair users and the blind and partially sighted"

"Safeguarding, human rights policy that has legal teeth, common sense in Government policy and think tanks."

"I'd rather see something like they have in Ireland - a National Disability Authority: They have a brilliant Centre of Excellence for Universal Design. And a national housing strategy for disabled people. We are so behind so many other countries on this."

Q3. Do you think legislation is required, or are there other ways in which the proposed Bill's aims could be achieved more effectively? Please explain the reasons for your response.

No Response

Scope of the Disability Commissioner Role

Q4. Which of the following best expresses your view of the Disability Commissioner role covering all disabilities; physical, mental, hidden and fluctuating conditions?

Fully supportive

Q4. Which of the following best expresses your view of the Disability Commissioner role covering all disabilities; physical, mental, hidden and fluctuating conditions?

Please give reasons for your response, including how the commissioner could co-ordinate with the work of existing bodies/organisations who support people with these conditions.

There was broad support from those in favour of the proposals that a Commissioner should be pan-impairment and advocate for all disabled people. These respondents felt that the Equality Act definition would provide a good starting point for deciding who the Commissioner should be advocating for.

Q5. Which of the following best expresses your view of the Disability Commissioner having a role in reviewing laws and policies that might impact on disabled people?

Fully supportive

Please explain the reasons for your response.

All those in favour of the proposals felt that a Disability Commissioner should be involved in devolved legislative reform and policy development affecting disabled Scots and should have strong and meaningful investigative powers to carry out general investigations into devolved matters if they see examples of disability discrimination or rights not being met.

Respondents who agreed that there should be a Disability Commissioner made suggestions about what the Commissioner should focus on that included the following issues:

Barriers to accessibility; Attitudes/stigma/awareness-raising; Housing; Health; Education; Employment; Public transport; Age specific issues; Access to legal advice; Treatment waiting times; Intersectional discrimination; Poverty; Access to public services; Income and social security; Invisible impairments (in particular neurodivergence); Social citizenship; Social care; Better complaints systems within public bodies; Access to information; Access to health care, accessible information and communications; emergency planning; lived experience within policy development

Q6. Which of the following best expresses your view of the Disability Commissioner promoting best practice and learning from service providers, key stakeholders and third sector?

Fully supportive

Please explain the reasons for your response, including how you envisage this work being undertaken?

Again, supportive respondents agreed that a Disability Commissioner would have an important role in promoting best practice and learning from public bodies and service providers.

When discussing the role of the Commissioner internally with the Inclusion Scotland staff team, the following comments were made by those in favour of a commissioner:

"When Commissioners are involved in investigations they will see a fair bit of bad practice, so it's very important that they have a role in promoting best practice and that disabled people have a key role in influencing what is actually considered best practice."

"A parliamentary Commissioner for disabled people should safeguard the rights of individual disabled people but also needs to change practice for the better so that collective progress for disabled people is also achieved. Promoting best practice and co-designing best practice with disabled people will be an important part of that."

Q7. Which of the following best expresses your view of encouraging involvement of disabled people and DPOs (Disabled People's Organisations) in the work of the Disability Commissioner?

Fully supportive

Please explain the reasons for your response. Please discuss how you think this would work in practise – would this be through focus groups, internships, paid roles etc

Many of those in favour of a Commissioner stated clearly that they felt that the Commissioner should be a disabled person themselves and many discussed the need for close co-operation with Disabled People's Organisations in the work of the Disability Commissioner.

"DPOs should feel that the Commissioner is an effective advocate for the range of policy issues they themselves work on. There should be close co-operation"

"The Commissioner needs to work well with those already advocating for disabled people's rights"

Inclusion Scotland would like to take this opportunity to highlight the guidance in the United Nations Committee on the Rights of Disabled People General Comment 7 which explains the difference between Disabled People's Organisations and disability organisations, and the importance of prioritising DPOs.

Q8. Who should the Disability Commissioner be allowed to investigate?

Both Scottish Public Bodies and service providers

Please explain the reasons for your response

When discussing the investigative powers of the Disability Commissioner with Inclusion Scotland staff members those in support of the commissioner felt that these powers should apply to both public bodies and service providers given that both are duty holders in relation to upholding disabled people's rights. From those more sceptical about the proposals for a Commissioner there was a feeling that investigative powers alone will not lead to the policy and legislative changes necessary to protect and promote disabled people's rights, as even when existing organisations such as the EHRC have investigative powers, as well as legal and enforcement powers using the court and tribunal systems, this has not resulted in the necessary policy and legal changes for disabled people.

Financial Implications

Q9. Any new law can have a financial impact which would affect individuals, businesses, the public sector, or others. What financial impact do you think this proposal could have if it became law?

some reduction in costs

Please explain the reasons for your answer, including who you would expect to feel the financial impact of the proposal, and if there are any ways you think the proposal could be delivered more cost-effectively.

Of respondents who answered this question, 90% said having a Disability Commissioner would be a good use of money. Almost all respondents who agreed with the idea of a Disability Commissioner said it was a good use of money.

Respondents who agreed a Disability Commissioner is a good use of money gave the following reasons:

- There is a need for action now
- Disabled people are entitled to support
- You can't put a price on human rights
- It will save money in the long-term

Supportive comments included the following:

"Benefits likely to outweigh costs."

Q9. Any new law can have a financial impact which would affect individuals, businesses, the public sector, or others. What financial impact do you think this proposal could have if it became law?

"Thousands of disabled people in Scotland are suffering in all fields of life (education, employment, healthcare etc). Having a commissioner will help them."

"Currently it is ALL talk and NO action! Genuinely helping people tackle discrimination and achieve their rights requires someone on the front line to stand up and speak for us, stand up for us and stand by us, NOT simple talk about it for personal credibility."

"You just need a good housekeeper of budgets. Be creative in setting up. If you can find billions for war you can find millions respecting people's lives and dignity."

"Human rights matter. The most vulnerable need a commissioner."

"Absolutely. We must not forget that 20% of our population have a disability. Add on their families, personal assistants, carers and friends who can be affected by not having the right legislation or policy in place. I think that there should be an independent Disability Commissioner (Tsar)...The flip side is what are the continuing costs by not doing it. Plus the possible figure mentioned is relatively very small within the larger picture."

"You need to consider the costs saved - to the NHS; education; Local Councils; emergency services etc if disabled people are properly supported to live independent lives and to feel that we, too, can take our full and active part in society and be fully respected. Our mental health and self-esteem is bolstered. Life is improved. The public purse is being used sensibly."

"It should be loud, visible and persistent - will be worth every penny if we get more disabled people into work, and into financially stable positions (in or out of work)."

"As long as the Commissioner has enough "teeth" to enact their powers then it's money well spent."

"Surely this would be money well worth invested. Disabled people don't feel part of society so it is about time that money is invested to be truly inclusive."

"I think that although money will need to be spent, I feel we need a commissioner to help in regards to disabled people not being discriminated against."

"I don't think any cost to give equality to all and aid inclusion for all can be counted in pounds."

Some respondents said it would be a good use of money on certain conditions:

"If they listen to what we say"

"But I would like to learn more of the experiences of other countries where there is such a Commissioner first."

"possibly - but only if he/she is of practical use or legally qualified -to stop illegal procedures and omissions effecting disabled people In other words S/HE needs teeth!!"

"As long as costs are kept as low as possible e.g. by sharing resources etc. Any "extra" money should be fed back into disability work."

"I wish there was a 'maybe' option - I wouldn't support yet another layer of non-disabled people overseeing Disabled people's needs."

A respondent who didn't answer the yes/no question said: "I don't know, a cost benefit analysis should be performed on this and alternative approaches."

Almost all of those respondents who said they disagreed with the idea of a Disability Commissioner said it was not a good use of public money:

"Just another useless job that the Scottish Government can waste money on per usual"

"A complete and utter waste of tax payers money to serve the needs of the few and not the many."

Q9. Any new law can have a financial impact which would affect individuals, businesses, the public sector, or others. What financial impact do you think this proposal could have if it became law?

One respondent didn't select yes or no but said: "I'm not sure, it depends on how this is set up. The last thing we need is another toothless quango. I'm also concerned with how many silos we're creating to protect everyone's rights. I'm concerned that they're getting lost in the bureaucracy."

Of the 5 respondents who neither agreed nor disagreed with the idea of a Disability Commissioner, 1 agreed it was a good use of public money, 2 disagreed and 2 didn't select yes or no.

Respondents who said no:

"This money could be put towards improving implementation gaps in pre-existing policies and services"

"I don't think it will actually do much for disabled people"

One respondent who didn't select yes or no said –

"I have no idea. It depends on what power they have - Also, why would the role be office-based? Could be discriminatory against many people still at high clinical risk"

Equalities

Q10. Any new law can have an impact on different individuals in society, for example as a result of their age, disability, gender re-assignment, marriage and civil partnership status, pregnancy and maternity, race, religion or belief, sex or sexual orientation.

What impact could this proposal have on particular people if it became law? If you do not have a view skip to next question.

Please explain the reasons for your answer and if there are any ways you think the proposal could avoid negative impacts on particular people.

No Response

Sustainability

Q11. Any new law can impact on work to protect and enhance the environment, achieve a sustainable economy, and create a strong, healthy, and just society for future generations.

Do you think the proposal could impact in any of these areas? (If you do not have a view then skip to next question)

Please explain the reasons for your answer, including what you think the impact of the proposal could be, and if there are any ways you think the proposal could avoid negative impacts?

No Response

General

Q12. Do you have any other additional comments or suggestions on the proposed Bill (which have not already been covered in any of your responses to earlier questions)?

No Response