

Annexe A: Skills and business alignment evidence – issues raised

Skills planning, alignment and demand

1. Skills planning and alignment with business needs is key to the Scottish economy and to the prospects of Scottish workers. The Enterprise and Skills Strategic Board published its strategic plan in October 2018 in which Skills Development Scotland (SDS) and the Scottish Funding Council (SFC) were asked to implement a joint skills alignment planning model, aligning provision with industry needs and critical skills.
2. Between 2018 and 2020, SFC and SDS worked together to develop a shared understanding and approach to investment in skills in Scotland. An implementation programme for skills alignment was built around a five-step planning model. However, in practice, the SFC told us that model did not deal effectively with the complexity of the system, with the competing demands of employers, learners, government policy direction and changes in the external operating environment.
3. SFC's [review of Coherent Provision](#), commissioned by the Scottish Government in June 2020, recommended an approach which involves taking a view of the entire education and skills system, in partnership with employers, SDS, Scottish Government and other partners. The Review recommended the introduction of a revised approach to strategic provision planning and skills alignment which the SFC is currently testing through Tertiary Provision Pathfinders.¹ SDS gauges future demand through annual regional and sectoral skills assessments which are agreed with relevant bodies and stakeholders, working with the SFC.²
4. SDS administers Scottish Apprenticeships on behalf of Scottish Government. SDS believes that Scottish Apprenticeships provide an 'excellent example' of how provision can fully align with business needs; there are more than 12,000 businesses engaged in the delivery of Scottish Apprenticeships, 90% of which are small and medium-sized enterprises (SMEs).³
5. Scottish Chambers of Commerce called for the protection and growth of Scottish apprenticeships 'as part of a rebalanced model that aligns investment with industry need.' They want to make further and higher education 'more responsive to the needs of industry by expanding graduate apprenticeships and developing shorter degree programmes.' They also want the scope of education to be expanded and spoke of the need to reskill 'huge sectors of our workforce.'⁴

6. We heard from SDS that there are currently issues where demand for apprenticeships outstrips supply, particularly in relation to graduate apprenticeships. Frank Mitchell of SDS confirmed that there is demand for around 4,000 graduate apprenticeships; currently the financial provision is for around 1,370.⁵ SDS said that it is having an on-going discussion with the Scottish Government about how to do more to meet the demand.⁶
7. Dr Colquhoun of the Scottish Apprenticeship Advisory Board (SAAB) suggested a model in which the employer can create and demand an apprenticeship from the system, rather using an apprenticeship from an allocation that is set centrally.⁷ They recently commissioned an independent review of graduate apprenticeships and are fully supportive of the recommendations in the report, including increasing flexibility, introducing an agile, demand-led funding system driven by employer demand and broadening the frameworks on offer.⁸
8. **We note evidence that demand is currently outstripping supply of apprenticeships, especially graduate apprenticeships. We recognise the skills planning models being deployed by the agencies and that there is a finite budget. We also note the recent reviews undertaken and the intention to introduce a revised approach to strategic planning. It is vital that the offer of the skills agencies fits the demands of employers, especially in the current labour market climate; the system must respond to employer demand and ensure that their needs are strategically integrated into skills planning. We ask to be kept updated on progress with introducing the revised approach to strategic planning.**
9. Audit Scotland published a [report on skills planning](#) after the Committee had taken evidence on these matters. The content of the report is therefore not reflected in this letter. It may form part of future work in this policy area.
10. **Given time constraints, we did not fully explore the impact of the pandemic on apprenticeship numbers; we know that workplace learning was challenging during this time. We ask the Scottish Government to set out what targets it will set for apprenticeships in the forthcoming year as we move into the recovery phase. We note that the pre-pandemic target was 30,000 new apprentice starts per year; given the demand, we believe that the target should be ambitious.**

Industry engagement

11. The Committee heard some concerns about industry engagement in the skills system. The Scottish Builders Federation (SBF) stated that employers do not feel engaged in the skills planning system, particularly with respect to

apprenticeships. This is despite the construction sector in Scotland providing a significant number of apprenticeship opportunities every year.⁹ Conversely, UK Hospitality Scotland told us that their industry works closely with education providers and with the Scottish and UK Governments; they described a partnership approach to developing the workforce for hospitality.¹⁰

12. SBF set out several issues around the registration of apprentices. Prior to 2017, it was mandatory that all craft apprentices were registered with the Scottish Building Apprenticeship and Training Council, a body with equal representation from employers/ federations and trade unions. Since this requirement has been removed, SBF suggested that fewer apprentices secure fair work terms with a greater proportion paid the national minimum wage. SBF also highlighted issues with reforms from CITB and the SQA, which have led to issues around the registration of apprentices, completion of the portfolio of evidence, a lack of skills assessors and conflicting offerings at different qualification levels.¹¹
13. SDS highlighted the role that SAAB play in ensuring that industry shape the apprenticeship frameworks in Scotland. They noted that over the next three to five years all foundation, modern and graduate apprenticeship frameworks will be redeveloped, led by SAAB.¹² SAAB highlighted their role as an independent voice of industry in the development of apprenticeships in Scotland, a role they have performed since 2016. They represent over 80 business leaders and representative organisations.¹³
14. **The evidence in relation to employer involvement in the skills system was mixed. We note the frustrations voiced by the SBF and would ask the skills agencies to reach out to them to seek to resolve these issues in relation to the construction sector.**
15. **We note and welcome the work being done by SDS, SAAB and the SFC in engaging with employers; however, we believe that they should look at what more could be done to engage with businesses, at a local level, through bodies such as local Chambers of Commerce, but also at a strategic level. The Committee would welcome a response from the Scottish Government and the skills agencies on what action is being taken to improve both strategic and local engagement with employers.**

Apprenticeship levy

Background

16. The Apprenticeship Levy is charged to all large employers (defined as those with a wage bill of over £3 million per year) at 0.5% of their total annual wage bill. Scotland receives a share of these revenues. The Flexible Workforce

Development Fund (FWDF), which is administered by the SFC, is open both to UK Apprenticeship Levy paying employers and SMEs in Scotland. Apprenticeship levy payers can access training up to the value of £15,000. Where specific training needs cannot be provided for via a local college, levy payers have the option to access funding through an independent training provider; the total fund available through this route is £2 million. SMEs can work with either their local college or with the Open University to access training up to the value of £5,000.

17. The SFC explained that the central purpose of the FWDF is to support the skills needs of apprenticeship levy paying employers. They confirmed that for 2020-21, the Scottish Government increased the budget and the fund was opened up to SMEs who do not pay the levy. The SFC explained that the FWDF enables colleges to engage with employers on specific training programmes to meet their specific needs.¹⁴

18. £2 million of the £20 million FWDF budget was allocated to SDS to administer to employers as grant funding that could be used with independent training providers where there were specialised training needs that could not be met via a college. The overall FWDF budget of £20 million was maintained for 2021-22. The £20 million FWDF for 2020-21 and 2021-22 is distributed as follows:

For UK Levy-paying employers

c.£13m to colleges

£2m to SDS

For SME employers

c.£4m to colleges

£1m to Open University

19. The SFC stated that since the FWDF began in 2017-18, over 1300 levy paying companies have accessed the fund, with many employers returning each year to upskill their employees. The number of employers accessing the fund each year is as follows:¹⁵

Year	Number of employers
Year 1: 2017-18	687
Year 2: 2018-19	750
Year 3: 2019-20	737
Year 4: 2020-21	
Levy payers	693
SME (college)	772

Fair allocation of funds?

20. In written evidence, the Scottish Retail Consortium (SRC) referred to restrictions on the FWDF; they do not believe they gain a 'fair' share of their contributions. They noted that retail is Scotland's largest private sector employer, but the sector struggles to attract a reasonable share of public spending through the apprenticeship levy, accessing only 2% of funding in Scotland. The FWDF limit of £15,000 training per employer which can only be accessed at one site limits retailers' ability to take advantage of the fund.¹⁶
21. It is not clear how the levy fits with other, industry specific levies such as the [construction industry training board levy](#) SBF spoke of many of its members 'paying twice', once for the industry training levy and again for the apprenticeship levy.¹⁷
22. UK Hospitality Scotland said that businesses would welcome the opportunity to use the levy for wider training purposes, such as upskilling and continuous professional development.¹⁸
23. Dr Colquhoun of SAAB acknowledged that the fund is structured so that each employer can receive only £15,000 each year, which he described as 'significant for some employers and not so significant for others.'¹⁹ However, he described the current process as 'top down' from the Scottish budget to the various agencies:
- 'It does not recognise the contribution that large employers make to the funding through the levy. Because it is such a hypothecated tax, they naturally would like to see a return on that taxation for apprenticeships. There is no direct link from employers' needs to the provision of apprenticeships from the apprenticeship system.'²⁰

Transparency

24. We sought views from witnesses about the transparency around the allocation of funds raised via the Apprenticeship Levy. Despite the figures available from the SFC and outlined above, some feel that more information should be provided on what return employers get for paying the levy.
25. UK Hospitality Scotland's members believe that there is a need for greater transparency around payments and expenditure, 'this would assist firms in better understanding how the system is working, what's being funded by government and how their contributions are being spent'.²¹ Dr Allan Colquhoun

of SAAB agreed that there is not sufficient transparency in relation to how the funds raised through the levy are divided between different activities.²²

Effectiveness

26. The SBF advocated connecting the levy to apprenticeship delivery through targeted support:

‘the recent success of the Apprenticeship Employer Grant (AEG) demonstrates that employers can be positively influenced to recruit apprentices through the provision of appropriate financial incentives’.²³

27. The SBF called for the creation of a hybrid model which would retain the existing provision for college training, upskilling and retraining, but that is aligned with an element of incentivising apprenticeship recruitment through the FWDF:

‘That fund could perhaps be targeted in areas where there are known skill shortages or areas where there are underrepresented groups. That would be a real step forward.’²⁴

28. UK Hospitality Scotland agreed, saying that its businesses would also welcome the opportunity to use the levy for wider training purposes. They stressed a need for greater dialogue with government to discuss the future development of the levy and how it must evolve to meet the needs of their sector, as businesses operate in a changed landscape.²⁵

Conclusions on Apprenticeship Levy

29. **It is vital that employers invest in skills for the benefit of employees and the Scottish economy. We recognise the value in seeking to fund training and development of the Scottish workforce through the FWDF but note the frustrations voiced by SRC and SBF in evidence. The fund was designed to compensate levy payers, but not every business is able to use it to suit their needs. We also note that non-levy paying SMEs are now benefiting from the fund, albeit in a more limited way than those who pay the levy.**

30. **There should be a clear, stated purpose for the levy and it should be used to fund a strategic approach to addressing skills gaps in Scotland. We note that the [Scottish Government committed to review the FWDF in the 2021-22 Programme for Government](#) and would ask the Scottish Government to provide a timescale for this work. We also ask the Scottish Government to address points of fairness and effectiveness set out in this letter as part of its review.**

31. **We note the points made about transparency around how the FDWF is utilised. We note the details provided by the SFC but believe that more detailed information should be made available. We ask the Scottish**

Government – through its skills agencies – to commit to providing more detailed information on how the FWDF is deployed. It would be helpful if this information could be broken down by sector to enable more detailed scrutiny of the effectiveness of the fund.

Funding

32. We heard from SFC that the Scottish Government intends to require it to use the Further and Higher Education core teaching budgets to fund foundation and graduate apprenticeships from 2021/22.²⁶ Karen Watt confirmed that the SFC is ‘determined’ to maintain the current commitment to funding:

‘At the minute, with the quantum of funding that we have been given, we are trying to rapidly model the opportunity that we have to maintain and sustain the programme, grow it where we can and make sure that we do not lose what is a very valuable programme. We are utterly committed to making it work.’²⁷

33. SFC offered to come back to the Committee when they have worked through the distribution methodologies.²⁸ The Committee welcomes this commitment and looks forward to receiving that information as soon as possible.

34. The Committee notes the change in the funding arrangements for foundation and graduate apprenticeships which will now come from SFC’s core budget. There is a concern that the mainstreaming of this funding could have an impact, particularly on graduate apprenticeships which are already oversubscribed. The Committee will continue to monitor how the funding is allocated and its impact on apprenticeships over the next financial year. We seek a commitment at this stage that foundation and graduate apprenticeships will continue to be supported to grow and that efforts will be made to meet demand.

Young Person’s guarantee

35. The Young Person’s Guarantee (YPG) is a Scottish Government commitment to bring together employers, partners and young people, which aims to connect every 16- to 24-year-old in Scotland to an opportunity. This could be a job, apprenticeship, further or high education, training programme or volunteering.

36. The SFC secured £10 million from the fund in 2020-21 to work with colleges and universities to develop proposals to meet the aims of the fund; they confirmed that around 240 courses were offered as part of the YPG offer in colleges in the second half of academic year 2020/21:

- A total of 2,438 students were recorded as having enrolled in YPG courses.
- 53.6% of enrolments were from the 4 most deprived SIMD deciles with 18.2% from the most deprived decile.²⁹

37. The SFC described the YPG as a 'really valuable' programme and said that they would like to see it sustained and, if possible, increased.³⁰
- 38. The Committee will continue to monitor data and outcomes of the YPG, particularly in relation to targeting funding at young people coming from most-deprived deciles. We ask the SFC to provide updates on the programme's outcomes when they become available.**

Diversity

39. The Committee believes that apprenticeships should be open to all. We note that the SDS Apprenticeship Equality Action Plan, published in 2015, outlined its priorities for improving diversity and equality of opportunity in Scottish Apprenticeships. In its final [report](#) on the plan, SDS set out its performance against targets:
- Increase the employment rate for young disabled people to the population average by 2021. 2021 (target: 12.5%; performance 13%).
 - Reduce to 60% the percentage of MA frameworks where the gender balance is 75:25 or worse (2021 target: 60%; performance: 70.1%)
 - Increase the number of MA starts from Black Minority Ethnic (BME) communities to equal the population share by 2021 (2021 target: 5.1%; performance: 2.7%)
 - Increase positive destinations year-on-year for care leavers by 2021 (2021 target: increase from baseline; performance 1.7%)
40. In relation to BME participation, SDS explained that there are cultural factors and perceptions about apprenticeships; work is being done in schools to promote apprenticeships as a good route for young people.³¹
41. We note that there are some occupational groupings that have historic gender segregation in the workforce, impacting the overall balance, particularly 'construction and related apprenticeships' where 2% of participants are female. The gender breakdown in the remaining occupational groupings (excluding construction & related) is 53.7% female and 46.3% male overall.
42. SDS said that there is still substantial work to do in this area which needs a joined-up approach from the early years.³²
- 43. The Committee notes the work being done by SDS and others to improve diversity in apprenticeships and would encourage further efforts. We note the complexity around attracting more candidates from BME communities to take on apprenticeships and the work being done to**

promote this as an attractive route for young people. We also note the challenges in achieving gender diversity in some sectors. We ask to be kept updated on progress with this work. Widening participation in apprenticeships is a goal that we all want to achieve; the Committee will seek to raise these issues with relevant witnesses and stakeholders in the course of its work throughout this session.

Apprenticeships in SMEs and rural areas

44. Given the prominence of SMEs in the Scottish economy, the Committee was keen to explore how apprenticeships are being promoted to smaller businesses, particularly those based in rural areas.

45. In 2019, SDS published the [Skills Action Plan for Rural Scotland](#) which is a framework for action to develop skills in rural Scotland. As part of this, SDS developed new [Regional Skills Assessments for Rural Scotland](#) to provide an evidence base to inform rural skills planning across a range of different partners.³³

46. SDS spoke of 'huge representation' from small businesses in apprenticeships but said that work is ongoing to make more inroads, particularly in rural areas.³⁴ Reference was also made to a reluctance on the part of some microbusinesses to become an apprenticeship employer; Frank Mitchell of SDS said:

'I have met potential employers in rural communities in the south and the north of Scotland who say they that might be able to use an apprentice for one or two days a week and want to know whether they could share an apprentice with another company.'³⁶

47. SDS spoke about work being done on the shared apprenticeship model which allows apprentices to complete a full programme of training by working with a number of different employers, to gain the skills they require to become qualified.³⁷

48. SDS highlighted that in 2019/20 there were 8,773 modern apprenticeship starts and 240 graduate apprenticeship starts in rural Scotland. This represents 31.5% of all MA starts and 20.7% of all GA starts, compared to a rural population which is 17% in the most recent Scottish Government statistics.³⁸

49. **We note the work being done to promote apprenticeships to SMEs and in rural areas. We ask to be kept informed of progress with the implementation of the Skills Action Plan for Rural Scotland.**

Digital skills

50. The Committee was keen to examine issues around digital skills, given their importance to the current and future labour market. ScotlandIS (representative trade organisation for the digital technologies industry) told us that 80% of jobs in the future will require a level of digital literacy; there is also currently a ‘huge skills gap’ in the industry. They explained that the industry requires better coding skills and a talent pipeline; this must start in schools and work all the way through to industry.³⁹

Teaching computer sciences

51. Witnesses highlighted the challenges facing the teaching of computer science in Scotland’s schools. We heard that the subject has experienced a significant fall in the number of pupils and teachers. There is currently a significant reliance on non-specialists to deliver the subject, which has resulted in a ‘dumbing down’ of the syllabus according to Professor Logan (University of Glasgow), which is neither interesting nor inspirational. One example was the teaching of GDPR – not particularly important until someone reaches professional level, and unlikely to inspire a digital career.⁴⁰
52. Dr Coull (University of Abertay) also suggested that the focus on examination as a form of assessment was not helpful to fostering creativity, and that the focus should be on more interesting project work.⁴¹ Where specialists were available to teach, they were not given sufficient opportunity and support to continually retrain which is essential to keep pace with a fast-moving subject matter. Fundamentally, computer science needs to be treated as a more prestigious subject to recognise its importance.⁴²
53. Professor Logan said that the only way to address these issues is by significantly fixing computer science teacher recruitment in terms of attraction and retention. He also spoke of the need to embark on a nationwide intensive and on-going upskilling campaign for our computing science teachers.⁴³

Infrastructure in schools

54. Professor Logan described a ‘huge divide’ in the equipment that is available in schools across Scotland.⁴⁴ Dr Coull agreed:
- ‘I have walked into a number of computing classrooms and found that the resources that are there are just not fit for purpose; in some, it has taken the kids 20 minutes just to log in. Ultimately, that impacts on their perception of the subject area. It is seen as boring, as something that does not work and as an environment in which they do not feel invigorated and stimulated.’
55. Dr Coull spoke of schools sharing IT support staff across local authorities which means that often issues cannot be resolved on the spot:

'That really puts a lot of teachers off teaching those more exciting aspects of computing, because they are so practical and they depend on the technology being up to date and working effectively. That is just not happening in our schools.'⁴⁵

Gender balance in the digital sector

56. We heard from witnesses about gender imbalance in computing, which was described as 'extreme' by Professor Logan, who said:

'we must do more as a country to denormalise gender ghettoisation in the tech industry—which is the term that I prefer—in the same way as we denormalised drunk driving some time back.'⁴⁶

57. Professor Logan spoke of the need to address gender issues in the industry as a whole.⁴⁷ ScotlandIS told the Committee about its 'critical friends' programme which aims to expose young people to the positive role models in the industry and allowing them to see the types of jobs that are out there for them.⁴⁸

Steering group

58. Professor Logan explained that the Cabinet Secretary for Education and Skills has recently convened a senior steering group to consider these issues and coordinate stakeholders in order to start making progress. He said:

'we have positive and energetic commitment from the leaders of the various agencies and groups to address the issue.'

59. However, the Committee was told that the focus must be maintained, as a multi-year fix is needed. Professor Logan made a plea to the Committee to assist in reminding the various actors that the issue is important and urgent.⁴⁹

Digital skills – conclusions

60. The Committee found the evidence heard on digital skills compelling. Given the need for these skills both now and in the future, action must be taken now to ensure that young people are given the tools they need to thrive in digital careers. This means well qualified and inspiring computer studies teachers, the promotion of computer science as a subject and the provision of the physical infrastructure needed in schools.

61. The Committee welcomes the setting up of the steering group but seeks assurances from the Scottish Government that momentum will be maintained in seeking to address these issues. We ask the Scottish Government to keep the Committee updated on progress in this area.

62. We note that there are structural issues which need to be addressed through interaction between the industry, formal education sector and

skills bodies. Local authorities should also be engaged in seeking to improve the infrastructure to improve computer science teaching facilities in schools, and to keep them up to date.

Annexe B: Evidence received

The Committee took oral evidence from:

Leon Thompson, Executive Director, Scotland, UK Hospitality Scotland;

Paul Mitchell, Head of Employment Affairs, Scottish Building Federation;

Professor Mark Logan, Professor in Practice, School of Computing Science, Glasgow University;

Dr Natalie Coull, Head of Cyber Security, School of Design and Informatics, Abertay University;

Karen Meechan, Chief Executive Officer and Nicola Taylor, Head of Operations and Skills, ScotlandIS;

Frank Mitchell, Chair, Skills Development Scotland (SDS);

Allan Colquhoun, University Liaison and Emerging Technologies Manager, Leonardo representing the Skills Apprenticeship Advisory Board (SAAB)

Scottish Funding Council (SFC).

The Official Reports of the meetings can be found here:

[8 December 2021](#)

[15 December 2021](#)

Written submissions

- [ScotlandIS](#)
- [Scottish Chamber of Commerce Network](#)
- [Scottish Retail Consortium](#)
- [Scottish Building Federation](#)
- [ScotlandIS](#)
- [UK Hospitality - Scotland](#)
- [Scottish Apprenticeship Advisory Board](#)
- [Scottish Funding Council](#)
- [Skills Development Scotland](#)

Supplementary written evidence

- [Scottish Building Federation](#)
- [ScotlandIS](#)
- [UK Hospitality - Scotland](#)
- [Skills Development Scotland Cyber Security Neurodiversity Skills Development Programme Pilot](#)
- [Skills Development Scotland](#)
- [Scottish Funding Council](#)

- ^[1] [SFC, written evidence](#)
- ^[2] [SDS oral evidence, 15 December 2021, col 24](#)
- ^[3] [SDS written evidence](#)
- ^[4] [SDS oral evidence, 15 December 2021 col 4](#)
- ^[5] [SDS oral evidence, 15 December 2021, col 26](#)
- ^[6] [SAAB oral evidence, 15 December 2021, col 4](#)
- ^[7] [SAAB, written evidence](#)
- ^[8] [SBF, oral evidence, 8 December 2021](#)
- ^[9] [UK Hospitality oral evidence, 8 December 2021, col 16](#)
- ^[10] [SBF, supplementary written evidence](#)
- ^[11] [SDS, written evidence](#)
- ^[12] [SAAB, written evidence](#)
- ^[13] [Oral evidence, 15 December 2021, col 6](#)
- ^[14] [SFC, written evidence](#)
- ^[15] [Scottish Retail Consortium, written evidence](#)
- ^[16] [SAAB, oral evidence, 15 December 2021, col 8](#)
- ^[17] [SAAB, oral evidence, 15 December 2021, col 3](#)
- ^[18] [UK Hospitality, supplementary written evidence](#)
- ^[19] [SAAB, oral evidence, 15 December 2021, col 2](#)
- ^[20] [SBF, supplementary written evidence](#)
- ^[21] [SBF, oral evidence, 8 December, col 18](#)
- ^[22] [UK Hospitality, supplementary written evidence](#)
- ^[23] [SFC, written evidence](#)
- ^[24] [SFC, oral evidence, 15 December 2021, col 28](#)
- ^[25] [SFC, oral evidence, 15 December 2021, col 29](#)
- ^[26] [SFC, written evidence](#)
- ^[27] [SFC, oral evidence, 15 December 2021, col 14](#)
- ^[28] [SDS, oral evidence, 15 December, col 16](#)
- ^[29] [SDS oral evidence, 15 December 2021, col 18](#)
- ^[30] [SDS, supplementary written evidence](#)
- ^[31] [SDS, oral evidence, 15 December col 34](#)
- ^[32] [SDS, oral evidence, 15 December 2021, cols 32 and 36](#)
- ^[33] [SDS, oral evidence, 15 December 2021, col 34](#)

^[34] Rural Scotland Key Facts 2021 <https://www.gov.scot/publications/rural-scotland-key-facts-2021/pages/2/>; SDS, supplementary written evidence

^[35] [ScotlandIS oral evidence, 8 December 2021, cols 33, 42](#) and [written evidence](#)

^[36] [Professor Logan oral evidence, 8 December 2021, cols 37 and 38](#)

^[37] [Dr Coull, oral evidence, 8 December 2021, col 47](#)

^[38] [Professor Logan oral evidence, 8 December 2021, col 38](#)

^[39] [Prof Logan oral evidence, 8 December 2021, cols 37- 38](#)

^[40] [Professor Logan oral evidence, 8 December 2021, col 45](#)

^[41] [Dr Coull oral evidence, 8 December 2021, col 47](#)

^[42] [Professor Logan oral evidence, 8 December 2021, cols 36-37](#)

^[43] [Professor Logan oral evidence, 8 December 2021, col 37](#)

^[44] [ScotlandIS oral evidence, 8 December 2021, col 35](#)