

Community Woodlands Association Community Empowerment (Scotland) Bill consultation response

The Community Woodlands Association (CWA) is very pleased to have the opportunity to respond to the consultation on the Community Empowerment (Scotland) Bill.

CWA was established in 2003 as the direct representative body of Scotland's community woodland groups. We help community woodland groups across the country achieve their aspirations and potential, providing advice, assistance and information, facilitating networking and training, and representing and promoting community woodlands to the wider world.

The first community land buyout in Scotland was at Wooplaw Community Woodland in the Borders (1987), and there are now well over 200 community woodland groups across Scotland, responsible for the management of tens of thousands of hectares of woodland and open space. More than half of our members own their woods, the remainder lease or work in partnership with public and private sector landowners.

We regard this Bill as an important opportunity to significantly advance the cause of sustainable, economically active and resilient communities, and we are pleased by the continuing recognition given to community asset ownership and enterprise as key drivers for community empowerment.

In general we endorse many of the proposals in the consultation document and draft provisions, however we believe that in a few key areas they do not go far enough, and additional provisions are required to ensure that the Bill once enacted makes a significant contribution to community empowerment and the achievement of sustainable development.

Key points and proposals in our response

Asset Transfer

- Amend wording of community body definition
- Clarify status of assets managed by Forestry Commission Scotland
- Add provision requirement acknowledgement of receipt of asset transfer requests
- Ensure appeals have external, independent evaluation
- Add provision for Ministers to issue guidance on valuation principles

Community Right to Buy

- Extend to all of Scotland
- Add provision for community request to purchase
- New arrangements for facilitated negotiation between landowners and community bodies
- Add provision for community right to purchase where negotiation is unsuccessful
- Add provision to create a Land Agency
- Greater flexibility for "late" registrations
- Wider definition of community body geographic definition and corporate form
- Ballot to focus on "yes" votes

Part I Asset transfer

Q1 Do you agree with the definition of community body at section 1? Do you have any changes to suggest?

We support the adoption of a criteria-based approach and the intent to provide some flexibility (cf. the exiting Land Reform Act provisions) but believe the wording needs amendment.

We assume that 1(1)(b) is intended to be the standard route for the majority of community bodies whilst 1(1)(a) is for the exceptional cases – such as well-established community bodies with non-standard constitutions.

However, the current wording (“company” and “articles of association”) unduly restricts the scope of 1(1)(b) to companies limited by Guarantee and Companies limited by Shares, excluding Scottish Charitable Incorporated Organisations, Industrial and Provident Societies¹, etc., which could otherwise meet the qualifying criteria detailed in clause 5.

We suggest replacing “company” with “corporate body” in clauses 1(1)(b), 1(5), 1(5)(a), 1(5)(b), 1(5)(c), 1(5)(d), 1(5)(e), 1(5)(f) & 1(6); and replacing “articles of association” with “governing document” in clauses 5 & 6.

Q2 Do you agree with the list of public bodies to be covered in this Part at Schedule 1 (Annex C page 21)? What other bodies should be added, or removed?

Yes, but it would be helpful to clarify whether Forestry Commission Scotland is covered by “Scottish Ministers”.

In particular we note that the most recent version of FCS’s accounts² includes the statement below which implies that some FCS assets are owned by the Forestry Commissioners: a cross-border body which may be outwith the scope of the Bill.

1.5 Property, plant and equipment

Legal ownership of all land is vested in the Scottish Government with legal ownership of the timber, including uncut trees, vested in the Forestry Commissioners. Legal ownership of other property, plant and equipment is vested in the Forestry Commissioners.

Q3 What do you think would be reasonable timescales for dealing with requests, making an offer and concluding a contract, in relation to sections 5(6), 6(2)(c) and 6(6)?

There should be provision requiring Public bodies to acknowledge receipt of a request for asset transfer within a specified time (we suggest 5 working days).

¹ SCIOs and IPSs are not companies, and do not have articles of association; their governing documents are “constitutions” and “rules” respectively.

² [http://www.forestry.gov.uk/pdf/ScotlandAccounts2012-13.pdf/\\$FILE/ScotlandAccounts2012-13.pdf](http://www.forestry.gov.uk/pdf/ScotlandAccounts2012-13.pdf/$FILE/ScotlandAccounts2012-13.pdf) (p67)

The date of this acknowledgement should be the point at which the clock starts running on the subsequent timescales.

In 5(6) the Public Authority should give notice of its decision to agree or refuse the request within three months from the date of the acknowledgement of receipt.

The proposed six month time periods for 6(2)(c) and 6(6) are appropriate.

We note that in all cases there is provision for an extension of this timescale as agreed by the authority and the community body.

Q4 Do you agree that community bodies should have a right of appeal to Ministers as set out in section 8? Are there other appeal or review procedures that you feel would be more appropriate?

We agree that community bodies should have a right of appeal. It is appropriate that the process to be followed in connection with appeals be prescribed in regulations rather than in the primary legislation; we believe this process should include external, independent evaluation.

Q5 What form of appeal or review processes would be appropriate in relation to decisions made by local authorities and by Scottish Ministers?

We believe that an appeal or review process for local authorities should be established, again incorporating external, independent evaluation. The Bill could include a provision requiring local authorities to establish an appeal process to be chaired by an independent person of suitable local standing and experience.

Likewise, and appeal or review process including independent evaluation of decisions made by Scottish Ministers (or more specifically, FCS staff charged with managing assets owned Scottish Ministers) should be established.

We note that currently all applications to the National Forest Land Scheme are assessed by an independent Evaluation Panel: there may be good practical reasons why such an arrangement is not possible for all asset transfers, however it demonstrates that the principle of independent evaluation of such processes has already been embraced by the Scottish Government

Q6 Do you have any other comments about the wording of the draft provisions?

The draft provisions gloss over issues of valuation. Our experience suggests that this is likely to be the primary obstacle to asset transfer under the model proposed, at least as far as land and woodland assets are concerned, where there is a wide and growing gap between the economic value of assets and the open market price, which is greatly inflated by the

fiscal advantages of land-holding, which do not in general accrue to communities, and by speculative investment³.

Simply put, the price being demanded for forest land under the National Forest Land Scheme, bears no relation to its productive value: indeed this is evident in the financial performance of Forestry Enterprise Scotland, who despite custody of a billion-pound estate, make a small loss as a forestry business, and require >£32 Million in Scottish Government grant (at 100% intervention rate) to deliver additional public benefits.

As we understand it, the draft provisions require that a community body making an asset transfer request for ownership must specify the price that the body would be prepared to pay for the transfer of ownership of the land, and then the public authority must, in making its decision, take into account a range of potential benefits arising from agreeing to the request, or from alternative proposals.

However clause 5(3)(h) of the draft provisions states that the public authority must also take into consideration “any obligations imposed on the authority, by or under any enactment or otherwise, that may prevent, restrict or otherwise affect its ability to agree to the request”.

It appears that this will allow public authorities such as FCS to reject asset transfers request purely on the grounds that price the community body has offered to pay, which we assume will be grounded in realistic business planning, does not satisfy the obligations placed on the public authority by the Public Sector Financial Manual.

There should be additional provision for Ministers to have the power to issue guidance to relevant authorities on what would constitute acceptable valuation principles when valuations are for purposes associated with the provisions of public asset transfers in this Bill. Without this we believe the intention of Ministers in empowering communities and in utilising land or building for public good and where they may be currently underused is unlikely to be realised.

Q7 What costs and savings do you think would come about as a result of these draft provisions? Please be as specific as you can.

We do not see the primary purpose of these provisions as being to make direct savings, but to support community empowerment and the delivery of sustainable development.

³ The District Valuer’s report on a potential community purchase on Raasay through the NFLS is instructive. The site at Brochel comprises 93.90 ha which has been almost completely clearfelled, and valued at £110,000. *The land at Brochel has a limited value in forestry terms. It will be many years before any income is realised from the planting and natural regeneration. There is however a degree of hope value in respect of this land. There is at least one ruined building and an area down by the foreshore which could lend itself to the erection of a small bothy or log cabin for holiday use, subject to ascertaining the necessary planning consents. Similar types of properties have sold well on the market in recent years. The remote island location and outlook lend itself to this type of buyer. Even in cases where the planners give negative feedback as to the potential for development, purchasers will often still take the risk as a medium to longer term project. After careful analysis, I expect that most purchasers would be deterred by the many factors outlined above. Despite this, if the purchase price was right some would take the risk and purchase the subjects in the hope of getting a return on their capital, or more likely, for the prospect of owning and enjoying a small estate property on a popular and attractive West Coast island*

In the short term there may be some additional administrative costs to public authorities, and there will in some cases be costs associated with the transfer of assets, but these will in the longer term be outweighed by the benefits arising from the more productive use of assets being transferred.

Part 2 Community right to participate

Q8 Do you agree with the definition of community body at section 11? Do you have any changes to suggest?

We welcome the intent to be inclusive and flexible in the definition of community bodies, however, it is important to seek to ensure that any community body is able to demonstrate its credentials to act on behalf of the whole community, or a specific interest within that community.

Q9 Do you agree with the list of public bodies to be covered in this Part at Schedule 2 (Annex C page 21)? What other bodies should be added, or removed?

We are not clear why this list does not replicate that in Schedule 1, and in particular why Scottish Ministers (including Forestry Commission Scotland) have been excluded from the list.

Q10 Do you agree with the description at section 13 of what a participation request by a community body to a public service authority should cover? Is there anything you would add or remove?

Q11 Do you agree with the criteria at section 15 that a public service authority should use when deciding whether to agree or refuse a participation request? Are there any other criteria that should be considered?

Q12 Do you have any other comments about the wording of the draft provisions?

Q13 What costs and savings do you think would come about as a result of these draft provisions? Please be as specific as you can.

No comment

Chapter 4.1: Community Right to Buy

Q17 The Scottish Government proposes to extend right to buy to communities in all parts of Scotland, where the Scottish Government is satisfied that it is in the public interest. Do you agree with this proposal, and are there any additional measures that would help our proposals for a streamlined community right to buy to apply across Scotland?

We support the proposal to extend the right to buy to all parts of Scotland.

However, we believe that a number of other additional measures are required to ensure that the Act contributes meaningfully to the achievement of community empowerment and sustainable development. These should include:

Provision to allow a community body to register a request to purchase land.

That new provision to trigger new arrangements for facilitated discussion, mediation, or negotiation, as appropriate, between an owner subject to the request to purchase, and the community body.

Provision for a further extended community right to buy in circumstances where a request to purchase has been registered and the triggered discussion, mediation or negotiation has failed to bring the matter to an agreed conclusion.

Provision to create a land agency for the purpose of facilitating the above provision for discussions, mediation and negotiation, and related purposes.

Q18 Do you think that Ministers should have the power to extend “registrable” land” to cover land that is currently not included as “registrable land”? What other land should also be considered as being “registrable”?

Yes

Q19 Do you think that there should be a compulsory power for communities to buy neglected or abandoned land in certain circumstances? What should these circumstances be?

Q20 How do you think this should work in practice? How do you think that the terms “neglected” and “abandoned” should be defined?

We believe the restriction of compulsory powers to “neglected” and “abandoned” land is wrong in principle, and does not align with established procedures for compulsory purchase, or with the crofting community right to buy, both of which are predicated on the proposed future development being in the public interest.

Moreover, whilst it might conceivably be workable in the context of single buildings, we do not believe it would be possible to frame a workable definition in the context of rural land.

The problem for much of rural Scotland is that the land is chronically underused: silent forestry plantations with no intervention planned until a clearfell harvest decades hence and empty hills awaiting the absentee landowner's annual visit to shoot a couple of stags. The contention here is not that the land is "abandoned" or "neglected", but that its current (and likely future) use contributes little or nothing to their sustainable development, whereas community ownership will deliver greatly enhanced (and more widely shared) public benefits and will contribute positively to sustainable development.

CWA believes that there should be compulsory powers for communities to buy land where this is demonstrably in the public interest.

Community Land Scotland has produced an admirable and detailed paper "The 'absolute' right to buy for communities, the nature of compulsory measures over land, and the question of the public interest" covering the extension of the community right to buy to circumstances where there is not a willing seller. We understand that this paper will form part of CLS's submission and we commend it to you.

It should be stressed that we anticipate that such compulsory powers would not be used lightly, and would be in effect a measure of last resort to be employed only after mediation and negotiation had failed to deliver a satisfactory outcome

We also envisage that in the majority of cases such powers would not be used to force the sale of entire land holdings, but to facilitate the transfer of relatively small parcels of land to deliver specific community projects. Whilst the powers could be used to force the transfer of an estate of tens of thousands of acres, in practice they are more likely to be used to deliver an acre or two, to for example, build affordable housing, create allotments or extend the village cemetery.

Q21 Do you think that the criteria to be met by a community body in section 38(1) of the Act are appropriate? Do you think that there should be additional criteria? Please set out what changes or additions should be made to the criteria.

We think the criteria are adequate.

Q22 Do you think that the information that is included in the Register of Community Interests in Land is appropriate? If not, what should that information include?

We think the information that is included is appropriate.

Q23 How could the application form to register a community interest in land be altered to make it easier to complete (eg, should there be a word limit on the answers to particular questions)? Should the questions be more specifically directed to the requirements of sections 36(2) and 38(1) of the Act? Do you have any other suggestions?

Various improvements are possible, including the points noted above and to reflect other amendments in the legislation.

Any changes to the form should be extensively tested by those with experience of completing CR2B applications.

Q24 Do you agree that communities should be able to apply to register an interest in land in cases where land unexpectedly comes on the market and they have not considered using the community right to buy? If so, what changes should be made to section 39 to ensure that such communities can apply to register a community interest in land?

Yes, communities should be able to register a “late” interest in land when it comes on the market.

The CEB consultation document states that:

78. The underlying policy of the community right to buy is that community bodies should prepare themselves for the community ownership of land. Communities should therefore be proactive in identifying land and land assets that can contribute to their sustainable development.

This is admirably idealistic, but underestimates the burden placed on voluntary organisations by the process of registering interests in land, and maintaining them, especially where there is no realistic prospect of an opportunity to activate them and actually acquire the asset in question.

Many community bodies are busy, multi-faceted organisations, and their focus will inevitably be on active projects, or with immediate prospects of delivery. For such community anchors there may be a considerable number of land and land assets which could contribute to their community’s sustainable development, and it is unrealistic to expect them to establish and service individual registrations on scores of assets.

Indeed, the Act actually inhibits proactive registration in certain circumstances, which are likely to become more common if the scope of the Act is extended into urban areas.

In some cases the asset that a community body has identified is one of a kind: an entire estate, a lighthouse, a disused MOD camp etc., and in such cases that the registration process appears to be designed for.

However where a community body has identified a need for retail or business premises, or a brownfield site for affordable housing, or community allotments, there may be very many potential assets⁴. Registration of all such potential sites however requires an intention to acquire them all if they were to all come on the market: registering all of them with the intention to purchase the first suitable one that becomes available – which would be sensible, although extremely onerous – is explicitly forbidden at present. The official guidance notes⁵ state:

⁴ an analogous situation arise where a community seeks to buy a small parcel of land for a discrete project from a single large land holding – there may be several suitable parcels but they can only register one.

⁵ <http://www.scotland.gov.uk/Publications/2009/06/08101427/3>

30. *You should not use multiple registrations as a "blanket" registration. Should your CB consider submitting multiple registrations, you should demonstrate serious intent to purchase any land subject to its registration. Your CB should make applications only in respect of land which, given the opportunity, you would want to buy. Any attempt to register a larger piece of land when a smaller piece is required will, in terms of section 67(2) of the Act, result in your CB having to buy either all or none of the registered land if the whole lot is put up for sale. This may result in your CB missing out on the piece of land you need, or having to buy too much land at additional expense. You should focus on land that you need and, when given the opportunity, you would want to buy.*

It would be possible to remove the prohibition on such “blanket” registrations, however this would still place a very significant burden on community bodies to establish and maintain multiple registrations.

A more promising route would be to permit late registrations where the community body has, through a recognised community development or business planning process, identified that the acquisition of a particular type of asset (or assets) would contribute to their community’s sustainable development⁶.

This would have the merit of encouraging proactive thinking within community bodies about future development prospects, without the accompanying burden of multiple registrations.

We do not agree that late registrations should require the demonstration of a significantly greater level of public support than timeous registrations

Q25 *Do you agree that the process to re-register a community interest should be a re-confirmation of a community interest in land?*

Q26 *Do you think that the community body should be asked to show that its application is (1) still relevant, (2) has the support of its “community”, and that (3) granting it is in the public interest?*

We consider the existing provisions for re-registration are too onerous.

Either the term of registration should be extended (e.g. to 10 years), or the re-registration process be considerably simplified, based around the community body being required to reconfirm its interest, and the absence of substantial, independently generated objections.

Q27 *What do you think should be the length of the statutory period for completing the right to buy, taking into account both the interests of the landowner and the community body? Please explain the reasons for your proposal.*

Q28 *Do you think that some of the tasks within the right to buy (such as valuation, ballot etc) should be rearranged and the timescales for their completion changed in order to make the best use of the time available within the right to buy? Please set out what changes you think should be made and why.*

⁶ We would envisage that the identification of potential assets would be based on a broad specification of the type/size/location(s) of the asset being sought, which was demonstrably appropriate for the desired purpose(s), rather than an exhaustive listing of all possible candidates.

We consider that the current timescales are too tight, and provide additional burdens (and stress) on community bodies

Currently, the community body has 6 months from the date on which it confirms to Ministers that it wishes to proceed with the right to buy (or 2 months from determination of appeal, if appeal is longer than 4 months, or later if agreed by both parties) to conclude missives.

We suggest that this 6 month period be timed from the receipt of the valuation

Currently, the community body must apply to Scottish Ministers for approval to exercise the right to buy within 28 days beginning with the date when the valuer notified the community body of the assessed value of the land and any moveable property.

We suggest that this period be extended to at least 2 months.

Q29 Do you agree that Scottish Ministers should organise the undertaking of a community body's ballot and pay its costs? If you disagree, please provide your reasons.

Yes

Q30 Should Scottish Ministers notify the ballot result to the landowner? Please explain your reasons.

Yes, in the interests of courtesy and fairness.

Q31 Do you think Ministers should develop a pro-forma for community bodies to set out their plans for the sustainable development of land and community? Please give reasons for your view.

Yes. Any such pro-forma should be extensively tested by those with experience of the Community Right to Buy application process.

Q32 Do you agree that community bodies should be able to define their "community" in a more flexible way by the use of either postcodes, settlement areas, localities of settlements, and electoral wards, or a mixture of these, as appropriate?

Q33 Are there any other ways that a "community" could be defined?

Yes. As a matter of principle, self-definition is a key component of empowerment, and it should be for community bodies to select the most appropriate method of geographic definition, subject to the requirement that any method must be unambiguous and mapable.

The existing discretion to Ministers to allow other means of definition should remain in addition to any specific additions to the list.

Q34 Do you agree that other legal entities in addition to the company limited by

guarantee should be able to apply to use the community right to buy provisions?

Q35 Do you agree that SCIOs should be able to apply under the provisions?

Q36 What other legal entities should be able to apply under the community right to buy provisions – and why?

We agree that other legal entities should be able to apply to use the community right to buy provisions. SCIOs are the most obvious addition, but other corporate forms, including Industrial and Provident Societies/Community Benefit Societies and Companies limited by Shares may also in some circumstances meet the criteria.

We believe the Community Right to Buy provisions should mirror the **amended** provisions for asset transfers (see Q1 above), namely that eligibility is open to corporate bodies that meet a schedule of criteria: controlled by an open membership from a geographically defined community, surpluses applied for community benefit, objectives consistent with sustainable development, appropriate winding up clauses.

Additionally Ministers should have discretionary powers to designate any other body as an eligible community body.

Q37 Do you agree that Ministers should only have to “approve” the changes to Articles of Association for community bodies that are actively seeking to use or are using the community right to buy?

Yes

Q38 Do you think that the length of a registered interest in land should remain as 5 years or be changed? If it should be changed, how long should it be – and what are your reasons for making that change?

Unless the re-registration process can be considerably simplified, the term of a registered interest should be extended to at least 10 years.

Q39 Do you agree that the valuation procedure should include counter representations by the landowner and community body? If you disagree, please give your reasons for your decision.

Yes

Q40 Do you think that there should be a provision to deter landowners from taking the land off the market after they have triggered the right to buy? Please explain your reasons.

Yes. The current legislation is unsatisfactory in this regard and this practice can create considerable work for community bodies in attempting to activate their right to buy, which is then extinguished.

The most effective way to deter this practice would be through an extended right to buy which did not require a willing seller

Q41 Do you think that there should there be greater flexibility in a community Body's level of support for a right to buy in the ballot result than is currently permitted?

Q42 Do you think that the ballot result should focus on a sufficient amount of support to justify the community support to proceed with the right to buy the land? If yes, please explain how secured community support should be measured.

We agree that demonstrating broad community support through a successful ballot is a necessary step in the process, however, greater flexibility or perhaps a much stronger promotion of the existing discretionary powers would be welcome.

The 50% turnout requirement (although we note Ministers' discretion on this point) is not aligned with any other electoral process, and taken at face value, creates the anomalous situation where it is perceived that a "No" vote is either meaningless or actually works in favour of an application⁷.

We believe the ballot result should focus on the positive support for the community to proceed. Currently a minimum of 25% of those balloted must vote yes, we would suggest that this remains the case, with an additional requirement that the majority in favour must be >10% of those balloted.

Q43 Do you agree that community bodies should be able to submit evidence to Ministers in support of their ballot result where they believe that their ballot has been affected by circumstances outwith their control?

Yes

Q44 Do you think that Scottish Ministers should be able to ask community bodies for additional information relating to their right to buy "application" which Ministers would then take into account in considering their right to buy "application"? Please explain your reasons.

Yes, it seems eminently sensible to allow officials to seek additional information to clarify matters relating to the application process.

Q45 Do you think that Ministers should be able to accept an application to register a community interest in land which is subject to an option agreement (on part or all of the land)?

Yes

Q46 If there is an option agreement in place, do you think that the landowner should be able to transfer the land as an exempt transfer while there is a registered interest over that land? Please explain your answer.

⁷ Because if 40% votes yes then >10% voting no will give an automatic positive result, whereas if <10% vote no the body will be dependent on ministerial discretion

No.

Allowing this would provide a mechanism to frustrate the purposes of the Act

Q47 Do you think that the prohibition on the landowner from taking steps to market or transfer the land to another party should apply from the day after the day on which Ministers issue the prohibition letter rather than the day when the owner/heritable creditor receives the notice? Please explain your answer.

Yes, for the reasons detailed in paras 122 and 123 in the consultation document.

Q48 Do you agree that public holidays should be excluded from the statutory timescales to register a community interest in land and the right to buy?

Yes

Q49 Do you agree that where a landowner makes an “exempt” transfer, this should be notified to Scottish Ministers? If you disagree, please provide reasons for your decision.

Yes, “exempt” transfers should be notified to Scottish Ministers. There should be additional regulations covering the public advertisement of such transfers.

Q50 Do you agree that community bodies and landowners should notify Scottish Ministers of any changes to their contact details (including any registered office)?

Community bodies are already required to inform their statutory regulators (Companies House for Companies limited by Guarantee, OSCR for SCIOs and charitable companies, etc) of changes to their Boards of Directors / Trustees or to their registered office, the address of which is freely available online, so it’s not clear what benefit would be gained by imposing additional requirements.

Where landowners are corporate bodies then they will be subject to the same requirements, however where landowners are natural persons there could be merit in them being required to notify Scottish Government of any changes to contact details.

Q51 Do you think that Ministers should monitor the impact of the community right to buy? How do you think that monitoring should be undertaken and what information should Ministers seek? Should the monitoring process be a statutory requirement, including provisions for reporting?

We are unclear as to the intention of this question, and are concerned that it might imply that there is a perceived need to continually re-justify the existence of the community right to buy provisions.

In almost all cases community bodies which are successful in acquiring land through the community right to buy (or any other processes from that matter) will be subject to rigorous monitoring processes related to acquisition and/or development project funding

from the Big Lottery or public bodies, and it is unclear what additionality a statutory monitoring process would provide (other than an additional reporting burden on community bodies).

If, however, such monitoring is seen as an absolute necessity, then we would consider that the first step in the process would be the establishment of a baseline, and we would propose that the initial monitoring effort be focussed on quantifying the impact and contribution to sustainable development of land and assets without a successful right to buy, and in particular those where the registrations under the community right to buy have not been successful or activated.

Chapter 4.3: Allotments

We support the proposals outlined for the provision of allotments by local authorities. Underused and unused land is one way of meeting the demand for growing spaces but sites must be suitable and free from contamination to be viable. This means prioritising and setting aside uncontaminated sites for use as allotments or community growing spaces.

The use of land for therapeutic projects should also be supported by local authorities, both as a way of making better use of assets and also as a part of a support for wellbeing and early intervention strategy in partnership with NHS and other agencies.

Chapter 5.1 Scotland Performs

We support the proposal to embed Scotland Performs and the National Performance Framework in legislation.