EuroPris

Prevention Measures in European Prisons against COVID-19

Updated on: 2 June 2020

Scottish Prison Service

Organisational principles and practice

The external environment for penal accountability in Scotland has intensified considerably over the last 3 months, with SPS being subjected to increased review and scrutiny from various quarters. SPS has understood the concerns expressed and has sought to provide the assurances that positive action to combat COVID-19 in Scottish prisons has been taken as quickly as possible in accordance Government health guidance.

In a rapidly evolving environment, the Service has driven forward and adapted its evidence grounded response based on a time-specific and 'best current view' of salient facts and their implications for those in custody, SPS and NHS staff, partner agencies in the community and the general public.

A National Coronavirus Response Group (NCRG) was established at the outset of the pandemic to support staff and prisons. Each prison also has a Local Coronavirus Response Group (LCRG) in place to work alongside the NCRG. The NCRG acts as a central control point for the mainstream activities of the SPS. Its work is divided into seven work-streams, each headed by an experienced senior manager / subject matter expert. These themes are:

- Prison Policy
- Partnership
- Resources
- Clinical
- Digital and Operational Resilience
- Human Resources and Staffing
- Communications

SPS has in place a robust Pandemic Plan which is continually updated to reflect the latest Public Health advice. This document provides clear guidance to underpin all operational decision making and practice. SPS' response to the COVID-19 outbreak has been informed by 3 key considerations: public health, operational stability and staffing capacity. Other acknowledged considerations are transparency and accountability in SPS COVID-19 responses. SPS has been cross checking all its actions and activities against human rights protocols.

It is acknowledged that prison can be a challenging environment in which to live or work at the best of times. COVID-19 has dramatically accentuated these challenges. The effective

relationships that have been maintained between SPS staff and people in our care throughout the pandemic have ensured a mutual conformity to public health and government advice, the result of which is the continued reduction of the number of people presenting with the symptoms of COVID-19 in recent weeks.

International standards

The SPS Pandemic Plan acknowledges, incorporates and implements World Health Organisation (WHO) guidance. SPS recognises the WHO principles need to be respected in the response to COVID-19 in prisons and that these are grounded in human rights law as well as the international standards and norms in criminal justice.

The following principles are incorporated into SPS practice:

- The provision of health care for people in prisons and other places of detention is a State responsibility.
- People in prisons and other places of detention should enjoy the same standards of health care that are available in the outside community, without discrimination on the grounds of their legal status.
- Adequate measures should be in place to ensure a gender-responsive approach in addressing the COVID-19 emergency in prisons and other places of detention.
- Prisons and other detention authorities need to ensure that the human rights of those in their custody are respected, that people are not cut off from the outside world and that they have access to information and adequate healthcare

Key initial actions

SPS' number one priority is to ensure the safety of everyone who lives or works in Scottish prisons. The Service is working with Scottish Government, Health Protection Scotland and a number of other partner agencies to ensure all responses and actions are fully informed by the very latest public health advice and guidance.

Social distancing, alongside effective and regular handwashing have been key in reducing the spread of COVID-19. Posters and information re-enforcing the importance of taking these measures are displayed throughout our prisons.

At the outset, SPS introduced a number of measures to further reduce the spread of COVID-19, these included suspending:

- all prison visits;
- all education classes;
- all non-essential prison work;
- communal dining; and
- all internal progression and all non-essential prison transfers.

SPS has also:

• restricted the number of people who can attend exercise, or recreation, at any one time;

- closed prison gyms; and
- increased the frequency of hygiene procedures.

The challenges presented by COVID-19 are ever changing and SPS is adapting to meet these in a flexible manner. SPS' approach is always aligned with the latest public health advice.

Information

NHS posters and information leaflets on COVID-19 have been widely displayed throughout establishments as well as information disseminated through in-cell television. Protocols have been put in place for partner agencies to share information and maintain contact with their various client groups. For those shortly to be liberated, release packs have been developed outlining revised processes and contact numbers for community services.

Staff have been provided with information on how to identify those who may be struggling whilst in isolation. Self-help support leaflets, designed by SPS Psychologists, have been issued to everyone in custody and these provide information and tools which can be used to maintain a sense of wellbeing.

Family contact

A central tenet of SPS' operating philosophy is maintaining appropriate family contact to assist the individual serve a sentence in a constructive manner and to support and strengthen the rehabilitative process. By necessity, personal family visits have had to be suspended, but steps are currently underway to scale up by significant margins access to mobile telephone and tablet based communication.

As well as maintaining all prisoners' wages, everyone in custody is being provided with a free weekly additional allowance on their landline phone cards ($\pounds 2.50$), together with a waiving of the weekly television rental fee ($\pounds 1$). The 'email a prisoner' scheme is being widely promoted.

Those in the community are increasingly resorting to communication technology to maintain links with family and friends; it is the intention of the Service to avail those in custody of similar opportunities. After resolving procurement, legal and technological issues, SPS will be in a position to issue mobile phones to all those in custody in June. Those in custody will be issued with a Nokia 105 mobile phone and a SIM card.

The phones will only be able to make outgoing calls and will not be able to send or receive text messages. Individuals will only be able to access numbers from their Prisoner Allocated Numbers (PAN) list (maximum 20), along with a contact for the Samaritans. For the period of restrictions on family visits, all those in custody will have access to unlimited outwards calls at no charge. The arrangement will be reviewed as regime restrictions change. Calls to legal representatives, service providers and international calls can made on the existing PIN Phone System which will continue to be used as normal.

SPS is exploring options to provide virtual video visits and is working in partnership with Unilink to secure the additional equipment needed to facilitate such visits. It is anticipated that the Virtual Visits service will be available at HMP & YOIs Cornton Vale and Polmont initially. A timetable for further roll out of this service across all other Scottish prisons, on a

site by site basis, has been developed and SPS is working to deliver this with the ability to increase provision quickly should the demand for this service be high. Details of the booking process are in development.

SPS is mindful of additional support people in custody may require as contact with their families begins to increase. As the public health guidance moves on, consideration will be given as to how physical distancing will be built into face to face visits. SPS has already engaged with Her Majesty's Prison and Probation Service in order to discuss the practicalities of reinstating face to face visits, when suitable, and in line with social distancing. SPS is also monitoring initiatives to reinstate family visits across various European jurisdictions through its association with EuroPris.

Work

In terms of prison wages, only those who undertake essential services to keep the prison running e.g. laundry, catering and cleaning are continuing to attend work. Those who are employed in these essential services receive an additional £10 weekly bonus on top of their current wage.

Whilst all other employment opportunities have been suspended; people in custody have not lost money as a result of being unable to attend work. Those who are unable to work continue to be paid their full wage. Those who were not previously working continue to receive a 'cell wage' in line with the Prisoner Earnings and Wages Policy, in addition to an extra £2 per week.

Mental wellbeing

The national lockdown has impacted on everyone's daily movements, freedoms and lifestyles. Ordinary citizens living at liberty in the community are quickly beginning to understand the nature of imposed confinement and its ramifications for functioning, time management and physical and mental health.

SPS is acutely aware that social isolation in a prison environment can have a detrimental effect on mental wellbeing and functioning among those in custody. This is especially true of those who present with known pre-existing conditions. Mental wellbeing advice leaflets and audio files have been developed by SPS Psychology to provide self-help for those in custody who are in isolation. Prison Chaplains continue to provide pastoral, spiritual and faith-specific care within establishments. Arrangements have also been put in place to enable the observation of religious ceremonies and festivals. Guidance for staff on coping mechanisms is also available, to protect themselves and to assist in identifying signs and indicators of problematic behaviour caused by isolation and distancing among those in custody.

SPS and NHS Health Boards have provided additional in-cell recreational activities and additional in-cell education activities have been delivered by Fife College. Relaxation and mindfulness exercises are also available on in-cell televisions and radio. Access to books and newspapers have not been stopped, but the arrangements by which people in custody can receive these items have changed. At the current time, families and friends are not able to hand in such items to prisons; however, they are able to arrange for them to be posted into prisons. Prisons are also encouraging greater outdoor exercise activities, while maintaining social distancing, in line with public health advice.

Outside exercise

All prison activity is now being delivered in a more controlled manner, with smaller groups and reduced numbers of participants. This approach allows staff to regulate levels of interpersonal contact in line with public health guidance.

People in custody continue to be offered outside exercise as entitled to under Rule 87 of the Prisons and Young Offenders Institutions (Scotland) Rules 2011. However, outside exercise is currently being delivered in significantly smaller groups than was permitted prior to the COVID-19 pandemic.

In line with both government and public health advice, during outside exercise, individuals must maintain a 2-metre distance and groups of more than two people are not be permitted to gather. It is at the Governor's discretion to provide guidance to staff on exactly how many people can participate in outside exercise at any one time and this decision is informed by these guiding principles.

Personal hygiene

SPS recognises the importance of personal hygiene and everyone in our care has access to running hot water, soap and towels in their cells. Those accommodated in recently built prisons and accommodation blocks also have access to in-cell showers. Across 13 Scotland's public prisons 34% of cells have in built showers.

COVID-19 has required all Scottish prisons to transition to a single shift core day. Whilst introduction of a core day has permitted more flexible deployment of diminishing staff availability, it has reduced the length of the prison day and restricted the time available to facilitate routine prison tasks.

All prison activity is now being delivered with enhanced controls and additional hygiene measures in place. In order to reduce the risk of spread of COVID-19, all communal areas including showers are cleaned thoroughly after use. Inevitably this reduces the time available for individuals to have access to communal showers.

It is SPS' intention at this time to continue, where possible, to provide people with the opportunity to shower or bathe on a daily basis, or at least every other day where adequate arrangements cannot be made to allow daily access. SPS would only consider using the flexibility to move to restricting access to bathe or shower twice weekly where it is became operationally necessary as result of the impact of COVID-19 on staffing levels.

Access to legal representation and medical care

Full access to legal agents and medical doctors and appropriate health care continues to be available.

Persons displaying COVID-19 symptoms are provided with a fluid repellent mask which they must wear anytime out of cell and staff must also wear recommended PPE

Complaints

The complaints process is also operating as normal within establishments. Changes to the prison rules, however, allow greater flexibility in regard to the administrative requirements and timescales that SPS are required to adhere to when dealing with complaints during normal circumstances.

Cellular confinement: quarantine, isolation and shielding

Confirmed cases and those showing symptoms of COVID-19 are managed under Rule 41 of the Prisons and Young Offenders Institutions (Scotland) Rules 2011, while those who have been in contact with a confirmed or symptomatic case are managed under Rule 40a; both require isolation. Both Rule 40(a) and Rule 41 can only be applied following advice from an NHS healthcare professional. All those held in isolation have a care plan in place detailing the activities that can be accessed during this time.

Separate cutlery, crockery, towels and bedding are provided together with cleaning products for cleaning the cell, sink and toilet area. Meals are provided in cell. Where the individual is being given access to the phone, to the shower or to outdoor exercise, they are provided with a fluid repellent mask which they must wear while out of cell. The staff must be in full PPE (fluid repellent mask, gloves, sleeveless apron and goggles). The phone or shower must be cleaned before and after use and strict social distancing must be observed if exercising outside.

Anyone who is in isolation will continue to have access to health and care and prescribed medication. All cells have hot water so those in isolation are still able to wash on a daily basis.

Mental health self-help leaflets available are issued to those who are isolating. Where staff identify that someone may be struggling with their mental health, they advise NHS Prison Healthcare.

People in prison who have an underlying health conditions have been advised by the NHS to stay in their cell as much as possible and follow social distancing guidance.

The NHS has also identified those who are clinically vulnerable due to certain underlying health conditions, including cancer, cystic fibrosis and organ transplant patients, and are therefore at greater risk from COVID-19. People in this group have been advised through NHS letters and discussions with healthcare staff that they should self-isolate ('shield') for up to 12 weeks. Where an individual is unwilling to comply, they are asked to sign an NHS disclaimer. This records their refusal to follow the medical advice provided and ensures clear and concise records are maintained of any advice provided and decisions taken.

Anyone shielding is accommodated in a single room and their meals and any prescribed medication are provided to them in their cells by staff, which also provides regular opportunities for human interaction. Those shielding continue to be given access to the phone and showers which are cleaned regularly.

Individuals in isolation are being asked if they would like a family member informed that they are in isolation due to suspected or confirmed COVID-19. Establishments thereafter make arrangements to contact the persons identified if so requested.

Cell sharing

In order to further reduce the risk of COVID-19 spread, SPS is actively seeking to provide single cell accommodation to everyone in our care. Currently around 85-90% of the Scottish prison population reside in a single cell. It is hoped that efforts to ensure a greater proportion of the prison population reside in single cell accommodation will be assisted by the implementation of Early Release legislation and greater provision of Home Detention Curfew (HDC).

However, whilst provision of single cell accommodation across the estate will require further reduction in prison numbers, this will not will not automatically become realisable when there are fewer people in Scotland's prisons than cells available. There are a number of complexities involved in the allocation of people across the prison estate and SPS is required to provide separate accommodation for a number of sub population e.g. there is a requirement to keep men and women; adult and young people and those who have committed sexual offences and the general prison population separate from each other.

While it is clearly not possible to maintain a social distance within a shared cell, Health Protection Scotland's interpretation is that a prison cell is considered a "household". Further, SPS is not, at this time, transferring people in our care between areas of prison, unless absolutely necessary in order to limit the risk of any further cross contamination or introduction of COVID-19 to a new area.

Staff safety and deployment

All Scottish prisons have transitioned to a single shift core day. SPS has been successful in procuring the required range and supply of Personal Protection Equipment (PPE) for the use of frontline staff where health guidance protocols necessitate. Private sector prisons have their own procurement processes to ensure sufficient PPE is available to staff.

SPS public sector staff have been issued with appropriate PPE, instructions on how and when to use it, together with information on how to keep themselves and people in custody safe. SPS staff who are required to undertake escorting duties are provided with PPE and instructions for use.

The Scottish Court Custody and Prisoner Escorting Service contractor, GEOAmey, has reported that all members of their staff have access to supplies of PPE in accordance with operating guidelines. GEOAmey is responsible for the risk assessment and provision of PPE for their staff and SPS has shared all relevant guidance and information with them.

Those undertaking roles which are not critical to reducing the spread of COVID-19 or to ensure operational stability have either been redeployed into critical roles or been advised to stay at home in line with public health advice and where possible, work from personal laptops. SPS has secured an appropriate licence which allows staff to utilise SPS' digital platforms and work from home using their own devices.

SPS has also been piloting a Work Smart Project which facilitates flexible home working through SPS laptops and associated equipment. SPS has now taken delivery of a large number of additional Work Smart laptops which will further support remote working and

these are being allocated on a priority basis to those engaged on, or recently redeployed to, essential operational business.

Further, SPS has introduced an additional payment scheme to incentivise those who remain able to work to commit to undertake additional hours and cover the time lost by colleagues who are unable through absence. This scheme is open to both operational and nonoperational staff and will operate initially over a 12-week period.

Staff continue to have access to the Employee Assistance Programme for confidential advice and guidance on a range of problems and COVID-19 wellbeing packs have been issued outlining the signs and indicators for self-monitoring and the appropriate therapeutic actions to pursue.

Staff recruitment

SPS has continued to advertise for new staff and the new recruit training is proceeding through the Officer Foundation Programme (OFP) being delivered by the Scottish Prison Service College. Recruits are working their way through the programme training modules in readiness for deployment. Thus far, all recruits have remained symptom free from the COVID-19. The Instructors have reported that the Safe Systems of Work in place are operating well.

Partner agencies

SPS understands and values the distinctive role that the Third Sector plays in achieving justice and wider public policy outcomes. In recognition of the need to engage strategically with the Third Sector around shared priorities, challenges and opportunities, SPS has jointly agreed arrangements with the Criminal Justice Voluntary Sector Forum (CJVSF). CJVSF has set up a web page to share COVID-19 and justice related updates.

Department for Work and Pensions (DWP) Prison Work Coaches are all now supporting the overall new claim effort in the community. DWP is in the process of establishing a dedicated service for prison leavers. In the immediate term, prison leavers can make an online claim for Universal Credit where possible or if they are unable to access/use the internet they can utilise the existing telephony claim service.

Interim guidance is in place to prevent homelessness on release. SPS and Scottish Government have drafted Sustainable Housing on Release (SHORE) and COVID-19 interim guidance has been issued.

Progression

Normally SPS offers people in our care the opportunity to progress to less secure conditions. However, in order to adhere to public health advice, progression remains suspended. The suspension of movement limits the risk of COVID-19 being transmitted from the community, or from new arrivals, to other prisons or residential areas.

There is a single national waiting list for progression to our National Top Ends and HMP Castle Huntly. This waiting list will ensure a clear and fair decision making process when

progression resumes. Those who are approaching critical dates will be prioritised for consideration. All pre-release case conferences continue to take place.

Early Release of Prisoners

The Coronavirus (Scotland) Act confers a power on the Scottish Ministers to provide for the early release of a class of persons from prison (to make regulations with immediate effect in order to release prisoners who would be released in any event in the following 180 days).

The Scottish Ministers can only exercise this power if they are satisfied that it is a necessary and proportionate response to the effects of coronavirus on prisons. The early release of prisoners who are due to be released shortly is considered to present a much lower risk to the public, and that lower risk, coupled with the significant risk to the effective operation of prisons, justifies the use of such action.

People serving 18 months or less sent who have only 3 months left to serve of their sentence are now eligible for early release, following the introduction of emergency legislation. Under the Coronavirus (Scotland) Act a number of categories of prisoners are excluded from early release (such as those convicted of sexual offences or terrorism related offences) and prison governors are able to veto the release of prisoners they deem to pose a risk of harm. The Release of Prisoners (Coronavirus) (Scotland) Regulations 2020, laid before the Scottish Parliament on 4th May 2020, extended these exclusions to include those serving sentences for domestic abuse offences, those with non-harassment orders or those convicted of certain COVID-19-related offences.

It is estimated that around 450 prisoners will be eligible for early release under the criteria. Prisoner releases began on 4th May and are taking place over 4 weeks in 3 tranches. There have been 348 people released early under the regulations and 63 uses of the Governor veto.

Scottish Government has announced that the presumption against Home Detention Curfew being granted to people who have committed certain offences (including those with an index offence involving an act of violence) will now no longer apply. Decisions will be made on a case by case basis following an assessment of available information on relevant risk factors. The decision has been made in consultation with HMIPS and HMICS and was taken following the introduction of changes to HDC assessment practices and guidance and in light of challenges posed by the current COVID-19 outbreak.

Liberation process for symptomatic prisoners

For Early Release

Where an individual is approved for early release and they are symptomatic for COVID-19, a request is be made to the local NHS team for the individual to be tested as a matter of urgency. Where the test result is returned and is negative the approved individual can be released at the earliest opportunity within their tranche.

Where the test result is positive, the individual must remain in isolation for the remainder of the 7 days from the first signs of COVID-19 symptoms. Then on the advice of a health care professional that the individual is no longer symptomatic, they should be released at the earliest opportunity. This may well be out with their identified tranche.

However, if their original EDL is before this confirmation, they must be released on that date and SPS will consult with the local Health Protection Team prior to their liberation.

Normal Liberations

Where someone has symptoms of COVID-19 and they were isolating at the time of their liberation date they must still be released. NHS will advise them that they will have to continue to isolate once they return home for a minimum of 7 days or until they no longer have symptoms. Any members of the household they are returning to will then also have to isolate for a minimum of 14 days.

Where someone is isolating at the time of their liberation date because they were a close contact with a COVID-19 case, they must still be released. NHS will advise them that they will have to continue to isolate once they return home for a minimum of 14 days. Any members of the household they are returning to will then also have to isolate for a minimum of 14 days.

If an individual is a confirmed COVID-19 case at the date of their liberation, they must still be released. The local Health Protection Team should be advised that the person is being released and to what address. The local Health Protection Team will provide advice to any other members of the household to which they are returning. If they are returning to a home where someone is shielding, it is the responsibility of the local authority to find them alternative accommodation.

Opiate Substitute Therapy (OST)

At present, approximately 25% of people in Scottish prisons receive a daily authorised Opiate Substitute Therapy (OST). In order to ensure continuity of OST, support social isolation and restricted movement within prisons and to support staff during the current pandemic, the Scottish Government, SPS and partners have identified Buvidal as an alternative OST for use within prisons. Buvidal is available as a 7-day or 28-day injection, which would reduce administration and treatment episodes. Health Boards and Integration Authorities are being asked to transfer all prisoners currently on OST, serving a sentence of six months or longer, onto injections of Buvidal where this is clinically appropriate. Guidance for the use of Buvidal for opiate substitution treatment in prisons during the COVID-19 pandemic has also been published.

Inspection and monitoring

During the COVID-19 emergency, the Inspection process to scrutinise SPS activities is being undertaken remotely through the transfer of relevant electronic data and regular contact by telephone between nominated individuals from SPS and from HMIPS. On-site Liaison Visit inspections are also being undertaken in each establishment in a single day, with the Inspection team fully complying with all requisite local personal protection protocols.

The HMIPS Remote Monitoring Framework comprises:

- HMCIP weekly scheduled telephone contact with Chief Executive and Directors;
- HMCIP weekly scheduled telephone contact with the Strategic Oversight Group;

- Nominated Independent Prison Monitors (IPM) weekly scheduled telephone contact with a representative from each Local Coronavirus Response Group (LRCG);
- IPM Co-ordinators monthly scheduled telephone contact with GICs;
- HMIPS staff weekly telephone contact with the National Prison Care Network for the Health Care Managers Meetings;
- Electronic monitoring data provided to HMIPS from existing sources and from the 20-item COVID-19 Assurance Template completed on a daily basis by establishments and collated and forwarded to HMIPS on a weekly basis;
- HMIPS on-site establishment Liaison Visits, adhering to local health protection requirements.

The following topics are being monitored by HMIPS:

- Availability of PPE for staff;
- New restrictions/changes to healthcare provision;
- Regime restrictions (type, location and length of time)
- Restrictions on/changes to access to time outside or a shower
- Changes to/restrictions on visits;
- Changes to process for progression or release;
- Action taken to mitigate impact of any changes to regime;
- Healthcare;
- Visits;
- Progression.

Governors in Charge have been provided with a daily data gathering spreadsheet which will allow SPS to evidence delivery against HMIPS monitoring priorities and compliance against The Prisons and Young Offenders Institutions (Scotland) Amendment Rules 2020. The spreadsheet is a dynamic document, updated in response to any changes to individual prison regimes and allows a real time overview of service delivery. Governors are also required to provide information on regime provision and the opportunities available for people in custody to access appropriate services.

Operational stability

SPS recognises the COVID-19 pandemic has dramatically altered the operating parameters within the penal environment and understands the deep concerns of individuals. In order to ensure that any tensions which may arise as a result of these concerns are minimised as far as possible, regular communications continue to be made to people in custody explaining the latest updates and changes in circumstances and providing context to the pandemic both in a prison and community setting. In addition, SPS has developed a weekly National Intelligence Assessment to provide an overview for senior operational staff regarding any risks identified that may impact on operational stability.

Research

Since the onset of the COVID-19 crisis, the SPS Research Access and Ethics Committee has been suspended until further notice and no new external studies are being considered at this time. All existing external academic research which was being conducted within the penal environment has also been suspended.

SPS' own planned internal Research Programme 2020-21 is under revision given the new dynamics of the COVID-19 prison environment in which only essential business is being delivered and the methodological limitations of fieldwork data gathering under conditions of social distancing.

However, in order to inform and assist in recovery planning, SPS Research is developing a revised programme for both staff and prisoner research. In June, two sample surveys will be undertaken – HQ staff will be asked about their experiences of remote working from home on their laptops during the enforced lockdown period and prisoners will be asked about their perceptions and experiences of the impact of COVID-19 on daily life in prison and their own sense of well-being. The former will be conducted using contemporary online survey technology, while the latter will use paper and pen questionnaire responses.

As lockdown restrictions gradually ease over the course of 2020-21, SPS will engage with the academic community to consider the ways in which research enterprise within the penal environment can be re-instated and developed post-COVID-19.

Recovery

In order to reduce the risk of COVID-19 spreading, SPS has had to restrict prison regimes which has inevitably impacted upon opportunities for people to engage in purposeful activities. Such restrictions were necessary and fully aligned with the latest public health advice.

SPS is currently devising plans to develop prison regimes in line with any proposed easing of restrictions. SPS' approach will be developed and informed by engagement with those who work and live in our prisons. SPS is currently considering how, in line with public health guidance, to facilitate:

- Additional prison activity which will allow people in custody greater time out of cell;
- Increased prison work activity as restrictions are lifted;
- Peer support arrangements to support the need for human interaction;
- Increased access to additional services, particularly through the introduction of virtual access; and
- Acceleration of current ongoing initiatives.

SPS has developed a model which will allow corporate oversight of the evolution of regimes at each prison. The timescales by which easing of restrictions can be delivered will differ on a site by site basis and will be dependent upon the ability of our partners to mobilise towards increased service delivery.

Dr James Carnie Head of SPS Research Calton House Edinburgh EH12 9HW

james.carnie@sps.pnn.gov.uk 44 0131 330 3766