

Respondent Information and Answer Return Form

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Our email address is: HumanRightsOffice@gov.scot

Our postal address is:

Human Rights Strategy & Legislation Unit

Directorate for Equality, Inclusion and Human Rights

Scottish Government

Area 3H North

Victoria Quay

Edinburgh

EH6 6QQ

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Are you responding as an individual or an organisation?

- Individual
- Organisation

Full name or organisation's name

Coalition of Care and Support Providers in Scotland (CCPS)

0131 475 2676

Phone number

Address

CCPS, Norton Park, 57 Albion Road, Edinburgh

Postcode

EH7 5QY

Email Address

Jen.goff@ccpscotland.org

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- Yes
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Questionnaire

The questions in this document refer to information contained in '[A Human Rights Bill for Scotland: Consultation](#)'.

Questions 1 – 5 refer to Part 4: Incorporating the Treaty Rights

Question 1:

What are your views on our proposal to allow for dignity to be considered by courts in interpreting the rights in the Bill?

Answer:

At the Coalition of Care and Support Providers in Scotland (CCPS)¹, our vision is that individuals and families are enabled to realise their aspirations and thrive. We see this vision as achieved through a rights and relationship-based social care and support system, where people are met with dignity as active participants in their family, community, education setting, and/or work. We therefore support the proposal to allow for the principle of 'dignity' to be considered by courts in interpreting the rights in the Human Rights Bill, and that this should be a requirement². We believe in the intrinsic worth of every person, with this being a belief this proposal strongly reflects.

Dignity stands as a fundamental pillar for human rights, underscoring the inherent worth of every person. By ensuring its explicit integration into legal interpretations, the meaning of human rights is given prominence beyond textual definitions. This principle deeply aligns with our responsibility as a membership body of third sector social care and support providers. Among the providers we represent, the unwavering commitment to dignity is non-negotiable. Those seeking care and support, often made vulnerable through intersecting inequalities, deserve more than just physical assistance. It's vital they are approached and treated in ways that foster their emotional and psychological well-being. In this way, this proposal supports the realisation of our members' commitment and acts as a procedural shift toward every person seeking or accessing social care and support having the right to a good quality of life made possible with dignity.

Furthermore, such emphasis on dignity is particularly crucial for marginalised groups, such as: older people; disabled people; people with learning disabilities, mental health problems, dementia, sensory impairment, and substance use issues; people with convictions; survivors of domestic and sexual violence; the LGBTQIA+ community; and people from ethnic minority backgrounds. It is these same communities whom our membership serves³. By incorporating the principle of dignity, we ensure these groups receive not just legal protection, but genuine respect and value in daily interactions. This contrasts with the prejudice and discrimination faced by these groups on a socio-political, cultural and interpersonal level⁴.

Lastly, the broader implications of this emphasis on dignity extends beyond the courtroom. By championing this principle, the Scottish Government sets the stage for a broader socio-cultural shift toward a Scotland based on human rights culture⁵. If accompanied by well resourced public education, and sufficient support for those who are under duties to enact this legislation, this shift could be characterised by greater empathy, understanding, and mutual respect. Consequently, the prejudice and discrimination faced by people seeking and accessing social care and support can be more meaningfully challenged on a systemic level.

Question 2

What are your views on our proposal to allow for dignity to be a key threshold for defining the content of MCOs?

Answer:

We agree with the proposal for dignity to be a key threshold for defining MCOs^{6 7}. However, while the intent to enshrine 'dignity' as such is commendable, it is essential for the Scottish Government to clarify the practical application of this principle in both the legal context and via publicly funded bodies. Clear, actionable guidelines on how to operationalise dignity in such contexts would empower courts, legal practitioners, and duty bearers to implement this principle meaningfully. This clarity was highlighted as of particular import by our members who provide housing and homelessness services, where the regulatory context of such providers is within the jurisdiction of both UK and devolved frameworks.

Additionally, courts must be required to consider dignity, rather than only allowed to. We view this requirement, in tandem with clear guidelines on its practical application, as being fundamental in transitioning 'dignity' from a concept to a threshold by which MCOs can be realised in practice.

An example provided by a social care and support provider within our membership demonstrates why dignity should be a key threshold. In their experience, disabled people are sometimes deemed to not have the capacity to manage their funds, with these funds then relegated to restrictive bank accounts. Such accounts impose additional costs on disabled people, while restricting their ability to engage in activities and access services that support a good quality of life. In our members experience, access to cash has taken on new dimensions and implications following the Covid-19 pandemic, with the use of restrictive bank accounts consequently violating the economic rights of disabled people. Hence, integrating dignity as a key threshold in defining minimum core obligations will ensure that the rights of the most vulnerable and marginalised are realised.

Question 3

What are your views on the types of international law, materials and mechanisms to be included within the proposed interpretative provision?

Answer:

We agree with the positions set out by the Human Rights Consortium Scotland (HRCS) and the ALLIANCE on Scottish Government's proposed approach^{8 9}. As such, that means we support the Scottish Government's acknowledgment of existing interpretative materials relating to international human rights standards. For example, the provisions for equal and timely access to health facilities under ICESCR General Comment 14¹⁰.

We also agree with the ALLIANCE's recognition that to give maximum possible effect to human rights, the bill should include provisions that address potential situations of conflicting interpretation. This will ensure the bill has the capacity to achieve the best possible outcomes for rights holders in line with clear accountability for duty bearers.

Question 4

What are your views on the proposed model of incorporation?

Answer:

We support some of the Scottish Government's approach. However, we believe that the incorporation model requires significant refinement to meaningfully realise and expand rights for a greater number of Scottish citizens. We therefore recommend the following ways to strengthen the bill¹¹:

- Public bodies should not only be obliged to give due regard but also have a definitive duty to comply with the rights articulated in the Bill. Furthermore, these obligations should be clearly delineated with set timeframes within the Bill itself.
- The proposed bill describes public bodies as those that provide services that people use every day to access their rights, including private actors that provide social care and support as public services. This raises an area within the proposed model where significant clarity is required on who constitutes duty bearers, and what the implications of duty bearer roles may be for the third sector. Therefore, if the proposed bill intends the scope of duty bearer responsibilities and associated accountability application to include third-sector providers providing public services as 'private actors', we strongly urge the Scottish Government to carry out a comprehensive and third-sector inclusive consultation process. Including third sector care and support providers as duty bearers with the associated responsibilities and accountability presents clear complications that risk the sustainability of the sector. For example:
 - Where third sector providers are providing some services that constitute public provision alongside other services that do not constitute public provision, it is unclear what legal or resource implications this may have for such providers.
 - Where third sector providers are contracted to provide social care and support services on behalf of public bodies, it is unclear how this will be accommodated through current procurement regulations.
 - Should third sector social care and support providers become duty bearers, they will require adequate and equitable resourcing to hold this role. It is not clear what cost calculation has taken place to ensure this resourcing has been adequately accounted for.
 - Where commissioning and procurement decisions directly impact a third sector care and support providers ability to uphold human rights, it is unclear whether accountability lies with the contracting body or contractor.

Consequently, we are willing and eager to lend our support in supporting a clarifying consultation process; however, it is essential that we understand the Scottish Government's understanding of third sector social care and support providers who may become duty bearers. While we support a whole systems approach to the realisation of human rights, we urge clarity on what accommodations and provisions the Scottish Government would make should this include some or all third sector social care and support providers as private actor duty bearers.

- Furthermore, both a duty to comply and due regard should be applied to specific rights in the UNCRPD not found in ICESCR. Without these amendments, the Scottish Government's commitment to the rights of disabled people might be incomplete¹². We note this is of particular import for incorporation of CRPD, with Article 19 (the right to live independently and be included in the community) of critical importance to people accessing social care and support. Thus, by incorporating UNCRPD, Scotland will make clear its commitment to safeguarding disabled people against human rights violations.
- We also ask for more clarity of the role private actors will hold within the proposed model of incorporation. Third sector social care and support providers provide services on behalf of statutory bodies, yet clarity on where responsibility would lie where rights are violated is

unclear. For example, how would a care experienced person whose rights were violated in a third sector care home seek redress?

Question 5

Are there any rights in the equality treaties which you think should be treated differently? If so, please identify these, explain why and how this could be achieved.

Answer:

Reflecting the views of other respondents, we believe calling CEDAW, CERD, and CRPD 'equalities treaties' does not reflect the risks to human rights violations people affected by these treaties experience. Instead, we support alternative terms that reflect the burden marginalisation places on these groups, such as 'special protection treaties'^{13 14 15}.

For many of the individuals, families, and communities served by CCPS's membership, their identities intersect with multiple special protection treaties. Such intersections increase and compound their vulnerability, further marginalising them and heightening their risk of rights violation. However, we note that CRPD is particularly central to the provision of social care and support in Scotland. Rights such as Article 19 (the right to live independently and be included in the community) are of critical importance because they enshrine human rights within the provision of social care and support, while prioritising the dignity and right to self-determine of people accessing services. At the same time, Article 19 prevents or minimises the use of exclusionary, coercive, discriminatory, and institutionalising practices that disproportionately affect people living with disabilities. In this way, Article 19 serves as the purpose, aim and realisation of human rights based social care and support. It is therefore vital that there is both a duty to give due regard **and** a duty to comply with the substantive rights delineated in the CRPD.

In sum, we strongly recommend a duty to have due regard and a duty to comply is included with the 'special protection treaties'. This will strengthen protection against discrimination and the subsequent harm rights violations have on those whose lives are most inequitably affected^{16 17}.

Questions 6 – 11 refer to Part 5: Recognising the Right to a Healthy Environment

Question 6

Do you agree or disagree with our proposed basis for defining the environment?

Answer:

The right to a healthy environment is crucial for people accessing social care and support. In Scotland, pressing environmental issues, such as air, water and noise pollution, and the prevalence of derelict land and poor environmental quality, lead to significant health disparities. For example, people from ethnic minority backgrounds are more likely to be affected by air pollution. This has a range of health impacts including asthma, cardiovascular

disease and poor mental health¹⁸. These problems disproportionately affect areas of high deprivation, where many individuals, families and communities served by our membership reside. These groups often face multiple intersecting barriers to engage in local decision-making and are systemically prevented from seeking environmental justice, sustaining the disparities that constitute violation of their human rights.

Additionally, we believe that the right to a healthy environment should encompass the right to quality housing. Quality housing, free from environmental hazards and situated in areas with good environmental quality, directly contributes to the overall health and dignity of its occupants. For those accessing social care and support, a safe and healthy home environment can reduce health disparities while facilitating social care and support to enhance quality of life.

We therefore agree with the proposed use of the Aarhus definition of the environment, which makes specific reference to ecosystems and the biosphere. We draw attention to the Aarhus Convention's Preamble, and Article 1 and 2 and would want to see this reflected in the Bill¹⁹. We however:

- urge a stronger focus on quality housing as part of a right to a health environment.
- seek clarification on how housing support providers will be resourced when residing within the jurisdiction of both UK and devolved regulatory frameworks.

Question 7

If you disagree please explain why.

Answer:

Not applicable.

Question 8

What are your views on the proposed formulation of the substantive and procedural aspects of the right to a healthy environment?

Answer:

We agree with the inclusion of clear and tangible environmental rights in the proposed human rights bill. The experience of individuals, families and communities supported by our members makes clear that these rights are interconnected and a significant influencing factor in overall health and wellbeing.

Further, many individuals, families and communities supported by our members have inequitable or poor access to green and blue spaces. Where they live in areas of high deprivation, they are also more likely to live with poor air quality and pollution. With a significant body of evidence demonstrating the links between health, wellbeing and environment, we welcome the formulation of substantive aspects of the right to include clean air, safe climate, safe and sufficient water, non-toxic environments, and healthy biodiversity and ecosystems. However, we urge the bill to clarify how these socio-economic aspects of a healthy environment fit into this right.

We disagree with the exclusion of the right to healthy and sustainably produced food because we believe it is a core feature of the substantive right to a healthy environment. People accessing social care and support from CCPS members are often made vulnerable through poverty, with this affecting their ability to access healthy and fresh food. We therefore advocate for the inclusion of the right to healthy and sustainably produced food^{20 21}.

Question 9

Do you agree or disagree with our proposed approach to the protection of healthy and sustainable food as part of the incorporation of the right to adequate food in ICESCR, rather than inclusion as a substantive aspect of the right to a healthy environment? Please give reasons for your answer.

Answer:

We disagree with the Scottish Government's proposed approach. We urge the Scottish Government to reconsider its stance on the right to food within the human rights bill.

Given the severe global food insecurities and the environmental impact of the food system, all of which has an impact on Scotland's citizens, we believe that the right to healthy sustainable food should be a key element of the right to a healthy environment. In this way, it is essential to differentiate between the socio-economic dimensions of food and its environmental health aspects. If the right to water is being recognised under both frameworks, it's inconsistent to omit the right to food, which is equally vital for a healthy environment^{22 23 24}.

Question 10

Do you agree or disagree with our proposed approach to including safe and sufficient water as a substantive aspect of the right to a healthy environment? Please give reasons for your answer.

Answer:

We agree with the proposed approach, and advocate extending the definition to recognise adequate sanitation. From a social care and support viewpoint, safe and sufficient water is paramount to the right to a healthy environment due to its direct link to health, dignity, and overall quality of life^{25 26}.

Water is fundamental for basic human needs. It holds a particular import when supporting vulnerable groups who may be at heightened risk of waterborne diseases or dehydration in social care and support settings. Any compromise in water quality or quantity can result in direct health and safety risks. Where such risks translate to health impacts on people accessing social care and support, the resources required to respond are increased on providers. In addition, the psychosocial stress from inadequate or unsanitary water access can compound existing challenges faced by those accessing social care support. Consequently, upholding the right to safe and sufficient water, in tandem with adequate sanitation, aligns with

a rights-based approach to social care and support. It also reinforces the wellbeing and dignity of individuals, families and communities served by our members. However, in line with our overall responses, we believe there needs to be more consideration to the resources required to uphold such rights – as well as clarifying what role third sector social care and support providers might have within the process of realisation.

Question 11

Are there any other substantive or procedural elements you think should be understood as aspects of the right?

Answer:

We need to see dedicated reforms with clear timelines to make the Right to a Healthy Environment fully enforceable^{27 28}.

Questions 12 – 18 refer to Part 6: Incorporating Further Rights and Embedding Equality

Question 12

Given that the Human Rights Act 1998 is protected from modification under the Scotland Act 1998, how do you think we can best signal that the Human Rights Act (and civil and political rights) form a core pillar of human rights law in Scotland?

Answer:

We accept the Scottish Government's conclusions. However, the Human Rights Act 1998 duties and rights should be fully included in implementation of this Bill, including being part of guidance, public body training and capacity building, as well as information and awareness raising²⁹.

Question 13

How can we best embed participation in the framework of the Bill?

Answer:

We believe participation is central to this Bill and should be embedded to the fullest extent throughout^{30 31 32 33}. This should mean including participation in the Bill's purpose, implementation reporting, ongoing monitoring and accountability mechanisms.

The individuals, families and communities supported by CCPS members experience a range of complex and intersectional barriers to participation. We therefore strongly urge the Scottish

Government to clarify minimum expectations of participation in decision making governance and service design. In agreement with Alliance Scotland, we believe participation in decisions that affect 'rights and lives should be free, meaningful, active and effective'³⁴. As such, we urge the Scottish Government to provide clarification and guidance on what participatory approaches mean, how they will be conducted ethically, and how they will be independently reviewed to ensure efficacy, ethics and inclusion. People accessing social care and support must be supported to participate in ways that meaningfully reduces participation barriers, values their labour, and mitigates any risks of psychological distress from participation. We note lived experience boards provide an in-depth articulation of what meaningful participation processes should involve and encourage learning from the principles set out by the boards³⁵.

Question 14

What are your views on the proposed approach to including an equality provision to ensure everyone is able to access rights in the Bill?

Answer:

We understand the profound importance of ensuring equality in accessing rights, especially within our sector where individuals, families and communities supported by our members often come from diverse backgrounds and face distinct, intersecting inequalities. We therefore strongly endorse the inclusion of an equality provision in the proposed Human Rights Bill^{36 37}.

Further, it is important that this provision not only acknowledges the general principle of equality but also recognises the distinct inequalities faced by specific marginalised groups. Beyond a mere declaration of equality, we urge the government to prioritise its practical implementation by allocating appropriate resources and introducing tangible mechanisms to realise these rights.

Additionally, for social care support providers to operationalise this effectively, clear guidelines, training materials, and best practices are essential. To enhance the Bill's efficacy, a feedback loop should be established where providers can report their experiences in upholding equality. Furthermore, public awareness campaigns will be instrumental, ensuring every person, especially those accessing social care support, is well-informed about their rights and avenues to access them. We believe a well-structured equality provision, backed by actionable strategies, can ensure genuine accessibility of rights for all.

Question 15

How do you think we should define the groups to be protected by the equality provision?

Answer:

We agree with the proposed definition contained within the equality section of the Bill that states that the rights should be secured without discrimination on grounds such as sex, race, colour, language, religion, political or other opinion, national or social origin, property, birth or other status.

We however recommend the additional inclusion of LGBTQI+ and older people. We recommend this inclusion because a significant body of evidence demonstrates that LGBTQI+ people face a series of socio-economic and health inequalities when compared to the general population in Scotland^{38 39 40 41 42 43}. Similarly, older people are more likely to face a range of socio-economic and health inequalities⁴⁴, which have been evidenced and acknowledged in the Scottish Government's framework for action 'A Fairer Scotland for Older People'⁴⁵. Further information on our rationale for recommending this inclusion is detailed in our response to question 17.

Question 16

Do you agree or disagree that the use of 'other status' in the equality provision would sufficiently protect the rights of LGBTI and older people? If you disagree, please provide comments to support your answer.

Answer:

We disagree.

Question 17

If you disagree, please provide comments to support your answer.

Answer:

We strongly recommend the inclusion of LGBTQI+ and older people as defined and protected groups within the equality provision. Both groups are served by CCPS members, and we know they experience greater marginalisation as a consequence of prejudice and discrimination. A significant body of evidence demonstrates the harm this has on their social, emotional, physical and mental health^{46 47 48 49 50 51}. Together these factors mean they face more barriers to the realisation of their rights, as well as an increased risk of human rights violations when compared to the general population.

We therefore support the Scottish Government's National Taskforce recommendation to, 'Include an equality clause which aligns with the Equality Act 2010 and provides equal access to everyone to the rights contained within the Bill'. This also includes calling for 'A right for older people to be included in the statutory framework', and 'An equality clause that protects and promotes the full and equal enjoyment of rights of LGBTI people'⁵².

Including both groups as defined within the bill will ensure they are adequately considered when deciding priorities, budgets, and social care and support provision.

Question 18

Do you think the Bill framework needs to do anything additionally for LGBTI or older people?

Answer:

We support and align with the recommendations set out the ALLIANCE, that the starting point should be that everyone has equal access to all the rights in the bill, all the time. That includes LGBTI and older people.

Questions 19 – 26 refer to Part 7: The Duties

Question 19

What is your view on who the duties in the Bill should apply to?

Answer:

While we agree that the duties should apply to as many public bodies as possible within devolution⁵³. As detailed in our response to question 4, the proposed model requires further clarity on who constitutes duty bearers, and what the implications of duty bearer roles may be for the third sector. If the proposed bill intends to expand the role, responsibilities and associated accountability of duty bearer to include third-sector providers offering public services as 'private actors', we strongly urge the Scottish Government to carry out a comprehensive and third-sector inclusive consultation process. Including third sector care and support providers as duty bearers presents clear complications for the sector which will need to be worked through. For example:

- Where third sector providers are providing some services that constitute public provision alongside other services that do not constitute public provision, it is unclear what legal or resource implications this may have for such providers.
- Where third sector providers are contracted to provide social care and support services on behalf of public bodies, it is unclear how this will be accommodated through current procurement regulations.
- Should third sector social care and support providers become duty bearers, they will require adequate and equitable resourcing to hold this role. It is not clear what cost calculation has taken place to ensure this resourcing has been adequately accounted for.
- Where commissioning and procurement decisions directly impact a third sector care and support providers ability to uphold human rights, it is unclear whether accountability lies with the contracting body or contractor.

Consequently, we are willing and eager to lend our support in supporting a clarifying consultation process; however, it is essential that we understand the Scottish Government's understanding of third sector social care and support providers who may become duty bearers. While we support a whole systems approach to the realisation of human rights, we urge clarity on what accommodations and provisions the Scottish Government would make should this include some or all third sector social care and support providers as private actor duty bearers.

In sum, people should be able to expect their human rights to be respected, protected and fulfilled by every public body. This should include whether or not it is within devolved or reserved competence. However, what constitutes a public body requires significant consultation and clarification as it relates to third sector social care and support providers.

Question 20

What is your view on the proposed initial procedural duty intended to embed rights in decision making?

Answer:

As noted in our responses to question 4 and 19, significant consultation and clarification is required on what constitutes duty bearers as it relates to private actors providing public services. This includes what the implications of duty bearer roles may be for the third sector social care and support providers if the proposed bill intends to expand the role, responsibilities and associated accountability. We therefore agree in principle that embedding human rights in decision-making is an important process within incorporation, however, further consultation is required on what this means for third sector social care and support providers.

Question 21

What is your view on the proposed duty to comply?

Answer:

As noted in our responses to question 4, 19 and 20, significant consultation and clarification is required on what constitutes duty bearers as it relates to private actors providing public services. This includes what the implications of duty bearer roles may be for the third sector social care and support providers if the proposed bill intends to expand the role, responsibilities and associated accountability. We therefore agree in principle that public bodies should have a duty to comply with the rights in the bill, including delivering on Minimum Core Obligations and taking deliberate steps to progressively realise rights⁵⁴. However, we strongly urge further consultation on what this means for third sector social care and support providers.

Question 22

Do you think certain public authorities should be required to report on what actions they are planning to take, and what actions they have taken, to meet the duties set out in the Bill?

Answer:

We agree that there should be a public bodies' reporting requirement - this should largely mirror the UNCRC reporting requirements. Public bodies should have to consult with people whose rights are most at risk when developing these reports, including to ensure that the content is accessible. Through our engagement with CCPS's membership, accountability through reporting was the most frequently cited priority concerning the incorporation of human rights as it relates to social care and support provision. Mirroring the views highlighted by the Human Rights Bill Lived Experience Boards, our membership is clear that the government and public bodies must not be able to 'mark their own homework' when it comes to rights. For this

bill to be impactful and procedurally transparent, there must be clear accountability processes in place⁵⁵.

Where our members provide housing support services, they highlighted the existing mechanisms in place for some regulated social care and support services to report via the Scottish Public Services Ombudsman⁵⁶. Our members urge use of existing reporting mechanisms. By minimising the addition of new reporting mechanisms, implementation and resource allocation can be made more efficient.

Furthermore, we echo the views of our members who provide housing support services in our work contributing to the future National Care Service. A future National Care Service should ensure adequate, regular and monitored reporting from its inception. This will ensure the National Care Service is developed informed by a valuing of and commitment to human rights.

We therefore support the views of HRCS and the Alliance that the Scottish Government should be required to consult with people whose rights are most at risk when developing guidance on reporting requirements. Public bodies should also be required to submit their reports to the Scottish Human Rights Commission for monitoring⁵⁷.

We also note that reporting requirements must include accountability resourcing, where individuals, families and communities who are affected by public services (and those provided by private actors) are able to meaningfully participate in governance reviews and consequential decision making.

As noted in our responses to question 4, 19, 20 and 21, significant consultation and clarification is required on what constitutes duty bearers as it relates to private actors providing public services. We strongly urge consultation on what this means for third sector social care and support providers.

Question 23

How could the proposed duty to report best align with existing reporting obligations on public authorities?

Answer:

We agree that it makes sense for these reporting requirements to complement and strengthen other public body reporting requirements. CCPS members who provide housing support note that this is of particular import⁵⁸. The housing support sector is highly regulated, with a breadth of existing monitoring and reporting requirements in place. We therefore recommend that new reporting requirements are integrated with those mandated by the Scottish Housing Regulator. Ensuring the duties coordinate and integrate with existing data collection requirements will support the efficacy and accessibility of reporting.

As noted in our responses to question 4, 19, 20, 21 and 22, significant consultation and clarification is required on what constitutes duty bearers as it relates to private actors providing public services. We strongly urge consultation on what this means for third sector social care and support providers.

Question 24

What are your views on the need to demonstrate compliance with economic, social and cultural rights, as well as the right to a healthy environment, via MCOs and progressive realisation?

Answer:

We agree with HRCS that after an initial period where only the procedural duty will apply, all Scottish public bodies should then have a duty to comply with rights in the Bill. This should mean delivering on Minimum Core Obligations and taking deliberate steps to progressively realise rights⁵⁹.

However, as noted in our responses to question 4, 19, 20, 21, 22 and 23, what constitutes a public body requires significant consultation and clarification as it relates to third sector social care and support providers and any adjustments to timing for those in a wider scope should be considered to ensure adequate resource is allocated to support implementation. We therefore urge this process takes place prior to enacting requirements to demonstrate compliance.

Question 25

What are your views on the right to a healthy environment falling under the same duties as economic, social and cultural rights?

Answer:

We agree that there should be the same duties for the right to a healthy environment as for ICESCR (and special protection treaties)⁶⁰.

Question 26

What is your view on the proposed duty to publish a Human Rights Scheme?

Answer:

We agree with these proposed duties, acknowledging it as a pivotal step towards a transparent and accountable approach to upholding human rights. CCPS's membership stress the importance of extensive consultation with rights holders who are vulnerable to facing rights violations and who encounter multiple barriers to participation when developing the scheme. It is imperative that the voices of those most affected are integral to the formation of the scheme, ensuring that it is reflective of and responsive to their unique needs and experiences.

Furthermore, a comprehensive and inclusive participatory process will facilitate the identification of systemic issues and potential areas of improvement within the scheme. The published scheme should be easily accessible, clear, and comprehensible, enabling people from diverse backgrounds to understand their rights and the means to realise them.

Going forward, regular reviews and updates of the Human Rights Scheme are essential to ensure its relevancy and efficacy in addressing emerging human rights challenges. Lastly, there should be robust mechanisms in place to monitor the implementation of the scheme and to assess its impact on safeguarding human rights, with findings made publicly available for the sake of transparency and accountability^{61 62 63}.

Questions 27 – 37 refer to Part 8: Ensuring Access to Justice for Rights Holders

Question 27

What are your views on the most effective ways of supporting advocacy and/or advice services to help rights-holders realise their rights under the Bill?

Answer:

We believe that an integrated and whole system approach is essential. Firstly, there should be robust funding mechanisms in place to ensure that independent advocacy and advice services are not only available but also easily accessible to all, especially those in vulnerable or marginalised groups⁶⁴.

Secondly, we note the significant emotional labour and risk of psychological distress that comes with seeking justice and navigating new services. We therefore recommend resourcing existing third-sector social care and support providers, who have a longstanding history of trust and engagement within communities, to support people accessing their services to realise their rights. This should be an addition to existing independent advocacy and advice services.

Thirdly, to ensure consistency and quality of service, regular training and updates should be provided to those involved in advocacy and advice roles, integrating both the legal aspects of the Bill and its practical implications.

Lastly, the creation of a centralised national network for human rights information, education, legal services and advice, complemented by offline resources, can provide a repository of information, best practices, and real-time support for both rights-holders and advocates. Collaborative feedback mechanisms, where social care and support providers and rights-holders can share their experiences and suggest improvements, will be pivotal in ensuring that the support system remains adaptive and responsive to evolving needs. In sum, a combination of adequate funding, leveraging third-sector expertise, consistent training, and embracing technology, all underpinned by continuous feedback, will be instrumental in effectively supporting advocacy and advice services under the bill ^{65 66 67}.

Question 28

What are your views on our proposals in relation to front-line complaints handling mechanisms of public bodies?

Answer:

We agree that frontline complaints handling by public bodies needs to be changed to take into account rights and duties in this bill⁶⁸.

We also note the establishment of a robust, transparent, and fair complaints system within the forthcoming National Care Service will be an important aspect of facilitating the incorporation of human rights-based approaches. This should include the critical participation of disabled people, people with long-term conditions, and unpaid carers in its implementation^{69 70}.

However, based on the experience of membership who provide housing support, we recommend any front-line complaints handling mechanism of public bodies, including the Scottish Public Services Ombudsman (SPSO) is adequately resourced and supported to accommodate new duties.

Furthermore, as membership body of social care and support providers, we strongly align with and support the ALLIANCE's response to this question. We echo their view that while updating complaints handling processes is beneficial, more substantive changes are required to rectify the evidenced issues within the handling of social care complaints⁷¹.

We are in full agreement with the ALLIANCE's emphasis on the necessity for enhanced transparency, inclusive communication, and straightforward access to information regarding care decisions. It is non-negotiable that people who face multiple access barriers need to be resourced to understand how and by whom their social care and support decisions are made. Similarly, we support the call for a proactive approach by professionals in informing people accessing social care and support services about their rights to challenge decisions and access complaint procedures, ensuring the availability of independent advocacy and support, inclusive of translation services. For human rights to be realised, it is essential that people have access to independent advocacy and feel supported throughout the complaints process, ensuring that their voices are heard and their rights are protected. However, we note that this requires adequate resourcing in addition to the existing funding of social care and support.

We also share concerns raised by the ALLIANCE regarding the temporary suspension or alteration of statutory complaints procedures amidst the COVID-19 pandemic and the subsequent impact on the exercise of the right to complain. It is crucial that any complaints touching on human rights are addressed promptly and with utmost importance, and that relevant information is made accessible to the public in clear and understandable formats⁷².

Furthermore, we endorse the recommendations for improvement arising from the Equality and Human Rights Commission's research, including the provision of clearer and more accessible information, regular and plain English communication, and the expedited processing of formal complaints^{73 74 75}.

Lastly, we assert, along with the ALLIANCE, that accessibility to a fair and efficient complaints system (including independent advocacy) should be universal, extending to unpaid carers, families, and every person who seeks to access social care and support services.

Question 29

What are your views in relation to our proposed changes to the Scottish Public Services Ombudsman's remit?

Answer:

We agree that SPSO should have an expanded remit to consider rights issues within complaints. However, more consideration is needed around remedy through SPSO being accessible, effective, affordable, timely and supportive⁷⁶.

People accessing social care and support often face multiple intersecting barriers when seeking remedies for human rights violations. These barriers include lack of awareness of their rights, limited access to information about complaint procedures, and fear of retaliation or worsened support if they voice concerns. Financial constraints also hinder their ability to seek legal recourse, while cognitive or communicative challenges can affect their capacity to articulate grievances. Additionally, systemic issues such as bureaucratic complexities and understaffed or undertrained social care support providers, further exacerbate these challenges. This makes seeking justice difficult for many in the social support care system. We therefore recommend more detail on resourcing and practical application in the Bill.

Question 30

What are your views on our proposals in relation to scrutiny bodies?

Answer:

We fully agree with scrutiny bodies having human rights added to their remit. The social care and support sector has a number of scrutiny bodies, including the Care Inspectorate, Scottish Social Services Council, Audit Scotland and Health Improvement Scotland. Each of these bodies currently carries out an important function ensuring the social care and support sector is both accountable and developing in line with that accountability. We therefore note that consideration to the resourcing of these bodies is prioritised as a way of ensuring human rights are procedurally realised. While each body has existing responsibility for the provision of social care and support, ensuring they are equipped to accommodate a new role of monitoring the upholding of human rights will require dedicated resourcing.

We also recommend support for scrutiny bodies to understand what their role in upholding human rights is. However, As noted in our responses to question 4, 19, 20, 21, 22, 23 and 24 significant consultation and clarification is required on what constitutes duty bearers as it relates to private actors providing public services. We strongly urge consultation on what this means for third sector social care and support providers. We therefore urge this process takes place as a way of ensuring social care and support scrutiny bodies are able to receive the clarity and support they need to form part of realising human rights.

Question 31

What are your views on additional powers for the Scottish Human Rights Commission?

Answer:

No answer to this question.

Question 32

What are your views on potentially mirroring these powers for the Children and Young People's Commissioner Scotland where needed?

Answer:

We agree that CYPSC should be given the same or similar powers under this Bill as the SHRC⁷⁷.

Question 33

What are your views on our proposed approach to 'standing' under the Human Rights Bill? Please explain.

Answer:

We agree that the proposed approach to 'standing' under Human Rights should mirror those in civil law cases in Scotland, allowing entities with 'sufficient interest' entitlement to seek a judicial review. This would facilitate organisations to present collective and test cases to protect the human rights of people who are at risk of rights violations while facing multiple barriers to redress⁷⁸.

Question 34

What should the approach be to assessing 'reasonableness' under the Human Rights Bill?

Answer:

No answer to this question.

Question 35

Do you agree or disagree that existing judicial remedies are sufficient in delivering effective remedy for rights-holders?

Answer:

No answer to this question.

Question 36

If you do not agree that existing judicial remedies are sufficient in delivering effective remedy for rights-holders, what additional remedies would help to do this?

Answer:

No answer to this question.

Question 37

What are your views on the most appropriate remedy in the event a court finds legislation is incompatible with the rights in the Bill?

Answer:

No answer to this question.

Questions 38 – 44 refer to Part 9: Implementing the New Scottish Human Rights Act

Question 38

What are your views on our proposals for bringing the legislation into force?

Answer:

As noted in our responses to question 4, 19, 20, 21, 22, 23, 24 and 30 significant consultation and clarification is required on what constitutes duty bearers as it relates to private actors providing public services. We strongly urge consultation on what this means for third sector social care and support providers. We therefore cannot agree nor disagree on the proposals for bringing the legislation into force without such clarification. We do however note that third sector social care and support providers witness the impact of people living with serious rights

violations every day, and as such we urge both clarifications and implementation timescales to account for this ongoing harm.

Question 39

What are your views on our proposals to establish MCOs through a participatory process?

Answer:

We agree with HRCS and the ALLIANCE that MCOs are developed through a participatory process. We do however urge consideration to the resources that will be required to ensure this is meaningful participation available to individuals, families and communities most at risk of human rights violations. As noted in our response to question 13, we urge the Scottish Government to provide clarification and guidance on what a participatory process will involve, how it will be conducted ethically, and how it will be independently reviewed to ensure efficacy, ethics and inclusion.

Question 40

What are your views on our proposals for a Human Rights Scheme?

Answer:

We agree that there should be a Human Rights Scheme and have outlined our views in question 26.

Question 41

What are your views on enhancing the assessment and scrutiny of legislation introduced to the Scottish Parliament in relation to the rights in the Human Rights Bill?

Answer:

We support the views of HRCS⁷⁹ and the ALLIANCE⁸⁰, agreeing that the assessment and scrutiny of the bill should be enhanced by including a requirement to demonstrate consultation with rights holders, including people at heightened risk of rights violations. Echoing our responses to questions 13 and 39, detail on how participatory forms of scrutiny will take place, as well as consideration to how this is adequately resourced, must be a core priority.

Question 42

How can the Scottish Government and partners effectively build capacity across the public sector to ensure the rights in the Bill are delivered?

Answer:

CCPS's membership echoes the views of HRCS⁸¹ and the ALLIANCE⁸², regarding the need for both statutory and non-statutory guidance as a critical aspect of building capacity across the public sector to deliver the bill's rights. Such guidance is crucial for the Bill to be effective, however, it must come alongside active participation of people at heightened risk of rights violations, as well as human rights experts and third sector social care and support providers. It is with this multi-stakeholder, participatory process that the provisions of the Bill will be made accessible, understandable, and actionable for both rights-holders and duty-bearers.

We also welcome the plan to enhance human rights capacity within government and public bodies and agree with the ALLIANCE on the urgent necessity for this enhancement. Understanding that our international human rights obligations are already in place, we concur that building capacity and the provision of adequate resources to public sector bodies should commence immediately and not be postponed until the passing of the Bill.

As noted in our responses to question 4, 19, 20, 21, 22, 23, 24, 30 and 38, significant consultation and clarification is required on what constitutes duty bearers as it relates to private actors providing public services. We strongly urge consultation on this as a priority to inform adequate capacity building and equitable resource allocation within our sector supporting those most at risk of rights violations⁸³.

Question 43

How can the Scottish Government and partners provide effective information and raise awareness of the rights for rights-holders?

Answer:

We agree with HRCS⁸⁴ that the lack of clarity on how this area will be developed is disappointing. However, we support the creation of a national network for human rights information, education, legal services and advice. The import of this as it relates to participation is detailed in our answer to question 27.

Question 44

What are your views on monitoring and reporting?

Answer:

As detailed in our answer to question 22, we agree with The Human Rights Bill Lived Experience Boards that government and public bodies should not be able to mark their own homework⁸⁵. This could include independent quality checking of duty bearers. However, as noted in our responses to question 4, 19, 20, 21, 30, 38 and 42, what constitutes a public body and duty bearer requires significant consultation and clarification as it relates to third sector social care and support providers.

CCPS's membership also recommends that use of existing monitoring and reporting mechanisms provided by the Scottish Public Services Ombudsman should be considered⁸⁶. As noted in our response to question 28, we recommend the resourcing of the Scottish Public Services Ombudsman can adequately accommodate new duties.

As detailed in our answer to question 26, monitoring and reporting findings should be made publicly available for the sake of transparency and accountability.

About you

Please tell us which of the following categories best describe you (select all that apply):

- Legal profession
- Organisation - Private
- Organisation – Public
- Rights holder
- Other – please specify

Organisation – Other (charity)

CCPS is a collation of not-for-profit care and support providers in Scotland. Our membership comprises 90 of the most substantial care and support providers in Scotland's third sector, providing high quality support in the areas of community care for adults with disabilities and for older people, youth and criminal justice, substance use, homelessness, and children's services and family support.

CCPS members provide support for a wide range of people with diverse needs, including older people; children, young people and families; disabled people; people with learning disabilities, mental health problems, dementia, sensory impairment, substance use, people with convictions; and survivors of domestic violence.

Additional space for answers

(Please specify the question information relates to)

Endnotes:

¹ <https://www.ccpscotland.org/>

² <https://hrcscotland.org/wp-content/uploads/2023/08/Final-HRCS-Guide-to-responding-to-Human-Rights-Bill-for-Scotland-consultation-August-2023-1.pdf>

³ <https://www.ccpscotland.org/about-ccps/>

⁴

https://pure.strath.ac.uk/ws/portalfiles/portal/138933044/Webster_2022_Can_talking_about_dignity_support_the_growth_of_a_hu%20man_rights_culture.pdf

⁵

https://pure.strath.ac.uk/ws/portalfiles/portal/138933044/Webster_2022_Can_talking_about_dignity_support_the_growth_of_a_hu%20man_rights_culture.pdf

⁶ <https://hrcscotland.org/wp-content/uploads/2023/08/Final-HRCS-Guide-to-responding-to-Human-Rights-Bill-for-Scotland-consultation-August-2023-1.pdf>

⁷ <https://www.alliance-scotland.org.uk/blog/news/alliance-publishes-human-rights-bill-consultation-draft-response/>

⁸ <https://hrcscotland.org/wp-content/uploads/2023/08/Final-HRCS-Guide-to-responding-to-Human-Rights-Bill-for-Scotland-consultation-August-2023-1.pdf>

⁹ <https://www.alliance-scotland.org.uk/blog/news/alliance-publishes-human-rights-bill-consultation-draft-response/>

¹⁰

https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=E%2FC.12%2F2000%2F4&Lang=en

¹¹ <https://hrcscotland.org/wp-content/uploads/2023/08/Final-HRCS-Guide-to-responding-to-Human-Rights-Bill-for-Scotland-consultation-August-2023-1.pdf>

¹² https://www.scl.d.org.uk/wp-content/uploads/2023/08/4-Rights-here-rights-now-for-orgs-and-service-providers_updated-version.pdf

¹³ <https://www.alliance-scotland.org.uk/blog/news/alliance-publishes-human-rights-bill-consultation-draft-response/>

¹⁴ <https://hrcscotland.org/wp-content/uploads/2023/08/Final-HRCS-Guide-to-responding-to-Human-Rights-Bill-for-Scotland-consultation-August-2023-1.pdf>

¹⁵ https://www.scl.d.org.uk/wp-content/uploads/2023/08/4-Rights-here-rights-now-for-orgs-and-service-providers_updated-version.pdf

¹⁶ https://www.scl.d.org.uk/wp-content/uploads/2023/08/4-Rights-here-rights-now-for-orgs-and-service-providers_updated-version.pdf

-
- ¹⁷ <https://www.engender.org.uk/content/publications/CEDAW-incorporation-paper.pdf>
- ¹⁸ <https://raceequalityfoundation.org.uk/wp-content/uploads/2023/05/How-will-the-climate-and-nature-crises-impact-people-from-Black-Asian-and-Ethnic-Minority-Communities.pdf>
- ¹⁹ https://www.ercs.scot/wp/wp-content/uploads/2023/08/230814_HR-Bill-consultation-Pt5_ERCS-response_V3.pdf
- ²⁰ https://www.ercs.scot/wp/wp-content/uploads/2023/08/230814_HR-Bill-consultation-Pt5_ERCS-response_V3.pdf
- ²¹ <https://hrcscotland.org/wp-content/uploads/2023/08/Final-HRCS-Guide-to-responding-to-Human-Rights-Bill-for-Scotland-consultation-August-2023-1.pdf>
- ²² https://www.ercs.scot/wp/wp-content/uploads/2023/08/230814_HR-Bill-consultation-Pt5_ERCS-response_V3.pdf
- ²³ <https://hrcscotland.org/wp-content/uploads/2023/08/Final-HRCS-Guide-to-responding-to-Human-Rights-Bill-for-Scotland-consultation-August-2023-1.pdf>
- ²⁴ <https://www.alliance-scotland.org.uk/blog/news/alliance-publishes-human-rights-bill-consultation-draft-response/>
- ²⁵ <https://www.alliance-scotland.org.uk/blog/news/alliance-publishes-human-rights-bill-consultation-draft-response/>
- ²⁶ https://www.ercs.scot/wp/wp-content/uploads/2023/08/230814_HR-Bill-consultation-Pt5_ERCS-response_V3.pdf
- ²⁷ <https://hrcscotland.org/wp-content/uploads/2023/08/Final-HRCS-Guide-to-responding-to-Human-Rights-Bill-for-Scotland-consultation-August-2023-1.pdf>
- ²⁸ https://www.ercs.scot/wp/wp-content/uploads/2023/08/230814_HR-Bill-consultation-Pt5_ERCS-response_V3.pdf
- ²⁹ <https://hrcscotland.org/wp-content/uploads/2023/08/Final-HRCS-Guide-to-responding-to-Human-Rights-Bill-for-Scotland-consultation-August-2023-1.pdf>
- ³⁰ https://www.sclid.org.uk/wp-content/uploads/2023/08/4-Rights-here-rights-now-for-orgs-and-service-providers_updated-version.pdf
- ³¹ <https://hrcscotland.org/wp-content/uploads/2023/08/Final-HRCS-Guide-to-responding-to-Human-Rights-Bill-for-Scotland-consultation-August-2023-1.pdf>
- ³² <https://www.alliance-scotland.org.uk/blog/news/alliance-publishes-human-rights-bill-consultation-draft-response/>
- ³³ <https://www.engender.org.uk/content/publications/CEDAW-incorporation-paper.pdf>
- ³⁴ <https://www.alliance-scotland.org.uk/blog/news/alliance-publishes-human-rights-bill-consultation-draft-response/>
- ³⁵ https://www.sclid.org.uk/wp-content/uploads/2023/01/06813-Solving-the-Human-Rights-Puzzle-report_WEB.pdf

-
- ³⁶ <https://hrcscotland.org/wp-content/uploads/2023/08/Final-HRCS-Guide-to-responding-to-Human-Rights-Bill-for-Scotland-consultation-August-2023-1.pdf>
- ³⁷ https://www.sclد.org.uk/wp-content/uploads/2023/08/4-Rights-here-rights-now-for-orgs-and-service-providers_updated-version.pdf
- ³⁸ <https://www.sciencedirect.com/science/article/pii/S0955395922002754?via%3Dihub>
- ³⁹ <https://journals.sagepub.com/doi/10.1177/0193723520962937>
- ⁴⁰ <https://www.stor.scot.nhs.uk/bitstream/handle/11289/580334/Trans%20Report%20-%20final%20%28June%202022%29.pdf?sequence=1andisAllowed=y>
- ⁴¹ <https://www.lgbtyouth.org.uk/media/2712/life-in-scotland-for-lgbt-young-people-2022-e-use.pdf>
- ⁴² <https://www.gov.scot/publications/sexual-orientation-scotland-2017-summary-evidence-base/pages/6/>
- ⁴³ <https://www.cambridge.org/core/journals/ageing-and-society/article/inequalities-in-older-lgbt-peoples-health-and-care-needs-in-the-united-kingdom-a-systematic-scoping-review/FDF7D2BC9C59B50FFF13B5A796D48259>
- ⁴⁴ <https://www.sciencedirect.com/science/article/pii/S003335061930037X>
- ⁴⁵ <https://www.gov.scot/publications/fairer-scotland-older-people-framework-action/pages/3/>
- ⁴⁶ <https://www.sciencedirect.com/science/article/pii/S0955395922002754?via%3Dihub>
- ⁴⁷ <https://journals.sagepub.com/doi/10.1177/0193723520962937>
- ⁴⁸ <https://www.stor.scot.nhs.uk/bitstream/handle/11289/580334/Trans%20Report%20-%20final%20%28June%202022%29.pdf?sequence=1andisAllowed=y>
- ⁴⁹ <https://www.lgbtyouth.org.uk/media/2712/life-in-scotland-for-lgbt-young-people-2022-e-use.pdf>
- ⁵⁰ <https://www.gov.scot/publications/sexual-orientation-scotland-2017-summary-evidence-base/pages/6/>
- ⁵¹ <https://www.gov.scot/publications/fairer-scotland-older-people-framework-action/pages/3/>
- ⁵² <https://www.gov.scot/publications/national-taskforce-human-rights-leadership-report/>
- ⁵³ <https://hrcscotland.org/wp-content/uploads/2023/08/Final-HRCS-Guide-to-responding-to-Human-Rights-Bill-for-Scotland-consultation-August-2023-1.pdf>
- ⁵⁴ <https://hrcscotland.org/wp-content/uploads/2023/08/Final-HRCS-Guide-to-responding-to-Human-Rights-Bill-for-Scotland-consultation-August-2023-1.pdf>
- ⁵⁵ <https://hrcscotland.org/human-rights-bill-lived-experience-board-reports/>
- ⁵⁶ <https://www.spsو.org.uk/how-to-complain-about-public-service>
- ⁵⁷ <https://hrcscotland.org/wp-content/uploads/2023/08/Final-HRCS-Guide-to-responding-to-Human-Rights-Bill-for-Scotland-consultation-August-2023-1.pdf>
- ⁵⁸ <https://hrcscotland.org/wp-content/uploads/2023/08/Final-HRCS-Guide-to-responding-to-Human-Rights-Bill-for-Scotland-consultation-August-2023-1.pdf>

-
- ⁵⁹ <https://hrcscotland.org/wp-content/uploads/2023/08/Final-HRCS-Guide-to-responding-to-Human-Rights-Bill-for-Scotland-consultation-August-2023-1.pdf>
- ⁶⁰ https://www.ercs.scot/wp/wp-content/uploads/2023/08/230814_HR-Bill-consultation-Pt5_ERCS-response_V3.pdf
- ⁶¹ <https://hrcscotland.org/wp-content/uploads/2023/08/Final-HRCS-Guide-to-responding-to-Human-Rights-Bill-for-Scotland-consultation-August-2023-1.pdf>
- ⁶² <https://www.alliance-scotland.org.uk/blog/news/social-care-and-the-scottish-human-rights-bill-consultation-event-report/>
- ⁶³ https://www.sclد.org.uk/wp-content/uploads/2023/01/06813-Solving-the-Human-Rights-Puzzle-report_WEB.pdf
- ⁶⁴ <https://www.alliance-scotland.org.uk/blog/news/alliance-publishes-human-rights-bill-consultation-draft-response/>
- ⁶⁵ <https://www.alliance-scotland.org.uk/blog/news/social-care-and-the-scottish-human-rights-bill-consultation-event-report/>
- ⁶⁶ <https://hrcscotland.org/wp-content/uploads/2023/08/Final-HRCS-Guide-to-responding-to-Human-Rights-Bill-for-Scotland-consultation-August-2023-1.pdf>
- ⁶⁷ <https://www.alliance-scotland.org.uk/blog/news/alliance-publishes-human-rights-bill-consultation-draft-response/>
- ⁶⁸ <https://hrcscotland.org/wp-content/uploads/2023/08/Final-HRCS-Guide-to-responding-to-Human-Rights-Bill-for-Scotland-consultation-August-2023-1.pdf>
- ⁶⁹ <https://www.alliance-scotland.org.uk/blog/news/the-alliance-calls-for-national-care-service-to-be-investment-of-citizenship/#:~:text=In%20a%20comprehensive%20response%20to,human%20rights%20and%20co%2Dproduction>
- ⁷⁰ <https://www.alliance-scotland.org.uk/blog/news/the-alliance-calls-for-national-care-service-to-be-investment-of-citizenship/#:~:text=In%20a%20comprehensive%20response%20to,human%20rights%20and%20co%2Dproduction>
- ⁷¹ <https://www.alliance-scotland.org.uk/wp-content/uploads/2020/10/ALLIANCE-SDSS-MSMC-National-Report-Oct-2020.pdf>
- ⁷² <https://www.alliance-scotland.org.uk/wp-content/uploads/2020/06/ALLIANCE-Briefing-social-care-and-COVID-19-emergency-powers-01.07.2020.pdf>
- ⁷³ <https://www.alliance-scotland.org.uk/blog/news/the-alliance-calls-for-national-care-service-to-be-investment-of-citizenship/#:~:text=In%20a%20comprehensive%20response%20to,human%20rights%20and%20co%2Dproduction>
- ⁷⁴ <https://www.equalityhumanrights.com/en/challenging-decisions-about-adult-social-care-scotland>
- ⁷⁵ <https://www.equalityhumanrights.com/en/publication-download/challenging-social-care-decisions-survey-local-authorities-scotland>

⁷⁶ <https://hrcscotland.org/wp-content/uploads/2023/08/Final-HRCS-Guide-to-responding-to-Human-Rights-Bill-for-Scotland-consultation-August-2023-1.pdf>

⁷⁷ <https://hrcscotland.org/wp-content/uploads/2023/08/Final-HRCS-Guide-to-responding-to-Human-Rights-Bill-for-Scotland-consultation-August-2023-1.pdf>

⁷⁸ <https://hrcscotland.org/wp-content/uploads/2023/08/Final-HRCS-Guide-to-responding-to-Human-Rights-Bill-for-Scotland-consultation-August-2023-1.pdf>

⁷⁹ <https://hrcscotland.org/wp-content/uploads/2023/08/Final-HRCS-Guide-to-responding-to-Human-Rights-Bill-for-Scotland-consultation-August-2023-1.pdf>

⁸⁰ <https://www.alliance-scotland.org.uk/blog/news/social-care-and-the-scottish-human-rights-bill-consultation-event-report/>

⁸¹ <https://hrcscotland.org/wp-content/uploads/2023/08/Final-HRCS-Guide-to-responding-to-Human-Rights-Bill-for-Scotland-consultation-August-2023-1.pdf>

⁸² <https://www.alliance-scotland.org.uk/blog/news/social-care-and-the-scottish-human-rights-bill-consultation-event-report/>

⁸³ <https://www.alliance-scotland.org.uk/blog/news/social-care-and-the-scottish-human-rights-bill-consultation-event-report/>

⁸⁴ <https://hrcscotland.org/wp-content/uploads/2023/08/Final-HRCS-Guide-to-responding-to-Human-Rights-Bill-for-Scotland-consultation-August-2023-1.pdf>

⁸⁵ <https://hrcscotland.org/human-rights-bill-lived-experience-board-reports/>

⁸⁶ <https://www.spsso.org.uk/how-to-complain-about-public-service>