

LICENSING OF FUNFAIRS (SCOTLAND) BILL

RICHARD LYLE MSP

SUMMARY OF CONSULTATION RESPONSES

This document summarises and analyses the responses to a consultation exercise carried out on the above proposal.

The background to the proposal is set out in section 1, while section 2 gives an overview of the results. A detailed analysis of the responses to the consultation questions is given in section 3. These three sections have been prepared by the Scottish Parliament's Non-Government Bills Unit (NGBU). Section 4 has been prepared by Richard Lyle MSP and includes his commentary on the results of the consultation.

Where respondents have requested that certain information be treated as confidential, or that the response remain anonymous, these requests have been respected in this summary.

In some places, the summary includes quantitative data about responses, including numbers and proportions of respondents who have indicated support for, or opposition to, the proposal (or particular aspects of it). In interpreting this data, it should be borne in mind that respondents are self-selecting and it should not be assumed that their individual or collective views are representative of wider stakeholder or public opinion. The principal aim of the document is to identify the main points made by respondents, giving weight in particular to those supported by arguments and evidence and those from respondents with relevant experience and expertise. A consultation is not an opinion poll, and the best arguments may not be those that obtain majority support.

All publishable responses can be seen on the member's website <http://www.richardlylemsp.org/consultation-responses.html>. A list of responses attributable to organisations and individuals can be found at the Annexe.

SECTION 1: INTRODUCTION AND BACKGROUND

Richard Lyle's draft proposal, lodged on 30 November 2017, is for a bill to exempt travelling funfairs from public entertainment licensing requirements and to create a distinct new licensing system for travelling funfairs in Scotland.

The proposal was accompanied by a consultation document, prepared with the assistance of NGBU. The consultation exercise was run by Richard Lyle's parliamentary office. The consultation period ran from 4 December 2017 to 26 February 2018 and the consultation document was published on the Parliament's website, from where it remains accessible—

[http://www.scottish.parliament.uk/S5MembersBills/Funfairs_consultation_FIN_AL\(1\).pdf](http://www.scottish.parliament.uk/S5MembersBills/Funfairs_consultation_FIN_AL(1).pdf)

The following were sent copies of the consultation document or links to it by the member, and were encouraged to share the consultation beyond their own networks—

- the Scottish Showmen's Guild;
- Showmen's Guild Sections from Regions across the United Kingdom; and
- the Vice President of the Showmen's Guild of Great Britain.

The consultation process was formally announced at the Scottish Showmen's Guild Annual Luncheon in November 2017 and, once launched, the consultation was promoted via social media. The consultation also became a standing item on the Agenda of the Scottish Showmen's Guild Cross Party Group in the Scottish Parliament

These meetings and events were held by the member and his staff and do not constitute part of the formal responses to the consultation and therefore no summary of the content is contained in this summary.

The consultation process is part of the procedure that MSPs must follow in order to obtain the right to introduce a Member's Bill. Further information about the procedure can be found in the Parliament's standing orders (see Rule 9.14) and in the *Guidance on Public Bills*, both of which are available on the Parliament's website:

- Standing orders (Chapter 9):
<http://www.scottish.parliament.uk/parliamentarybusiness/26514.aspx>.
- Guidance (Part 3):
<http://www.scottish.parliament.uk/parliamentarybusiness/Bills/25690.aspx>.

SECTION 2: OVERVIEW OF RESPONSES

In total, 189 responses were received. The majority of responses were submitted directly via Smart Survey (an online survey which allows responses to be completed and submitted online). However, a number of responses were received by email, or in hard copy and added to the survey.

Responses made by organisations

Twenty-four responses (13% of the total number of responses) were from organisations, which identified themselves as follows—

- Nine (37%) were from local authorities;
- Seven (29%) were from funfair operators who identified as commercial organisations (four of these asked to be anonymous);
- Six (25%) were from representative organisations (this included the Showmen's Guild of Scotland and other (anonymous) regional groups of the Showmen's Guild, and a response from the Amusement Catering Equipment Society. Three respondents in this category asked to be anonymous, and one asked to be confidential);
- One (4%) was from a third sector body which asked to be anonymous; and
- One (4%) was from another organisation which asked to be anonymous.

Organisational responses were therefore either from local authorities or funfair operators (or representative groups of funfair operators), with only one other response, from the Amusement Catering Equipment Society (which was fully supportive).

The local authority views were mixed: five were opposed to the proposal (three fully and two partially), two were partially supportive and two were neutral.

Although a small number of funfair operators and representative groups that responded appeared to fully support the proposal, most were supportive only of removing funfairs from the current licensing requirements, but not supportive of replacing that with a new licensing regime as per the proposal (this included some that stated that they fully supported the proposal).

Responses made by individuals

One hundred and sixty-five responses (87% of the total number of responses) came from individuals, of which—

- One (<1%) was from an individual politician (Richard Lockhart Conservative Councillor - South Lanarkshire Council);
- Forty (24%) were from professionals with experience in a relevant subject;
- Three (2%) were from academics with expertise in a relevant subject; and
- One hundred and twenty-one (73%) were from members of the public.

Of the total of 165 responses from individuals, 73, 44%, requested that their response be anonymous and 18, 11%, requested that their response be confidential. The remaining 74, 45%, were content for the response to be attributed to them.

A significant majority of individual responses appeared to come from funfair operators and members of the showpeople community. There were a small number of responses from members of the public who either attend funfairs, or were from communities where funfairs have been held.

Executive summary of responses

A substantial majority of respondents (87%) stated that they were supportive (either fully or partially) of the proposed Bill. However, whilst 74% of respondents chose the 'fully supportive' option (with 13% choosing 'partially supportive') it is clear from many of the respondents' subsequent comments that they are in fact only supportive of one element of the proposal – exempting funfairs from public entertainment licensing. Other responses which stated opposition to the proposal were also in favour of the removal of funfairs from licensing altogether. Therefore, a much larger number of responses than reflected in the statistics appear to be partially, rather than fully, supportive of the proposal, or opposed to the proposal.

Respondents can generally be broken down into three categories – funfair operators/showpeople (and their representative organisations), local authorities, and members of the public (either funfair goers or people in communities which host funfairs).

A large majority of responses came from funfair operators/showpeople, who were on the whole either fully or partially supportive of the proposal. Most supported the removal of funfairs from licensing altogether on the grounds that funfairs operating in the rest of UK, and in Europe, did not require a license and that the system in Scotland was unnecessary, inconsistent and inflexible, and was putting operators out of business. The Showmen's Guild of Scotland (which states in its response that it is the main organisation that represents showmen and the accepted negotiating body at national and local level since 1908) stated in its response that it has been expressing concerns about the current licensing arrangements for over 30 years and that the current system is having a disproportionate effect on the industry which has created a stark decline in the number of fairs operating in Scotland.

Some operators/showpeople were fully supportive of the proposal (to replace the current system with a new, bespoke, fairer, system) as they believed this could address the current problems whilst ensuring that funfairs were appropriately regulated.

As stated above, the local authority view was mixed, but there was consensus that there should be some form of licensing, and that it was important that appropriate time was given to assess applications and consult with relevant groups, including local communities.

The small response from members of the public was also mixed, with funfair attendees/enthusiasts supportive of removing funfairs from licensing altogether, or of replacing the current system with a new regime as per the proposal, while members of communities where funfairs can be held expressed concerns about the negative impact fairs could have on the local area and the importance of proper consultation and approval procedures being in place.

A number of responses appeared to have come from members of the same operator/showpeople families and others were identical or near identical in content. Several appeared to use pro-forma text provided by a third party.

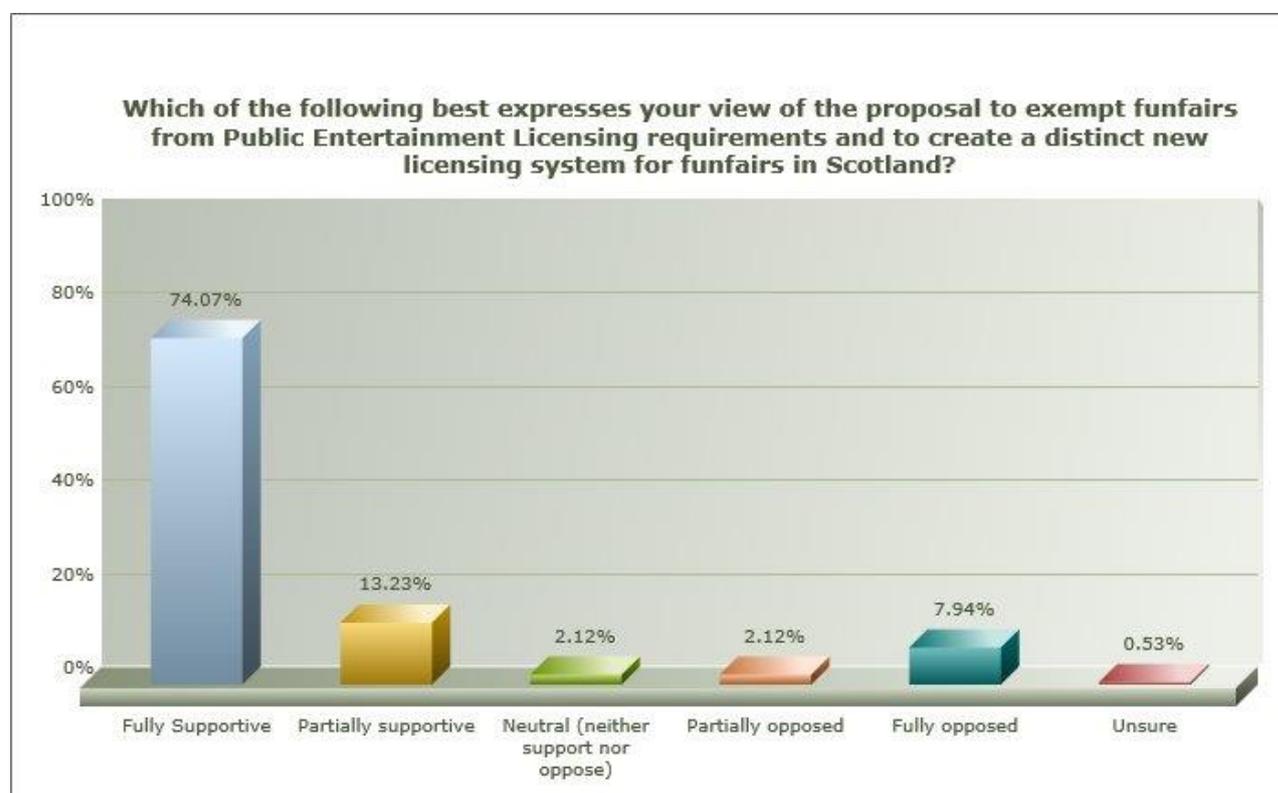
Some responses were unclear or appeared to have misunderstood either the question being asked or the aims of the proposal as a whole. For example, a number of respondents gave contradictory answers to different questions. This made it difficult at times to obtain a clear view of the intended response.

A detailed summary of the responses to each question can be found below.

SECTION 3: RESPONSES TO CONSULTATION QUESTIONS

General view – Question 1

All 189 respondents answered this question—



Reasons for supporting the proposed Bill

A large majority, 165 respondents (87%), were supportive of the proposal (140, 74%, of those who answered the question, stated that they were fully supportive and a further 25, 13%, were partially supportive). Of the 24 organisations which responded to the consultation, 17, 71%, were supportive (7, 29%, fully supportive and 10, 42%, partially supportive).

As stated above, although a substantial majority stated that they were fully supportive of the proposal, it is clear that a large number of those respondents were in fact only supportive of one element - the exemption of funfairs from public entertainment licensing. Many respondents who chose 'fully supportive' under question 1 went on to state that they did not support a new licensing system and suggested that funfairs should be exempted from licensing altogether.

It should therefore be recognized that while 74% claimed to be fully supportive of the proposal, this is not borne out in subsequent comments and responses which suggest that a significantly proportion of these respondents were in fact only partially supportive.

Reasons for fully supporting the proposal

Ensuring consistency

Many respondents noted that, within Scotland, the fees charged and operating conditions put in place varied greatly between different local authority areas. Many of the showpeople responding considered this to be unfair and to have a negative effect on their ability to run their business. One anonymous respondent explained—

“The difference in the cost of applying for a Public Entertainment Licence from council to council is quite incredible. There should be a nationwide fee in place which would mean that no council area can charge more than another, or ideally the same approach should be taken as English councils, where no such licence is required to operate a Funfair” (ID: 71831597).

It was noted by one respondent that simplified regulations had been introduced for other mobile businesses (such as mobile food providers) throughout Scotland and that the same should therefore be introduced for travelling funfairs (ID: 74825210).

Fees too high

Many respondents considered that the fees charged for the licensing of funfairs are too high, and that this was having a negative effect on the livelihoods of operators/showpeople. It was suggested by some respondents that funfairs were going out of business due to the fees being charged. Thomson’s Funfair stated—

“[W]e are the only country in Europe to hold such laws. As a Showman I feel that the licensing process is restricting our business and costing families a living. The fact you have to apply for some licences 12 weeks before actually operating a funfair and they can be refused a day before the opening is shambolic. Everyone is entitled to make a source of income. And the licensing is depriving us of doing so. In today’s society having to pay anything from £90-£600 just for an application to be heard is shocking.”(ID: 71817663)

Lack of flexibility and overly bureaucratic

Many respondents considered that the current licensing system was complex, inflexible and overly bureaucratic. In particular, the lack of flexibility was criticised with licences often being granted or rejected at very short notice. Respondents explained that, should the licence be rejected, there was little opportunity for alternative plans to be put in place. This was made worse as, in such cases, application fees were not refunded.

The length of time taken to process applications was criticised by some, with one respondent saying the process, often taking 6-12 weeks, was unique to the funfair industry (ID: 74156688).

Threat to Scotland's cultural heritage

One theme that emerged was the important role that funfairs play in Scotland's cultural heritage and the threat the current system poses to that. A number of respondents noted the importance of valuing and preserving Scotland's funfairs, something it was feared would be threatened by the current licensing system. One individual, Jacqueline Macleod, stated—

“The fairs are part of the Scottish public's cultural heritage as well as the cultural heritage of the Showpeople Community. The Showpeople contribute to our economy and this needs formal recognition and support. The UK is behind the EU in relation to this legislation. The change is long overdue because the situation as it currently stands puts the Showpeople communities' way of life at risk and directly adversely affects the social heritage of many people in Scotland” (ID: 78026776).

Funfairs contribution to local communities

A number of respondents considered that funfairs provide a service to local communities and should therefore be supported and encouraged as much as possible, including through the introduction of a fairer, standardised licensing regime (or as many respondents suggested – by exempting funfairs from licensing). It was suggested that a reduction in the costs of running fairs would allow them to operate in smaller communities which in turn would bring not only a means of entertainment to the area, but a boost to the local economy (ID: 74538583).

Reasons for partial support

The majority of those expressing partial support explained that they were only supportive of one element of the proposal – exempting funfairs from public entertainment licenses.

Bringing Scotland in line with other countries

A large number of the showpeople who responded to this question stated that funfairs in the rest of the United Kingdom and the EU were not subject to public entertainment licensing, or licensing of any kind. It was therefore considered unfair that those running fairs in Scotland were penalised by having to pay fees and adhere to licensing requirements. One respondent, Clark Macintyre, stated—

“All over Europe they don't need a licence to operate, there are showmen who travel in the Scottish Borders and pay for a licence then a few miles south they don't need a licence; also the price of licences change in different council.” (ID: 72193855).

It was noted by some that Scotland was at odds with the rest of Europe where travelling fairs are supported and encouraged, with many respondents stating that where fairs operate without licences, no major issues have been reported.

This was also the view of the Showmen’s Guild of Scotland (SGOS) which considered that travelling fairs should be exempted from licensing requirements. The SGOS stated—

“A half-way house such as a new licensing regime will only allow local authorities to continue to thwart our members’ attempts to operate travelling funfairs and to earn a living. An exemption from the licensing regime would hopefully allow travelling fairs to flourish and protect our members’ way of life” (ID: 75014475).

The SGOS went on to explain that funfairs are already highly regulated, and have to comply with extensive health and safety regulations. It therefore considered it unnecessary for local authorities to impose further conditions on funfairs via licensing.

Two of the local authorities which responded expressed partial support for the proposal. While Clackmannanshire Council considered that a new system would create consistency in the licensing arrangements throughout Scotland, it warned of the pressure this could place on local authorities—

“There must however be a balance to ensure that any new regime does not impose a burden on the already stretched Local Authority staff and budgets. Particularly in respect of costs and processing times” (ID: 74875672).

Fife Council Environmental Health Department, Food and Workplace Safety Team stated that many considerations would need to be addressed before it was in a position to express full support (ID: 75010560).

Reasons for opposing the proposed Bill

A minority of respondents, 19 (10% of those who responded), were opposed to the proposal (15 respondents were fully opposed, and 4 respondents were partially opposed).

Reasons for full opposition

Some respondents gave unclear answers to this question – for example, by suggesting that the proposed Bill would have a negative effect on funfairs but not explaining why they considered this to be the case. One individual stated that they were ‘fully opposed’ but said they would require further information in order to reach a view on the proposal (ID: 72072174).

Taking local circumstances into account

Some individual respondents and local authorities felt the current system was adequate and were concerned that creating a new licensing system would lead to less consultation with local communities and less consideration of local-specific needs. One anonymous respondent set out their view on this matter—

“While I can see how the proposals seem to address the concerns of the travelling show people, it fails to give local communities an effective

voice. This government (rightly) makes a huge deal of the role local communities should have in local decision making, of empowering communities and making Scotland a fairer and more equal place. There needs to be an adequate period of time for local communities to consider proposals for the siting of fairgrounds. It is not enough to suggest that fairgrounds are an economic benefit to a community, to do so ignores the reality for many residents and wider community. It is essential to listen to the experiences of residents living adjacent to sites. You cannot pay lip service to community empowerment/ engagement, while the rights of communities of interest should be fully considered, this should not be done at the expense of other (geographic) communities” (ID: 72910247).

An individual respondent, James Allison, detailed the negative impact that he considered funfairs to have on the local area, explaining that he and other residents—

“...have had frequent funfairs literally dumped on our back gardens, and have had to deal with the noise and light pollution, the constant running diesel generators, sometimes through the night, noise and fume pollution, road blockages and restrictions, road safety bollards being removed by the operators leaving a hazardous school crossing, intimidation by the operators and their employees.” (ID: 72814029)

Aberdeenshire Council Licensing sub-committee also expressed concern that a standardised licensing system would create issues—

“We disagree with the premise that the licensing regime for funfairs should be uniform across Scotland. Each local authority has to take into account different considerations according to local circumstances, budgetary considerations, and other factors that can change from area to area.” (74856736)

Argyll and Bute Council (ID: 74893366) considered that Public Entertainment Licensing requirements serve their purpose well and allows for proper scrutiny of licence applications to take place, for example, by allowing for consultation with Police Scotland.

Another reason given for fully opposing the proposal included that funfairs should adhere to the same conditions as other businesses which require a Public Entertainment Licence.

Reasons for partial opposition

Only four respondents were partially opposed, and some of the reasons given were unclear. Others were similar to those already covered above, with Renfrewshire Council (ID: 73381394) expressing concern that a new standardised system would not allow for sufficient consultation with both appropriate agencies and local communities. North Lanarkshire Council (ID: 74910368) argued that funfairs should not have their own distinct regulatory

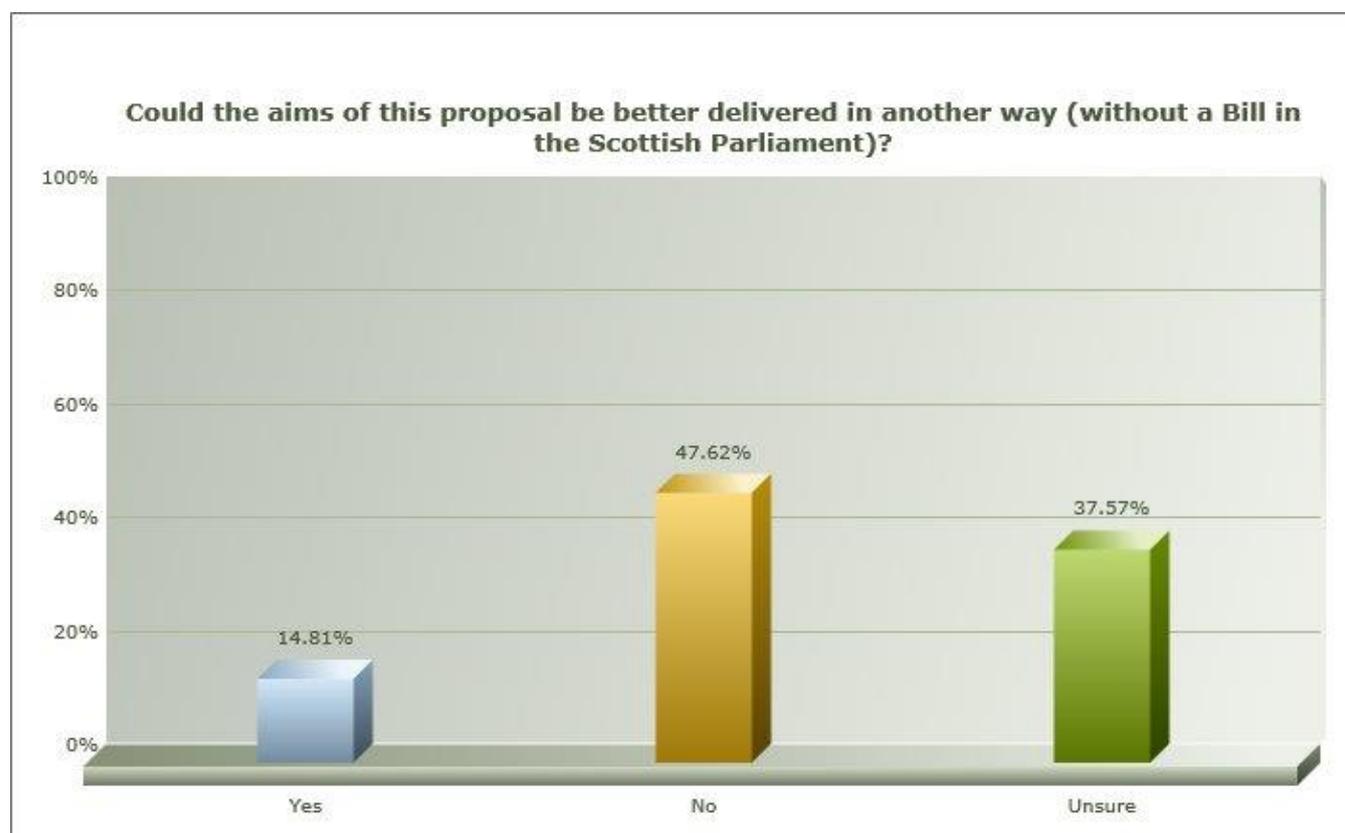
procedures, separate to other businesses subject to Public Entertainment Licences.

Neutral and unsure

Highland Council and East Ayrshire Council were among the four respondents who chose this option, stating that more details of the proposed new licensing system were required before a view could be reached.

Alternatives to a Bill – Question 2

All 189 respondents answered this question as follows—



As with other questions throughout the consultation, it is apparent that many respondents answered on the basis of funfairs being exempt from any form of licensing, rather than on the proposal which is to replace the current system with a new one.

Those who thought the aims could not be better delivered in another way

Many respondents who answered this question, 90, 48%, believed that the aims could not be better delivered in another way (i.e. without a bill in the Scottish Parliament). Many responses reiterated support for exempting funfairs from licensing altogether, or for replacing the current system with a new one, while some of the comments made were unclear.

It was considered by many that legislation was required in order to ensure that local authorities would implement the proposed changes. A number of respondents were critical of guidance which had previously been issued by the Scottish Government (as an alternative to new or revised legislation), stating that it had been ineffective. The SGOS (who support exempting funfairs from licensing altogether) stated—

“This guidance merely reinstates the terms of the 1982 Act with no additional guidance to licensing authorities. This is disappointing since the Showmen’s Guild has raised concerns about the licensing regime from the date of its inception some thirty years ago. Even if these guidelines were to be amended in the future, without legislative change, there would be no compulsion on local authorities to change their current practices. Moreover, this would not improve consistency across all local authorities, as each authority will consider and act upon it on an individual, rather than a collective, basis.”

A prevailing view was that legislation would ensure country-wide changes and bring much needed consistency to the licensing system. One anonymous respondent referred to multiple attempts by the Showmen’s Guild to bring about changes to the licensing regime. These had failed to result in change, and the respondent therefore concluded that legislation was required (ID: 74825210).

Some operators/showpeople who responded considered that legislation would be the most appropriate means of ensuring that they were treated fairly and not discriminated against in relation to the licensing of funfairs. One anonymous respondent stated—

“It has to be done through parliament so that it becomes apparent and that all councils must adhere to across the board so that there is no room for further discrimination and the showmen and women are treated equally and fairly wherever they choose to open for business” (ID: 72184962).

Those who thought the aims could be better delivered in another way

Twenty-eight respondents, 15% of those who answered this question, believed that the aims of the Bill could be better delivered in another way.

The majority of these responses reiterated their support or opposition to the proposal, with many focusing on their desire for the licensing of fairs to be abolished. Some made suggestions of specific changes that could be made to the licensing system such as requiring local authorities to provide a refund when fairs cannot go ahead due to poor weather conditions.

Argyll and Bute Council reiterated its view that the current licensing system works well but considered that amendments could be made to the Civic Government (Scotland) Act 1982 to maintain “consistency and congruency.” (ID: 74893366).

Those who were unsure

A significant number, 71 respondents, 38% of those who answered the question, were unsure whether the aims could be better delivered in another way or not. However, only 14 of the 71 respondents provided further comments to explain the reasons for their answer.

Two of the local authorities which responded chose this option, referencing the aforementioned guidance on funfair licensing which had been issued by the Scottish Government. East Ayrshire Council noted that the guidance did not address inconsistencies in the current regime. However, Aberdeenshire Licensing sub-committee was of the view that the guidance could offer a degree of consistency whilst allowing local authorities to take into account local circumstances and adjust their own licensing system accordingly.

Advantages of the proposal – Question 3

What do you think would be the main advantages, if any, of the proposal?

One hundred and thirty-nine respondents answered this question.

There was significant repetition and overlap between this question and reasons given for full or partial support in question 1. Detailed views on the advantages of the proposal can therefore be found in the summary to question 1. A number of responses simply stated support for the proposal. Some respondents who had previously answered that they were opposed to the proposal repeated that opposition in answering this question by stating that there were no advantages, or by listing disadvantages.

Responses to this question were at times unclear. For example, some respondents who stated that there were no advantages had, in answer to a previous question, stated that they were ‘fully supportive’ of the proposal.

A number of responses referred to the advantages of exempting funfairs from licensing rather than commenting on the advantages of a new bespoke system. This included the SGOS which emphasised the positive impact exemption from licensing would have on showpeople—

“By removing travelling fairs from the licensing regime the Bill should have a positive effect on the 400 or so businesses operating across Scotland. This would have a direct impact as the requirements to hold a funfair would be less costly and bureaucratic. It would also help support our way of life – one that is a struggle for many due to the burden of over regulation. As noted elsewhere in this document children are turning away from the Showpeople way of life owing to these difficulties. There would also be a number of indirect benefits, such as being able to better plan business activities over the short, medium and long term. The proposal will also affect the myriad of local businesses that support local fairs, from engineers to food retailers.”

The response also sets out the potential positive impact on local communities, primarily by allowing more fairs to operate, and the social and economic benefits that this would create.

Some of the additional points made by other respondents include that—

- It would create a fair, standardised system, putting Scotland on an equal footing with the rest of the UK and the EU. It was considered that a new system would be simpler and less bureaucratic; Clackmannanshire Council stated that a consistent application process would improve the quality of applications received and therefore reduce delays in processing applications;
- Any reduction in the costs associated with running a funfair would be beneficial to members of the public with more rides being available to customers and lower prices charged; and
- Local authorities could gain revenue by leasing ground to fairs which previously had been unable to operate in the area.

Fife Council Environmental Health Department, Food and Workplace Safety Team made some suggestions as to how a new licensing system could be streamlined in order to work well. Suggestions included—

- Providing risk assessments, Amusement Device Inspection Procedure Scheme Inspection reports and Public liability insurance would be provided along with any application;
- The creation of a national database where Showpeople could provide up-to-date supporting information. This would avoid the local authority having to ask for this information on multiple occasions;
- Food vendor information provided at the point of application; and
- Local authorities providing lists of suitable locations dependant on size and scale of event. This would also allow for noise and light pollution, waste management and anti-social behaviour issues for these locations to be assessed in advance, reducing the time taken for this at application stage (ID: 75010560).

Disadvantages of the proposal – Question 4

What do you think would be the main disadvantages, if any, of the proposal?

One hundred and fifteen respondents answered this question and many of the disadvantages given repeated answers given to previous questions. There were also a significant number of responses from those who supported either the exemption of funfairs from licensing altogether, or the introduction of a new system, and who stated that there were no disadvantages to the proposal.

A large number of respondents appeared to have misunderstood the question as their answers stated what they considered to be the disadvantages of the current system rather than what the disadvantages of the proposed Bill would be.

A number of local authorities raised concerns in response to this question. As with question 1, the main issue raised was the need to ensure that local circumstances are fully accounted for and that communities are able to feed into the process, as Renfrewshire Council set out in its response—

“We are concerned that a reduction in the scrutiny of applications, or reduced scope for local licensing authorities to engage with local communities or other interested bodies, could be detrimental to the interests of the general public.” (ID: 73381394).

This view was echoed by Aberdeenshire Council Licensing sub-committee and Argyll and Bute Council who agreed that it was important for local authorities to take the needs of their local area into account, something it was feared a new system would prevent.

South Lanarkshire Council was particularly concerned that a revised licensing system would not allow for the concerns of communities regarding issues such as anti-social behaviour to be addressed—

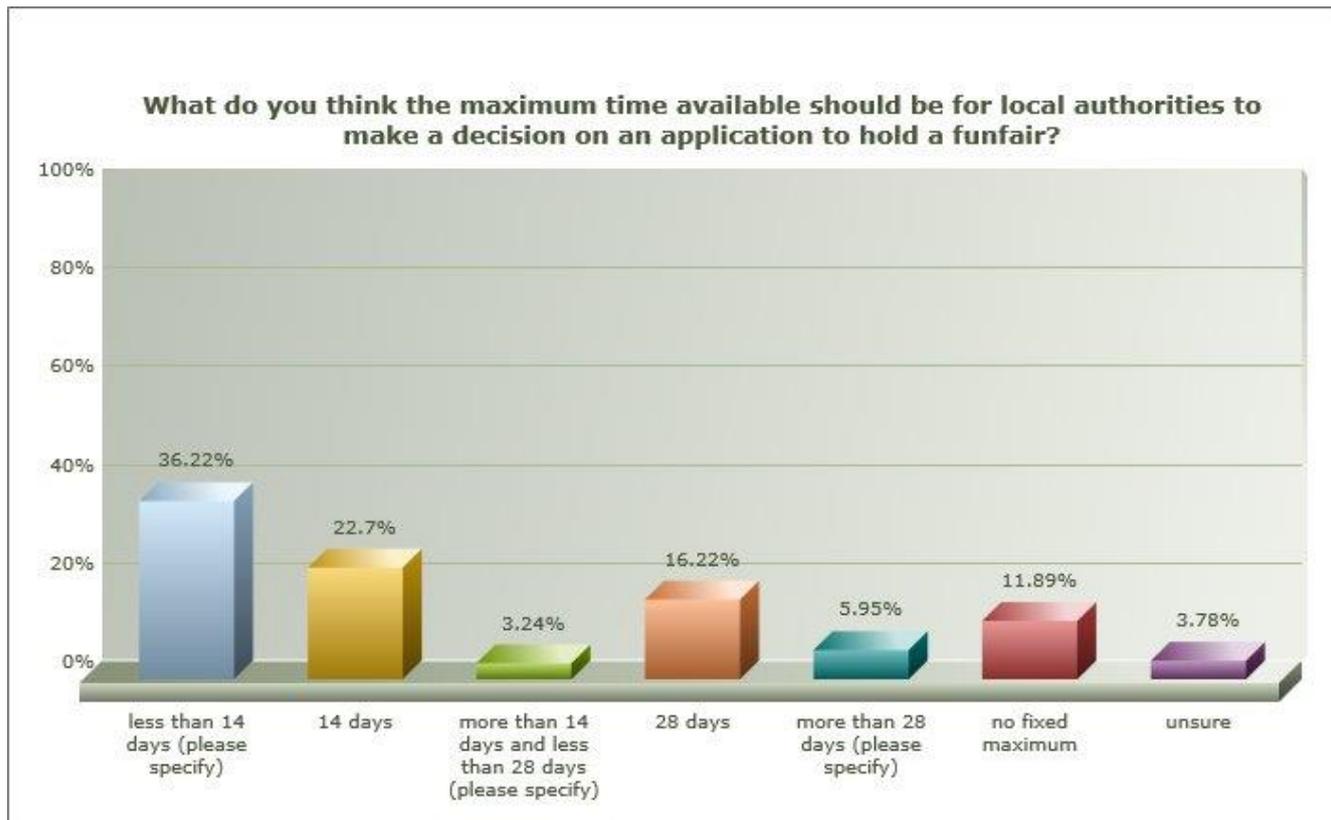
“The consultation document refers to the Health and Safety Executive and the ability of Environmental Services to serve statutory notices to prevent noise nuisance. No reference is made to any proposals to allow the community the right to comment on applications nor are there any proposals on how issues which cause disturbance to neighbours but fall short of statutory noise nuisance will be responded to, for example, fairground rides sited too close to houses” (ID 75012683).

Clackmannanshire Council listed some additional concerns including: undue pressure on admin staff to meet timescales, time and cost of training staff on the new system, potential costs of the new software required, and the expectation of all 32 councils working in exactly the same way being unrealistic.

Timescales for deciding applications – Question 5

Some respondents who answered this question (and questions 6-7, also on the detail of the proposal) stated that, as they considered that there should be no licensing system for funfairs, these questions were irrelevant.

One hundred and eighty-five respondents answered this question as follows—



Less than 28 days (Less than 14 days/14 days/ more than 14 days and less than 28 days)

A majority of respondents to this question (115, 62% of those who answered the question) thought that less than 28 days should be taken by local authorities to decide on an application

The most popular response was 'less than 14 days' (67 respondents, 36% of those who answered the question) which was largely chosen by individual respondents (funfair operators/showpeople) and their representative organisations. A prevalent view was that requiring a decision to be made relatively quickly would allow funfair operators to plan in advance. It was noted that it can currently take a long time for local authorities to reach decisions, and that operators feel left in limbo, unsure whether the fair will go ahead. The SGOS (whose preference would be for there to be no licensing of funfairs) and many other respondents were of the view that if decisions were reached more quickly, operators would have time to make alternative arrangements should the licence not be granted or if, for example, ground conditions meant that they were unable to use a planned site. One anonymous respondent explained—

“There should be the flexibility for councils to make their decision as soon as possible as the ground conditions can change with the weather and make it impossible to hold a funfair on the original piece of land. Under the current system it would take up to 12 weeks to get the location changed this would mean the fair could not happen on its normal dates” (ID: 71919525).

Several respondents also noted that modern electronic means of communication should allow for quicker turn around times for applications compared to when the current system was introduced in 1982.

28 days or more (28 days/ More than 28 days)

Thirty respondents, 16% of those who answered the question, suggested a timescale of 28 days. Many stated that this would be fair to both the funfair operators and the local authorities, leaving sufficient time for local authorities to seek feedback and put resources in place and for operators/showpeople to plan ahead. One anonymous respondent set out their reasoning for choosing a 28 day timescale—

“A uniform time is essential for effective forward planning. 28 days seems to me ample time to give notification of the event and allow potential objectors to note their concerns. I should think that given the way social media is used to disseminate information, 7 days is enough time for objections to be made and a further 21 days to take account of any resulting discussions. It may be that this timescale is too tight for some local authorities to work to but I would certainly hope for a maximum time to be included in any bill for a licence application to be processed as without it, the Funfair operators would be unable to make advance plans” (ID number: 74161243).

Eleven respondents, 6% of those who answered the question, thought that a timeframe of longer than 28 days was required in order to properly deal with licensing applications. This included a number of local authorities, with Renfrewshire, Clackmannanshire, East Ayrshire, Argyll and Bute and Highland Councils all choosing this option.

Again, the main reason given was that this would allow local authorities to consult with local residents on the potential impacts and for objections to be made. Highland Council set out a seven stage process which is followed including allowing time for sufficient notice to be given to the public, for an objection period and for hearings. Clackmannanshire Council (ID: 74875672) set out its own process, explaining that at least eight weeks were required.

No fixed maximum

It was considered by some respondents (22, 12% of those who answered the question) that having no fixed maximum timescale would be most appropriate. Many thought that this would allow local authorities to deal with each specific application correctly depending on the circumstances, with one respondent, Craig Dunbar, raising concerns that should there be a problem with an application the local authority may feel duty bound to reject it if required to reach a decision within a certain timeframe (ID: 74528198).

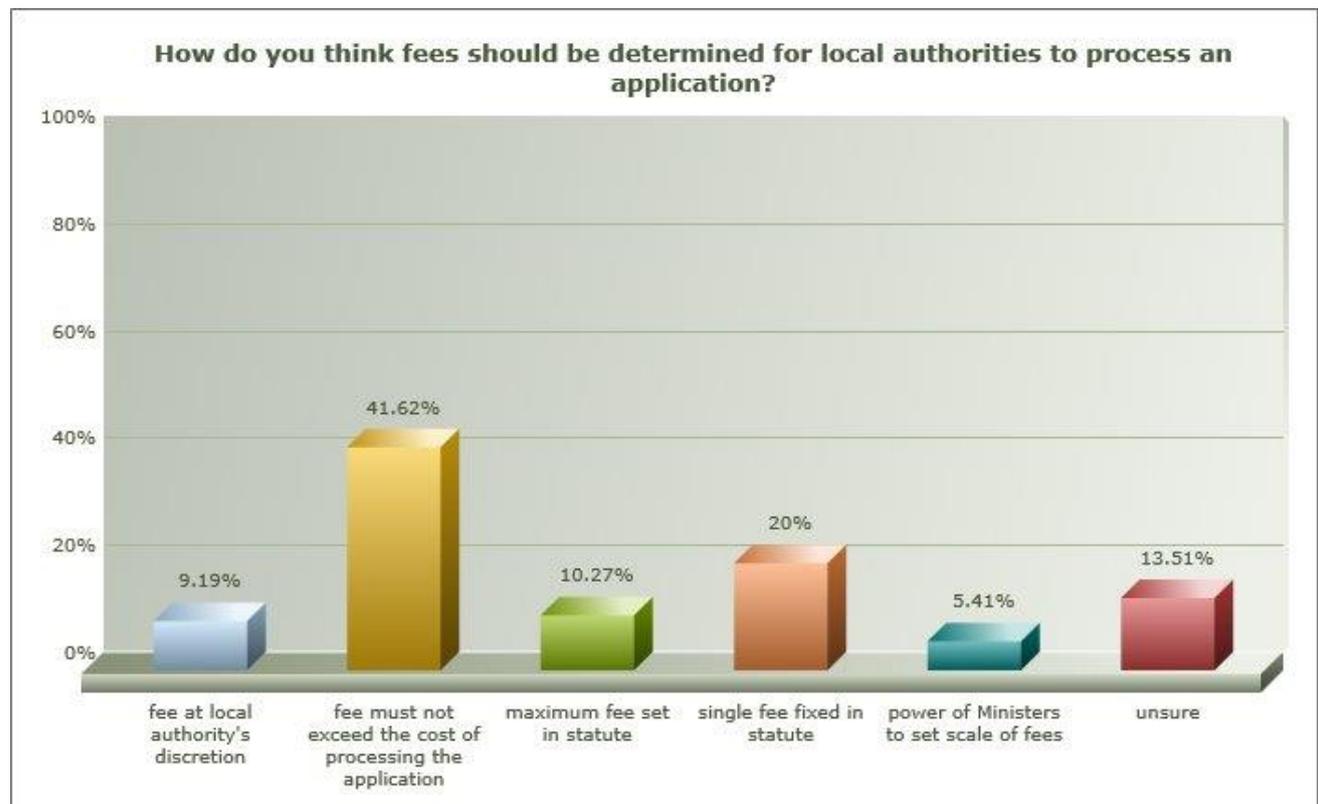
Aberdeenshire Council Licensing sub-committee noted that budgetary considerations would have an impact on the resources available to process applications and the amount of time taken on them.

Unsure

Seven respondents, 4% of those who answered the question, were unsure, although only two of those offered any explanation. One anonymous respondent who answered in this way noted that local authorities faced time and resource pressures in dealing with applications and suggested that the system should be simplified in order to lessen this pressure and to help showpeople.

Determining fees – Question 6

One hundred and eighty-five respondents answered this question as follows—



As with questions 5 and 7- also on the detail of the proposal - some respondents who answered this question stated that, as they considered that there should be no licensing system for funfairs, these questions were irrelevant.

Fee must not exceed the cost of processing the application

This was the most popular response (77 respondents, 42% of those who answered the question) with a large number of respondents reasoning that while local authorities' costs should be covered, they should not profit from processing license applications. Some operators stated that existing legislation already states that fees should be in place to cover administrative costs but suggested that this was not always adhered to. Lanarkshire Council was of the view that local authorities should be able to recoup any costs involved in processing an application and not incur any losses. Some respondents pointed

out that funfair operators also have to pay other expenditures including fees to rent the land on which the funfair takes place. It was also noted that the presence of funfairs would boost the local economy of the areas they visit and therefore be beneficial to local authorities.

Single fee fixed in statute

Thirty seven respondents, 20% of those who answered the question, thought a single fee should be set in the Bill. Again, it was reflected that fees should accurately reflect the work involved with processing a license and not be used by local authorities to generate funds.

Some also considered that a single fixed fee would counteract the current lack of transparency around how fees are determined, with one anonymous respondent adding that the Showmen's Guild should be consulted on this matter—

“There is no transparency in the decision making that result in these high fees. Fees do not include a breakdown of the service they provide and appear at odds in terms of scale with other comparable licensing fees. Therefore it is undesirable for local authorities to continue to set fees. The fees should be set in consultation with the Showmen's Guild, taking into account the average number of days lost due to bad weather, a point that should be made explicit to policymakers is that this business is wholly dependent on the vagaries of Scottish weather and therefore is unenviably vulnerable to an unpredictable climate. In contrast to festival-goers, families tend not to visit funfairs in the rain” (Anon 74825210).

Fife Council Environmental Health Department, Food and Workplace Safety Team agreed that a single fixed fee would “allow consistency, proportionality and transparency” (ID: 75010560)

Other fees in statute (Maximum fee or power of Ministers to set scale of fees)

Nineteen respondents, 10% of those who answered the question, thought a maximum fee should be set in statute. Some considered this would allow local authorities some discretion to vary the amount charged depending on individual circumstances, for example, the fee would vary depending on the size of the fair or the number of rides. Clackmannanshire Council stated—

“It must be recognised that there is a difference between 3 or 4 rides coming to a local park and the Kirkcaldy Promenade type set up with 30 -40 rides. Either a maximum fee or a scale of pre-determined fees identifying clearly defined different sized travelling fairs would achieve the aim of consistency of cost.” (ID: 74875672).

One respondent , Barbie Colquhoun (ID: 74178889), suggested that avoiding a fixed fee would allow smaller local authorities to charge less in order to attract fairs to their area.

Similar reasoning was given by those who were of the view that Ministers should set a scale of fees (10 respondents, 5% of those who answered the question). It was considered that this would allow fees to reflect the size and duration of the fair whilst avoiding unwarranted regional variations. The SGOS, whilst in favour of funfairs being exempt from licensing, stated that if funfairs had to be licensed this would be its preferred option as it would ensure that fees reflected the costs incurred by local authorities.

Fee at local authorities' discretion

Seventeen respondents, 9% of those who answered the question, thought the fees should be at the discretion of the local authority. As with the responses to various other questions in the consultation, the need to take full account of local needs in determining licensing fee arrangements was raised by a number of respondents and by local authorities in particular. For example, Renfrewshire Council stated that fees need to be set in order to meet the expenses of the local licensing authority, going on to state—

“In relation to fees, while Renfrewshire’s fee for licensing funfairs is one of the higher fees shown, the reason for this is that the Council has a policy of advertising these particular applications, which are seen as carrying a higher risk of causing public concern, in a local newspaper. The cost of doing so is expensive, amounting to a substantial proportion of the licensing fee charged. If the cost of advertising were removed from the charge, the application fee in Renfrewshire would be less than that applying in a number of other authorities. It is stated on page 7 of the consultation document that some authorities “must be profiting” from the fees charged. We challenge this assumption, given the above circumstances, in Renfrewshire” (ID: 73381394).

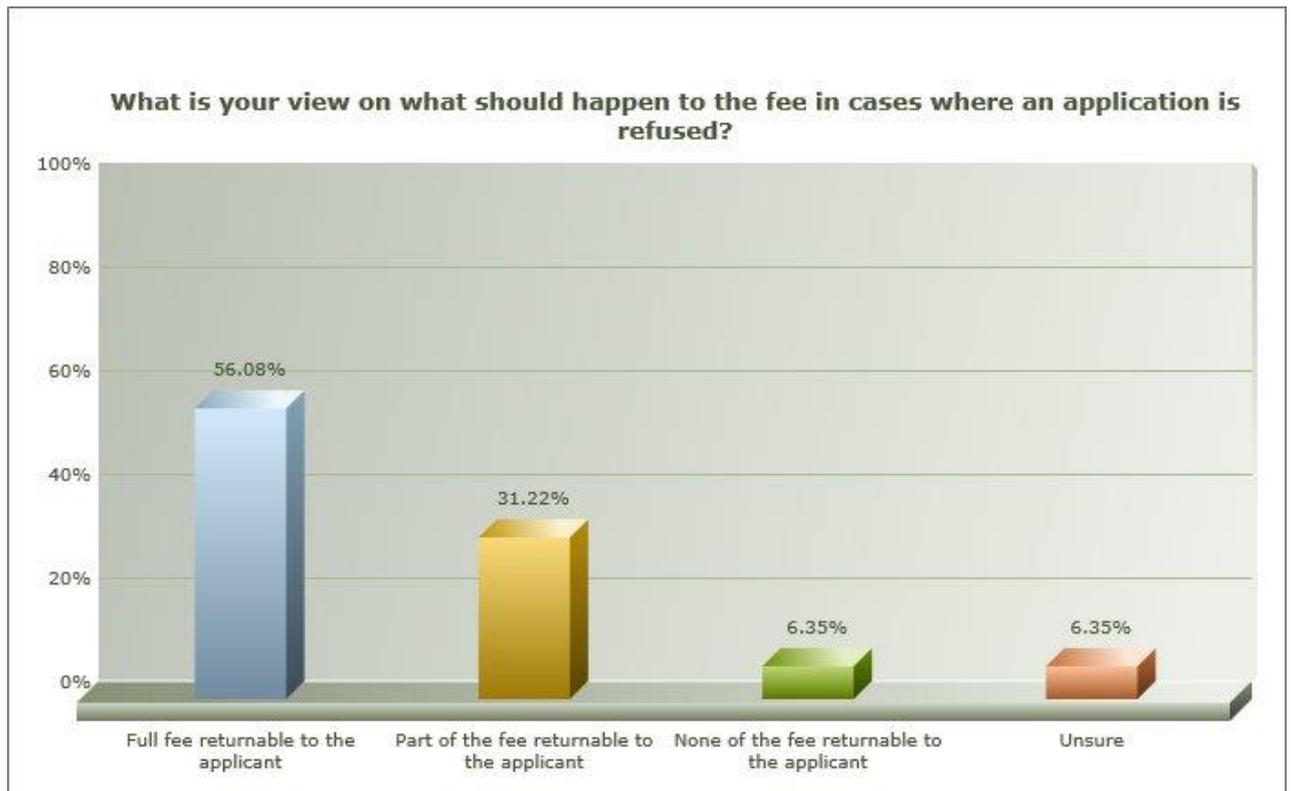
This was echoed by Aberdeenshire Council Licensing sub-committee and Argyll and Bute Council. The latter was of the view that as different local authorities had different processes (for example some undertook extensive advertising and consultation) it was inevitable that they would have to charge different fees. However, it emphasised that whilst fees varied between council areas, they are designed to recover costs. South Lanarkshire Council agreed that the fee should be determined by the amount of work required; stating that sometimes the fee it charges is lower than it should be, given the amount of work that has been carried out.

Unsure

Although 25 respondents answered in this way, only six commented further. Some comments stated that further information was required in order for a view to be reached whilst others stated that there should be no fee.

Outcome when application refused – Question 7

All 189 respondents answered this question as follows—



As with questions 5 and 6 (also on the detail of the proposal) some respondents who answered this question stated that as they considered that as there should be no licensing system for funfairs, these questions were irrelevant.

Full fee refunded

This was the most popular response, selected by 106 respondents, with many adding no further comment. It was considered by a number of respondents that operators/showpeople should not have to pay a fee if they are not going to get anything in return. Some stated that other businesses only pay a fee once a license has been granted, including George Morrison who spoke of his own experience—

“As someone who has lost money to the fees, I think it should be handed back to the applicant if refused. We have to pay for the application up front, when other businesses do not pay until granted” (ID: 74390185).

It was further noted by some that the current license fee was prohibitively expensive and knowing that a fee would be returned should the license be refused would encourage more people to apply.

Part of fee returned

Fifty nine respondents thought part of the fee should be returned. The majority of those who answered in this way acknowledged that local authorities would incur a cost in processing applications and therefore considered that part of the fee should be retained by councils should the application be refused. The general view was that this would be fair to both parties and many, including the

SGOS, were keen to emphasise that local authorities should not profit from the application process.

Whilst most respondents who chose this option appeared to be operators/showpeople or their representative organisations, it should be noted that some local authorities also chose this option. Fife Council was of the view that the fee minus administration charge should be returned whilst South Lanarkshire Council considered that part of the fee should be returned only if the application had not gone before a committee for a hearing.

One respondent, Helen Toner, suggested an alternative of allowing the funfair operators to make a repeat application at a later date without having to pay an additional fee (ID: 71816888).

No fee returned

Twelve respondents thought that none of the fee should be returned. This option was chosen by a majority of the local authorities which responded, who considered that fees charged were based on cost recovery and should therefore not be returned. It was noted by some that if, as was the most popular response under question 6, the fee did not exceed the cost of processing the application, then there is no reason why the fee should be returned.

Highland Council made reference to the costs incurred by local authorities, explaining that it was more costly to process applications which are refused than those which are granted—

“None of the fee should be returnable in the event of refusal of an application. Local authority staff undertake more work in cases of refusal, as these will be cases where objections have been received and the application has therefore had to be referred to Committee...Refusals therefore effectively cost local authorities more than grants.” (ID: 73197499).

Renfrewshire Council, Aberdeenshire Council Licensing sub-committee and Argyll and Bute Council all made similar points with the latter adding that those applying for licences were informed from the outset that the fee would not be refunded regardless of the outcome.

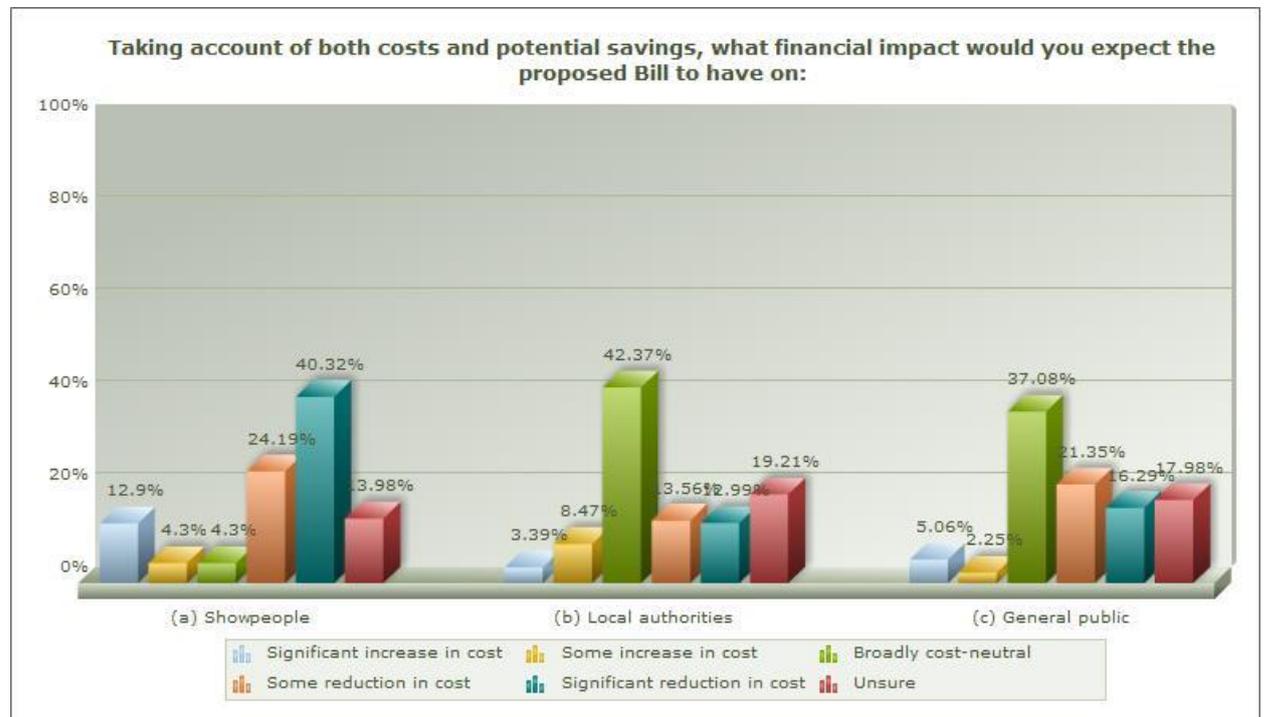
Unsure

Twelve respondents were unsure. Comments made included that whether the fee should be returned would be dependent on why the application had been refused and whether the fee was set out in statute or not. With reference to the grounds of refusal being a determining factor, World of Parties explained—

“This really depends on the grounds, if the application is not filled in correctly then the form should be returned along with fee, however if a local service has reasonable grounds to object, this should be included in a note section of an application. IF the police raise real concerns then this has used services and I feel this should be paid for like any other business” (ID: 71836847).

Financial implications – Question 8

187 respondents answered this question as follows—



It should be noted that a number of respondents found this question difficult to respond to as circumstances vary throughout the country with, for example, some local authorities charging much higher fees than others.

Showpeople

A majority of respondents considered that there would be a reduction in costs for operators/showpeople; however, it was clear that many answered this question based on the view that there should be no licence rather than on the proposal as a whole. Many respondents therefore stated that showpeople would save money by not having to pay license fees.

However, others did make reference to a new licensing system, considering that it would lead to lower fees, and therefore create savings for showpeople. It was considered that reduced fees and a more straightforward process for obtaining a licence would allow more fairs to take place and therefore help showpeople to continue to make a living and employ staff.

One anonymous respondent explained that smaller operators would see more of a benefit—

“Smaller operators would see the most significant reduction in costs, since costs incurred by operators inevitably get passed on to stall holders, kiosks etc. This is an important point, as due to the increasingly unpredictable nature of the funfair applications, many small operators have left the industry and funfairs have lost their unique British

characteristics, with some funfairs consisting of large amusement rides and very few smaller enterprises, similar to US style 'carnivals'. Thus, the financial impact would benefit smaller enterprises to a greater extent” (ID: 74825210).

Argyll and Bute Council noted that while showpeople would be likely to make savings, some who are part of larger entertainment events may find themselves with an increase in costs should they have to pay for a Public Entertainment Licence under the current system in addition to a separate funfair licence.

For those who thought there would be an increase in costs, the majority of reasons given were either unclear or appeared to be based on a misunderstanding about what the proposal was intended to achieve.

Local authorities

The majority of respondents considered that the proposed Bill would be broadly cost-neutral for local authorities. As before, many answered with regard to the exempting of licensing fees but not the creation of a new system. Some respondents therefore considered that local authorities would save money by not having to administer a licensing system for funfairs whereas others considered that local authorities would lose revenue should fees be reduced or abolished.

It was also suggested that, should local authorities charge a fee which only covered the cost of processing the application, they would not gain or lose any revenue.

Whilst some respondents took the view that setting up a new licensing system would be costly for local authorities, others suggested that a more streamlined and efficient licensing system would save them money.

Most local authorities who responded to this question stated that it was difficult to reach a view on this matter without having full details of how the new system would work.

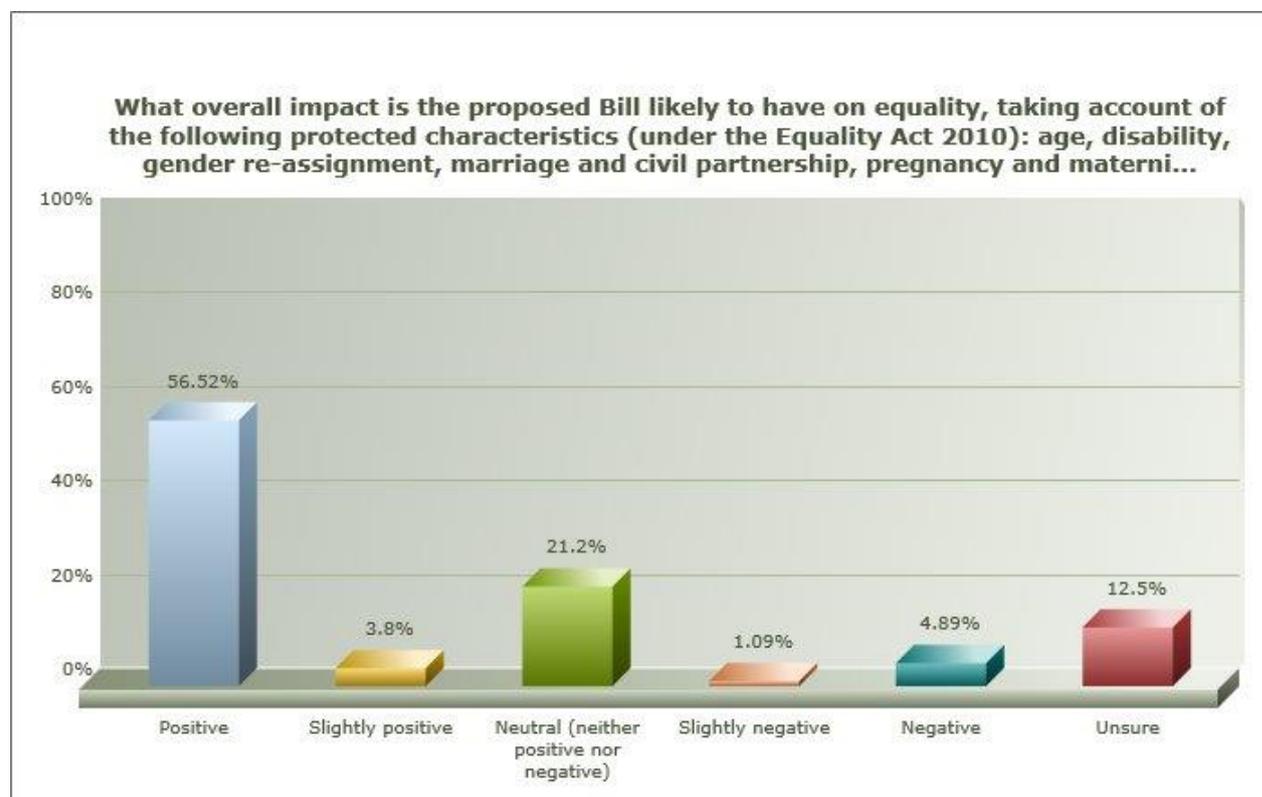
General public

Most respondents considered that the proposed Bill would either be cost-neutral or would lead to a reduction in costs for the general public. The general view appeared to be that there should be no cost to the public, and if anything they would benefit from the reduction of costs to operators being passed on to the public through, for example, a reduction in ride prices.

Others were of the view that the proposed Bill would lead to an increase in the number of fairs taking place in different areas which would boost local economies.

Equalities: overall impact – Question 9

184 respondents answered this question as follows—



A large number of respondents reiterated their support or opposition to the proposal, with many stating that it would have no impact on equalities. Many respondents appeared to answer on the basis of funfairs being exempt from any form of licensing altogether, and therefore took the view that the proposal would have a positive affect by making licensing conditions for showpeople in Scotland the same as for those in the rest of the UK and Europe. However, many answers did not deal specifically with the impact the Bill would have on protected groups under the Equality Act 2010.

Positive impact

A majority of respondents, 111, 60% of those who answered this question, thought there would be a positive (56%) or slightly positive (4%) overall impact on equalities.

The following anonymous response discusses some of the specific issues facing showpeople and reflects many of the points made in other responses—

“It is important to note that Scottish show people can face many similar issues to Scottish Gypsy Travellers, in terms of discrimination, which the Equalities act 2010 covers by placing a legal responsibility own local authorities to act in a non-discriminatory manner as a public body to anyone discriminated against onto grounds of mistaken perception. Show people

are both a business and cultural community, often of many generations, whose livelihood and wellbeing is dependent on being able to travel and stage funfairs around the country. Show people report that their own children and grandchildren are becoming less and less inclined to follow and support the family business because of the difficulties they experience through uncertainty of income from the licensing system, leading to considerable concern that this way of life is under threat. An improved and more proportionate licensing system should ensure this cultural tradition, which exists across many countries in Western Europe will continue in Scotland” (ID: 72692104).

Other points made included that the proposal would allow fairs to visit smaller communities, benefitting those who cannot easily travel to other sites.

Negative impact

Eleven respondents, 6%, answered in this way, however only two made any further comment, with one apparently misunderstanding the proposal, stating that it would deprive showpeople of earnings and the other referring to their previous responses (which expressed opposition to the proposed Bill).

Neutral impacts

The majority of those who answered in this way, 39, 21% of those who answered the question, made no additional comments other than to say that they could not see how the Bill would have any impact on equalities.

Unsure

While 23 respondents, 13%, chose this option, only four commented further with some stating they required more details in order to reach a view and one saying that they found it difficult to see how the proposal would adversely affect equalities.

Equalities: minimising or avoiding negative impacts – Question 10

Could any negative impact of the proposed Bill on any of these protected groups be minimised or avoided?

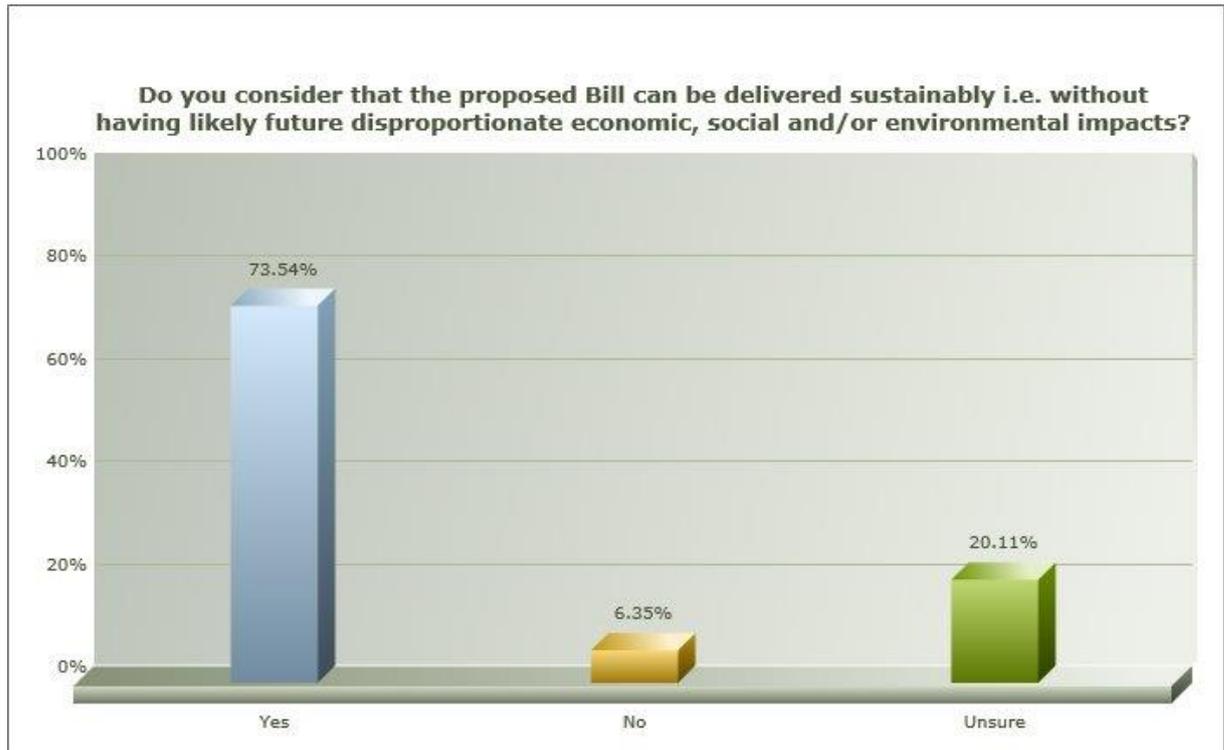
Although eighty five respondents answered this question, a majority of responses addressed perceived negative impacts of the proposal as a whole, including the impacts of licensing funfair at all, rather than addressing any negative impacts on protected groups. Within those answers a number of responses repeated their support or opposition for the proposal.

A smaller number of respondents answered the question, but considered that the proposed Bill would have no impact, either negative or positive, on equalities while several others stated that they required more detail before reaching a view.

A number of other responses which answered the question stated that the proposal would have a negative impact on showpeople specifically but did not explain why or suggest how this could be avoided. Other points made included that showpeople should be allowed to attend meetings in which decisions on licensing were made and to put their views across and that a trial period should be imposed for the new system.

Sustainability of the proposal – Question 11

All 189 respondents answered this question as follows—



A large number of responses repeated the respondents support or opposition to the proposal, or stated that it would have a positive or negative impact on sustainability but did not expand on this further. Many responses outlined the impact of the proposal in general terms, both positive and negative, rather than specifically in relation to sustainability. As with all other questions, many respondents answered this question on the basis of their being no funfair licensing at all, rather than under the terms of the proposal, which is to create a new licensing process.

Proposal delivered sustainably

A majority of respondents (139, 74% of those who answered this question) thought the proposal could be delivered sustainably. Reasons given for this included that—

- Funfairs in the rest of the UK are not subject to licensing and this has not caused any sustainability issues;

- It would ensure funfairs are sustainable businesses and lead to an increase in the number of fairs taking place, creating increased employment opportunities and a positive impact on local economies. Many responses also noted that this would protect showpeople’s way of life; and that
- Showpeople already had to take environmental and health and safety matters into account and this would not change.

One anonymous respondent (ID 74825210) outlined the various positive impacts the proposal could have on sustainability in detail, stating that the proposal would support sustainable economic growth by freeing small and medium sized businesses from overly bureaucratic regulation, which would also boost the economies of local communities by attracting visitors. The respondent also stated that the proposal would be socially sustainable, and have positive social impacts, due to fairs keeping a cultural tradition alive and bringing community cohesion to local areas, and was also environmentally sustainable as operators take care of the land used and encourage people to visit local parks and common land.

Proposal not delivered sustainably

A minority of respondents, 12, 6% of those who answered the question, thought it could not be delivered sustainably. The main reason given was that the proposal could prevent licensing from being determined at local level, as Aberdeenshire Council Licensing Sub-Committee set out—

“Taking away the ability for these decisions to be made locally is likely to have a negative impact, socially, economically, and environmentally, on local authorities as they will not have the discretion to take into account local circumstances. Over the medium to long term, this will not be sustainable as circumstances change and authorities are subject to a rigid licensing regime.” (ID: 74856736)

Unsure of the sustainability of the proposal

Thirty eight respondents, 20% of those who answered the question, were unsure. Of those 38, only seven commented further. Those who commented stated that they required more details of the proposed new system in order to take a view on this matter. This point was made by several local authorities including Renfrewshire, East Ayrshire, Clackmannanshire and Argyll and Bute Councils, with Renfrewshire and Argyll and Bute Council expressing particular concern that a new system would lead to local communities not being given the opportunity to comment fully on the licensing of funfairs.

General – Question 12

Do you have any other comments or suggestions on the proposal?

Ninety five respondents answered this question. Many of the comments made reiterated points made in answer to other questions (either in favour or in

opposition to the proposal), or simply stated that the respondent had nothing additional to add. Some of the other points made included—

- Funfairs are already highly regulated and must adhere to health and safety requirements/safe practice rules. However, Renfrewshire Council expressed concerns that a new system would not allow sufficient time to consult on health and safety;
- The new system must strike an appropriate balance between safeguarding interests of public as well as business needs (ID: 73381394);
- The Bill should clearly define what constitutes a funfair (ID: 71816888);
- Someone who wants to hold a funfair should be personally vetted to ensure they are a responsible individual (ID: 72063823); and that
- Fees should be charged for every day showpeople are on site not just for when they are trading (ID: 72284157).

SECTION 4: MEMBER'S COMMENTARY

Richard Lyle MSP has provided the following commentary on the results of the consultation, as summarised in sections 1-3 above.

I would like to begin by taking the opportunity to thank all of those individuals and organisations which have assisted me in the process of this consultation on a Member's Bill; including but not limited to the Scottish Showmen's Guild, the Showmen's Guild of Great Britain and indeed to those local authorities who assisted in providing their current arrangements across Scotland.

In addition, I am grateful to the many individuals and organisations who responded to my consultation. I read with interest the commentary which was provided in the responses which were received. There was a spread of responses from across the spectrum with nine of Scotland's thirty-two Local Authorities responding; seven funfair operators, six from representative organisations such as Showmen's Guild or regional groups; one from a third sector body and one from another external organisation. This is in addition of course to the many individual responses which were received.

I welcome the overwhelming view of the 87% of respondents who stated that they were supportive either fully or partially of the proposed Bill. Whilst noting that a large majority of responses came from funfair operators/showpeople – this can be attributed to the fact that they are, in no doubt, the community most impacted by the legislation as it currently stands. I consider much of their argument to be about fairness and equity.

That said, I do recognize that a number of areas for reflection were raised both in favour and against the proposed Bill and it is useful to consider those in this commentary.

I welcome reiteration of what I had heard during informal consultation that did not form part of the responses in this consultation, which was that support for this Bill was being given because it is considered that fees are too high, that there is a lack of flexibility and that it will ensure consistency across the country.

I noted with interest the submission by Thomson's Funfair which articulates the sentiments shared in many responses, where they stated:

“We are the only country in Europe to hold such laws. As a Showman I feel that the licensing process is restricting our business and costing families a living. The fact you have to apply for some licences twelve weeks before actually operating a funfair and they can be refused a day before the opening is shambolic. Everyone is entitled to make a source of income. And the licensing is depriving us of doing so. In today's society having to pay anything from £90-£600 just for an application to be heard is shocking.”

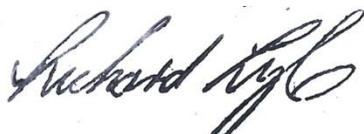
Whilst in responses many argued positively that this proposal delivered consistency, concerns were raised by some local authorities and there did

seem to be a disparity in responses by the authorities. Clackmannanshire Council, which was partially supportive, believed that the new system would create consistency in the licensing arrangements across Scotland.

I have considered a wide range of views, both informally, at the Scottish Parliament's Cross-Party Group on the Scottish Showmen's Guild, and indeed within the responses to this formal consultation process. This includes the response by the Scottish Showmen's Guild which is the representative and negotiating body at national and local level of showpeople (and has been since 1908).

After careful consideration, I intend to lodge a final proposal in the same terms as my draft proposal. To seek support for a Bill which will exempt funfairs from the current legislation, which enables local authorities to decide to license funfairs without any guarantee of consistency or reasonable treatment, and to establish a new licence process specifically for funfairs. It is my intention that, should I earn the right to introduce a Bill to deliver on that proposal, that the Bill would replace the current system with a simple, proportionate and consistent process that would set reasonable maximum fees and timescales, and allow for more flexibility should agreed sites be unusable.

I hope to be able to pursue the Bill in due course with the support of my colleagues across all parties in the Scottish Parliament and indeed with those most affected, Scottish showpeople.

A handwritten signature in black ink, appearing to read 'Richard Lyle', written in a cursive style.

Richard Lyle MSP

Consultation responses

All publishable responses can be seen on the member's website <http://www.richardlylemosp.org/> together with a table which sets out the sequential number and the name or status of every response, for ease of reference. Below is a list of responses attributable to organisations and individuals. Each response has a sequential number, an ID number from Smart Survey, and details of the name of the respondent (or whether it is anonymous or confidential)

Organisations

17.	ID 71817663	Thomson's Funfair
38.	ID 71836847	P. Grubb - World of Parties
55.	ID 71895519	Affordable Leisure
63.	ID 71932621	Anonymous
112.	ID 72692104	Anonymous
120.	ID 73197499	Highland Council
124.	ID 73381394	Renfrewshire Council
127.	ID 73523166	Anonymous
134.	ID 73388955	Anonymous
150.	ID 74298396	Anonymous
156.	ID 74487225	Anonymous
165.	ID 74770658	Anonymous
168.	ID 74547766	Anonymous
178.	ID 74852293	Amusement Catering Equipment Society
179.	ID 74875672	Clackmannanshire Council
180.	ID 74255353	East Ayrshire Council
181.	ID 74856736	Aberdeenshire Council Licensing Sub Committee
182.	ID 74893366	Argyll and Bute Council
183.	ID 74910368	North Lanarkshire Council
185.	ID 75010560	Fife Council, Environmental Health Department, Food and Workplace Safety Team
186.	ID 75012683	South Lanarkshire Council
187.	ID 75014475	Showmen's Guild of Scotland
188.	ID 76674817	Anonymous
189.	ID 79321692	Confidential

Individuals

1.	ID 69239433	Anonymous
2.	ID 71775854	Jeffrey Lovett
3.	ID 71781799	Anonymous
4.	ID 71781530	William Stirling
5.	ID 71801599	Mr S Hiscoe
6.	ID 71817657	David Weir

7.	ID 71816809	David Moore
8.	ID 71816888	Helen Toner
9.	ID 71817189	Anonymous
10.	ID 71817601	C Kinloch
11.	ID 71818503	Anonymous
12.	ID 71818864	Anonymous
13.	ID 71819292	Anonymous
14.	ID 71820043	Joshua Chandler
15.	ID 71820729	Anonymous
16.	ID 71820217	Anonymous
18.	ID 71820550	Jacqueline Macleod
19.	ID 71821967	Joann Sedgwick
20.	ID 71822995	Anonymous
21.	ID 71823231	Confidential
22.	ID 71823508	James Kiddle
23.	ID 7182374	Anonymous
24.	ID 71825274	Anonymous
25.	ID 71825567	Anonymous
26.	ID 71825686	M. Cochrane
27.	ID 71823528	Anonymous
28.	ID 71826707	Anonymous
29.	ID 71827196	Anonymous
30.	ID 71828912	Anonymous
31.	ID 71831301	Anonymous
32.	ID 71830870	Robert Thomas Kayes
33.	ID 71831937	Robert McKenzie
34.	ID 71830516	Anonymous
35.	ID 71831597	Anonymous
36.	ID 71831720	Anonymous
37.	ID 71833298	Anonymous
39.	ID 71840460	Wilma Abernethy
40.	ID 71843379	Confidential
41.	ID 71841059	Trevor Smith
42.	ID 71849632	Glen McCourtney
43.	ID 71850442	Warren Deakin
44.	ID 71853492	Confidential
45.	ID 71857849	S&I Entertainments
46.	ID 71864317	Anonymous
47.	ID 71872349	Gary Witcomb
48.	ID 71872127	Brian McGinley
49.	ID 71874662	Anonymous
50.	ID 71886997	Anonymous
51.	ID 71885869	Confidential
52.	ID 71891961	David Thomson
53.	ID 71894795	Anonymous
54.	ID 71832141	Neil Campbell
56.	ID 71894676	Thomas Wilmot MacIntyre
57.	ID 71896442	Anonymous
58.	ID 71895531	George Shearer
59.	ID 71896955	Anonymous

60.	ID 71902810	Anonymous
61.	ID 71919525	Anonymous
62.	ID 71926483	Aston Reader
64.	ID 71973334	Anonymous
65.	ID 71995557	Anonymous
66.	ID 72014014	Anonymous
67.	ID 72031807	James Milne
68.	ID 72063823	Irvin Stringfellow
69.	ID 72071336	Lindsay Gamble
70.	ID 72072237	Confidential
71.	ID 72072174	Jason Ferry
72.	ID 72072259	Confidential
73.	ID 72073586	Nyree Dawm Stott
74.	ID 72072275	Confidential
75.	ID 72075166	Anonymous
76.	ID 72075726	Confidential
77.	ID 72078405	Anonymous
78.	ID 71876201	Douglas Briglmen
79.	ID 72152188	Anonymous
80.	ID 72184962	Anonymous
81.	ID 72193855	Clark Macintyre
82.	ID 72229954	Helen Miller
83.	ID 72235513	Anonymous
84.	ID 72239609	Barry Jones
85.	ID 72246927	Ross Crawford
86.	ID 72248415	William Morrison
87.	ID 72247552	Gail Taylor
88.	ID 72250219	Anonymous
89.	ID 72252282	Anonymous
90.	ID 72254959	Confidential
91.	ID 72259199	Kevin McDonald
92.	ID 72265396	Anonymous
93.	ID 72270889	Dean Brown
94.	ID 72271356	Confidential
95.	ID 72271555	Anonymous
96.	ID 72276598	Anonymous
97.	ID 72282870	Confidential
98.	ID 72284579	Anonymous
99.	ID 72286337	Anonymous
100.	ID 72288223	Anonymous
101.	ID 72290183	Anonymous
102.	ID 72296322	Anonymous
103.	ID 72341105	Confidential
104.	ID 72344436	John Faid
105.	ID 72361687	Anonymous
106.	ID 72284157	Anonymous
107.	ID 72378758	John O'Connor
108.	ID 72385237	Anonymous
109.	ID 72391960	Confidential
110.	ID 72403706	Anonymous

111.	ID 72625851	Kyle Johnstone
113.	ID 72807362	Anonymous
114.	ID 72808930	Anonymous
115.	ID 72814029	James Allison
116.	ID 72817390	Niall Cockburn
117.	ID 72910247	Anonymous
118.	ID 72916580	Anonymous
119.	ID 73181077	Confidential
121.	ID 73267671	Anonymous
122.	ID 73294065	Alexander James Colquhoun
123.	ID 73339201	Anonymous
125.	ID 73423868	Councillor Richard Lockhart
126.	ID 73517253	James McClelland
128.	ID 73533279	Ted Mcloughlin
129.	ID 73588418	Confidential
130.	ID 73789974	Greg Hickey
131.	ID 73798626	George William Pinder
132.	ID 73814684	Graeme Johnson
133.	ID 73827287	Anonymous
135.	ID 73837118	Anonymous
136.	ID 73842539	Steven Hill
137.	ID 73857022	Ross Jones
138.	ID 73881433	Bonnie Taylor
139.	ID 74156688	Justin Codona
140.	ID 74161243	Anonymous
141.	ID 74178889	Barbie Colquhoun
142.	ID 74180454	Paul Gartland
143.	ID 74183449	Chelsea Turnbull
144.	ID 74187294	Liam Borthwick
145.	ID 74189980	Confidential
146.	ID 74188021	Anonymous
147.	ID 74192517	Anonymous
148.	ID 74191283	Confidential
149.	ID 74193546	Anonymous
151.	ID 74325417	Anonymous
152.	ID 74390185	George Morrison
153.	ID 74420294	Anonymous
154.	ID 74428780	Anonymous
155.	ID 74435247	Michael Cowie
157.	ID 74528198	Craig Dunbar
158.	ID 74538583	Peter J Wright Jnr
159.	ID 74538885	Anonymous
160.	ID 74558554	Anonymous
161.	ID 74655491	Paul Cannop
162.	ID 74657096	John Miller
163.	ID 74659522	Jonathan
164.	ID 74659332	Anonymous
166.	ID 74771422	Anonymous
167.	ID 74771835	Confidential
169.	ID 74811828	Anonymous

170.	ID 74821048	William Hammond
171.	ID 74821855	Brejetta Hammond
172.	ID 74822134	Frances Hammond
173.	ID 74822573	Janine Boswell
174.	ID 74823614	Ryan Boswell
175.	ID 74823929	Lucille Hammond
176.	ID 74824344	Aaron Boswell
177.	ID 74825210	Anonymous
184.	ID 74924759	Anonymous