

# **Abortion Law Review: Stakeholder Questionnaire on the Expert Group Report RCGP Scotland Response**

## **General**

**This section seeks your views on the methodology and overarching principles adopted by the Expert Group to underpin their process of reviewing the law and subsequent recommendations.**

**These can be found on pages 19-27 of the report.**

### **Q. What are your views on the Expert Group’s methodology?**

RCGP Scotland considers that the Expert Group adopted a robust and well-structured methodology. The Group undertook extensive preparatory work, including a comprehensive comparative review of legal frameworks, clinical evidence, and research. It demonstrated a clear commitment to analysing the Abortion Act 1967 in depth and identifying areas for potential reform.

The methodology incorporated a wide range of stakeholder perspectives, including engagement with approximately 50 organisations, ensuring a breadth of views. The inclusion of international comparators was particularly valuable, enabling benchmarking against jurisdictions where reforms have been implemented successfully. Overall, the methodology was rigorous, evidence-based, and appropriate to the complexity of the subject matter.

### **Q. What are your views on the “overarching principles” adopted by the Expert Group?**

RCGP Scotland believes that the overarching principles adopted by the Expert Group are appropriate and align with the core principles underpinning healthcare delivery in Scotland.

The framing of abortion as a healthcare issue is consistent with established medical ethics, human rights obligations, equality legislation, and the Scottish Patient Rights Charter. The Group’s emphasis on equitable access, evidence-based decision-making, and alignment with national and international clinical standards provides a strong and appropriate foundation for reform.

These principles support a modern, patient-centred approach to care and are consistent with the expectations placed on all healthcare services in Scotland.

## **Review of the Current Law**

This section seeks your views on the Expert Group's review of the current law.

This can be found on pages 28-37 of the report.

### **Q. What are your views on the Expert Group's consideration of the current law?**

RCGP Scotland considers that the Expert Group undertook a thorough and detailed review of the current legal framework. The analysis reflects a clear understanding of the Abortion Act 1967 and subsequent legislative amendments.

The review appropriately examined key areas including who may provide abortion services, where services may be delivered, and the regulatory framework governing practice. It also considered wider legislative contexts, including relevant Scottish and UK laws; The Concealment of Birth (Scotland) Act 1809; The Medicines Act 1968 and the Human Medicines Regulations and the Adults with Incapacity situation.

Importantly, the Group recognised issues relating to access, including the impact on marginalised communities and the effects of abortion remaining within a criminal law framework. The consideration of international guidance, including that of the World Health Organization view that abortion should be removed from criminal law, further strengthens the analysis. Overall, the assessment is comprehensive and well evidenced.

## **Gestational Limits and Grounds**

### **Gestational Limits**

The relevant sections within the report on this topic are on pages 38-45 and 52-54.

#### **Q. What are your views on the Expert Group's assessment of the current law regarding gestational limits for abortion?**

RCGP Scotland considers that the Expert Group provided a comprehensive and well-informed assessment of the current legal framework relating to gestational limits. The analysis demonstrates a strong understanding of both domestic legislation and relevant international reforms.

The Group appropriately incorporated stakeholder expertise and examined developments in comparator jurisdictions, including New Zealand, Australia and Northern Ireland. This has ensured that the assessment is informed by contemporary practice and policy developments.

#### **Q. What are your views on the range and quality of evidence considered by the Expert Group?**

**(When answering this question, you may also highlight any matters relevant to this topic that were not considered by the Expert Group and which, in your view, should have been covered.)**

The range and quality of evidence considered by the Expert Group is extensive and appropriate. The Group reviewed legal cases, clinical evidence, and lived experience, alongside input from a broad range of stakeholders.

There is clear evidence of consideration of marginalised groups, issues of access and equity, and the experiences of individuals affected by domestic abuse. This breadth of evidence ensures that the conclusions are well grounded and reflect the realities of service delivery.

#### **Q. What are your views on the Expert Group's analysis of that evidence?**

RCGP Scotland considers that the Expert Group's analysis is balanced and clearly articulated. The Group presents a range of potential approaches and provides a reasoned explanation for its conclusions, demonstrating transparency and careful consideration of the evidence.

**Q. What are your views on the Expert Group's recommendations regarding gestational limits?**

RCGP Scotland notes that the recommendation made regarding gestation limits takes into account the safety of both mother and foetus. It considered widely the evidence and global practices but also seeks to set Scotland and its own standards as best practice. There is a range of evidence considered relating to infanticide, foetal awareness and literature and evidence reviews conducted and considered with all viable options. It is for this reason RCGP Scotland agrees that the Expert Group has arrived at the appropriate position.

## **Grounds**

The relevant sections within the report on this topic are on pages 46-52 and 55-57.

### **Q. What are your views on the Expert Group's assessment of the current law regarding grounds for abortion?**

RCGP Scotland considers that the Expert Group undertook a robust and comprehensive review of the current grounds-based system, including analysis across the UK and internationally.

The proposal to frame abortion as a healthcare matter, rather than a criminal justice issue, is appropriate and reflects modern clinical practice. The consideration of abortion on request within defined gestational limits is consistent with international best practice.

### **Q. What are your views on the range and quality of evidence considered by the Expert Group?**

**(When answering this question, you may also highlight any matters relevant to this topic that were not considered by the Expert Group and which, in your view, should have been covered.)**

The range and quality of evidence is appropriate and well balanced. The Group considered legislative frameworks, stakeholder views, and public attitudes, including data from the British Social Attitudes survey and current Scots law.

This provides a strong evidential basis for the Group's conclusions.

### **Q. What are your views on the Expert Group's analysis of that evidence?**

RCGP Scotland notes that the Expert Group stated, "The Group agreed unanimously that current Scottish abortion law is not fit for purpose and that alternative models should be considered. In particular, it agreed that the grounds-based model was anachronistic, paternalistic and failed to reflect best modern practice in abortion care. It agreed that legal recognition should be given to the woman's right to make their own decision regarding whether to continue or to end a pregnancy, and that abortion should become available on request, at least within gestational limits."

RCGP Scotland considers that the Expert Group's analysis is thorough and well-reasoned. The conclusion that the current grounds-based model is outdated and does not reflect modern clinical practice is supported by the evidence presented.

**Q. What are your views on the Expert Group's recommendations regarding Grounds?**

RCGP Scotland supports the Expert Group's recommendations regarding grounds.

### **Sex Selective Abortion**

The relevant sections within the report on this topic are on pages 49-50 and 57-58.

#### **Q. What are your views on the Expert Group's assessment of the current law regarding sex selective abortion?**

RCGP Scotland believes that the Expert Group's assessment of the current law regarding sex selective abortion was thorough, consulting the relevant literature.

#### **Q. What are your views on the range and quality of evidence considered by the Expert Group?**

**(When answering this question, you may also highlight any matters relevant to this topic that were not considered by the Expert Group and which, in your view, should have been covered.)**

An appropriate breadth of evidence was considered by the Expert Group. RCGP Scotland welcomes the consideration of the patient view survey, believing this to be pertinent.

#### **Q. What are your views on the Expert Group's analysis of that evidence?**

RCGP Scotland believes that appropriate conclusions have been drawn based on the evidence.

#### **Q. What are your views on the Expert Group's recommendation regarding sex selective abortion?**

RCGP Scotland agrees with the final decision of the Expert Group as it relates to sex selective abortion. The Group considered the pros and cons of a change to this aspect of abortion law and the conclusion feels appropriate given the evidence reviewed.

## **Pathways**

### **Provision**

The relevant sections within the report on this topic are on pages 60-64 and 81-82.

#### **Q. What are your views on the Expert Group's assessment of the current law regarding abortion provision?**

RCGP Scotland agrees with the Expert Group's assessment that abortion care can be safely and effectively delivered by a range of appropriately trained healthcare professionals, including nurses and midwives.

The Group reviewed the evidence on the safety, effectiveness and acceptability of abortion care being provided by a wide range of healthcare professionals beyond doctors. Across the literature, and the international examples, there is consensus that abortion care can be safely and effectively delivered by a variety of professionals, including nurses and midwives, providing that they have the appropriate training.

RCGP Scotland believes the Expert Group have adequately and appropriately assessed the current legal standpoint and particular its restrictions and risks which can occur and inadvertently cause harm. The Expert Group looked at global examples, WHO principles and discussed the pros and cons of current standpoint in relation to current models of practice with healthcare services and how these have vastly changed since this legislation was put in place.

#### **Q. What are your views on the range and quality of evidence considered by the Expert Group?**

**(When answering this question, you may also highlight any matters relevant to this topic that were not considered by the Expert Group and which, in your view, should have been covered.)**

The evidence base is strong, drawing on international evidence and large-scale studies. It reflects current clinical practice and global best practice.

#### **Q. What are your views on the Expert Group's analysis of that evidence?**

RCGP Scotland considers that the analysis is thorough and balanced, with a clear emphasis on patient safety and clinical competence. We note the Expert Group

concludes, “The crucial requirement is that any clinician providing abortion care at any gestation is appropriately trained and competent, in line with clinical standards that are in place to ensure safe provision in other areas of healthcare.”

**Q. What are your views on the Expert Group's recommendations regarding abortion provision?**

RCGP Scotland strongly supports the recommendations. They represent a modern, safe and proportionate approach which reduces unnecessary barriers to care and improves access for patients.

## **Certification**

The relevant sections within the report on this topic are on pages 60-64 and 82-83.

### **Q. What are your views on the Expert Group's assessment of the current law regarding abortion certification?**

RCGP Scotland considers that the Expert Group has undertaken a comprehensive and balanced assessment of the current certification requirements. The review appropriately identifies how existing provisions may contribute to delays and barriers in accessing care.

The Group has given due consideration to both routine and complex clinical scenarios, recognising that while reduced certification requirements are appropriate in most cases, additional clinical input may be required in more complex circumstances, particularly at later gestational stages.

### **Q. What are your views on the range and quality of evidence considered by the Expert Group?**

**(When answering this question, you may also highlight any matters relevant to this topic that were not considered by the Expert Group and which, in your view, should have been covered.)**

RCGP Scotland considers that the Expert Group has examined a wide range of high-quality evidence relating to abortion certification.

### **Q. What are your views on the Expert Group's analysis of that evidence?**

RCGP Scotland considers that the analysis is robust and reflects established clinical guidance and international best practice. The conclusions are consistent with positions taken by key professional bodies and demonstrate a balanced approach to patient safety and access. We note the Expert Group's findings, "The RCOG and BMA have also reiterated support for the removal of certification requirements. The Group appreciates that clinicians involved in later stage abortions, particularly those over 24 weeks, value consultation with other professionals when making what can sometimes be complex decisions. It is recommended that two healthcare professionals agree that an abortion would be appropriate after this gestational limit."

**Q. What are your views on the Expert Group's recommendations regarding abortion certification?**

RCGP Scotland supports the recommendations, which represent a proportionate and evidence-based step towards reducing unnecessary barriers while maintaining appropriate safeguards for complex cases.

## Place

The relevant sections within the report on this topic are on pages 65-67 and 83-84.

### **Q. What are your views on the Expert Group's assessment of the current law regarding where abortions can be provided?**

RCGP Scotland agrees that the Expert Group has appropriately assessed the limitations of the current legal framework, particularly in light of significant changes in healthcare delivery since the legislation was introduced. The assessment recognises the need to modernise provisions governing where abortion care can be delivered.

### **Q. What are your views on the range and quality of evidence considered by the Expert Group?**

(When answering this question, you may also highlight any matters relevant to this topic that were not considered by the Expert Group and which, in your view, should have been covered.)

The evidence considered is appropriate.

### **Q. What are your views on the Expert Group's analysis of that evidence?**

RCGP Scotland agrees with the conclusions drawn, particularly in relation to the interaction between current legislation and the regulation of NHS and independent providers needing approval from HIS. The analysis appropriately highlights areas where further clarity and modernisation may be required.

### **Q. What are your views on the Expert Group's recommendations regarding where abortions can be provided?**

RCGP Scotland agrees with the Expert Group's recommendations regarding where abortions can be provided.

## **Counselling**

The relevant sections within the report on this topic are on pages 74-77 and 84-85.

### **Q. What are your views on the Expert Group's assessment of the current approach regarding counselling for women accessing abortion?**

RCGP Scotland considers that the Expert Group has undertaken a thorough review of the available evidence, including national and international clinical guidelines and large-scale studies – including guidance from NICE and RCOG.

The assessment appropriately considers both the benefits and potential unintended consequences of mandating counselling in legislation.

### **Q. What are your views on the range and quality of evidence considered by the Expert Group?**

**(When answering this question, you may also highlight any matters relevant to this topic that were not considered by the Expert Group and which, in your view, should have been covered.)**

The range and quality of evidence is high, including robust clinical studies, evidence-based guidelines, and stakeholder perspectives. The Group has clearly sought to ground its analysis in established scientific and clinical evidence.

### **Q. What are your views on the Expert Group's analysis of that evidence?**

RCGP Scotland considers that the analysis is balanced and demonstrates a clear understanding of the need to avoid unintended barriers to care. The Group appropriately considers issues such as patient autonomy, safety, and the risk of delays in access to services.

### **Q. What are your views on the Expert Group's recommendations regarding counselling?**

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RCGP Scotland agrees with the final recommendations in terms of not formally legislating for mandatory counselling. There are multiple charities and services available to patients already which can help should counselling be required. The statement is accurate in that in terms of clinical guidance offering counselling and supporting the patient to access this where needed. We consider this statement from the Expert Group to be an entirely appropriate way forward, "It is recommended that clinical guidance, rather than legislation, should state that there should be timely access to counselling available for patients who wish to access it."

### **Mandatory Waiting Periods**

The relevant sections within the report on this topic are on pages 77-79 and 85.

#### **Q. What are your views on the Expert Group's assessment of the current approach regarding mandatory waiting periods?**

RCGP Scotland considers the Expert Group's assessment to be proportionate and well founded.

#### **Q. What are your views on the range and quality of evidence considered by the Expert Group?**

**(When answering this question, you may also highlight any matters relevant to this topic that were not considered by the Expert Group and which, in your view, should have been covered.)**

The evidence base is appropriate and includes consideration of clinical guidelines, stakeholder perspectives, and international approaches. The analysis reflects a balanced consideration of risks and benefits of potential mandatory waiting periods.

#### **Q. What are your views on the Expert Group's analysis of that evidence?**

RCGP Scotland considers that the analysis appropriately balances patient autonomy with safety considerations, and recognises the potential harms associated with unnecessary delays.

#### **Q. What are your views on the Expert Group's recommendation regarding mandatory waiting periods?**

RCGP Scotland supports the recommendation not to introduce mandatory waiting periods, recognising that such measures may create unnecessary barriers to timely care.

### **Conscientious Objection**

The relevant sections within the report on this topic are on pages 67-72 and 85-86.

#### **Q. What are your views on the Expert Group's assessment of the current law regarding conscientious objection?**

RCGP Scotland considers that the Expert Group has provided a clear and comprehensive assessment of the current legal framework and its practical implications.

#### **Q. What are your views on the range and quality of evidence considered by the Expert Group?**

**(When answering this question, you may also highlight any matters relevant to this topic that were not considered by the Expert Group and which, in your view, should have been covered.)**

The Expert Group provided a clear and well thought out presentation of case law, global jurisdiction and Scots law. They have sought stakeholder views and taken time to explain the stakeholder position and their reason for accepting or refuting that point of view. The Case laws presented are clearly described and they have taken time to consider those in contracted positions, impacts on workforce, and training for clinicians. The evidence range and quality is excellent.

#### **Q. What are your views on the Expert Group's analysis of that evidence?**

RCGP Scotland considers that the analysis is robust and appropriately balances the rights of healthcare professionals with the need to ensure patient access to care. The analysis considered views from the ECHR and the UK's General Medical Council, in Personal Beliefs and Medical Practice, which permits refusal to participate in the abortion procedure itself but not in pre- or post-abortion care, advice, or referrals.

#### **Q. What are your views on the Expert Group's recommendations regarding conscientious objection?**

RCGP Scotland supports the recommendations, which provide a proportionate framework to ensure both protection of personal beliefs and access to timely abortion care.



### **Data and Reporting**

The relevant sections within the report on this topic are on pages 72-3 and 86-87.

#### **Q. What are your views on the Expert Group's assessment of the current law regarding reporting and notification of abortions?**

RCGP Scotland considers that the Expert Group has provided an appropriate assessment of the current system of data and reporting, including its limitations.

#### **Q. What are your views on the range and quality of evidence considered by the Expert Group?**

**(When answering this question, you may also highlight any matters relevant to this topic that were not considered by the Expert Group and which, in your view, should have been covered.)**

The evidence considered is appropriate and includes relevant stakeholder perspectives.

#### **Q. What are your views on the Expert Group's analysis of that evidence?**

RCGP Scotland agrees with the conclusions, particularly the emphasis on reducing stigma and supporting effective service planning through appropriate data collection.

#### **Q. What are your views on the Expert Group's recommendations regarding reporting and notification of abortions?**

RCGP Scotland agrees with all the recommendations as laid out. The need to report all abortions to the CMO is antiquated and potentially stigmatising, and we support the removal of this step. The requirement for data to be recorded by PHS is appropriate while recommending that what data is collected remain as part of guidelines and not primary legislation is also appropriate for current modern-day practice.

### **Adults with Incapacity, Young People and Brain Stem Dead Patients**

The relevant sections within the report on these topics are on pages 79-80 and 87-88.

**Q. What are your views on the Expert Group's assessment of the current law regarding adults with incapacity, young people and brain stem dead patients?**

RCGP Scotland considers that the Expert Group has appropriately assessed the current legal framework and its application to these complex groups.

**Q. What are your views on the range and quality of evidence considered by the Expert Group?**

**(When answering this question, you may also highlight any matters relevant to this topic that were not considered by the Expert Group and which, in your view, should have been covered.)**

The range and quality of evidence considered is appropriate, with the Expert Group having examined specific case law, current legislation and impacts and the wider call for a Human rights approach should be adopted when considering these patients. The Expert Group analysed the current Adults with Incapacity Act 2000 (AWIA), to confirm the treatment is in the person's best interests. In cases of abortion, regulations made under section 48 AWIA requires that an independent opinion be obtained from the Mental Welfare Commission and/or that a court order be obtained. The consideration of the complex area of brain stem death and how best proceed has been adequately considered.

**Q. What are your views on the Expert Group's analysis of that evidence?**

The evidence base is appropriate and includes relevant legislation, case law, and human rights considerations.

**Q. What are your views on the Expert Group's recommendations regarding adults with incapacity, young people and brain stem dead patients?**

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RCGP Scotland considers that the analysis is balanced and reaches sensible conclusions.

**Positive Duty to Provide**

The relevant sections within the report on this topic are on pages 80-81 and 89.

**Q. What are your views on the Expert Group's assessment of the current approach regarding positive duties to provide abortion care?**

RCGP Scotland considers that the Expert Group has provided an appropriate assessment of the current position and the potential benefits and risks of introducing a duty to provide abortion care.

**Q. What are your views on the range and quality of evidence considered by the Expert Group?**

**(When answering this question, you may also highlight any matters relevant to this topic that were not considered by the Expert Group and which, in your view, should have been covered.)**

NA.

**Q. What are your views on the Expert Group's analysis of that evidence?**

The Expert Group completed a fair and balanced analysis and have reached appropriate conclusions for best practice and patient safety.

**Q. What are your views on the Expert Group's recommendations regarding a positive duty to provide abortion care?**

RCGP Scotland agrees with the Expert Group's view as it relates to a positive duty to provide abortion care. In consideration of the NHS (Scotland) Act 1978 to cover such a duty and ensure provision of abortion services is framed as part of a Health Board's role in providing healthcare.

The recommendation that the Scottish Government explore a duty to ensure sufficient staffing levels within the Health and Care (Staffing) (Scotland) Act 2019 and alongside a duty on Health Boards, that the Scottish Government should consider a duty placed on Scottish Ministers is entirely appropriate with a requirement to ensure this is reviewed every 10 years.



## **Offences**

### **Criminal offences for women acting with regard to their own pregnancies**

The relevant sections within the report on this topic are on pages 97-99 and 105-106.

#### **Q. What are your views on the Expert Group's assessment of the current law regarding women acting with regard to their own pregnancies?**

RCGP Scotland reiterates that all relevant major professional health bodies in the UK support decriminalisation of abortion. We concur that the current law imposes restrictions which do not reflect the current evidence-base. The BMA also believe the law is not in line with the emphasis on patient autonomy found in other areas of medicine. The Expert Group's assessment of current law makes several clear and valid points.

#### **Q. What are your views on the range and quality of evidence considered by the Expert Group?**

**(When answering this question, you may also highlight any matters relevant to this topic that were not considered by the Expert Group and which, in your view, should have been covered.)**

A wide range of high-quality evidence has been considered. This includes a review of the current legal position, relevant cases, and an assessment of the risks and benefits of maintaining the existing framework. The analysis has drawn on the views of major Royal Colleges, as well as guidance from FIGO, the BMA, and the WHO. The opinion of the Royal Pharmaceutical Society of Scotland (RPharmS) was also taken into account. It is clear that the current legal framework can further stigmatise those seeking an abortion and may, in some cases, place maternal health at risk.

#### **Q. What are your views on the Expert Group's analysis of that evidence?**

We note that the Expert Group's analysis found that, "international evidence that suggests the decriminalisation of those seeking abortion in law does not directly increase the incidence of abortion, gestational age at the time of abortion, sex selective abortion or compromise the safety of abortion."

We also note that the analysis has signposted specific evidence that contradicts the points made in submissions from organisations that are wholly or partially opposed to abortion health care.

**Q. What are your views on the Expert Group's recommendation regarding criminal offences for women acting with regards to their own pregnancies?**

RCGP Scotland accepts the Expert Group's recommendation regarding criminal offences for women acting with regards to their own pregnancies, believing the recommendation to be evidence based.

### **Concealment of Birth**

The relevant sections within the report on this topic are on pages 99-100 and 107.

#### **Q. What are your views on the Expert Group's assessment of the current law regarding concealment of birth?**

RCGP Scotland agrees with the Expert Group's assessment of the current law regarding concealment of birth.

#### **Q. What are your views on the range and quality of evidence considered by the Expert Group?**

**(When answering this question, you may also highlight any matters relevant to this topic that were not considered by the Expert Group and which, in your view, should have been covered.)**

We believe that the evidence is appropriate and includes case law and expert opinion.

#### **Q. What are your views on the Expert Group's analysis of that evidence?**

RCGP Scotland agrees with the analysis.

#### **Q. What are your views on the Expert Group's recommendation regarding concealment of birth?**

RCGP Scotland agrees with the Expert Group's recommendation regarding the concealment of birth.

### **Offences for providers (registered healthcare practitioners)**

The relevant sections within the report on this topic are on pages 100-102 and 107-108.

#### **Q. What are your views on the Expert Group's assessment of the current law regarding healthcare providers who provide an abortion out with the terms of the legal framework for abortion?**

RCGP Scotland agrees with the Expert Group's assessment of the current law regarding healthcare providers who provide an abortion out with the terms of the legal framework for abortion.

#### **Q. What are your views on the range and quality of evidence considered by the Expert Group?**

**(When answering this question, you may also highlight any matters relevant to this topic that were not considered by the Expert Group and which, in your view, should have been covered.)**

The evidence base is robust and includes regulatory guidance, professional standards, and clinical considerations.

#### **Q. What are your views on the Expert Group's analysis of that evidence?**

RCGP Scotland believes that the analysis reached appropriate conclusions and considered patient safety, harms, prescribing guidelines and best practice.

#### **Q. What are your views on the Expert Group's recommendations regarding offences for healthcare providers?**

RCGP Scotland welcomes the Expert Group's recommendations regarding offences for healthcare providers, including repealing the common law offences for registered healthcare professionals who provide abortions out with the current legislative framework.

The third recommendation is essential such that there is no unintended consequence of new offences preventing innovation in contraceptive and abortion care, including the use of new medications, or the development of contraceptives.



**Offences for abortions provided by someone who is not a registered Healthcare Professional**

The relevant sections within the report on this topic are on page 109.

**Q. What are your views on the Expert Group's assessment of the current law regarding abortions provided by someone who is not a registered healthcare professional?**

RCGP Scotland agrees with the views of the Expert Group's assessment of the current law regarding abortions provided by someone who is not a registered healthcare professional. Abortion healthcare should only be delivered by registered healthcare professionals.

**Q. What are your views on the range and quality of evidence considered by the Expert Group?**

**(When answering this question, you may also highlight any matters relevant to this topic that were not considered by the Expert Group and which, in your view, should have been covered.)**

The evidence is more limited in this area but is sufficient to support the conclusions reached.

**Q. What are your views on the Expert Group's analysis of that evidence?**

RCGP Scotland considers that the analysis is reasonable and appropriately highlights areas requiring clarification.

**Q. What are your views on the Expert Group's recommendations regarding abortions provided by a person who is not a registered healthcare professional?**

RCGP Scotland agrees with the Expert Group's recommendations regarding abortions provided by a person who is not a registered healthcare professional.

**Procuring abortion through fear, force, or fraud**

The relevant sections within the report on this topic are on pages 102-104 and 109-111.

**Q. What are your views on the Expert Group's assessment of the current law regarding the procurement of abortion through fear, force or fraud?**

RCGP Scotland agrees with the Expert Group's assessment and review of the current laws, and welcomes the consideration of trauma informed working, domestic abuse legislation and the difficulty in establishing a definition for coercion.

**Q. What are your views on the range and quality of evidence considered by the Expert Group?**

**(When answering this question, you may also highlight any matters relevant to this topic that were not considered by the Expert Group and which, in your view, should have been covered.)**

The evidence base is appropriate and includes legal analysis and stakeholder perspectives.

**Q. What are your views on the Expert Group's analysis of that evidence?**

RCGP Scotland agrees with the analysis of the evidence and the need for caution to mitigate against unintended harms.

**Q. What are your views on the Expert Group's recommendations regarding the procurement of abortion through fear, force or fraud?**

RCGP Scotland supports the recommendations, noting the importance of minimising unintended harms and adopting a trauma-informed approach.

**Offences relating to ending a pregnancy without consent**

The relevant sections within the report on this topic are on pages 111-112.

**Q. What are your views on the Expert Group's assessment of the current law regarding ending a pregnancy without consent?**

RCGP Scotland agrees that there is a need for further clarity within the current legal framework.

**Q. What are your views on the range and quality of evidence considered by the Expert Group?**

**(When answering this question, you may also highlight any matters relevant to this topic that were not considered by the Expert Group and which, in your view, should have been covered.)**

RCGP Scotland recognises the Expert Group's findings of limited evidence in this area.

**Q. What are your views on the Expert Group's analysis of that evidence?**

NA.

**Q. What are your views on the Expert Group's recommendations regarding offences relating to ending a pregnancy without consent?**

RCGP Scotland supports the recommendations.



### **Other**

If you have any further comments on the current law relating to abortion, or views you wish to share on any future legal framework, please provide comments here:

The Expert Group has delivered a very robust, evidence-based list of recommendations to support the Scottish Government in the next steps of this process.