



Scottish Government response to the Report of Working Group on Consumer and Competition Policy for Scotland

Citizens Advice Scotland response
May 2016

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Introduction to the Citizens Advice Service in Scotland

The Citizens Advice Service in Scotland is Scotland's largest independent advice and advocacy network. Our aims are two-fold:

1. to ensure that individuals do not suffer through lack of knowledge of their rights and responsibilities or of the services available to them, or through an inability to express their needs effectively;

and equally

2. to exercise a responsible influence on the development of social policies and services both locally and nationally

The Citizens Advice Service in Scotland has a unique and difficult to replicate role in Scotland in terms of:

- **Trust** – decades of independent advice and advocacy have embedded high levels of public trust
- **Evidence** - extensive consumer data directs and informs advocacy
- **Reach** - a combination of local and national advice and advocacy networks

This blend of trust, evidence and reach ensures that CAS is able to achieve positive results for hundreds of thousands of consumers each year as we strive to fulfil our dual aims.

We achieve this through providing Scottish citizens with access to multi-channel advice **and then** learning from the advice which has been sought to put in place solutions to help all consumers – through advocacy to Government, industry, and stakeholders as well as through targeted information and education.¹

Our advice is free, independent, confidential, impartial and available to everyone:

- face-to-face through our 61 member Citizens Advice Bureaux
- by telephone through our Citizens Advice Consumer Service and the Extra Help Unit
- online through our self-help website, Adviceguide

In 2014/15, the Scottish zone of Adviceguide received approximately **4 million** unique page views while the wider Service helped over **323,000 clients** in Scotland

¹ See Appendix 1 for more details

deal with **over one million issues**. Over this period, our citizens advice bureaux recorded a financial gain for clients of over **£124 million**.

In all of these interactions with our information and advice services, CAS can learn about the issues affecting consumers on a daily, weekly, monthly and annual basis. We can gauge where in the country consumers are most impacted by an issue, which advice channel consumers are most likely to utilise for which issue, and importantly what other issues may be co-related. Our ability to analyse trends from our information sources is an extremely valuable resource.

Perhaps even more valuable than this however is our ability to achieve a comprehensive and service-wide response to an issue: ensuring consumer information and education is targeted to consumers effectively in the short term while advocating for more fundamental change.

Case Study: Private Parking Charges



Our information, advice, general consumer advocacy, and education are inextricably linked. To deliver the maximum benefit to consumers it is essential to be agile in our response to achieving change: whether change comes through legislation, industry codes of practice or consumer behaviour, it needs to be the result of informed decisions. This is a fundamental strength of the Citizens Advice Service in Scotland.

In 2014 CAS data suggested that private parking charges in Scotland had become an issue. Unique views of our private parking web page rose from 110,000 to 208,000, bureaux enquiries rose by 50% and the Citizens Advice Consumer Service recorded an increase in calls on the issue.

CAS produced a report, which became the basis of a Ministerial roundtable with Transport Scotland and two leading Private Parking Associations.

To empower consumers :

- an online self-help tool was developed to generate an appropriate letter to allow consumers to appeal when being given a ticket
- 18 bureaux took part in a campaign which involved wide distribution of over 20,000 postcards and posters

During the month of our consumer education campaign 30,000 consumers accessed the online materials. Subsequently the Independent Parking Committee agreed to extend their third party appeals service to Scotland.

Since 2014, there are two distinct consumer advocacy sections within Citizens Advice Scotland:

- the Policy Team
- the Consumer Futures Unit

They focus on different areas of consumer advocacy and utilise differing sources of evidence.

The Policy Team is more closely linked to CAS's advice functions. It is funded from several sources, but primarily via the *rest of the economy* grant. The team conducts general consumer advocacy over a broad range of areas and have the capacity to respond quickly to emerging trends. Critical to the Policy Team's work is the benefit of being part of the same organisation as those providing the data and evidence on which its work is based (the bureaux, the Citizens Advice Consumer Service, the public website and the Extra Help Unit).

"I think the main strength is picking up issues or potential issues before they become huge issues for individuals. They tend to be a really good barometer of what's happening."

Politician on Citizens Advice Scotland advocacy¹

The Consumer Futures Unit was transferred to CAS in 2014. Funded by a levy on companies in the energy, post and water industries as well as from government for cross sectoral work, it focuses exclusively on consumer advocacy in those areas, looking at both current and future issues relating to Scotland and GB alongside colleagues in England and Wales. It has a significant research budget and its advocacy is based on evidence primarily derived from research that it commissions and conducts.

Consultation Response Summary

Citizens Advice Scotland supports the Scottish Government's proposal of establishing a dedicated consumer protection body to strengthen links across the four pillars of consumer protection and competition policy. We believe that the new body should hold a **leadership, coordination and support** role right across the consumer landscape, adding value to current work and building positive consumer benefits.

CAS looks forward to being a key partner of the new body, ensuring that our work is complementary. Consumers – whether clients of the Citizens Advice Service in Scotland or more widely - are at the heart of all work we undertake. We will work with the Scottish Government to support the development of the Scottish consumer landscape under the newly devolved powers and ensure the consumer voice is not lost or lessened in the process of change.

The ultimate test for any of the proposals related to the new body must be whether it will be one which adds value and support to what is already done well in Scotland, while standing up for Scottish consumers in areas where there are gaps in provision.

The opportunity of devolution

Devolution of advice and advocacy powers to the Scottish Parliament offers the potential to enhance the representation and protection of consumers in Scotland. In particular to:

- strengthen Scottish research, policy and advocacy expertise
- develop and expand the use of innovative consumer participation practice to ensure representation of a wide range of consumer perspectives
- co-ordinate and facilitate partnership working between those bodies engaged in general consumer research, policy and advocacy, with a focus on data provision
- better support the delivery of consumer advice post devolution of advice powers

However, those potential benefits are accompanied by the risk that, in the UK framework of regulated industries, devolution could mean the particular issues experienced by Scottish consumers are given insufficient attention – the danger of being *out of sight, out of mind*.

The role of the new consumer body

With these factors in mind, and drawing upon the Working Group's paper and the Scottish Government's response, we believe that the new consumer body should include the following functions:

- **Strategic Overview** of all Scottish consumer issues,:
 - identifying where there are gaps and overlaps in provision and facilitating joint working between agencies and organisations
 - influencing priorities and actions of partner organisations
 - supporting what is already done well in Scotland

- **Specialist Market and Competition Expertise**, ensuring Scottish consumers remain in sight of relevant UK bodies:
 - commissioning and conducting research focussed on competition and market structures and their implications for Scottish consumers
 - receiving and acting on referrals from advice agencies and other partners
 - representing Scottish consumers in regulated industries outwith energy, post and water
 - acting as a strong voice to effectively represent Scottish Consumers with Scottish and UK regulators, companies and other stakeholders, bringing key organisations and government departments to the table
 - working with the UK government and international organisations

- Home of the **Scottish Consumer Protection Partnership (SCPP)**, playing a coordinating role between advice and support providers, facilitating data and other information sharing, and identifying key issues

These are new functions in the Scottish context and we believe they would add real value to the consumer landscape at the same time as retaining and utilising the pivotal work that the Citizens Advice Service undertakes in advising, educating and advocating for consumers. This partnership approach, called for in the Working Group's report, would achieve positive outcomes for consumers in Scotland.

Detailed Comments on the Scottish Government response

A Dedicated Consumer Protection Body

We support the Scottish Government's proposals for establishing a dedicated consumer protection body to strengthen links across the four pillars of consumer protection and competition policy. We believe that the new body can hold a **'leadership, coordination and support'** function right across the consumer landscape, adding value and support to current work and building on what already works well. CAS looks forward to being a key partner of the new body, ensuring that our work is complementary.

We will work with the Scottish Government to ensure a close and positive relationship with the new body, with the aim of supporting and building on the best work that is undertaken with and for consumers across Scotland.

Working with stakeholders

Going forward, we support the Scottish Government's intentions of working with stakeholders to consider the possible form and functions of the new body and to identify and progress practical solutions. This work with stakeholders would benefit from comprehensive mapping of the consumer landscape, including advocacy and advice, to ensure that the new body does not duplicate or replicate work but instead builds on and adds value to what already works for consumers.

We see considerable benefit in the new body being empowered to take recommendations for investigations from advice and advocacy partners.

Sharing information and data

We support the commitment to working with stakeholders to identify practical solutions to gathering and sharing information data. This will help to ensure that all organisations working in the consumer landscape are able to input into forward planning, horizon scanning and assessments of consumer detriment. It would also facilitate joint working between organisations with shared objectives, and avoid duplication.

CAS will explore with the Scottish Government the practical solutions that could be established to allow bureau service data to be shared with the new consumer body. We currently provide "cleansed" data to partners on the Consumer Protection Partnership on a quarterly basis, which could be a basis of a possible future data sharing model. CAS also provides consumer data to local Trading Standards bodies to enable them to carry out data analysis, and enforcement activity.

A Scottish Consumer Protection Partnership (CPP)

CAS has been an active member of the UK CPP since its inception in 2011 and can see the benefits that a Scottish CPP would bring in terms of coordination of activity and sharing of data. A Scottish CPP would look at Scottish priorities, complementing and working alongside the UK CPP. CAS should have a key role in a Scottish CPP, using our data to highlight consumer issues in Scotland.

We have worked closely with a range of organisations through the UK CPP, including the FCA, the CMA, and Trading Standards Scotland on issues such as Scams Awareness Month, National Consumer Week, used car campaigns, research into consumer contracts, and a report into subscription traps. We would be happy to share our learning with the Scottish Government – including our experience of sharing data, prioritising issues and planning joint working - and assist in the establishment of the Scottish CPP.

Advocacy

General consumer advocacy

On the publication of the Final Report of the Working Group in late 2015, we welcomed and supported the stated view that Citizens Advice Scotland should continue to provide general consumer advocacy alongside Consumer Scotland:

“General consumer advocacy is, and will continue to be, provided by a range of bodies, such as Citizens Advice Scotland (CAS) and Which? who advocate on behalf of consumers on a range of issues across public and private markets.”

Further, we support the Working Group’s view that Consumer Scotland should work in partnership with CAS:

“Consumer Scotland should work in partnership with bodies such as CAS and Which? who have general consumer advocacy at their core.”

This partnership, which will be essential in the new consumer landscape, is not referenced in the Scottish Government’s response. We are keen to work with the Scottish Government to put in place an effective partnership as soon as possible.

A consumer-focused model of regulation

We support the proposals to develop and champion a consumer-focused model of regulation across different sectors of the economy. CAS is also carrying out a participation project this year, which focuses on developing and testing different models of customer representation and participation in both the public and private sectors. We will share the key findings and learning from this project with the Scottish Government to inform their work on consumer-focused models of regulation.

Going forward, the Citizens Advice Service in Scotland is in a unique position to develop and enable consumer participation in regulation. Our services are accessed and trusted by hundreds of thousands of consumers each year, and additionally, we act as a trusted intermediary for consumers from all parts of Scotland and all socio-economic backgrounds. We would like to explore this role with the Scottish Government.

A role for the new body in advocacy

We believe that the new body can add benefit to general consumer advocacy. It can play a crucial role by:

- **Taking a Strategic Overview** of all Scottish consumer issues:
 - identifying where there are gaps and overlaps in provision and facilitating joint working between agencies and organisations
 - influencing priorities and actions of partner organisations
 - supporting what is already done well in Scotland

- **Having Specialist Market and Competition Expertise**, ensuring Scottish consumers remain in sight of relevant UK bodies:
 - commissioning and conducting research focussed on competition and market structures and their implications for Scottish consumers
 - receiving and acting on referrals from advice agencies and other partners
 - representing Scottish consumers in regulated industries outwith energy, post and water
 - acting as a strong voice to effectively represent Scottish Consumers with Scottish and UK regulators, companies and other stakeholders, bringing key organisations and government departments to the table
 - working with the UK government and international organisations

- **Home of the Scottish Consumer Protection Partnership (SCPP)**, playing a coordinating role between advice and support providers, facilitating data and other information sharing, and identifying key issues

This leadership, coordination and support function in advocacy would add real value to the current advocacy landscape.

Challenges moving forward

This partnership approach to consumer advocacy would add considerable benefit to the consumer landscape, but – crucially – resource and funding needs to be in place to ensure the partnership is possible.

In the four year transition period that transferred the consumer functions into the Citizens Advice service from 2010 to 2014 (see appendix 2), the infrastructure of both CAS and the Scottish CAB service was bolstered and redefined. These additional resources allowed us to collate better and more wide ranging data, undertake national campaigns as well as enabling and supporting local work, while significantly increasing and expanding our consumer advocacy work.

The strengths of the Service already mentioned – including data collation and analysis, consumer education and campaigns – all require dedicated resources to be maintained. The challenge for the Scottish Government and for CAS is to bring about this positive partnership: supporting and building on what is already benefitting consumers, and ultimately working together to empower consumers across Scotland.

Advice

CAS appreciates the confidence expressed by the Scottish Government in both our Consumer Helpline and Extra Help Unit operations. We look forward to working with the Scottish Government to build comprehensive plans to enhance their delivery to the benefit of Scottish consumers including:

- raising consumer awareness of brand thereby extending the reach of the service
- transferring first level Scottish energy and post advice enquiries from England to the Scottish consumer service
- working with Scottish Government and other stakeholders to build a quality framework fit for the future with a view to demonstrating consumer value and benefit
- developing the alternative dispute resolution advice and information already provided as part of the consumer advice service to ensure Scottish developments in the area are fully taken into account, and consumers in Scotland are aware of them

Oversight and coordination of advice provision

We welcome the support that the new body proposes to offer the consumer advice sector in Scotland. We agree with the assessment that consumer advice provision in Scotland has an important role to play in informing individuals and empowering them.

CAS and the consumer helpline are well positioned to deliver the Scottish Government's objectives of consistent high quality advice and multi-channel access for consumers given the breadth of the Scottish bureau network, the strength of the existing consumer helpline and our established relationships with enforcement colleagues.

Mapping the advice landscape

CAS and the CAB network make up the largest independent advice network in Scotland, advising on over a million issues each year. Advice provided by the Citizens Advice Service is provided nationally by Citizens Advice Direct and the Consumer Helpline, and locally in 30 of the 32 local authorities in Scotland by 61 Member Bureaux in over 250 locations².

A key strength of the CAB network is that it puts local communities at the heart of operational development and delivery. We are keen to work with the Scottish

² See Appendix 4 for a more detailed breakdown

Government to evidence the advice provision that the Service offers, and show the many benefits that it offers to consumers in Scotland.

Single portal

CAS have long been supportive of a single portal for advice provision and we advocated the consumer benefit of this approach at the launch of the Justice Digital Strategy, which prioritised a single portal as a key development. We have continued to work with the Scottish Government in the development of this portal under the JDS and would hope that these developments can be co-ordinated with the new body in respect of consumer advice.

We are also keen to work with the new body to explore the potential for the well-established Consumer Helpline - which already takes on over 50,000 cases in Scotland each year - to have a complementary role in ensuring that consumers reach the right place for advice and representation. The Helpline currently plays a role in referring to and from Trading Standards, citizens advice bureaux, the Extra Help Unit, alternative dispute resolution and other relevant services. The helpline is a critical link in supporting the enforcement work undertaken by trading standards services throughout the UK, dealing with issues of concern to Scottish consumers.

Consistency and outcomes

The advice sector landscape is complex, and the CAB service takes great effort to ensure a consistently high and quality assured service throughout the country. This is ensured through the CAB audit process which uses a continual improvement model to support the quality of advice, which is accredited to the Scottish National Advice Standards and the Money Advice Service quality standards in money advice. CAS provides a framework of support for bureaux to support delivery of good advice, which includes developing business support, IT and network development, CAB information provision, specialist advice support for advisers, and volunteer training and development.

Consumer rights education

CAS supports the Working Group's recommendation that the Scottish Government work with consumer advice providers to increase the range of users accessing advice provision through marketing and coordination of education. CAS's ability to reach a large and diverse group of consumers through the existing infrastructure could greatly benefit this objective. Using consumer education campaigns as a focal point, CAS uses established communication networks to reach a wider audience and promote the Citizens Advice Service.

For example, an underrepresented group in accessing consumer advice is the over 65s. Using Scams Awareness Month 2015 as a focal point, CAS supported the

bureaux network to raise awareness of how to spot and stop scams through community engagement. This local activity focused on traditional media, working with local partners to increase reach, talks to community groups, and targeted events such as lunch clubs, coffee mornings and stalls in high footfall shopping areas. Conversely, our consumer education campaign during National Consumer Week 2015 used targeted messaging on social media, reaching an estimated 100,000 users most of whom were aged between 13 and 17.

CAS would welcome the opportunity to work with the Scottish Government and education providers to explore ways to embed consumer rights education in children's learning and build on our existing work in this area. At a national level CAS has been one of the main sponsors for Trading Standards' Young Consumers of the Year competition for the last four years. CAS is working with Trading Standards to develop the competition and bring the benefits of an understanding of consumer rights to a wider audience of young people.

Locally too, CAS is supporting the development of projects working in and with local schools to ensure the delivery of peer advice, and ensure that pupils are aware of their responsibilities and rights as consumers. The lessons being learned in these projects have application throughout Scotland.

Increased data sharing

There are several sources of such data and work is underway to seek to better coordinate this on a UK and Scottish level. DBIS are working with Citizens Advice (England and Wales) and CAS to review consumer and energy related enquiry coding. In Scotland advice codes are being examined through the CAB harmonising indicators project, in conjunction with the Improvement Service and the Scottish Legal Aid Board, in order to ensure that we can better map the demand for and the provision of advice in Scotland.

In any sharing of data, it is imperative that the confidentiality of client data is maintained and that any service user is fully aware of the purposes for which their information will be used. Data sharing agreements must therefore be robust and data protected in a secure environment.

Enforcement

CAS supports the Scottish Government's intention of ensuring that Trading Standards Services in Scotland have the necessary capacity and expertise to effectively enforce consumer protection. A key factor in enforcement is its effective links with consumer advice and intelligence, and we are happy to work with the Scottish Government and Trading Standards to further strengthen these links.

The Citizens Advice Service and Trading Standards

Citizens advice bureaux and Trading Standards have a long history of working together at a local level to ensure that consumers achieve the best outcome to their issue, and also to make the link between consumer advice and enforcement. The changes to the consumer landscape in the UK meant that Trading Standards and the Citizens Advice Service have increasingly become key partners in working for consumers in Scotland. This includes local partnership arrangements between bureaux and local authorities, referrals to and from the Citizens Advice Consumer Helpline, and strategic work at a national level between Trading Standards Scotland, SCOTTS, and Citizens Advice Scotland.

At a local level, the new consumer landscape has led to new partnership working between bureaux and Trading Standards in local authorities across Scotland. An example of this is the award winning Highland Consumer Partnership which was formed in December 2012 and comprises of Highland Council Trading Standards Service, the eight citizens advice bureaux in the Highlands, and Citizens Advice Scotland.

At a national level, Citizens Advice Scotland has worked in partnership with Trading Standards Scotland following its establishment in 2013. This includes representing the interests of consumers in Scotland at the Consumer Protection Partnership (CPP), taking part in various operational and strategic groups, and working together on various consumer education campaigns.

Sharing intelligence

The Consumer Helpline is delivered by Citizens Advice and Citizens Advice Scotland in partnership operating across Great Britain. Contacts from consumers are shared across the UK contact centre estate ensuring efficient, speedy and consistent customer advice. In addition, online support is provided through the Citizens Advice consumer website pages.

As Trading standards enforcement works on a UK wide basis, with action being taken by the relevant local trading standards team where the trader is based, our service partners include all of Great Britain local authority trading standards units, which enables the service to share information on traders operating both locally and nationally across local authority boundaries. A shared GB management team

manages contracts and performance to ensure service availability, including business continuity, and consistency and accuracy of service.

This ensures intelligence is available on, for example, national and international traders like Amazon, Arnold Clark and Royal Bank of Scotland. In addition the service provides support to consumers seeking advice on energy and post matters, our GB intelligence in this area informs and guides GB policy. In all areas our cross border intelligence enables effective enforcement action to be taken when required.

Redress

The Citizens Advice Service in Scotland is the leading consumer redress organisation in Scotland providing advice directly to consumers, and advocating for change on their behalf.

Redress is absolutely core to the Scottish CAB Service. Almost all of the issues brought by clients have a potential resolution through the legal system but a key strength of the Service is in facilitating early resolution outside of the formal court or tribunal process; negotiating on behalf of clients with creditors; helping to put in place payment plans with landlords; or helping clients to use ADR Services such as Ombudsmen.

Resolving issues at an earlier stage keeps people from needing to go to court and helps consumers to get better outcomes. CAS welcome the Scottish Government's focus on ADR.

There are numerous examples of our activities to help consumers more effectively achieve redress, including the In-Court Advice Services which are established in many courts in Scotland. Another example is the Alternative Dispute Resolution (ADR) element of the Consumer Helpline which was established in June 2015. In the first 8 months of its operation, over 7,000 consumers were signposted to ADR providers for assistance in resolving their dispute. This will be developed over the coming year with publicity to ensure that awareness of the work we do is maximised.

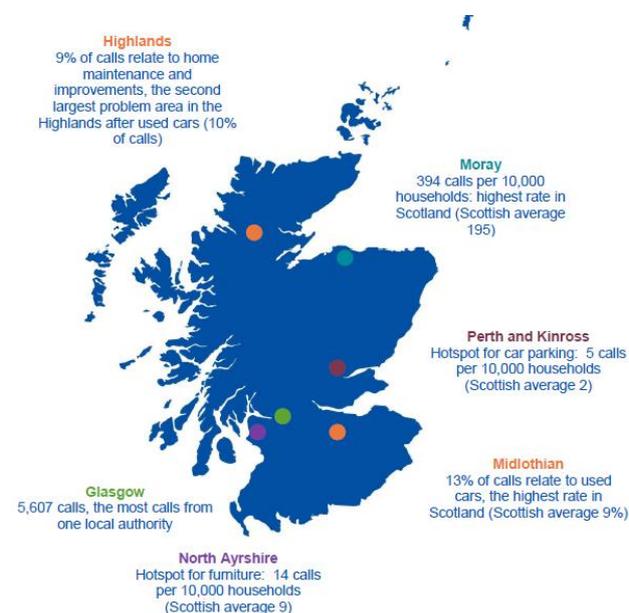
As a Service we are concerned with ensuring routes to redress are accessible and successful: that a consumer who has a problem knows (or can easily find out) how to access resolution to resolve their problem. With this in mind, CAS undertook research to map the consumer redress landscape for the top 30 issues that consumers sought advice on through the Consumer Helpline. We are happy to share the results of the research with the Scottish Government to inform the next step of better integrating redress provision within the consumer landscape in Scotland.

The Citizens Advice Service is central to consumer redress in Scotland and we look forward to working with the Scottish Government to help raise awareness of redress and to help promote a more joined-up approach in Scotland.

Competition

CAS supports the Working Group's recommendation of a competition policy for Scotland that takes account of Scotland's geographical, cultural and economic circumstances. Our data shows not just the differences in consumer issues and experiences in Scotland compared to the rest of the UK, but also the differences that exist within Scotland. A Scottish approach to competition should be able to address the issues that exist both at national and local levels.

Understanding consumer issues in Scotland



Our integrated consumer service allows local and national data to influence our advocacy and campaigning. This enables evidence based national advocacy and campaigning at a local level that targets local needs.

Data from our services also allow us to analyse the issues that are more common in Scotland than in the rest of the UK. This enables our advocacy and campaigns to target the consumer issues that have a particular impact on consumers in Scotland.

More common in Scotland:

- Domestic fuel (+84%)
- Time shares (+42%)
- House construction (+34%)
- Betting, competitions and prize draws (+20%)
- Textiles and soft furnishings (+12%)

Less common in Scotland:

- Disability aids (-58%)
- Books, newspapers and magazines (-50%)
- Broadcasting (-46%)
- Estate agents (-46%)
- Home-working and gifting schemes (-44%)

Engaging with market studies

We recognise the importance of engaging with market studies and investigations, and have a long history of influencing market studies to look more specifically at the Scottish context. For example, CAS engaged in the current CMA market investigation into personal banking, providing significant input into the Scottish context and how this differed from the UK market in terms of rurality and brand loyalty. We understand the importance of engaging in competition studies and support the Scottish Government's proposals of strengthening and broadening Scottish input into these studies.

CMA engagement in Scotland

CAS welcomes the proposals for the CMA to increase its engagement in the delivery of Scottish competition policy. We have already noted an increase in CMA engagement in Scotland at a senior level and look forward to further joint work with them. However, given that the CMA is a UK Government body, careful thought must be given to how the new consumer body in Scotland works with the CMA, including how market issues are identified, evidenced and referred to the CMA.

Appendix 1: The Citizens Advice Service in Scotland in more detail

Figure 1 outlines the connections between the consumer and the advice, advocacy, education and campaigns that the Service provides:

Figure 1: The integrated service for consumers



Advice

In total, more than 300,000 consumers receive advice on over one million issues each year, with our self-help website receiving over four million unique page views in Scotland alone helping consumers to address their own issues and queries. Almost 1 in 6 consumers in Scotland have sought advice from the citizens advice service in the last three years, with 96% of consumers agreeing that the Scottish CAB Service is an important community asset.

Advice is fundamental to the Citizens Advice Service in Scotland. We help consumers in the advice that we give, and the lessons we learn from giving that advice allow us to achieve real and positive change for consumers. An important aspect of the advice provided through the CAB network is that we support the person, not just look at the issue. The holistic nature of our service means that we are able to provide a solution for the client which may involve several different elements of advice. Clients leave with a better understanding of their situation and are better placed to deal with issues in the future, and confidence in the advice they have received.

Consumer Confidence in the CAB Service

CAS commissioned Ipsos Mori to undertake research on Consumer Confidence and Understanding in 2016. The research comprised a survey of 1,004 consumers in Scotland (aged 16 and over), carried out between 7 and 20 March 2016. The specific issues covered were: experience of consumer problems and complaints; awareness and expectations of consumer organisations; awareness and perceptions of CAS; and experiences of using CAS services. The findings of the research show the essential nature of the services offered by the CAB Service in Scotland:

- Perceptions of the Scottish CAB Service were very positive: Around three quarters (76%) of those who had heard of the organisation said they were 'very' (32%) or 'mainly' (43%) favourable towards it.
- Almost all respondents (96%) thought the Scottish CAB Service was an important community service, while around two thirds (62%) said it was important to them personally.
- Most respondents (85%) said they would be likely to use the Scottish CAB Service in the future if they needed advice or information. Most (84%) also said they would recommend the organisation to a friend or a relative.
- Fifteen per cent of respondents said they had sought advice or information from the Scottish CAB Service in the last three years. By far the most common means by which respondents had contacted the Scottish CAB Service was in person (75%), followed by phone contact (49%). Around one in ten (11%) had used CAS' online services and 3% had had a home visit.
- More than nine in ten (92%) respondents who had sought advice or information from the Scottish CAB Service in the last three years were satisfied with the service they received.

Data

All of the data and evidence from consumers is collated and analysed by Citizens Advice Scotland to form a rich and extensive evidence base on consumers and their issues in Scotland. In addition to this, we commission research to ensure that our evidence base reflects all consumers in Scotland and can explore the detail behind our evidence. Put together, the Citizens Advice Service has one of the most powerful evidence bases on consumer issues in Scotland.

General consumer advocacy

Our powerful evidence base flows directly into our advocacy, ensuring that all of our work is firmly evidence based, responsive, and targeted at the key areas of consumer detriment in Scotland. Our advocacy is valued by key stakeholders and is influential in achieving change for consumers across a range of sectors.

CAS's advocacy function was bolstered in 2013 by new functions and funding, helping expand our effective and integrated system of general advocacy, education and campaigns. Clients and stakeholders alike have come to rely on our provision of general consumer advocacy. In fact, in areas such as legal services, we are currently the only general consumer advocate in Scotland.

Local campaigns and consumer advocacy

The addition of new functions and funding in 2013 also enhanced CAS's capacity to support bureaux in undertaking local advocacy work. Through our dedicated infrastructure, CAS supports and builds the capacity of the bureaux network with tools and resources to campaign on key consumer issues locally and create confident and knowledgeable communities across Scotland.

CAS undertakes four national consumer campaigns each year, targeted at key areas of consumer detriment identified in our data. This approach multiplies the influence of our advocacy work, reaching consumers across the country and allows bureaux to tailor advocacy work to target local needs.

The success of this local approach is the trust and understanding which exists between CAS and the member bureaux. CAS offers flexible support to meet the needs and expectations of our local network.

The consumer

Ultimately, the consumer benefits from this integrated service. Hundreds of thousands of consumers are reached and empowered by our advice, education, campaigns and advocacy each year; all of which extends from our direct contact with consumers.

Appendix 2: The Growth of CAS

In 2010, the UK Government decided that the Citizens Advice service would become the publicly-funded voice for consumers, championing their needs and empowering them to make the right choices for themselves. Since then, the Citizens Advice Service has taken on a series of additional responsibilities to ensure that we can fulfil this role for consumers. In a four year transition period, Citizens Advice Scotland took on:

- **The Citizens Advice Consumer Service** (2012) – formerly known as Consumer Direct, the helpline now takes on over 54,000 consumer cases in Scotland each year
- **Consumer Education** (2013) - the Office of Fair Trading's (now the Competition and Markets Authority) responsibilities for consumer education transferred to the Citizens Advice Service in April 2013
- **General consumer advocacy** (2013) – responsibility for consumer advocacy on non-regulated industries (rest of the economy) transferred to Citizens Advice Scotland, augmenting our already strong advocacy role in representing consumers
- **The Extra Help Unit** (2014) - a team of telephone caseworkers based in Glasgow that helps people and micro-businesses throughout Great Britain who have complex energy or postal complaints
- **Consumer Futures** (2014) – delivered jointly with colleagues in England and Wales, the Consumer Futures Unit focuses on the essential regulated services of energy and post, and in Scotland includes water, using evidence from consumers and the citizens advice service to advocate for change in the interests of current and future consumers

The Citizens Advice Service now offers a comprehensive and integrated service for consumers, encompassing advice, information, advocacy, research, campaigns and education.

Appendix 3: What stakeholders say about CAS advocacy

CAS recently commissioned an independent audit of stakeholder views on its services and reputation in a changing environment. The following comments are from stakeholders.

“CAS offers incredibly insightful information on societal and welfare issues in Scotland”

Civil Servant

“Making arguments because you think something’s happening is one thing, but CAS’ work means that it’s evidenced which is really powerful and they take stories and turn them into something which can be used by policy makers.”

Politician

“I think the main strength is picking up issues or potential issues before they become huge issues for individuals. They tend to be a really good barometer of what’s happening.”

Politician

“CAS is very knowledgeable about issues that affect people on the ground. CAS is able to tap into bureau staff to anchor views about policy. If we’re looking at a change in policy, CAS is a useful resource to understand how this change would affect people.”

Civil Servant

“The campaign and policy work is excellent.”

Civil Servant

“They are very good at engaging on the topics of the day and contributing to public debate on these issues. The wider network is a core strength.”

Civil Servant

“The intelligence that comes into the network from the bureau is unmatched”

Civil Servant

“They tap into what the public are thinking and what issues are causing people problems.”

Civil Servant

“I think the thing that’s probably most useful for me as an MP is probably the quality of the research.”

Politician

Appendix 4: The reach of Citizens Advice Scotland

Citizens Advice services reach consumers across the length and breadth of Scotland across all walks of life. Our data shows that bureaux are particularly successful at reaching potentially vulnerable groups that other services may struggle to reach. We are in the final stages of our Consumer Confidence research (commissioned to Ipsos Mori) which uses a panel of over 1,000 representative consumers to explore their experience of consumer problems and complaints, as well as their awareness and expectations of consumer organisations. CAS would be happy to share the final results with the Scottish Government to inform the mapping of the consumer landscape.

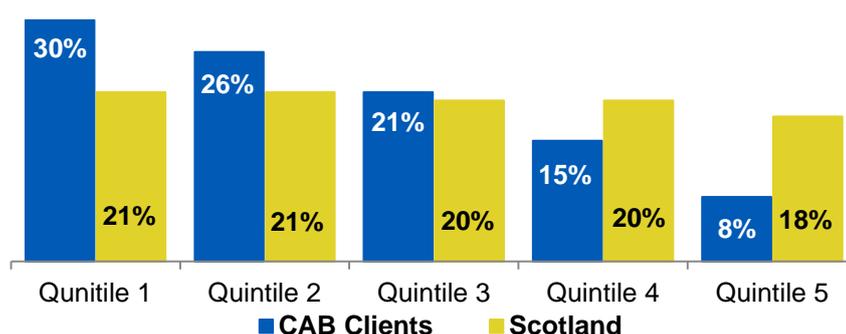
Advice for Scotland

Client profile statistics from bureaux collated in November 2015 showed the reach of their services, covering all parts of society, but particularly providing assistance to 'hard to reach groups' such as those living in relative deprivation, with disabilities, and/or living in rural areas.

Compared to the population of Scotland, CAB clients were:

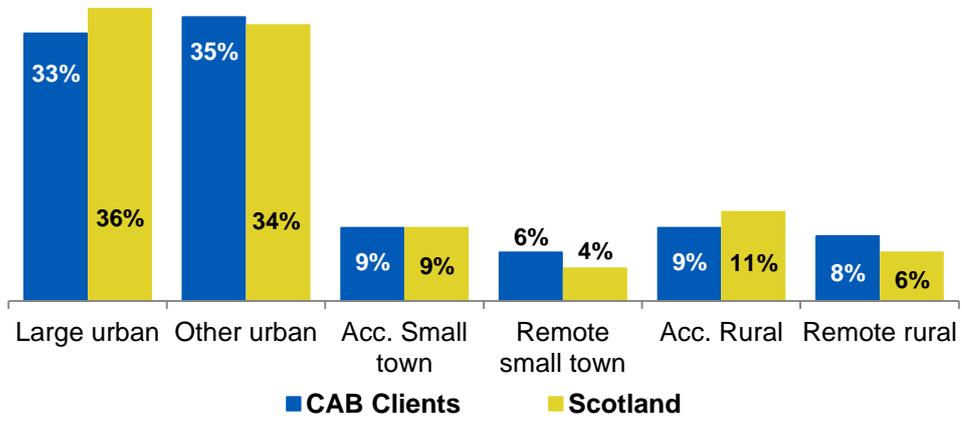
- More likely to live in areas of **relative deprivation** (30% of clients lived in the 20% most deprived areas compared to 21% of the population)

CAB clients by relative deprivation



- More likely to live in a **remote** area of Scotland (14% of CAB clients compared to 10% of the population)

CAB clients by urban/rural classification



- More likely to be unable to work due to an **illness or disability** (25% of CAB clients compared to 6% of the population).