

Consultation response: Public Authorities (Fraud, Error and Recovery) Act DWP Codes of Practice

February 2026

Background

As Scotland's largest independent advice network, we welcome this opportunity to contribute our views and considerations concerning how the Department's new powers to identify, prevent, and reduce fraud and error should be applied in practice.

Reflecting our role in representing the interests of those who seek advice from the network in Scotland, and our corresponding evidence base, our response is limited to the sections of the draft Code of Practice concerning eligibility verification notices (EVNs). Our response is drawn from evidence concerning the perspective of the advice sector and the people that it supports.

Key points

- The Code must be further developed. In it is not in its current form robust enough to minimise the risk of harm, stigma and deterrence, limiting the right to social security.
- Safeguarding focused conversations with potential and existing claimants about the EVN process and how it might impact them must be co-designed and referenced.
- Clear, unambiguous timeframes on when information must be provided to claimants highlighting that a response to an EVN has triggered further process.
- The Code must specify how it is envisaged that EVNs could work alongside measures to improve targeted support for people in vulnerable circumstances including:
 - Accessible communication,
 - Multi-channel prompts and check-ins,
 - Self-help tools (including hypothetical examples of relevant and not relevant changes),
 - Flexible reporting options.

Eligibility Verification Notices (EVNs)

3. Chapter 2 clearly explains the purpose of the Eligibility Verification Measure (EVM).

a. Strongly agree

b. Agree

c. Neither agree nor disagree

d. Disagree

e. Strongly disagree

Chapter 2 explains that, broadly, the purpose of the EVN measure is to facilitate the early identification of incorrect payments, helping to reduce error and fraud and preventing large debts accruing. What is not clear in the Chapter is the link between the envisaged operation

of EVNs and this stated purpose. Since the Code will form an anchor reference point for understanding the new powers and the parameters of their application, that clarity is vital.

Chapter 2 confirms that when a financial institution receives an eligibility verification notice (EVN), it will be required to identify 'relevant accounts' it holds, which are all of those receiving a specified DWP payment, or other accounts held by the person receiving the payment. If listed indicators that the person may be paid inappropriately are flagged, financial institutions must then give the DWP restricted information about the accounts. It is not clear how this information --can play a significant role in reducing error and fraud. This is because it is simply an overview and not an in-depth analysis or a dynamic information feed such as HMRC's Real Time Information.

For example, Chapter 2 states that these eligibility indicators "*could be set such as to require [financial institutions] to provide the Secretary of State with information about benefit receiving accounts (and any linked accounts) which have a total capital balance over the threshold of £16,000, which in the majority of cases is the maximum permitted under Universal Credit eligibility rules.*" Given that all accounts connected with a payment of Universal Credit, for example, are in scope, banks will be obliged to provide information concerning accounts containing funds to be disregarded in accordance with, for example, Schedule 10 of the Universal Credit Regulations 2013¹, or which are covered by a transitional capital disregard². There is no clear mechanism within the EVN process to enable financial institutions to identify and exclude such accounts; that is acknowledged in the Code itself.

Furthermore, since EVNs can be expected to involve requests that are one time or periodic, or some combination of both, it will be the case that individuals who have funds earmarked for a specific purpose, or who receive earnings more frequently at certain points in a year, could find themselves appearing not to match eligibility criteria. However, in reality, this is not the case. A snapshot is not able to provide such an in-depth analysis and could lead to severe unintended consequences.

There is inadequate specific provision in the Code regarding the DWP's obligations to swiftly identify and disregard information obtained via an EVN pertaining to claimants in these circumstances. The Code states that "*DWP will **always aim** to act on the data received promptly, for example within one month*"; this is an outline and not a firm expected timeline. It means that many people will experience distress and anxiety linked to the uncertainty of whether or not their claim is potentially going to be reviewed triggered by information returned in response to an EVN. The Committee of Public Accounts has noted in this connection that the "*DWP has not fully set out how it will use these powers in a way that supports public trust*".³

Given the sensitivity of the information held by banks, the Code must be robust enough to minimise the risk of harm, stigma and deterrence from realising the right to social security. Chapter 2 does not specify how the purpose and operation of EVNs will be communicated to

¹ [The Universal Credit Regulations 2013](#)

² [The Universal Credit \(Transitional Provisions\) Regulations 2014](#) section 51

³ [Tackling fraud and error in benefit expenditure 2024-25](#)

claimants and potential claimants, confirming simply that the “DWP will make claimants aware of this [EVNs] through various means, including through this Code and by updating [Personal information charter - Department for Work and Pensions - GOV.UK](#).”

This is a considerable oversight, since analysis has highlighted that ineffective communication between claimants, potential claimants and social security agencies is overwhelmingly a key driver of overpayments⁴, in cases both of error and fraud. More must be done to further develop the Code to cover such gaps.

DWP commissioned research⁵ concerning how the current penalties regime influences behaviour, identified several potential communication gaps. Participants perception of the claimant declaration was that it is not clear enough concerning claimants’ level of responsibility and how that relates to individual circumstances. Participants explained their difficulty in understanding what qualified as a relevant change and described struggling to communicate changes to the DWP.

These challenges are being experienced by the people that our network supports with Universal Credit advice; the result can be unmanageable debt, financial hardship and deeply detrimental levels of distress. For people like Emily, the existence of the Eligibility Verification Notice (EVN) process would not have prevented an overpayment.

Emily’s Experience

Emily sought help from her local CAB when she received notification that she had been overpaid Pension Credit. Emily is in her eighties and is distressed and anxious about the possibility that she is in debt. The CAB ascertained that the overpayment related to the continued payment of Severe Disability Premium (SDP) after Emily’s granddaughter moved into the household to provide care. Emily had applied for Pension Credit over the phone and had not been provided sufficient information to understand SDP and the conditions of entitlement to receive it. While supporting Emily to understand how much she owed and establish a re-payment plan, the CAB noted that incorrect information was provided about the debt (initially advised to be in excess of £24,000 before being corrected to approximately £2,000) and that the process of communicating with the debt management team was protracted and difficult.

For the people that the network support who do not speak English as a first language, the importance of practical, accessible and flexible ways of communicating changes, and the need for advice to support people to do so, cannot be overstated. Accessible and flexible communication more broadly is key to ensuring that EVNs can function effectively and do not increase administrative burdens on individuals, third sector organisations such as our local CABs, financial institutions and the Department.

Maria’s experience

Maria is a lone parent of two children, one of whom has a disability. English is Maria’s second language, making communication online challenging. She approached her local CAB

⁴ [Countering Fraud in Social Benefit Programmes \(EN\)](#)

⁵ [Qualitative research into the behavioural impact of the penalties regime for benefit fraud and error - GOV.UK](#)

for advice. Her circumstances have changed- her father has joined the household, and her child is now in receipt of a higher rate of Child Disability Payment (CDP). She was asked by the DWP to provide bank statements, and to re-report the change to Child Disability Payment as this could not be verified. When following this instruction, Maria noted that her UC account showed her father appearing and disappearing as a member of the household. She explained via her online journal the mistake, offered to submit documentation confirming the change to CDP, and asking for confirmation of receipt of the bank statements requested. Maria's communication has not been responded to, leaving very anxious about being incorrectly paid.

At present, it can be a leap for many with communication needs, from language barriers to sensory impairments, to get connected to accessible formats. For instance, one North of Scotland based CAB notes that while the DWP offer a Textphone service, for deaf and non-verbal people, for example, establishing this via telephone is out of reach. The CAB noted that to access Video Relay, people are advised to check benefit service centre contact details to find out where it is available and how to use it, which is not adequate to overcome the significant barriers to communication being faced by people with sensory impairments and learning difficulties.

Leila's experience

Leila approached her local CAB for help to manage her UC claim. Leila required an Arabic interpreter to access UC Helpline. While an interpreter could be provided by the DWP, Leila had been unable to complete initial identification questions to connect to this service. Leila is a lone parent living in temporary accommodation with five children, two of whom have disabilities.

The DWP commissioned research, cited above, recommended multi-channel prompts, check-ins, tools to assess personal circumstances, targeted support for people in vulnerable circumstances, and flexible reporting options and communication methods. All with the aim to improve in these areas.

EVNs represent a process that simultaneously carries the risk of being understood as a stigmatising form of surveillance designed solely to detect fraud, while providing an opportunity to improve communication, build claimant's confidence in managing a UC claim, and proactively identify vulnerable circumstances.

The need for effective and sensitive communication around EVNs to alleviate the distress, anxiety and mistrust that they generate is illustrated by Sally's experience.

Sally's experience

Sally approached her local CAB for support when her UC payments stopped following a review. Sally was asked to provide bank statements; she accordingly provided the statements, clearly showing the amount being paid into her account and the account balance, but with outgoings redacted to protect her privacy. Sally's UC claim was suspended and thereafter terminated, leaving her in extreme financial hardship, reliant upon friends and family, at risk of rent arrears and feeling stripped of her right to dignity and privacy.

A complex mix of anxiety, communication barriers, vulnerable circumstances and trust concerns drive both overpayments and the corresponding important issue of unfulfilled eligibility (underpayments). This unfulfilled eligibility, which particularly affects sick and disabled people who may fail to report that their condition has worsened, rose to £3.7billion in 2024-25, up from £3.1billion the year before⁶.

CAS solution: The Code must specify in detail how the new powers to issue EVNs will be communicated to potential and existing claimants. The Code must specify how it is envisaged that EVNs could work alongside measures to improve targeted support for people in vulnerable circumstances, accessible communication, multi-channel prompts and check-ins, self-help tools (including fictional examples of relevant and not relevant changes), and flexible reporting options.

7. Chapter 2 clearly explains how the EVM Test and Learn period will operate.

- a. Strongly agree
 - b. Agree
 - c. Neither agree nor disagree
 - d. Disagree**
 - e. Strongly disagree
8. Please explain your response.

Chapter 2 fails to specify the scale or duration of the Test and Learn period. It specifies only that the DWP will initially test the power with a small number of financial institutions to ensure that delivery is optimised. It is unclear how many financial institutions will be involved, and whether any limitations will be placed on the scope of EVNs during this phase to test the impact. Key financial institutions manage very large numbers of accounts into which in scope payments are being made yet limiting the EVN notice in meaningful ways (such as matching accounts within a specified geographical area) poses data safeguarding risks. It may be that the Test and Learn period will involve smaller scale financial institutions, but this is not specified in the Code. Information is not provided about Test and Learn in relation to providers of digital only services.

Furthermore, it is not clear what evaluation process will occur during the Test and Learn phase and what evaluation benchmarks might be used to phase scaling up beyond the Test and Learn period. This is unacceptable. Clear timelines must be provided to ensure everyone understands how the process will be developed and tested.

11. Chapter 2 clearly explains that an EVN will only be issued when it is necessary and proportionate to do so, and the factors that may be considered as part of that assessment.

- a. Strongly agree
 - b. Agree
 - c. Neither agree nor disagree
 - d. Disagree**
 - e. Strongly disagree
12. Please explain your response.

⁶ [Unfulfilled eligibility in the benefit system, Financial Year Ending \(FYE\) 2025 - GOV.UK](#)

Firstly, The Code is clear that only " *DWP staff who are authorised by the Secretary of State will exercise the power to issue an EVN, on behalf of the Secretary of State. These limited number of people who will be authorised to issue the EVN are known as "authorised persons."* There is no further information provided about the appointment of authorised officers how they might be expected to use the Code; their role is not explicitly linked, for example, to the confirmation that the Code is " *admissible as evidence in any proceedings if any provision of the Code is relevant in considering the exercise of the [new] powers.*"

The Code defines the factors that authorised officers will consider in determining whether issuing an EVN is necessary and proportionate very broadly. The factors referenced in the Code appear to require substantial data that will not be immediately available in depth and based on real world operation of the new powers-namely the burden on financial institutions, the efficacy of EVN's in relation to a particular benefit, reports of the Independent Reviewer, and appeal outcomes.

The first report of the Independent Reviewer will be based on data from February 2026 but the Test and Learn phase will not run until the summer of that year, so it will only provide very early insights. In the interim, no examples are provided to users of the Code as to what would constitute good and bad practice in determining if a request is necessary and proportionate.

It is not clear under what circumstances it will be considered necessary and proportionate that the requested data be provided at a specific frequency for a period of time. Furthermore, an EVN request of this nature would potentially disproportionately impact people with fluctuating earnings, including the self-employed, seasonal workers, parents, carers, sick and disabled people, and those seeking to return gradually to the workplace.

The Code only states that the " *DWP will take all reasonable steps to identify vulnerable individuals using information it already holds.*" This does not obligate any specific processes to occur concerning safeguarding prior to a decision being made that issuing an EVN is necessary and proportionate. Nor does the Code explicitly account for scenarios in which the EVN notice itself exposes or exacerbates a latent vulnerability such as economic abuse. While it is appreciated that an EVN is only capable of triggering further process, at which point safeguarding protocol would apply, that is not a satisfactory position given the sensitivity of the information being requested, and indeed is a missed opportunity to identify vulnerable circumstances pro-actively.

There is no mechanism to exclude accounts associated with claims by people with known and recorded vulnerable circumstances, regardless of how clear the vulnerability may already be to the DWP. For example, Alternative Payment Arrangements (APAs) are established subsequent to specific vulnerable circumstances criteria having been flagged and confirmed; claims associated with APAs will be in scope for EVN requests.

The lack of safeguarding specifically concerning vulnerable circumstances therefore requires to be addressed, most effectively attached to safeguarding focused conversations with potential and existing claimants about the EVN process and how it might impact them. This would support the pro-active identification of vulnerable circumstances, economic abuse and communication needs in particular, and more robust protection of those already acknowledged to be in vulnerable circumstances. Such a conversation would allow specific flags to be attached to claims, better securing the appropriate use of any information

returned in response to an EVN. Additionally, it would reduce the risk of harm from the simple existence of the EVN process (such as misinformation being perpetrated by abusers).

CAS solution: Safeguarding focused conversations with potential and existing claimants about the EVN process and how it might impact them must be co-designed and referenced in the Code.

13. Chapter 3 clearly explains the types of accounts that fall within the scope of EVM.

- a. Strongly agree
- b. Agree
- c. Neither agree nor disagree
- d. Disagree
- e. Strongly disagree

14. Please explain your response.

The Code does not unambiguously set out what the next steps are should it transpire that an EVN returns information about an account not owned by the claimant. While the Code states that such information will be disregarded, it does not confirm that no alternative steps will subsequently be undertaken to check the claimant meets the eligibility criteria specified in the EVN.

The Code specifies that *“where the benefit is a household benefit, such as Universal Credit, the capital held by both individuals may be relevant to eligibility for the benefit where those individuals are part of the same household. On receipt of the information from the financial institution, DWP will analyse the information, and information which is not relevant to eligibility for benefits will not be shared further or used by any DWP operational area.”* This completely lacks detail; nor does it adequately reassure victim survivors, who may find themselves swept into an investigative process triggered by information returned in response to an EVN and related to financial activity concerning which they had no knowledge or control. While it is appreciated that business as usual processes surrounding safeguarding would apply if such an investigation is triggered, the reality that the EVN process itself could be the first indicator within a claim that abuse is happening mandates specific provision in the Code for this eventuality.

Clarity in the Code concerning in scope accounts not owned by the claimant is even more relevant to Scotland, since many claimants will establish Scottish Choices Direct to Landlord payments. Some of these payments will be destined for in scope accounts held by private landlords. The Code provides that *“Some landlords may also independently claim a benefit specified in the EVN. In cases where a landlord is also a claimant of a benefit specified in the EVN, DWP will use the information to verify their eligibility for the benefits that they receive.”* The Code does not provide adequately robust assurances to private landlords for whom the existence of EVNs may potentially act as a deterrent to renting to Universal Credit recipients.

Significantly, some 900,000 people across the UK do not have a bank account⁷. This disproportionately impacts on people in vulnerable circumstances, such as when leaving

⁷ [Holding to Account Wider Report.pdf](#)

prison, experiencing homelessness, claiming asylum or exiting an abusive relationship. People in these circumstances may have even less capacity to access a bank account, and therefore social security entitlements, especially if friends and family members become less willing to allow temporary use of an account for the purpose of receiving a social security payment due to the evasive nature of the EVN process. Thus, further excluding these individuals from society, not just financially and exacerbating their already vulnerable situations. More needs to be done to protect those who are unbanked and do not have a bank account.

15. Chapter 3 clearly explains how DWP will use EVM information.

- a. Strongly agree
 - b. Agree
 - c. Neither agree nor disagree
 - d. Disagree**
 - e. Strongly disagree
16. Please explain your response.

The Code specifies that no automatic decisions will be made based on eligibility verification data alone; where potential fraud is identified against eligibility indicators, cases will be referred to DWP's counter fraud and compliance teams for further consideration and, if necessary, investigation. Final decisions, the Code states, will always involve a human agent.

The context to this, however, is that the new powers do mean that every claimant of key social security payments will face the possibility that information relating to their bank accounts triggers a fraud and error investigation.

For many people, the nature of their circumstances can put them at risk of reporting inaccurate information. Limited capability to understand and follow rules and reporting obligations, often due to poor health, or low financial and digital literacy, all represent substantial barriers to effective engagement.

The Code does not adequately account for this beyond indicating that business as usual safeguarding procedures will apply to investigations triggered by information returned in response to an EVN. Without evaluating and understanding the role of vulnerable circumstances in precipitating fraud and error, EVNs may perpetuate harm without making a significant impact on fraud and error detection.

Emma's experience

Emma attended the CAB for support in respect of her treatment at the hands of the JobCentre. She has not received a payment of Universal Credit for two months. Emma has not received any correspondence or formal decision explaining this, depriving her of challenge rights. Emma has experienced a brain injury and she inadvertently reported the wrong information about her savings. She attempted to correct this by uploading the up-to-date statements to her UC online account and by attending the JobCentre with the evidence. Emma feels as though she is being accused of withholding information, and furthermore of deliberate deprivation of capital following her purchase of a funeral plan. Emma presented at the CAB in a very distressed state since from her perspective "she is not cheating the system but is being made to feel this way".

One of the fundamental concerns from a safeguarding angle is the inevitable eventuality that “*EVM information may be relevant to a potential decision to suspend benefit payments or to change a benefit entitlement decision.*” Furthermore (also inevitably) “*if the data received indicates that a claimant has received an incorrect payment of one of the benefits set out in the EVN and they are also in receipt of a different benefit, then DWP may use the information received to re-assess the claimant’s eligibility for the second benefit*”, risking a cascade of financial shocks.

While it is clearly stated in the Code that the “*DWP must consider all information it holds which is relevant to that decision*”, Nina’s experience illustrates the hazards inherent in suspending benefits whilst gathering information aimed at reducing fraud and error. Nina’s case was subject to a review based on flags generated by the DWP’s Integrated Risk and Intelligence Service (IRIS).

Nina’s experience

Nina attended her local CAB for support following the suspension of her Universal Credit (UC) payments. Nina arrived in the UK from Ukraine in the Spring of 2022 with her husband and their two children, now aged seven and eleven. Nina has since separated and is now a lone parent while studying. Nina has received messages on her UC online journal indicating that her claim is going to be reviewed, and subsequently from the DWP’s Enhanced Review Team advising her that her claim has been suspended pending the outcome of the review. Nina believes that she has provided all the requested information, but she confirmed to the CAB that she feels uncertain of the process in part due to English not being her first language as well as some uncertainty about what documents will suffice e.g., she was asked for a council tax bill but was unclear about this since she has a student exemption. Nina was offered a face-to-face appointment due to the language barrier; however, the CAB are not able to be present when Nina receives a call-back from the DWP following up on the review, which will occur at an unspecified time. At the time that Nina attended the CAB it had been over one month since her last payment of UC and she was facing severe financial hardship. Nina has a shortfall to pay in respect of rent and does not receive child maintenance or student income.

CAS solution: A robust safeguarding strategy, clearly linking appropriate requirements concerning EVNs to wider Departmental safeguarding objectives, must be referenced clearly in the Code. Clear, unambiguous timeframes must be provided in the Code specifying when and how information must be provided to claimants that a response to an EVN has triggered further process. This would provide some level of certainty to alleviate anxiety.

19. The content in Chapter 4, regarding the safeguards in place for financial institutions who will be required to comply with EVM, is clear.

- a. Strongly agree
 - b. Agree
 - c. Neither agree nor disagree
 - d. Disagree
 - e. Strongly disagree
20. Please explain your response.

The Code advises that if the DWP considers that a financial institution has failed to comply with the terms of an EVN within a specified period, without providing a “*reasonable excuse*”, then the financial institution may be issued with a fixed penalty. This means that it for the DWP to determine failure to comply. The Code does not specify, or even indicate, what the DWP will consider to be a “*reasonable excuse*”.

The Code contains a commitment on the part of the DWP to, prior to issuing an EVN, extending an offer to “*discuss the requirements of complying with it with the institution in order to help them prepare for the formal ask, including ensuring a suitable digital solution is in place to allow the transfer of the data.*” Yet no further details about this offer are provided, nor is an explanation provided about what is envisaged as a “suitable” digital solution. Such ambiguity could ever lead to harm.

Similarly, the Code provides that “*financial institutions which experience technical difficulties while complying with an EVN may contact DWP using its Incident Management process*”, while leaving the details to be confirmed. Since financial institutions have varying operational set ups and requirements, their understanding of what constitutes technical difficulties, and the type of difficulties they are most exposed to, will be very different. The lack of detail in the Code could therefore lead to confusion, unanticipated challenges, or data integrity risks, to the potential detriment of the people on behalf of whom financial institutions and the Department work.

23. Chapter 4 clearly explains the role and remit of the Independent Reviewer.

- a. Strongly agree
- b. Agree**
- c. Neither agree nor disagree
- d. Disagree
- e. Strongly disagree

24. Please explain your response.

The Code clearly explains the appointment process, remit and role of the Independent Reviewer in the scrutiny of the new powers:

“The independent person will produce a report for the Secretary of State every 12 months on the use of the power to issue an EVN. This report must be published and laid before Parliament. DWP must give the independent person any requested information which is relevant for the purposes of carrying out the review.”

However, it fails to clarify further how the process of agreeing with the appointed person what is “relevant” information will operate. Having a clear definition will be useful for all parties concerned.

32. What changes if any, would you like to see in relation to the EVM Code of Practice, please explain here

The Code, in so far as it concerns the new EVN powers, does not adequately account for the complexity of the lives and circumstances of those who will be impacted, and the potentially disproportionate impact on women and disabled people.

33. Do you have any other comments on the EVM Code of Practice? Is there anything that you consider has not been addressed in the Code of Practice?

The scale of the impact of this regime will be considerable, given the reach of UC (the key payment affected in Scotland) and demand for UC advice. Significantly, Scotland has the highest proportion of UC claimants on the UC health journey (48% of Scotland's UC claimants in September 2025, a caseload of 326,341⁸). This demonstrates the number of people with complex needs who will be impacted by these new powers to issue EVNs.

In the three months to January 2026, we provided 42,831 pieces of advice (representing 31% of the demand for social security advice, which itself constitutes more than half of the advice work delivered by the network) to 10,651 people.

Of those who provided us with information about their health, more than four in ten (43%) reported being unable to work due for health reasons. 38% of those that we supported with UC advice in that three-month period reported having a caring responsibility. 25% were in work. Six in ten (61%) were living in the most deprived areas of Scotland (SIMD 1 and 2).

Exploring the key areas of UC advice demands highlights the imperative nature of effective advice and communication, as well as the extent of complex need amongst those seeking advice about UC. In the three months to January 2026, we provided:

- 2,231 pieces of advice about reporting a change of circumstances,
- 3,4456 pieces of advice about the Limited Capability for Work- and Work-Related Activity group, and a further 2, 431 pieces of advice about the Work Capability Assessment,
- 2606 pieces of advice about Scottish Choices, enabling people to receive payments fortnightly and/or direct Housing Element to landlord accounts,
- 1429 pieces of advice on verifying identity.

The volume of advice on these specific themes is an indicator of the clear need for EVNs to be introduced in the context of addressing the gaps in accessible communication discussed in our response to Question 3. It demonstrates the need for clear and sensitive communication about the EVN process, and the need for a person-centred, flexible approach when considering information received in response to an EVN.

The advice sector will play an indispensable role in communicating accurate information concerning the new powers and supporting people to navigate claims and to in scope benefits more broadly. The advice sector will also play a vital role in supporting people to access other services related to the operation of the new powers, such as banking. As such the advice sector will be relying heavily on the Code to hold the Department to account and to ensure the EVN process has been conducted fairly. If it lacks in such necessary detail, this could make such complaints and challenges to decisions harder to enforce.

⁸ [Universal Credit Work Capability Assessment statistics, April 2019 to September 2025 - GOV.UK](#) and [Stat-Xplore - Home](#)

CAS solution: Partnership working between devolved and reserved administrations concerning the delivery of sustainable, multi-year funding for free, professional advice services to ensure they are readily available to people when and where needed will support the effective deployment of the new powers.

About Citizens Advice Scotland

The Citizens Advice network in Scotland is Scotland's largest independent advice provider. Advisers across all corners of the country work in Citizens Advice Bureaux (CAB) to provide free, impartial and confidential advice. Our Extra Help Unit (EHU), based in Glasgow, helps people resolve complex and time-sensitive energy problems. Each year our network supports hundreds of thousands of people, unlocking millions of pounds worth of financial gains. By looking at a person's complete circumstances, CAS gains an unparalleled insight into the scale and complexity of what's happening in communities throughout Scotland.

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