

Our Impact Plan for 2021/22



April 2021

Contents

Introduction	3
Financial Health	4
Strong Communities	16
Social Justice	17
Fair Markets	27
Campaigns and supporting local advocacy	34

Introduction

Scotland's Citizens Advice network empowers people in every corner of Scotland through our local bureaux and national services by providing free, confidential, and independent advice. We use peoples' real-life experiences to influence policy and drive positive change. We are on the side of people in Scotland who need help, and we change lives for the better.

Our 2021/22 Impact work plan outlines the areas where we will be working to secure changes on behalf of our network's clients. It has been drawn together following extensive analysis of advice data and consultative workshops with representatives from the network to identify significant trends and areas of concern.

This work comes as Scotland faces a cliff edge following COVID-19. Even before the pandemic people in Scotland faced insufficient incomes and rising living costs, and the pandemic will have exacerbated these issues for many.

Estimates suggest Scotland's fuel poverty rate, already at an unacceptable 1 in 4 homes, could reach 29% as a result of COVID-19¹.

Meanwhile, analysis of clients with multiple debts undertaken during the pandemic reveals more than half have debts of more than £10,000, and more than 2 in 5 have no money left at the end of the month after meeting their living costs.

Later this year people will see various financial support schemes implemented during the pandemic expire. This is a moment of huge risk for many, who will have built up new or additional debts and arrears during the crisis, and face reduced incomes, rising bills, and unemployment.

It is essential then, that we see change to improve incomes and cut living costs for people as we face the biggest economic challenge in living memory

Our work plan is rooted in delivering positive change for people during this unprecedented period and is split across four policy workstreams: Fair Markets, Financial Health, Strong Communities and Social Justice.

How we developed our work plan

What makes the advocacy work CAS carries out so special is that it is drawn from the lived experiences of real people – the clients who use the Citizens Advice network in Scotland.

The CAS Impact Team drew on nine months of advice data to identify issues of significant detriment across our key policy areas.

We then discussed these issues at a series of work planning consultation events, drawing in comments and anecdotal evidence from representatives of the wider Citizens Advice network as well as interested stakeholders.

These consultation events discussed the problems people were facing, the outcome we wished to achieve and potential tactics to deliver those outcomes. The conclusions drawn from this engagement influenced the outcomes in this work plan.

¹ <https://www.gov.scot/publications/scottish-house-condition-survey-additional-analysis/>

Financial Health

These are turbulent times for the finances of individuals and households. The economic impact of COVID-19 has been significant – job losses and reduced incomes are, for many people, causing great difficulty to pay bills, clear arrears, repay debts, and generally meet the costs of daily living. With the full financial impact of COVID yet to come when the furlough scheme and other payment support measures end, worrying numbers of people are expected to run into financial problems.

The work of the Financial Health Team in the coming year will be largely driven by the actions and advocacy that we can take to mitigate the economic fall-out of the pandemic on people in Scotland.

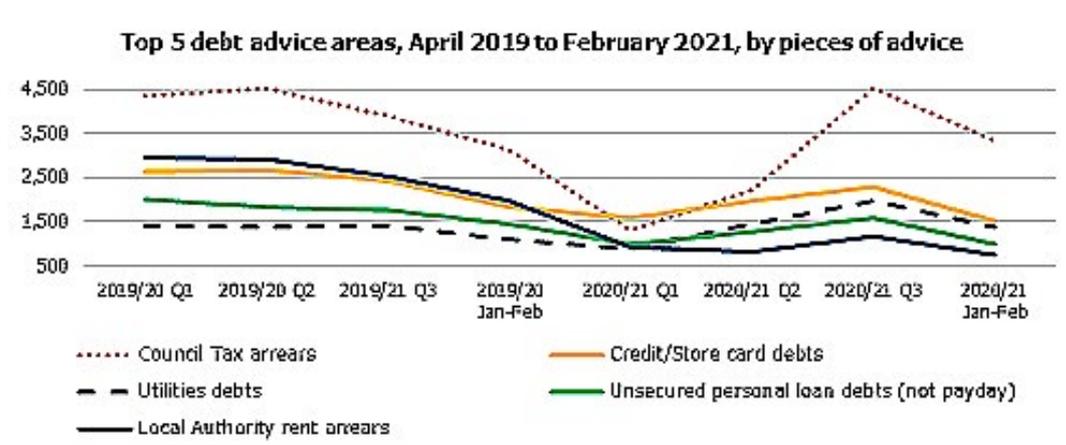
We will be particularly focusing on council tax debt and money and mental health which are issues affected by COVID-19 and that the CAB network view as a priority.

We will also be working on other significant areas such as ensuring Scotland’s statutory debt solutions are working in the best interests of debtors; raising awareness of the importance of seeking debt advice early; promoting our financial self-support tools, www.moneymap.scot and www.checkmycounciltax.scot to as wide an audience as possible; and continuing research into living standards of people in debt. We also engage in other issues like scams, housing debt, high-cost lending, affordable credit, and access to cash.

Council Tax Debt

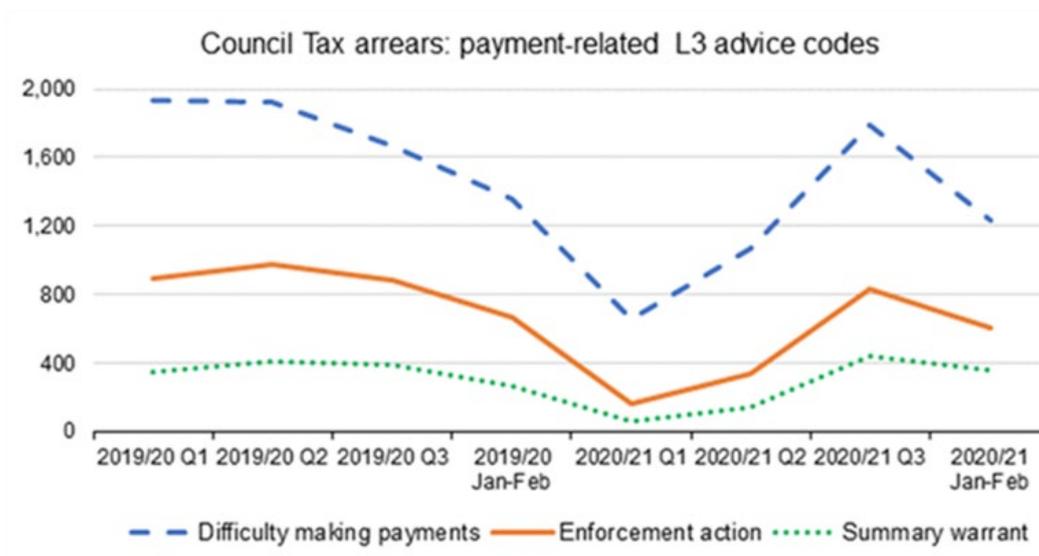
Council tax debt remains the single biggest debt issue that clients bring to the CAB network each year.

The graph below reflects how COVID has exacerbated the typical ebb and flow pattern of debt advice but critically it shows that demand is stabilising, however it is fully expected that advice across all debt areas will increase beyond the previous year’s level. For council tax arrears in particular, advice given in Quarter 3 of 20/21 has exceeded levels in the corresponding quarter of 19/20 pre-pandemic.



Financial Health

The economic effects of COVID-19 are beginning to have an impact on people's ability to make council tax payments and this is set to significantly increase in 2021/22 once furlough and other payment support measures end in April 2021.



There are various measures that CAS can take to advocate and influence change in this area, but this is a difficult landscape. Engaging with, and effecting change, across 32 individual local authorities requires 32 different conversations in 32 local contexts making it impracticable for the Financial Health team at CAS to do.

Instead, we will engage the key council tax players at a national level – Scottish Government, COSLA and the IRRV – and use their standing and influence to make the changes we seek. We will also support local CABs to have conversations with their own local authorities around the issues of council tax debt.

We will take a collaborative approach, seeking positive routes to change and harnessing the collective will of all interested parties to reduce the damaging impact of council tax debt on people's lives.

Outcome

- > To alleviate the pressure of meeting council tax bills for those struggling to pay.

Financial Health

Actions

We will work to improve:

- > Forbearance measures for those in council tax arrears and debt. For example, maximising the points of no return for paying arrears.
- > Local authority communications around billing and debt collection. For example, where someone has Council Tax Reduction ensuring that council tax bills highlight water & sewerage charges still need paid.
- > Public awareness of the risks of not paying council tax and of ways to reduce council tax bills. For example, highlighting that council tax is a priority bill and raising awareness of how claiming Council Tax Reduction can help with council tax costs.
- > National policy and practice to better mitigate against the effect council tax debt has on people's lives. For example, ensuring automatic Council Tax Reduction for those on relevant benefits.

What we will do

We will work collaboratively with Scottish Government, COSLA and IRRV to influence local authorities to:

- > Apply forbearance matching the levels shown during the first wave of the pandemic.
- > Have no points of no return for when those in arrears can engage with councils to make payment.
- > Improve the clarity on billing and debt recovery letters so that it is clear water charges must still be paid even where Council Tax Reduction has been granted.
- > Include in billing and debt recovery letters reference to CAB support along with the CAS council tax tool and Money Map tool.
- > Improve council websites to include better council tax debt information along with the CAS council tax tool and Money Map tool.
- > Increase public awareness of Council Tax Reduction, the CAS council tax tool and Money Map tool at key points throughout the year.
- > Increase public awareness of paying water & sewerage charges even where Council Tax Reduction has been applied.
- > Slow down the speed by which summary warrants are applied in favour of a softer approach to reduce the use of debt recovery options such as bank arrestments, earnings arrestments, and exceptional attachment orders.
- > Achieve write-off for historic debts which are unlikely to be recovered or will cause hardship to those with the debt.
- > Influence local authorities to allow a breathing space or moratorium for people in council tax debt arrears to work with an advice provider to make a proposal for payment.

Financial Health

- > Influence changes councils can make for those with poor mental health who are struggling to meet council tax payments or arrears.
- > Build on previous work by the Improvement Service to improve best practice around council tax debt.
- > Introduce measures in the 2022/23 Scottish Government Budget to help those struggling with council tax debt.
- > Work with Scottish Government, DWP, COSLA and IRRV to influence all local authorities to automatically apply Council Tax Reduction for those on relevant benefits who are eligible to claim.
- > Identify one local authority to work with to develop best practice around its communications with households around billing and collection which we can use as the basis of influencing change in other local authority areas.
- > Review the council tax tool to ensure it remains fit for purpose and significantly increase and sustain our promotion of it.
- > Review the council tax pages on the CAS public advice site to ensure they remain accurate and helpful to users at all times.

Money and Mental Health

The devastating link between mental health and money worries is well-established with mental health often being the cause and consequence of financial difficulties.

Unfortunately, COVID-19 has seen the rates of poor mental health increase significantly as have the rates of money and debt problems.

It was the **number one** issue that the network wished us to take forward in 2021/22



The **Money & Pensions Service** predicts demand for debt advice will increase by **60%** over the end of 2021.

Recent research by the Money and Mental Health Policy Institute found that

46%

of people in problem debt also have a mental health problem. This equates to every **1 in 2 people** who are over-indebted.



The **Money and Mental Health Policy Institute** also reports that **1 in 5 people** with mental health issues are in problem debt and

72%

stated their mental health had made their financial situation worse.



For these reasons and more, the CAB network held this as one of the most important issues facing their clients. Similarly, the Scottish Government in their *Mental Health – Scotland’s Transition and Recovery* plan recognise that the economic fall-out of COVID-19 will likely have a significant impact on the public’s mental health in the coming years. This impact is likely to be unevenly distributed with those on low incomes or in debt being at higher risk of the negative mental health impacts due to COVID-19.

Whilst this is a long-standing issue, it will be the first time CAS is undertaking advocacy in this area. It is not without its challenges as it tends to be an area where each issue of debt and of mental health is dealt with individually. Although there are positive movements amongst stakeholder organisations, including the Scottish Government, mental health institutions and debt advice organisations to come together to tackle this as a conjoined issue.

This is a new area for CAS advocacy, and we will explore and establish how best to influence change and will work collaboratively with all relevant stakeholders in doing so.

Money and Mental Health

Outcome

- > To make improvements in the external environment so that people with money and mental health issues achieve better support and outcomes.

Actions

We will work to improve:

- > Forbearance measures, debt recovery and collection practices of creditors, as well as local and national government to ensure they act appropriately and with due consideration of the increased vulnerability of those with mental health problems.
- > Statutory Debt Solutions to ensure they are flexible and account for the nuances of mental illness, mental health crisis and the impact this has on debt repayment.
- > Engagement between mental health professionals and agencies providing assistance and support with debt to ensure they are working collaboratively to achieve the best possible outcomes for those with mental health and money problems.
- > CAB data by including collection of the “soft” impacts of debt on mental health and wellbeing, for example, statistical information on the number of CAB debt clients who are having problems sleeping or on medication due to mental ill-health.

What we will do

Work with the Scottish Government on the development and delivery of its Transition and Recovery Plan for COVID-19 and Mental Health in relation to money and debt.

We will work collaboratively with the Scottish Government, COSLA and IRRV to influence local authorities to:

- > Apply appropriate forbearance measures when supporting those with mental health and money issues.
- > Improve engagement with local debt advice agencies on mental health and money issues.
- > Improve debt recovery practices and internal policies when supporting those with mental health and money issues, including recalling arrear accounts from Sheriff Officers if shown there is a severe detriment to mental health.
- > Influence local authorities to ensure the practices of Sheriff Officers working under their instructions follow their own internal policies when supporting those with mental health and money issues.
- > Increase public awareness of Severe Mental Impairment as a Council Tax Exemption including clarity on its eligibility criteria.

Money and Mental Health

Work with creditors and financial services to:

- > Apply appropriate forbearance measures which support those with mental health and money issues. This includes having a dedicated team or staff member who has undertaken specialist mental health awareness training.
- > Improve engagement with debt advice agencies and better support those with mental health and money issues. This includes advocating for mental health awareness training for creditor and financial services' staff so they can talk confidently about mental health and are able to signpost to appropriate mental health support and/or debt advice support.
- > Improve debt recovery practices when supporting those with mental health and money issues. This includes ensuring all front-line staff working in debt collection departments are able to appropriately respond to those presenting with mental health and money problems, including suicide ideation.
- > Work with the Accountant in Bankruptcy and other debt advice organisations on the Scottish Statutory Debt Solutions Review to ensure debt relief measures are flexible by advocating for the inclusion of Mental Health Crisis Breaks across all statutory debt options.
- > Work with the UK and Scottish Governments to ensure their own departments responsible for debt recovery including HMRC, Social Security Scotland and the Department for Work and Pensions apply appropriate debt collection practices when supporting those with mental health issues.
- > Work with GPs to improve the process for completing the Debt & Mental Health form including exploring with the Scottish Government and British Medical Association the reduction or removal of fees charged for completion of these forms.
- > Work with the Scottish Government, COSLA, IRRV, debt advice organisations and mental health support services to reconsider the language of Severe Mental Impairment and how it acts as a barrier to the take-up of Severe Mental Impairment Exemption for Council Tax.
- > Explore the introduction of a Mental Health and Money Charter with the Scottish Government and other stakeholders including financial services, regulators, debt advice organisations and mental health support services.
- > Undertake internal work within CAS to collect and collate the “soft” impacts of debt on mental health and wellbeing.

Strong Communities

Local Citizens Advice Bureaux are at the heart of Scottish communities. Their value as community assets has been demonstrated throughout the impact of COVID and the resilience of communities up and down the country has also been greatly tested.

In 2021/22 the Strong Communities team will be focussing on the issues of access to digital services and dispute resolution. Both are common issues which individuals will come to a Citizens Advice Bureau for advice on. On digital this could be for advice on mobile or broadband costs, or more simply for help trying to engage with another service through digital means. For dispute resolution individuals may be seeking advice on alternative forms of dispute resolution or on how to access a legal practitioner and for information on costs or eligibility for legal aid.

We know that COVID placed an almost immediate focus on the importance of digital communication for many across Scotland. It also heightened the impacts of digital exclusion which is experienced by people either because of access, affordability, skills, or connectivity itself. This is why the Strong Communities team will work to facilitate increased levels of digital access and to make this more accessible and affordable for those that are digitally excluded.

The pandemic has also shone a light on issues of dispute resolution. This has highlighted the importance of people understanding court processes and how these have functioned or been altered during the pandemic. There has also been increased interest in other forms of dispute resolution that have been more utilised during COVID as individuals seek to resolve various situations they are experiencing. Ultimately CAS wants to ensure access to justice can be achieved by everyone in Scotland and that individuals are appropriately supported to achieve this using whatever mechanisms are best for their own circumstances. This is why the Strong Communities team will work to ensure clients and the network understand all dispute resolution processes that are available and that those processes are accessible to those requiring them.

Strong Communities

Dispute Resolution

CAB clients approach the network for help with a variety of disputes and can experience problems in resolving disputes in a way that is prompt, accessible and affordable and which delivers long-term solutions to the issues the client is experiencing.

In the first three-quarters of 2020-21 Bureaux advised 3895 clients on Alternative Dispute Resolution (ADR), across a range of sectors, such as housing, including neighbourhood disputes, employment, consumer, relationships, utilities and healthcare.

This year has seen increases in demand for advice on ADR in relation to employment and housing matters. Some mediation services are still operating during the pandemic, using Zoom or telephone facilities.

In the first three quarters of 2020-21 Bureaux provided

2193 pieces of advice about accessing a practitioner 
and more than **500** pieces of advice were also given about costs

They also advised **1,072** clients on legal aid and of this,
780 clients were advised in terms of access and finding a practitioner.



Further to this, there were **684,987** unique page views of the law and courts pages on the Advice for Scotland public advice site.

Polling conducted by CAS suggests that cost can be a significant barrier to people seeking advice and that many people do not know where to start in finding a practitioner, especially if they require specialist advice. Many clients are unfamiliar with court and tribunal processes and require support to draft claims or responses and navigate court processes.

During the pandemic many processes such as Simple Procedure have moved primarily online, causing issues for clients who cannot access digital services or who require face to face support. Many hearings have also been conducted online or by telephone.

The pandemic has caused delays in formal court proceedings, meaning that cases are taking longer to resolve.

Strong Communities

Outcome

Work to ensure clients and the network understand all dispute resolution processes that are available and that those processes are accessible to those requiring them.

Actions

- > Working to promote effective knowledge and awareness of ADR across the network, including working to identify best practice and highlighting areas for improvement in order to benefit clients engaging with ADR processes.
- > Ensuring adequate support is in place within the legal system for clients to undertake their dispute process effectively, including advocating for an approach based around early intervention and prevention and for clients to be able to access timely and affordable advice on legal issues.
- > Monitor court and tribunal processes and advocate for change where necessary so that these processes can meet the needs of all users, and that access to justice is achieved.
- > Engage in policy development across the wider access to justice landscape including issues such as legal regulation and complaints, legal aid, and the creation of Consumer Scotland.

What we will do

- > Increase network and client understanding of all dispute resolution processes that are available and ensure that those processes are accessible to those requiring them.
- > We will work to identify best practice and highlight areas for improvement in order to benefit clients engaging with ADR processes. This will help to improve consumer education and action in relation to ADR.
- > We will do this in the first instance through our legal services group as well as more widely seek instances of good practice as well as barriers in relation to ADR processes. This will help to deepen our understanding of the experiences of CAB clients and advisors in relation to ADR.
- > We will engage with other teams within CAS, as well as other stakeholders in relation to ADR including the Scottish Government, to ensure effective knowledge and awareness of ADR and to promote its uptake with the ultimate aim of improving consumer education and action in relation to ADR.
- > Ensure adequate support is in place within the legal system for consumers and clients to undertake their dispute process effectively.
- > Advocate for effective and consistent support for clients throughout their dispute process. We will also advocate for a greater emphasis on an early intervention and prevention approach and for clients and consumers more widely to be able to access timely, affordable, and effective advice on legal issues when required. This is necessary in order to improve the transparency of the legal services market and make it less opaque for consumers.

Strong Communities

- > Engage with anticipated Scottish Government consultations on the regulation of legal services and dispute resolution as these will provide opportunities to undertake this further advocacy work.
- > Engage with legislation relating to legal aid. We anticipate this process will begin in the next parliament and will use that opportunity to continue to advocate for an early intervention and prevention approach to accessing legal aid.
- > Monitor court and tribunal processes and advocate for change where necessary so that these processes can meet the needs of all users, so that access to justice is achieved. This is crucial particularly as we emerge from the pandemic period and formal court processes re-start.
- > Engage in policy development across the wider access to justice landscape including legal regulation and complaints, legal aid, and dispute resolution.

Access to digital services

Prior to the COVID-19 pandemic, the Citizens Advice Network in Scotland was aware of the detrimental impact of a lack of digital access on CAB clients. CAB clients can struggle to access digital services for various reasons, including lack of access to a device, the affordability of mobile and broadband data, a lack of digital literacy or skills, or having no reliable mobile or broadband connection where they live. The increased reliance on digital services during the COVID-19 pandemic has exacerbated issues of digital exclusion.

Lack of digital access is often an underlying factor for clients who may present with other advice needs. For example, issues with starting or maintaining a Universal Credit application, paying Council Tax online, or accessing emails from other welfare agencies.

A west of Scotland CAB reports that: **“A client called in today seeking assistance with an application to Universal Credit as they do not have access to internet at home and are shielding due to COVID-19.”**

Access to Digital Services is dependent on many factors. Firstly affordability. Through our own “Disconnected” research, we understand that the biggest barrier to CAB clients accessing digital services is broadband and mobile costs.

The second factor is connectivity. Data provided by the telecommunications regulator Ofcom tells us that Scottish consumers in rural communities have limited access to reliable broadband or mobile signal. The costs of connecting to key infrastructure can act as a barrier for clients in rural areas.

Social Policy feedback also shows us this, with a north of Scotland CAB reporting that a **“client’s son has an unreliable broadband connection with [provider], the engineer has not been to examine connection despite client’s son being told to expect someone. Client’s son is disabled and relies on internet to complete basic tasks, such as banking”.**

Thirdly, digital literacy. Our own “Disconnected” research tells us that a third of all CAB clients surveyed either had difficulty using a computer or had no digital knowledge at all. This leaves clients reliant upon CAB for assistance with accessing digital services.

Our Staying in Touch research from 2020 highlighted a number of barriers to access for older and disabled consumers. Such as: poor connection speeds and consistency, lack of consumer knowledge and motivation, security concerns, and participants’ desires to maintain face-to-face interaction in their daily routines. This suggests that internet and mobile phone provision needs to be made more reliable and attractive as a means of completing common tasks for older and disabled consumers.

Strong Communities

Outcome

Work to facilitate increased levels of digital access and make this more accessible and affordable for those that are digitally excluded.

Actions

- > Undertake work to better understand the nature and scale of the digital access issues facing clients by improving the way we capture this data.
- > Work to help ensure that Scottish consumers can access reliable, affordable broadband and mobile services.
- > Seek greater partnership working opportunities with a range of stakeholders in order to assist in improving support and consumer education for digitally excluded CAB clients.

What we will do

- > We will develop a better understanding of the nature and scale of the digital access issues facing clients of the Citizens Advice network in Scotland by improving the way we capture this data.
- > This will build on advocacy work already undertaken on digital access this year and better advocate for the needs of CAB clients going forward when engaging with regulators about how to protect vulnerable groups and individuals. It will also allow CAB themselves to better identify digitally excluded clients who require support.
- > We will work to ensure that Scottish consumers can access reliable, affordable broadband and mobile services by advocating for improved infrastructure and connectivity, wider availability of social tariffs and greater access to devices for those in need.
- > This will require continued work and engagement with a number of key stakeholders, including the Scottish and UK Governments, Ofcom, and others particularly in relation to social tariffs.
- > We will advocate individually and collectively to the UK Government and Ofcom for the wider application of social tariffs in terms of both internet and mobile internet. This will build on CAS advocacy work this year highlighting the issues of affordability, and access to services by vulnerable customers.
- > We will seek greater partnership working opportunities with a range of stakeholders in order to assist in improving support and consumer education for digitally excluded CAB clients. This will involve work to ensure that the network is able to appropriately signpost clients who need help with digital literacy to wider sources of support and training as well as engaging with partners at a national level to facilitate relationships with local CAB. This will help those that are digitally excluded to seek and engage with appropriate sources of support and improve consumer education around digital issues, skills and literacy.

Social Justice

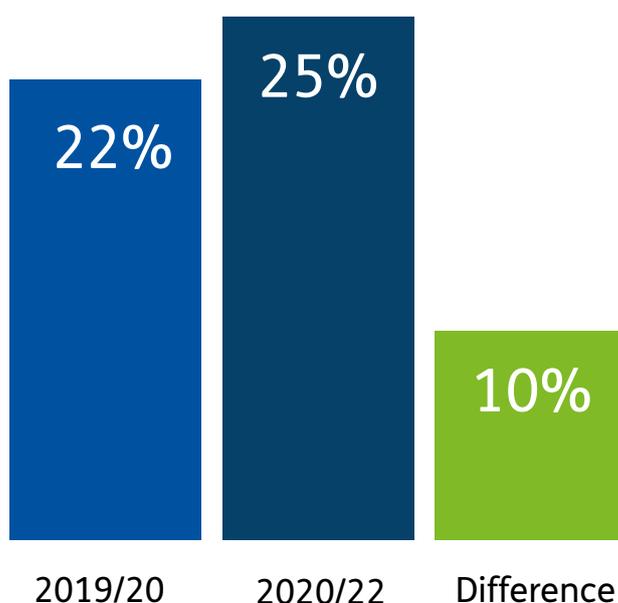
Work on social security, housing and other social justice issues makes up almost half of the workload of the Citizens Advice network in Scotland. A large part of our work in 2021/22 will be to make sure governments support those hit hardest by COVID-19 so we all can contribute to, and benefit from, the recovery. This includes ensuring Universal Credit works better for anyone who needs it and removing the threat of eviction into homelessness for people who have had pandemic-related housing struggles.

This year is also critical in the devolution of some social security powers to the Scottish Parliament. The newly devolved parts of social security cover some of the most common advice topics at Citizens Advice Bureaux around the country and we want to see the new system made fairer and more accurate than its predecessor.

Universal Credit

Benefits remain the single largest advice need for the Scottish Citizens Advice network, accounting for 45% of all advice given by the CAS network from March to December 2020. Universal Credit (UC) accounted for a quarter of all such benefits advice, a 10% increase from the same period in 2019. This makes visible the impact the pandemic has had on our clients, and with unemployment rates set to peak later in the year once furlough and other support measures are withdrawn, it is unlikely this need will decrease as we move out of the pandemic.

Comparison of Universal Credit as a proportion of all Benefits advice (Q1-Q3, L3 advice codes)



Social Justice

Many of the issues with UC are well-established. People claiming UC can face hardship and growing arrears during the five-week wait before their first UC payment, as well as issues transferring from legacy benefits. Once on UC, the overall adequacy of its Basic Allowance - particularly once subjected to deductions, sanctions, and limits such as the benefit cap and the two-child limit - as well as the digital access requirements for maintaining a UC claim can cause ongoing problems for our clients. Finally, as an in-work benefit UC has remained insufficient, with Work Allowances for UC removed for many clients in 2016 and reduced for others, meaning a lower-than-ever income threshold at which people are taken off of UC and other passported benefits.

The pandemic has compounded a number of these issues. The influx of new people claiming UC has led to difficulties with DWP administration. For example, we have seen social policy feedback showing these difficulties causing delays to the processing of people's claims, leaving many without support for long periods of time. But the pandemic has also reopened debates on the adequacy and administration of UC. The increase in people claiming UC for the first time and the possibility of changes to the labour market during economic recovery also pose the opportunity for mobilisation of new sectors of the public around UC sufficiency and Work Allowances.

There are various measures that CAS can take to influence policy in this area. Alongside analysis, publications, and media work that engages with UK Government policy, we will directly engage with Ministers and Scottish MPs to raise our work in Parliamentary debates, Select Committees, and the policies of their own political parties. We will also work in coalition with third sector organisations across the UK to build consensus around the key policy solutions required. Where suitable, we will engage with the Scottish Government and the DWP as well.

We will take an evidence-based approach to campaigning, using our network statistics and Citizens Alerts to illustrate the frontline impact of UC policy on our clients.

Outcome

Universal Credit allows people to participate in society in a dignified way.

Actions

We will work to improve:

- > The adequacy of UC, as both an out-of- and in-work benefit.
- > Support for those claiming UC for the first time, particularly in relation to the five-week wait and the availability of Scottish choices.
- > The administration of UC by the DWP, including sanctions, deductions, digital access, CWA assessments, and the requirement of explicit consent for our CAB advisers helping clients.
- > The fair treatment of those on legacy benefits and the transition to UC.

Social Justice

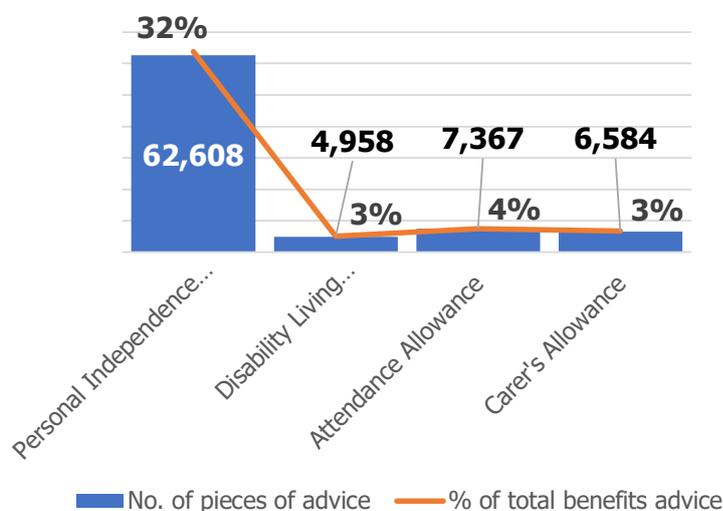
What we will do

- > Work with Ministers in charge of Work and Pensions, Parliamentary Select Committees, and MPs to influence UK Government policy on UC, in particular to improve the adequacy of UC rates and the restoration of the Work Allowance for all claimants.
- > Seek coverage in the media on the impact of UC on CAB clients, including media releases on our data and research and opinion columns in the Herald.
- > Work with Scottish Government and the DWP to implement the outstanding and improve the administration of current Scottish Choices.
- > Produce and publicise short reports on developments in UC policy, centring network data, SPF cases and CAB adviser perspectives wherever possible.
- > Work within CAS to identify areas of collaboration, particularly in relation to debt advice.
- > Utilise already-commissioned research into the experience of CAB clients who have claimed UC to gather further evidence for future campaigns and publications.
- > Closely monitor the UK's response to the UN Committee on Economic, Social, and Cultural Rights, due to be submitted on 30 June, for updates on the sufficiency of UC from a human rights perspective. When the UK was last reviewed in 2016, the Committee reported its 'deep concern' about the compatibility of social security reforms with international human rights standards.
- > Consider engaging with the UN Committee on Economic, Social, and Cultural Rights' monitoring mechanism.

Scottish Social Security

Over 2021/22 key milestones in the devolution of social security powers to Scotland will be met. These include the introduction of Disability Assistance to Children and Young People, the introduction of Adult Disability Payment, the development of the new Carer's Assistance payments as well as the continued rollout of the new Scottish Child Payment.

Chart. Advice provided on current UK Government disability and carers benefits (Q1-Q3 2020/21)



Currently, 1 in 10 disabled people in Scotland receives an additional costs' social security payment (533,000 people) – through PIP, DLA and AA – worth a total value of over £2.5 billion per year. Advice on disability benefits is consistently a top three advice issue for CAB. Between Q1-Q3 of 2020/21, CAB provided almost 200,000 pieces of advice on benefits; 38% of benefits advice related to disability benefits (Personal Independence Payment (PIP), Disability Living Allowance (DLA) and Attendance Allowance (AA)).

CAS has been demonstrably influential in the creation thus far of Scotland's first Social Security System. The connection between the policy expertise within CAS and the practical experience and knowledge of CAB advisers and the culmination of these in working to influence and improve Scottish Social Security has been widely recognised by the Scottish Government.

CAS will continue to advocate for positive changes to Scottish social security as key elements of the new system – including Scottish disability benefits – are legislated for and subsequently implemented. In seeking to further advocate and influence the development of the Scottish Social Security, CAS will adopt a strategy that influences decision-makers in the Scottish Government and the Scottish Parliament.

Scottish Social Security

Outcome

- > The devolution of social security to Scotland results in a system that is delivered accurately and fairly, leading to more positive experiences for people on social security in Scotland.

Actions

We will work to improve:

The new system of social security support for disabled people through:

- > Engaging with and influencing the introduction of legislation for Adult Disability Payment and advocating for positive changes - such as the introduction of indefinite awards for progressive conditions.
- > Monitoring and evaluating the pilot and actual roll-out of Disability Assistance for Children and Young People.
- > Advocating for the introduction of Older People's Disability Assistance as soon as possible.
- > Ensuring the new Scottish Carer's Assistance payment, which will replace Carer's Allowance, is developed in a way that better fits the needs and lives of carers in Scotland.
- > Supporting the continued roll-out of Scottish Child Payment, including advocating for the payment to be rolled out as soon as possible to children aged 6 and above.
- > Ensuring the Scottish Welfare Fund is accessible, adequate and meeting the needs of people who require assistance.

What we will do

- > Directly engage with the Scottish Government through Ministers, Officials and Stakeholder groups to influence the development of the Adult Disability Payment Regulations.
- > Respond to consultations on the regulations for Adult Disability Payment at Scottish Government, Scottish Parliament and Scottish Commission on Social Security levels.
- > Build effective collaborations with other stakeholder organisations working in the disability and advice sector, such as through the Scottish Campaign on Rights to Social Security.
- > Engage with the Scottish Parliament, Social Security Committee and MSPs on social security.
- > Engage with the Scottish Government Carer's Benefits Stakeholder Group.
- > Respond to Scottish Government consultations on Carer's Assistance.
- > Work with other organisations working to advocate for positive changes to Carer's Assistance.
- > Engage with the Scottish Government to promote uptake of Scottish Child Payment and relay any identified issues in the delivery of the new benefit.

Scottish Social Security

- > Engage with the Scottish Government to increase the speed of the rollout to children aged six and above.
- > Work with other stakeholder organisations to develop policy recommendations to enable the rollout to children aged six and above to commence as soon as possible.
- > Work with the Scottish Government and COSLA to review the guidance around the Scottish Welfare Fund with a specific focus on accessibility.

Housing

As the pandemic has continued, the experiences of renters in the private rented sector have become increasingly concerning to CAS. These concerns are borne out by Q1-3 statistics, which show that advice on private renting as a proportion of all housing advice has grown, and that private rented sector arrears as a proportion of all arrears advice has grown.



Most common types of housing advice as a proportion of all housing advice	April-December 2019	April-December 2020
Private sector rented property	17%	23%
Local Authority housing	16%	14%
Owner occupier property	11%	13%
Environmental and neighbour issues	7%	11%
Access to and provision of accommodation	10%	9%

As the data shows, there has been an interesting shift in the most common types of housing advice provided in the space of a year, which indicates that a different type of housing advice need has arisen during the COVID pandemic. Advice on private renting and local authority housing were similar in the first three quarters of 2019, but have diverged quite significantly since, with many more pieces of advice being given on private renting in 2020.

Housing



Types of arrears as a proportion of all housing arrears	April-December 2019	April-December 2020
Arrears - mortgage / secured loans	17%	18%
Arrears - rent: LA	50%	42%
Arrears - rent: private landlord	6%	14%
Arrears - rent: registered social landlords	27%	26%

In terms of types of arrears, we can see that while advice on local authority arrears remains the highest at 42% in 2020, it has dropped 8 percentage points from the same period last year. At the same time, advice given about private sector arrears has increased significantly from 6% to 14%.

Private renters are particularly vulnerable to the worst effects of the pandemic, and many will have accumulated rent arrears as a result of employment changes, without the system of support that exists in the social rented sector. As a result, a rent arrears crisis is growing, and this may turn into a wave of evictions once the protections introduced at the start of the pandemic are lifted². At the time of writing, these provisions are due to expire at the end of March 2021, however these are likely to be extended until September 2021.

Outcomes

- > Renters are more effectively supported to sustain their tenancies during and beyond the pandemic, and the foundations are laid for a fairer housing system in Scotland.

² These protections include: the introduction of pre-action requirements; all eviction grounds becoming discretionary; a ban on the enforcement of evictions (except in cases of criminal or antisocial behaviour), and; the extension of eviction notice periods

Housing

Actions

We will work to improve:

- > Knowledge in the housing sector of potential impacts of lifting the pandemic protections by completing a mapping exercise based on CAB data of anticipated long-term impacts on tenants coming out of the pandemic, as well as the wider public impact. We will work with the Scottish Government and other stakeholders to mitigate these.
- > The available financial support through Discretionary Housing Payments (DHPs) and other sources of funding to help people clear rent arrears accumulated during the crisis. We will lobby the Scottish Government to top up DHP funding proactively and lobby for guidance which would allow DHPs to be used for rent arrears, as well as other grant support. This includes new sources of funding.
- > The protections and processes associated with evictions in Scotland through lobbying for pre-action requirements and the removal of mandatory grounds for eviction in the private rented sector to be made permanent. This includes raising awareness of tenant and landlord rights and responsibilities particularly in relation to the First Tier Tribunal Housing and Property Chamber.
- > Transparency in the private rented sector, by calling for the creation of a rent register, or additional information on actual rents to be held in landlord registers.
- > The Scottish Government's understanding and definition of affordability.

What we will do

- > Work with the research team to develop research into the impact of lifting pandemic protections on tenants.
- > Share the findings of this research with relevant stakeholders and Scottish Government, which will amplify our call for a plan for the safe transition out of the pandemic for renters.
- > We will monitor DHP uptake, liaise with relevant local authority partners and use our own arrears data to lobby the Scottish Government to increase the amount of DHP funding available to local authorities.
- > We will explore options by which DHP guidance can be changed so that DHPs can be used against arrears and lobby the Scottish Government to take this action.
- > We will actively participate in the Scottish Government's (early) plans to conduct a review of the new pre-action requirements in the private rented sector, drawing on the knowledge and expertise of our CAB advisers.
- > We will lobby the Scottish Government to make pre-action requirements in the private rented sector permanent and suggest improvements to how they work.
- > Similarly, we will draw on the knowledge of CAB advisers in regard to keeping all eviction grounds discretionary and lobby the Scottish Government to this effect.

Housing

- > Use the experiences in the pandemic as part of the evidence base for a new rent register, and actively build support for this through engagement and collaboration with relevant stakeholders.
- > We will engage with relevant stakeholders and Scottish Government on the topic of affordability.

Fair Markets

Our 59 member bureaux, Advice for Scotland website, and the Extra Help Unit, make the Citizens Advice network Scotland's largest independent provider of energy advice and assistance. With 24.6% of households in fuel poverty even before COVID-19 took hold, in 2020/21 our network saw unprecedented demand for our expertise in this area as society's dependency on affordable, reliable sources of heat and power was challenged by the logistical and economic effects of the public health crisis.

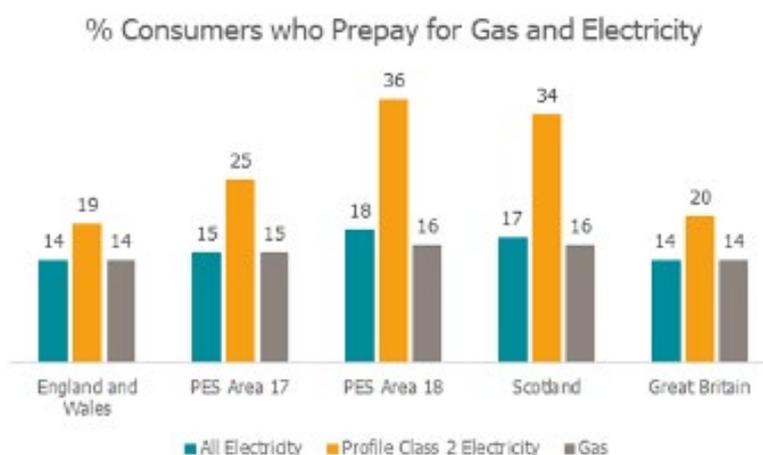
Evidence from our network reveals that concerns about energy affordability have been paramount among consumers contacting our service for help with their energy over the past 12 months. Our data reveals growing levels of energy debt, and with COVID-19 restrictions forcing many people to spend more time at home than normal, there has been a significant rise in demand for advice about energy efficiency. Requests for financial assistance with energy costs have also grown substantially as incomes have been squeezed as domestic energy demand increased while households were required to stay at home wherever possible. No more keenly has this been felt than among people in Scotland who pay in advance for their energy through a prepayment meter, with record numbers contacting our service in fuel crisis.

In 2021/22, our focus on alleviating the drivers of fuel poverty will therefore remain as the Scottish Government continues work on its Fuel Poverty Strategy. In response to the priority needs of people contacting our network, we will in particular undertake work to ensure that prepayment energy consumers in Scotland are better supported, and treated fairly, and that fuel poverty support measures are better targeted at and deliver greater benefits to those experiencing fuel poverty in Scotland.

We will also continue our work to ensure that the retail energy market meets the needs of consumers in Scotland, using evidence from the Citizens Advice network to advocate for positive change where appropriate. As the nation's energy efficiency retrofit and low carbon heating revolution gathers pace as part of the promised 'green recovery', we will also continue to support our network to ensure that people in Scotland obtain appropriate and effective redress whenever their realistic expectations are not fully met.

Prepayment meters in Scotland

People in Scotland are more likely than those in England and Wales to pay for their gas and electricity in advance through a prepayment meter³. Among those who use electricity as the primary source of space and hot water heating, the difference between nations is particularly stark: consumers with Profile Class 2 electricity meters in Scotland are almost twice as likely to use a prepayment meter when compared with equivalent consumers in England and Wales⁴.



People with prepayment meters are more likely to be vulnerable⁵ and in Scotland they are also significantly more likely to be in fuel poverty than those who pay for their energy by direct debit or standard credit⁶. Prepayment energy customers also have less choice in the energy market, are less likely to be engaged, and are exposed to a range of additional harms when compared with customers who pay by direct debit or standard credit, including risks associated with self-disconnection. Significant seasonal variations in heating costs can also drive substantial fluctuations in weekly energy spend which exacerbate issues of energy affordability and compromise the ability of many low income and vulnerable consumers to remain on supply, especially during winter.

The Citizens Advice network in Scotland is highly invested in supporting consumers with prepayment meters, including consumers in energy crisis. While the need for this support is not new, the COVID-19 crisis has underlined its importance, with a 62% increase in the volume of advice provided by our bureau network on energy prepayment and a 278% increase in non-repayable financial support to consumers in energy crisis recorded in the final 9 months of 2020. Indeed, demand for advice from consumers in energy crisis has grown to such an extent that it accounted for 1 in every 8 pieces of advice on gas and electricity provided by Citizens Advice Bureau in Scotland in the second half of 2020.

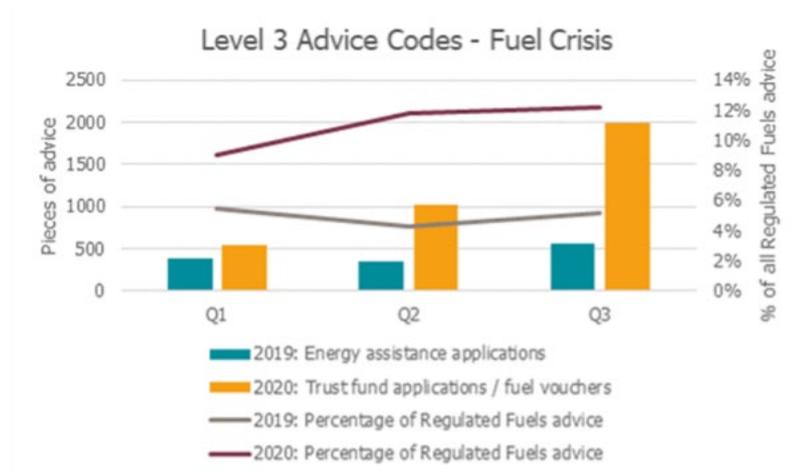
³ <https://www.gov.uk/government/statistical-data-sets/quarterly-domestic-energy-price-stastics>

⁴ <https://www.gov.uk/government/statistical-data-sets/quarterly-domestic-energy-price-stastic>

⁵ <https://www.ofgem.gov.uk/gas/retail-market/consumer-vulnerability-strategy/prepayment-meter-ppm-customers>

⁶ [Scottish House Condition Survey: 2019 Key Findings](#)

Fair Markets



With fuel poverty likely to increase as a result of the financial fallout from the COVID-19 crisis, it has arguably never been more important to ensure that energy consumers in Scotland have access to viable alternatives to prepayment meters, and that those who do prepay are consistently provided with accessible, effective, and timely support. However, evidence from our bureau network highlights a range of factors which currently result in inconsistent levels of service and poor quality consumer outcomes among those in Scotland with prepayment meters. In 2021/22, we will therefore work with our network to better understand how the prepayment energy market in Scotland is working from the perspective of those who use prepayment meters, with a view to informing the development of future energy policies and support by the industry and its stakeholders in Scotland.

Outcome

- > To improve outcomes for consumers in Scotland with energy prepayment meters.

Actions

We will work with our stakeholders to:

- > Ensure that all prepayment energy consumers in Scotland have access to viable alternatives to traditional prepayment meters.
- > Ensure that all prepayment energy consumers in Scotland have access to the information and support needed to enable them to make informed choices about how they pay for their household's reasonable energy needs.
- > Ensure that the prepayment energy market in Scotland offers consumers greater choice, where technically feasible.
- > Ensure that the energy supply industry and its stakeholders consistently meet the realistic expectations of prepayment energy consumers in Scotland.

Fair Markets

- > Enhance levels of engagement with the energy industry among prepayment consumers in Scotland.
- > Reduce the incidence and impact of energy crisis among prepayment consumers in Scotland.

What we will do

We will work collaboratively with our stakeholders to:

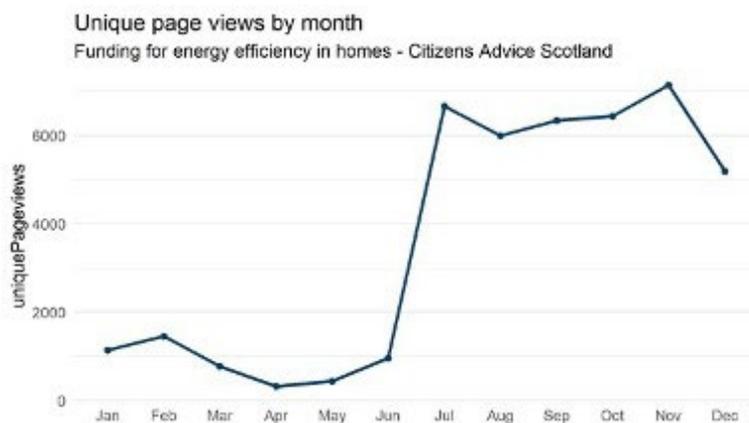
- > Improve the understanding of the needs and motivations of prepayment energy consumers in Scotland.
- > Improve the understanding of the energy prepayment user experience in Scotland.
- > Ensure that industry and non-industry support for prepayment energy consumers in Scotland is more consistent and accessible.
- > Address real and perceived barriers to greater market engagement among prepayment energy consumers in Scotland.
- > Ensure that prepayment energy consumers in Scotland are aware of available industry and non-industry support.
- > Ensure that consumers in energy crisis are consistently able to access timely, compassionate and effective support.
- > Consider the role of industry and non-industry stakeholders in Scotland in reducing regional disparities in the prevalence of prepayment meters.
- > Address real and perceived barriers to accessing viable alternatives to prepayment meters in Scotland.

Levy Funded Fuel Poverty Support in Scotland

The latest figures from the Scottish Government reveal that 24.6% of households in Scotland are in fuel poverty⁸. Among these 613,000 households, more than half find themselves in extreme fuel poverty⁹. In 2019, 1 in 8 households in Scotland therefore required to spend more than 20% of their adjusted net income to meet their reasonable fuel needs, but in doing so were unable to maintain an acceptable standard of living. Scenario modelling undertaken by the Scottish Government suggests that the COVID-19 crisis will only make this worse, worse, with unemployment figures¹⁰ suggesting that the number of households in fuel poverty could increase by about 126,000 and the number of households in extreme fuel poverty could increase by approximately 68,000¹¹.

The Citizens Advice network in Scotland is at the forefront of the fight against fuel poverty. In the final 9 months of 2020, our bureaux recorded a 15% year-on-year increase in the volume of advice provided to vulnerable and low-income consumers on the UK Government's most direct form of fuel poverty support, the Warm Home Discount scheme. For the first time since 2012, Warm Home Discount is therefore now the most commonly discussed energy-related issue on which consumers seek advice from their local Citizens Advice Bureau.

At the same time, with many consumers having spent significantly more time at home than normal due to COVID-19 restrictions, our online advice on sources of funding available to improve the energy efficiency of homes in Scotland has recorded 8 times more unique page views than any other energy-related advice page in the second half of 2020, and our bureau network has witnessed a significant increase in requests for energy efficiency advice across all housing tenures.



In its Energy White Paper¹², the UK Government committed to extending the Energy Company Obligation and the Warm Home Discount scheme (or a successor scheme) to at least 31 March 2026.

⁸ [Scottish House Condition Survey: 2019 Key Findings](#)

⁹ [Scottish House Condition Survey: 2019 Key Findings](#)

¹⁰ <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/regionalabourmarket/march2021>

¹¹ <https://www.gov.scot/publications/scottish-house-condition-survey-additional-analysis/>

¹² <https://www.gov.uk/government/publications/energy-white-paper-powering-our-net-zero-future>

Levy Funded Fuel Poverty Support in Scotland

As sources of significant fuel poverty support it is essential that these initiatives deliver positive outcomes for fuel poor consumers in Scotland. However, a combination of research and evidence from our bureau network has found that both Warm Home Discount and the Energy Company Obligation are poorly targeted at the needs of fuel poor consumers in Scotland, too often delivering poor customer journeys and poor consumer outcomes.

In 2021/22, we will therefore seek to adopt a collaborative approach to explore the potential for improvements to be made to the delivery and targeting of Warm Home Discount and Energy Company Obligation support to fuel poor consumers in Scotland. We will work with our stakeholders, advocating for and influencing the adoption of change that will improve the overall customer experience of these initiatives, and we will work to ensure that they deliver significantly improved consumer outcomes.

Outcome

- > To improve the targeting, delivery and impact of levy funded fuel poverty support in Scotland.

Actions

We will work to:

- > Maximise the spending envelope for levy funded fuel poverty support in Scotland, in the context of UK Government commitments and the need to ensure a just transition to net-zero.
- > Improve the targeting of levy funded fuel poverty support in Scotland;
- > Simplify the application process for levy funded fuel poverty support among fuel poor consumers in Scotland.
- > Enhance the consistency with which levy funded support is offered to fuel poor consumers in Scotland.
- > Improve the timeliness of levy funded fuel poverty support in Scotland.
- > Increase the effectiveness of levy funded fuel poverty support in Scotland in reducing levels of fuel poverty and extreme fuel poverty.

Levy Funded Fuel Poverty Support in Scotland

What we will do

We will work collaboratively with our stakeholders to:

- > Ensure that Scotland continues to receive its fair share of levy funded fuel poverty support.
- > Identify the means by which levy funded fuel poverty support in Scotland could be most efficiently administered from April 2022.
- > Ensure that the targeting of levy funded fuel poverty support in Scotland leads to a greater proportion of the total spending envelope reaching consumers in fuel poverty, as measured by the current definition of fuel poverty in Scotland.
- > Improve communication around the availability of levy funded support for fuel poor consumers in Scotland, to enhance levels of consumer awareness and uptake.
- > Improve the accessibility of application processes for levy funded fuel poverty support in Scotland, removing 'digital by default' routes to support and ensuring that processes are designed and delivered in a way that properly accommodates the needs of low income and vulnerable consumers in Scotland.
- > Improve the quality of the customer journey among applicants for levy funded fuel poverty support in Scotland, including processes to be followed when things go wrong, using evidence of best practice to drive up standards for all.
- > Ensure that levy funded fuel poverty support in Scotland can be delivered at a time and in a format that is most beneficial to fuel poor consumers in Scotland.
- > Mitigate against real and perceived barriers to wider market engagement among recipients of levy funded fuel poverty support in Scotland.

Campaigns and supporting local advocacy

In the coming year CAS will continue to work with the wider network to deliver national campaigns, support local advocacy work and continue to strengthen our network's capacity and ability to strive for change.

2021/22 campaigns programme

Building on the co-design success of the 2020/21 campaigns programme, CAS will engage with the Citizens Advice network in Scotland over issues identified in this work plan that to build a campaigns plan for this year that's responds to the priorities identified in our national data.

We will also ensure CABs have the tools and skills they need to carry out campaigning effectively over a period of time where some social distancing restrictions may likely continue to apply.

Supporting local advocacy

In 2021/22 we intend to increase the financial support and provision of expertise to the network to enhance the capacity of the bureaux to act as local agents of change: through increased provision of grants which will increase local engagement and action, and a larger allocation of CAS resources to engaging with and supporting the CAB.

Our national policy and advocacy work depends on the evidence provided by the network. Regular communication between the CAS team and the CAB network allows us to better understand the issues and achieve better outcomes for our clients. Regular engagement also provides CAB with access to and support from the functions within the Impact Team and encourages complementary local activity.

Strengthening these relationships and supporting bureaux to take part in policy, advocacy and campaigning activity is an integral part of our workplan. The key features of our network engagement and capacity building programme in 2021-22 build on the framework we developed in 2020-21.

Supporting engagement

Quarterly online sessions will provide updates on upcoming work and opportunities for the network. We will trial an online engagement platform to encourage engagement and collaboration on key issues. Developing these mechanisms aim to increase access to CAS resources and build a shared understanding of the changes we want to see.

Policy Reference Groups

Our policy teams will run a series of reference groups on policy issues. The aim of these groups is to encourage and build engagement on key topics, and for the network to support the CAS team in fully understanding the issues and how these impact on clients.

Campaigns and supporting local advocacy

Local Impact Grant programme

A local impact grant scheme will support CAB to develop and deliver local advocacy projects which respond to the needs of their communities.

Funding will accompany support and access to the policy teams, Research Team and Communications Team.

Online skills workshops

We will run a series of online workshops to develop communications and campaigning skills, and the delivery of local advocacy and research projects. As with the 20-21 programme, we will consult the network and build the programme based on the requirements of CAB.

Adviser training

Working with the CAS Training Team, we will continue to review and update our training programme to ensure that that CAB advisers and volunteers understand the feedback cycle and how important their evidence is in achieving change.

www.cas.org.uk



@CitAdviceScot



CitizensAdviceScotland

The Scottish Association of Citizens Advice Bureaux -
Citizens Advice Scotland. Scottish charity (SC016637) and
company limited by guarantee (89892)

ISSN 2398-6190 (Print)

ISSN 2398-6204 (Electronic)

