



Impact Team national advocacy workplan



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Introduction

The Scottish Citizens Advice network has a footprint in every local community in Scotland and by linking this local offering with our national expertise in advice provision we can ensure that people can access advice where and how they want, regardless of where they live in Scotland.

We hold the largest data set of societal issues outside the public sector. We are wholly independent from government, and use our insight, evidence and influence to provide a genuine voice for people. Our advocacy work spans working with governments, regulators and business at a UK and Scottish level on improving areas of harm, undertaking research and delivering awareness and education campaigns. All these activities are focussed on improving outcomes for the people we represent: our network's clients.

At CAS, we work on the issues that matter to our network's clients and our member CAB. Our focus is on delivering advocacy drawn from the experience and insights of the Scottish Citizens Advice network, which is rooted in communities across the country. This approach recognises the unique ability of the Citizens Advice network in Scotland to deliver advocacy based on the lived experiences of people and especially (but not exclusively) those experiencing vulnerability or crisis. We look at the issues that people bring to our network to identify the most pressing issues that require change. We have also worked with our CAB who have helped us to define the areas where we can have the greatest impact. The outcomes and activities outlined in this Work Plan have all been developed using this approach.

In a short space of time, COVID 19 has had a huge impact on our service: both in terms of the shift in the types and numbers of people coming to us seeking advice online and in person, and the issues they are bringing. Throughout the year we will continue to build our understanding of the issues being faced by people and adapt our focus to ensure we are delivering impact where it is needed most. We anticipate that the impacts of the pandemic are likely to exacerbate existing inequalities or areas of detriment and we will monitor and respond to these changes throughout the year.

Our 2020-21 Work Plan also responds to longer term changes in the Scottish consumer landscape brought about by the passage of the Consumer Scotland Act. The focus of CAS's advocacy activities is being developed to provide a grassroots, community focussed approach, to complement to the strategic oversight role of the new body, Consumer Scotland. CAS will also be using its experience of delivering consumer advocacy to support the successful implementation of the new body, thereby delivering maximum benefit for consumers.

This work is supported through grant funding provided by UK and Scottish Governments.



COVID 19 Response

Throughout 2020-21 we will look to adapt quickly and work flexibly to re-evaluate the delivery of our key outcomes considering the evolving impacts of the COVID 19 pandemic. This will require us to respond to new challenges and alter our approaches to our advocacy work to ensure we are delivering impact where it is most needed.

Our response to COVID 19 has been informed by the following priorities, which have been drawn from the needs of network's clients and represent CAS's commitment to working to support the UK and Scottish Governments in their efforts to manage the national responses to the pandemic.

- > We have prioritised supporting our network's critical functions by ensuring we are supporting national efforts to support citizens through our own service offering. We have worked hard to ensure the provision of free impartial and confidential advice to all who require it, particularly at this time.
- > To ensure that governments have the best possible picture of what is happening in Scottish communities, we have been sharing our data and insight with key decision makers in an informative, timely and accessible way.
- > Collaboration is key to our approach:

we are finding alternative mechanisms for engagement with network and stakeholders that are appropriate to the public health context, and we have been forging new and meaningful partnerships to collectively deliver better outcomes, more quickly.

- > We have adapted our campaigning approach to respond to COVID 19 related issues and detriment.
- > We have been reviewing our approach regularly to ensure it is relevant and appropriate response to evolving situation.

Section 1: National Advocacy

In order to identify our national priority areas, CAS undertook an analysis of advice data to understand the most significant areas of detriment experienced by CAB and EHU clients, alongside analysing data from our public advice website. Prioritisation of these outcomes took place prior to the COVID 19 pandemic however, and have been subsequently reviewed and adapted to respond to emerging categories of detriment as the impacts of the pandemic become felt by people and communities across Scotland.

Our national advocacy activities are grouped into 4 main themes which represent the areas of interest to our network:

- > Social Justice
- > Financial Health
- > Strong Communities
- > Fair and Simple Markets

In each area we have identified a number of outcomes that we are seeking to achieve.





Social Justice

Help protect the incomes of the most vulnerable people in Scotland during and beyond the COVID-19 crisis.

Universal Credit is provided at a level that allows people to participate in society in a dignified way.

Ensure Scotland's disability social security system works for people.

Maintain a watching brief on housing issues in Scotland during the crisis, particularly for tenants in the Private Rented Sector.



Financial Health

Mitigate the financial detriment on people affected by the economic consequences of COVID 19 by focusing our efforts on influencing key decision-makers and increasing awareness of how people can help themselves to manage the financial effects of the pandemic.

Work to ensure the legal services market is truly responsive to all areas of need and improves access to justice for all consumers during and after the COVID 19 pandemic.

Consumers should not be negatively impacted by digital accessibility issues during and beyond the current COVID 19 period



Strong Communities

Ensure the Citizens Advice service plays a role in a healthier Scotland.

Empower consumers to access, and make effective and informed choices about their need for and use of, legal services including those arising during the COVID 19 pandemic or resulting from it, and to resolve those issues effectively and affordably.



Fair Markets

Advocate for measures that will have the impact of reducing fuel poverty.

Work collaboratively to improve energy efficiency standards in private rents.

Ensure consumers are protected in new green infrastructure projects.

1.1 Social Justice

Work on social security, employment and other social justice issues makes up almost half of the workload of the Scottish network. A major focus of our work in 2020/21 will be on responding to the impact of COVID 19 by identifying gaps in emergency support and lobbying for them to be addressed and in pushing for governments to put people at the centre of their recovery plans.

Key outcomes in 2020-21

- > Help protect the incomes of the most vulnerable people in Scotland during and beyond the COVID 19 crisis.
- > Universal Credit is provided at a level that allows people to participate in society in a dignified way.
- > Ensure Scotland's disability social security system works for people.
- > Maintain a watching brief on housing issues in Scotland during the crisis, particularly for tenants in the Private Rented Sector.



1.1 Social Justice

1.1.1 Help protect the incomes of the most vulnerable people in Scotland during and beyond the COVID 19 crisis

We are already seeing a significant impact of the COVID 19 crisis through the evidence base generated by the CAB network. We will continue to monitor and respond to the impact of the crisis on Scotland's communities throughout the year. We will undertake ongoing analysis of social policy feedback and weekly advice code data, alongside website analytics, including to understand the experience of different groups of people within Scottish society.

Our aims

- > Gaps in emergency income support provisions and existing social security measures are identified and addressed by Government.
- > Working with others, we will build public support for adequacy in social security and wages.
- > The UK Government's policies on modern working practices are influenced by learning about precarious and low paid work during the COVID 19 crisis.

How we plan to do this

We will monitor how the UK and Scottish Governments respond to the crisis with measures related to employment, social security and housing and will compare them to what we know from our evidence base pre- and during the crisis in order to identify gaps in support. We will also provide updates to CAS colleagues to ensure our advice content and training materials are kept up to date.

We will engage regularly with Scottish Government, Low Pay Commission, Department for Work and Pensions (DWP), the Scotland Office and the Department for Business, Energy and Industrial Strategy (BEIS) to share findings and recommendations, working jointly with Citizens Advice England and Wales (CitA) and other voluntary sector allies where relevant and effective. This will involve strengthening our relationships with BEIS and the Scotland Office in particular.

We will make formal submissions to Low Pay Commission's consultation to submissions to appropriate parliamentary committees as opportunities arise.

We will develop "think-piece" /editorial media coverage of what CAS wants to see in the "new normal", couched as long-term, not designed to put pressure on government now, but to trail ideas and push for public support.

We will support Scottish Government in the development of the Scottish Child Payment and will explore further opportunities for them to use their powers to boost the incomes of people who are struggling through the crisis.

We will explore opportunities for campaigning activities to build public support for adequacy in social security and wages.

1.1 Social Justice

1.1.2 Universal Credit provides not only a safety net to prevent people falling into destitution and debt, but is also adequate to allow people to participate in society in a dignified way

Universal Credit is the main income support benefit in the UK and will provide essential support to hundreds of thousands of people affected by COVID 19. Between 16 March and 12 April, Scotland's CAB network advised 9,621 clients on 19,654 benefits-related issues, representing 60% of advice provided in the period. This included notable increases in advice provided on contributions-based Jobseekers Allowance, Universal Credit and Working Tax Credit compared with the equivalent period last year. Improvements have been made to the system in response to the current crisis such as the increase in basic payments and the suspension of the minimum income floor for self-employed people. We will push for these changes to be maintained post-crisis.

Our aims

- > The increase in Universal Credit is maintained beyond the crisis and a commitment is made to regular uprating at least in line with inflation.
- > The five week wait for the first payment is reduced by the introduction of a non-repayable grant.
- > Deductions are set at a level determined by robust affordability tests (and are

suspended for the duration of the COVID 19 crisis).

- > Universal Credit adapts to support people to return to work by introducing a work allowance for all, reducing the taper rate and maintaining the suspension of the minimum income floor for self-employed people.
- > Watching brief to monitor digital access issues to UC during the COVID 19 crisis, including potentially pushing for the temporary provision for phone claims during COVID 19 to be kept in place.

How we plan to do this

We will use our significant evidence base to produce briefings and reports for Government, DWP, MPs, parliament and media to support recommendations. We will develop new relationships with Scotland Office to help progress our recommendations, particularly around work. We will work in partnership with other organisations on shared objectives as appropriate, including through providing leadership to the Scottish Campaign on Rights to Social Security (SCORSS) UC subgroup.

On deductions, we will work with other teams within CAS to produce recommendations for a revised system for managing debt through deductions that better reflects people's ability to pay without experiencing hardship.

On work we will seek to develop collaborative work with employers, employers' organisations, and trade unions.

1.1 Social Justice

1.1.3 The devolution of social security related to disability or ill-health results in a system that is delivered accurately and fairly and leads to a more positive experience for people

We have evidence of CAB clients suffering from distress, loss of dignity and destitution caused by issues in the design and delivery of the current UK administered system of ill-health and disability related social security.

In 2019-20, 152,466 pieces of advice were given on Personal Independence Payments and Employment Support Allowance altogether, plus another 13,123 on Attendance Allowance.

Estimates from Disability Benefits Consortium suggest disabled people are four times more worse off as a result of welfare reform than non-disabled people, typically losing out around £1200 a year.

Our aims

- > Work with Scottish Government to use our evidence base to reprioritise the social security programme following delays caused by the COVID 19 crisis.
- > Seek to influence the shape of the disability assistance in Scotland including changes to the disability mobility assistance test and increasing the length of awards.
- > Government and political parties commit to implement the recommendations of SCORSS Long Term Vision on Disability Assistance report.
- > We will also monitor the operation of the existing system during the crisis and will flag issues to DWP and Scottish Government.

How we plan to do this

The Scottish Government's programme for social security has been delayed by the COVID 19 crisis, and at time of writing it is unclear what the new timescales will be. We will liaise with civil servants to share insight from our evidence base which can support reprioritisation. We are aware that civil servants are still working on the child and adult disability payments and we will seek to use the delay in the timescales as another opportunity to influence the shape of the adult disability payment in particular through engagement with Scottish Government officials working on the drafting of the adult payment regulations.

We will also engage with the parliamentary processes for both the child and adult payments to ensure recommendations emerging from our evidence base are reflected as far as possible. We will engage with Scottish Government officials, stakeholder groups and, as appropriate, MSPs and political parties to provide CAB evidence, expertise and recommendations. We will respond to relevant consultations based on CAB evidence, in particular those related to regulations for disability assistance.

We will use the Long Term Vision for Disability Assistance report to influence government's thinking on disability assistance in both the short and long term, and we will push for inclusion of the principles in party manifestos for the 2021 Scottish Parliamentary elections.

CAS will work closely with partner organisations for a collective voice on shared priorities, in particular SCoRSS members on developing and promoting recommendations for a long term vision for disability assistance.

1.1 Social Justice

1.1.4 We will maintain a watching brief on housing issues in Scotland during the crisis, particularly for tenants in the Private Rented Sector.

Our evidence shows increased hardship caused by lack of affordable housing, including high costs in the Private Rented Sector (PRS), limited social rented housing and rising property prices.

15% of people are in private rented housing in Scotland, but for 25-34 year olds this is the single most popular housing type (35% of this age group live in private rented accommodation). Property prices have increased in Scotland by about 13% since 2007-08.

Scottish Government figures show average private sector rents in Scotland have increased by 24.6% for 2 bedroom properties since 2009, with those in Lothian rising by more than 45%. Average house price increased 52% between 2004 and 2017. Weekly social rent has increased 75% over the same time frame.

Worryingly, clients seeking PRS and homelessness-threatened advice are less likely to have no caring responsibilities than CAB clients in general, so there are additional potential impacts on children and/or adults with caring requirements.

How we plan to do this

To keep a watching brief on this area, we will monitor the effectiveness of Scottish Government's changes to reduce evictions alongside the impact of COVID 19 on housing generally through monitoring weekly advice code and website data, as well as social policy feedback on housing issues.

We will flag issues found through participation in the SG PRS resilience group.

We will also consider the mid to long-term impacts of COVID 19 on the PRS including the possibility of significant arrears and mass evictions once lockdown restrictions are eased.

1.2 Financial Health

After Social Justice, Financial Health related issues make up the next largest area of work for the Scottish Citizens Advice network. In the main, this focusses on supporting clients to resolve money and debt issues.

Our role is to ensure the policy and practice of decision-makers, regulators, lenders and others do not cause unnecessary detriment on people's financial well-being and to empower people to improve their own financial health. This includes representing the interests of vulnerable consumers as part of the money and debt landscape.

Key outcomes in 2020-21

The over-riding outcome is to mitigate the financial detriment on people affected by the economic consequences of COVID 19 by focusing our efforts on influencing key decision-makers and increasing awareness of how people can help themselves to manage the financial effects of the pandemic.

1.2.1 Mitigating the financial detriment on people affected by COVID 19

COVID 19 will create an enormous pressure on people's finances, once the impacts are fully realised. The current short term measures by Governments, local authorities, regulators, financial institutions to protect income and safeguard against bills are welcome and are having a positive effect but they are a sticking plaster - the real danger lies ahead when furlough and forbearance measures end and people's incomes disappear or drop due to a changed employment status.

How, and when, these measures end will have a massive impact on how people recover from the financial damage caused to their lives by the pandemic. There are two dangers requiring attention. Firstly, enforcement action being taken against people who have run up priority debts like rent, mortgages and council tax due to COVID 19 and secondly, to help people repay debts or additional interest on credit built up due to COVID 19 in a sustainable way. Financial distress and debt are inevitable from what is a truly unique shock to economic life and advice agencies are expecting huge increases in demand for money and debt advice, but the steps taken beyond the

initial measures are crucial to help mitigate the worst of the pandemic's financial fall-out.

Our aims:

- > Work with the other debt advice organisations such as Money Advice Scotland to develop a sector wide response for helping people cope with the financial fall-out.
- > Ensure the current short term measures in place for helping those economically impacted are working as they should.
- > Work with and influence every key body (Government, regulators, financial institutions, agencies, local authorities) responsible for the current short term support measures to develop plans for further support for people when these measures end.
- > To work with these key bodies to retain some of the current measures on a permanent basis and get new permanent measures introduced. For example, working with Scottish Government and Accountant in Bankruptcy in seeking to make permanent the very positive changes in eligibility for a Minimal Asset Process bankruptcy that were introduced as a temporary measure in the COVID 19 emergency legislation.

1.2 Financial Health

- > Use Citizens Advice Bureaux data to identify issues arising which can be taken to Governments and other key decision makers to make appropriate changes.
- > Adopt a safeguarding role – identify and influence at an early stage any hotspots that arise prior to being identifiable in Citizens Advice Bureaux data. This could be an issue like car finance, a new high-cost lender entering the market targeting vulnerable people, fiercer behaviour from creditors, rises in mental health problems due to money/debt.
- > Prepare in advance as much advice/online information on Citizens Advice Scotland websites that we know people will be seeking help with as their financial situation worsens when furlough and forbearance ends. This will involve signposting to other agencies and websites where it is appropriate to do so such as local authority sites for access to Council Tax Reduction or Welfare Fund or to sites with useful tools for calculating budgets.
- > Respond to those policy input opportunities from government, parliament, regulators, agencies that will have clear line of influence to help people recover their financial well-being. These are likely to have shorter than normal response deadlines.
- > Increase public awareness of the importance of advice so that help is sought sooner rather than later. With the support of our Campaigns Team, this will be achieved by working with external partners who have networks and links to key groups most at risk of adverse financial effects of COVID 19 to push messaging about the importance of seeking early advice for money and debt problems.
- > Increase public awareness of ways in which people can maximise incomes for example through strong promotion of our council tax tool.

This is not an exhaustive list. It is not clear what

all the advocacy actions the Citizens Advice Scotland Financial Health team will be due to the uncertainty of the recovery period from COVID 19 but the areas listed are a solid basis to proceed and we will remain alert to changing demands and circumstances. We will pay particular attention on how we can help those for whom any national recovery measures do not support and are left with the detriment caused by the financial impact of COVID 19.

How we plan to do this

- > Joint debt advice sectoral approach to working with the Scottish Government to ensure emergency measures on statutory debt solutions continue to work to help people in financial difficulty. This will involve a joint letter and request for meeting with Minister and officials and on-going dialogue.
- > Joint debt advice sectoral approach to working with Scottish Government and the Convention of Scottish Local Authorities in ensuring COVID 19 related forbearance measures on council tax continue for as long as they are needed and to consider further measures that could be taken. This will involve a joint letter and request for meeting with Minister and officials and on-going dialogue.
- > Work with the Financial Conduct Authority in responding to consultations to adopt measures that will help consumers of financial products who are struggling to make payments due to COVID 19 and supplying Citizens Advice Bureaux data and insight on Financial Conduct Authority related issues to shape decision-making.
- > Engage all opportunities to influence decision-makers in government, parliament, regulators, agencies that are looking for insight and views on the impact of COVID 19 on people's financial health such as government, parliament, regulators, and local authorities.

1.2 Financial Health

- > Monitor closely emerging trends and behaviours in the debt landscape for new challenges that may emerge from COVID 19 and quickly respond to addressing those challenges such as vulnerable consumers being targeted by aggressive behaviour from creditors, marketing of new high cost loan products, or an increase in promotion of debt options such as Protected Trust Deeds which may not be the right solution for some.
- > Provide Citizens Advice Bureaux data to agencies such as Scottish Government, Convention of Scottish Local Authorities, Financial Conduct Authority on COVID 19 related financial issues that consumers are experiencing to help shape policy decisions that will benefit people.
- > Use our Citizens Advice Bureaux data on scams to raise awareness of the growing risk to consumers from COVID 19 through media and campaigning activity and to feed into the Scottish Government's Scams Strategy Working Group.
- > We will harness the strength of our data collection to deepen our understanding of the effects of COVID 19 so that we can inform policy decision making as the financial consequences take hold. We will monitor the financial status of clients through our Data Hub, monitor the impact on wider public through our Consumer Tracker report, and develop a Debt Profile report to provide data on the socio-economic/demographic characteristics of Citizens Advice Bureaux clients suffering detriment from the pandemic.
- > We will enhance our digital information offering with valuable content that informs people to manage the financial stress of COVID 19 as the external environment changes. We will seek to develop useful tools and tips to increase people's financial situation including signposting to other sites.
- > We will work with other partners in the third sector with proximity to vulnerable groups, including local Citizens Advice Bureaux, to deliver information about the importance of seeking early advice on money and debt problems and this will also include advice on tips and routes for getting help with maximising income. This will involve the promotion of our online Council Tax tool which seeks to save people money on their council tax bills.

1.3 Fair Markets

The Citizens Advice network in Scotland has a long history of providing independent advice and support to people who have felt poorly served by the energy market. It is also our role to advocate on behalf of these consumers during the policy development process.

As with so many other organisations our planned work in this area has been impacted as we have responded to the ongoing COVID 19 crisis. CAS has placed a significant emphasis on understanding how people are experiencing the crisis through analysis of our data sets. The Fair Markets team will continue to analyse the issues that people are contacting us about throughout 2020/21 and to advocate for government and industry to respond accordingly.

At a fundamental level the COVID 19 crisis has magnified the issues of affordability, fairness, market complexity and sustainability that essential services have been grappling with for years. Our planned work aims to build on our data and market expertise to ensure that energy policy is designed or amended to take account of people's experiences and needs throughout the crisis and into recovery.

Based on engagement with our network and evidence from our data sources, in 2020/21 the Fair Markets team will maintain a focus on reducing fuel poverty, advocating for increased energy efficiency standards in the private rented sector and making the case for consumer protection that is fit for purpose in any new green infrastructure projects.

Key outcomes in 2020-21

- > Advocate for measures that will have the impact of reducing fuel poverty.
- > Work collaboratively to improve energy efficiency standards in private rents.
- > Ensure consumers are protected in new green infrastructure projects.



1.3 Fair Markets

1.3.1 Advocate for measures which will have the impact of reducing fuel poverty

We want to see fuel poverty rates decrease in Scotland – improving consumers’ health and increasing their standard of living. Specifically, we want to see the impact that energy has on the cost of living reduced.

Too many people in Scotland struggle to pay their fuel bills and subsequently live in a home that is too cold to meet their needs. As the economic impacts of COVID 19 take hold, this is expected to become more acute.

In 2017, a quarter (24.9%) of Scottish households were estimated to be in fuel poverty and 7% of those households were living in extreme fuel poverty. The prevalence of specific fuel types compounds fuel poverty figures, in Scotland 17% of properties are not connected to the mains gas grid. Of those households with electric heating, 52% are in fuel poverty.

It is well evidenced that living in a cold home can have severe physical and mental health impacts.

Our aims:

- > Influence the design of financial initiatives to alleviate fuel poverty in Scotland.
- > Network capacity building and engagement.
- > Utilise our consumer evidence to influence development of the Fuel Poverty Strategy.

How we plan to do this

Influence the design of financial initiatives

Financial support that seeks to increase household income or reduce fuel bill costs is an essential part of the suite of support that will

be required to eliminate fuel poverty. People continue to tell us that they are worried about both their income and ability to pay their bills. Our network has seen increased demand from people seeking advice on how to access grants and support to help them pay their fuel bills over recent months.

We will seek to influence the design of financial initiatives such as the evolving Winter Heating Assistance (WHA) and the Warm Home Discount (WHD), the design of which is due to be reviewed (although delays are expected). We will also continue to advocate for increased access to Emergency Fuel Vouchers, and the value of linking these with a holistic advice offering.

Network capacity building and engagement

We will continue to engage with the fuel poverty work carried out by the bureau network, particularly where local and regional fuel poverty issues are evidenced. We will work alongside key partners, including Home Energy Scotland and Ofgem to support existing national projects that support consumers with their energy bills e.g. Energy Best Deal and Big Energy Savings Week.

When our network returns to a ‘new normal’ we will work alongside Home Energy Scotland to upskill CAB advisers on energy issues and support the work of the CAB Energy Advisers’ Network. This work will form part of a two-way system of upskilling support between CAS and HES to ensure expertise complement, but do not duplicate one another. In this way we will work to strengthen consistency, improve consumer journeys and maximise resources ensuring people in fuel poverty are passed smoothly to HES where they may be eligible for support under energy efficiency schemes and that HES can help their contacts access the full range of support provided through CAS. This commitment will ensure people receive the full range of support they are entitled to regardless of their chosen organisation to contact.

1.3 Fair Markets

Fuel Poverty Strategy

Using our data and evidence, we will seek to work closely with the Scottish Government as work on the Fuel Poverty Strategy recommences.

We provide advice and support to Scots living in fuel poverty on a daily basis and have built a significant evidence base to advocate for a fair, low carbon heat market over many years.

We will work closely with the Scottish Government Fuel Poverty Team to ensure that the valuable insights drawn from our network complement the analysis work undertaken by the Scottish Government. To ensure this we will set up a series of workshops between CAS and Scottish Government Fuel Poverty policy leads, to identify where our skills, expertise and insights from the CAB network could best inform the Fuel Poverty Strategy and develop a series of specific objectives as appropriate to align with the strategy timelines. This project development process will be completed no later than the end of August 2020 – this will ensure that we maximise the remaining time available this financial year to focus on delivering impact and improving outcomes for consumers in vulnerable circumstances.

1.3.2 Improve energy efficiency standards in private rents

We want to see the contribution that poor energy efficiency plays in making people live in homes that are too cold for their needs and too expensive to heat eliminated. People have spent significantly more time in their home as a result of COVID 19, this is likely to be ongoing in the ‘new normal’ we are experiencing as a result of the global pandemic. In this context it is increasingly important that people live in a warm, draught and mould-free home that is affordable to heat.

We have continued to draw attention to the level of consumer detriment as a result of poor energy efficiency in private sector housing since our Coming in from the Cold report in 2015. As we move towards net zero, it is important that this sector is fully supported to engage with energy efficiency. As a consumer facing advice provider we want to work with a broad set of stakeholders and support improved energy efficiency literacy for landlords and tenants.

We will continue to call for substantial national efforts to lead and transform public opinion on the real benefits of energy efficiency – whether through education, communications and marketing, or awareness raising. We will also advocate for additional budget to be assigned to the energy efficiency retrofit market as part of Scotland’s economic recovery.

Our aims

- > Engage with landlords and tenants to support improved energy efficiency literacy and awareness in the private rented sector.
- > Identify barriers to energy efficiency engagement and promote good practice.

1.3 Fair Markets

How we plan to do this

Improved Energy Efficiency literacy and awareness

Previous CAS research found that when making a decision about renting a property, energy efficiency is rarely a deciding factor. However whilst research has shown significant inertia in relation to energy efficiency when choosing a property, we also know that tenants also highly value warmth and comfort, alongside affordable energy costs. Improving the energy efficiency literacy of landlords and tenants will help towards supporting consumers to live in homes that are healthy and affordable to heat. The importance of this may be magnified by any continued need to practice social distancing and self-isolation.

Working with the bureau network and other key external partners, we will undertake research to further understand the motivations or disincentives for engaging with energy efficiency. We will identify any needs for resources, or opportunities for joint working and outward engagement to increase energy efficiency literacy and awareness. We will further work alongside our partners to improve referral mechanisms and signposting to relevant organisations and others to ensure that tenants and landlords are able to access holistic, relevant, and accurate advice.

Identify barriers to energy efficiency engagement and promote good practice

By both utilising our previous research and building relationships with key organisations we seek to better understand how decisions are made about energy efficiency and low carbon heat installations within those organisations. To support this work, we will gather evidence in areas where there are currently gaps and promote good practice, particularly around tenant engagement and supporting landlords to access the resources they require for decision-making. We will look across sectors and work with stakeholders to translate these learnings as applicable to the private rented sector, with the aim of identifying and where possible addressing support needs.

1.3 Fair Markets

1.3.3 Ensure consumers are protected in new green infrastructure projects

Upgrading the energy efficiency of Scotland's homes and supporting the use of renewable technologies will play a central role on the Scottish Government's 'whole system' approach to meeting our ambitious net zero targets. One of the biggest challenges will be in encouraging owners to invest and improve standards in owner-occupied properties, which at 61% of homes (1.49 million households) are the largest sector of Scottish housing.

We want to ensure that emerging markets in the energy sector have the appropriate consumer protections in place to avoid any detriment and make sure that people receive the advice and support they need when things do go wrong. Consumer buy-in will be a critical foundation both for the objectives of new green infrastructure projects and the measures necessary to achieve them.

Specifically, we want to ensure that the energy efficient and renewables sector in Scotland and the growing Scottish heat network market are developed with the best interests of people at their core.

Our aims:

- > Robust consumer protection in the Energy Efficient Scotland programme.
- > Mis-sold Green Deal debt and repayments cancelled.
- > District Heat to provide affordable, low carbon heat with robust consumer protection.

How we plan to do this

Consumer protection in the energy efficient and renewables sector in Scotland

The Scottish Government has already designated energy efficiency as a National Infrastructure Priority, and Energy Efficient Scotland provides the opportunity for a fresh approach to delivery. Whilst work in this area has paused as the country responds to the impact COVID 19, as we move into recovery the importance of successful domestic energy efficiency from both a consumer and economic perspective can't be overstated. We will continue to work closely with Scottish Government when they recommence following COVID 19, to advocate for an effective consumer protection regime for Energy Efficient Scotland.

We will publish research which sets out a framework for effective consumer protection. This will include advocating for the Scottish Quality Mark to support collaboration across the sector to develop high level principles as part of strengthening consumer protections. Our recent research identified how principles based / ethical based practice can support collaboration across this complex sector and drive a consumer focused approach. We will engage with certification bodies to promote our research recommendations in this area, alongside Trustmark and its' Data warehouse, as we support a streamlined consumer journey.

As emerging markets develop we will continue to work with our network to ensure our advice provision keeps pace. As people come to us for support, we will ensure they are correctly signposted and analyse any evidence of consumer detriment in the energy efficient and renewable retrofit sector presented to our CAB. We will collate and highlight emerging cases to present consumer experiences to relevant bodies and partner organisations.

Mis-sold Green Deal debt and repayments cancelled

CAS will continue to work closely with the UK Government and other partners such as Action Groups, MPs, MSPs, Trading Standards Scotland, Scottish Government, certification bodies and others to advocate for all customers affected to have their Green Deal debt and repayments cancelled. Since 2012 our local bureaux have received a number of cases relating to the UK government's flagship 'pay-as-you save' energy efficiency scheme - The Green Deal. These cases largely relate to one particular installer whose customers resided primarily in Scotland. This issue of mis-selling has caused significant detriment to a significant number of households. We believe it is vital that this issue is resolved, not only to provide redress to those mis-sold, but also to restore consumer confidence in the energy efficiency retrofit market and to ensure lessons are learned and future consumers protected from similar problems.

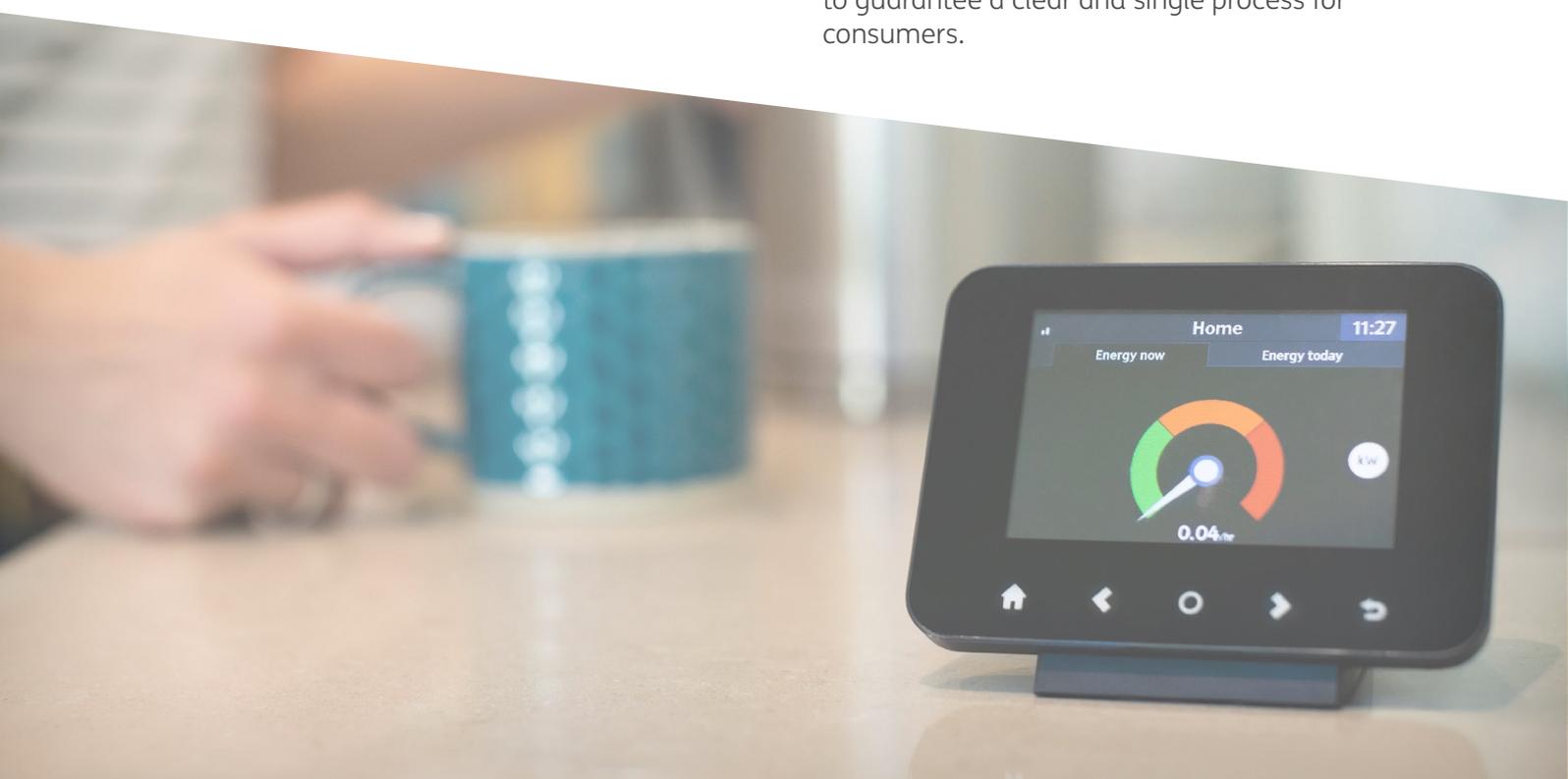
Heat Networks to provide affordable, low carbon heat with robust consumer protection

Heat Networks could play a positive role in tackling fuel poverty and in the move toward net zero. CAS has long advocated for increased consumer protection and regulation in the heat network market. We want to ensure that Heat Networks Bill going through the Scottish Parliament and new regulations in the UK provide affordable, low carbon heat with robust consumer protection measures.

We will work with other organisations to develop a position on the Bill. We would like to see community engagement integrated into the Scottish process to offer a level of indirect consumer protection.

We will continue to work with Citizens Advice England and Wales and BEIS to ensure effective consumer protection for Scottish consumers is enshrined in the UK-wide market framework which is currently under development and that it is not lost in between the two licensing systems.

We will also work with BEIS, Citizens Advice England & Wales and the Heat Trust to ensure alignment of the UK and Scottish schemes, to guarantee a clear and single process for consumers.



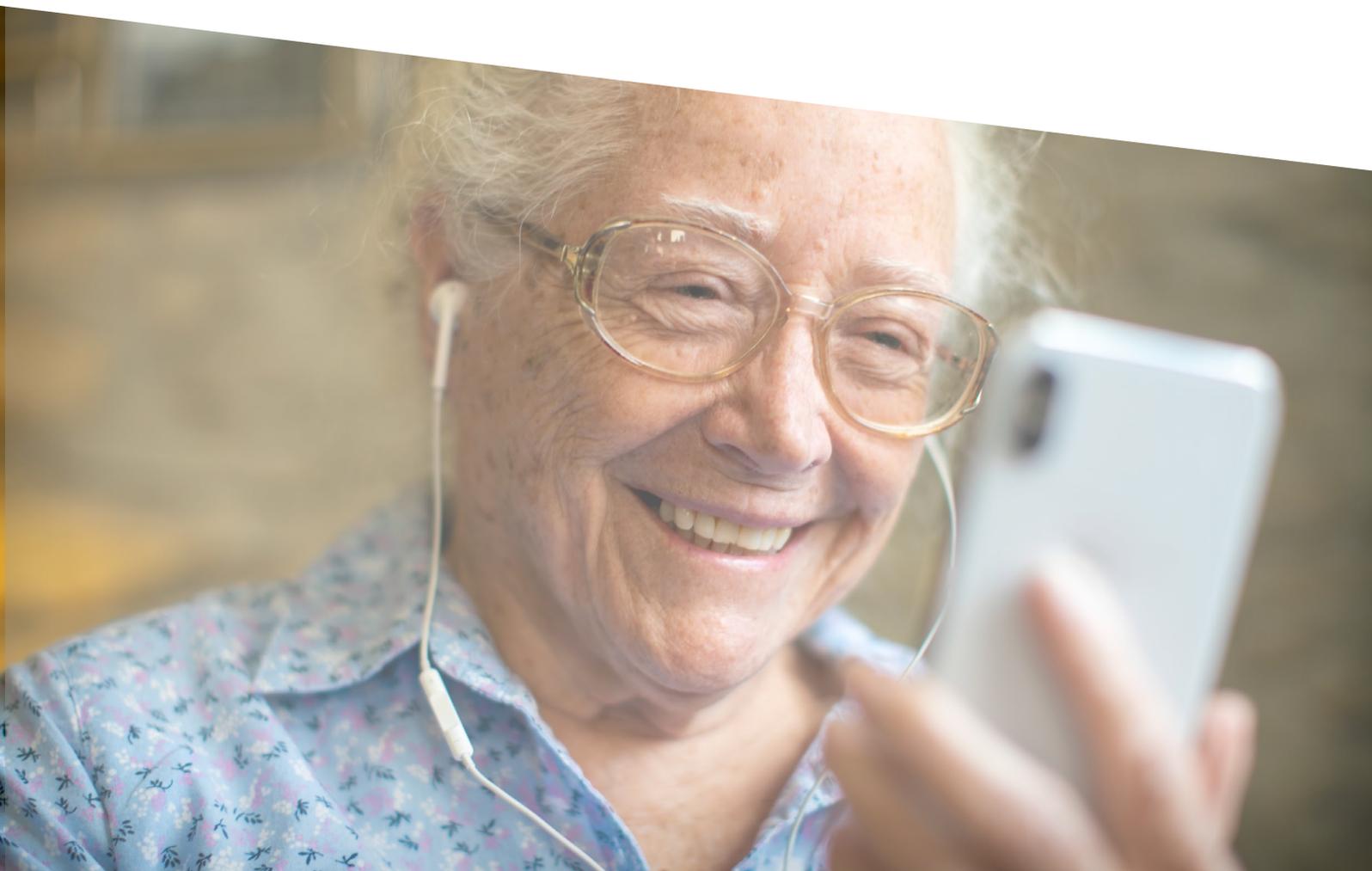
1.4 Strong Communities

59 Citizens Advice Bureaux are at the heart of Scottish communities – filled with trained local staff and volunteers who offer information and advice to people.

Our Strong Communities team focusses on accessibility and strengthening local communities including emphasising the value of the local bureaux at the centre of those communities. For 2020/21 the team will consider issues related to: post and telecoms, access to justice, the role of the Citizen's Advice Network in the health and wellbeing of communities, and considering the impact of the UK's transition out of the EU on communities.

The main focus for the Strong Communities Team in 2020-21 is to:

- > Ensure the Citizens Advice service plays a role in a healthier Scotland.
- > Empower consumers to access, and make effective and informed choices about their need for and use of, legal services including those arising during the COVID 19 pandemic or resulting from it, and to resolve those issues effectively and affordably.
- > Work to ensure the legal services market is truly responsive to all areas of need and improves access to justice for all consumers during and after the COVID 19 pandemic.
- > Consumers should not be negatively impacted by digital accessibility issues during and beyond the current COVID 19 period.



1.4 Strong Communities

1.4.1 Ensure the Citizens Advice service plays a role in a healthier Scotland

CAS will work towards ensuring that advice provided by the Citizens Advice Network is routinely promoted and accessed as part of wider healthcare services to help improve the overall wellbeing of healthcare users, patients, and their families during the COVID 19 pandemic period. So that those who have been impacted by COVID 19 either in terms of health or otherwise can access all the advice they need on this from the Citizens Advice Network in Scotland.

The COVID 19 pandemic will only increase the range of issues on which individuals seek advice from the Citizens Advice Network on. Given this it is crucial that those suffering detriment due to COVID 19 are effectively signposted to the Citizens Advice Network in Scotland for accurate and impartial advice. Likewise, there is a need to ensure those accessing healthcare services as a result of COVID 19 are provided with information on the Citizen's Advice Network in Scotland and appropriately sign posted to this advice.

Our aims:

- > Better understand current work by CABs in providing advice and appropriate signposting within a healthcare setting and coverage of this across Scotland.
- > Initiate and develop relationships with key stakeholders in this policy area to ensure that those that have been impacted by the COVID 19 pandemic are directed to the Citizens Advice Network in Scotland for help and advice.

How we plan to do this

While the majority of those accessing advice through the Citizens Advice Network do so in relation to debt and welfare issues, many other issues which the network provides advice on may be pertinent to those accessing healthcare services. For instance, advice on legal issues such as power of attorney, or cancellation or alteration of energy/telecoms services may be other issues which individuals require advice on, as well as other CAS National projects such as PASS.

To ensure a holistic approach to wellbeing and public health there is a need to ensure those accessing healthcare services during the COVID 19 pandemic are appropriately signposted to the Citizens Advice Network in Scotland for advice if appropriate.

Given that healthcare is not an issue that has been considered in detail by the CAS Impact team to date during 2020/21 we will be undertaking the following work:

- > Seek to better understand current work by CABs in providing advice within a healthcare setting and coverage of this across Scotland through desk based analysis.
- > Establish and maintain effective stakeholder relationships on this issue to ensure that those who need help and advice can be directed to the Citizen's Advice Network in Scotland. This will involve developing relationships for example with Scottish Government, NHS, public bodies, and other third sector partners.

1.4 Strong Communities

1.4.2 Empower consumers to access, and make effective and informed choices about their need for and use of, legal services including those arising during the COVID 19 pandemic or resulting from it, and to resolve those issues effectively and affordably

Given there was a gap in CAS work on access to justice in recent years, during 2019/20 we engaged with the network to understand their needs in this space alongside their views on current advocacy work. This has also been bolstered by on-line polling undertaken in March 2020, and our Legal Services Group will continue to provide input going forward.

CAS data highlights that individuals can have difficulty accessing a legal practitioner to advise and represent them. This can have detrimental impact both in personal and legal terms, and so CAS will be working to empower consumers to access, and make effective and informed choices about their need for and use of legal services. Given this there is a need to ensure that those who need to access legal services are able to do so for any area of law and in any part of the country and also during or resulting from the COVID 19 pandemic. Individuals need to be aware of circumstances when they may have to use legal services and also when this is not necessary. When legal services are necessary an individual's access should not be impeded due to geography, or lack of specialist providers or resources.

Our aims:

- > Consider our current advice provision across the network on the use of legal services and whether this can be better formulated to inform and educate consumers on this issue.
- > Raise awareness and understanding of alternative forms of dispute resolution.

How we plan to do this

We will consider our current advice provision across the network on the use of legal services and whether this can be better formulated to inform and educate consumers on this issue. CAS will consider whether an online tool or hub and campaign activity would be useful for consumers when deciding if they may need to use legal services.

Polling data from March 2020 is helping CAS to outline consumers' understanding of this issue further and if there is a need for greater consumer education on this issue either through a campaign or on-line tool or hub. Engagement will take place with key stakeholders to determine the appropriate course of work and within CAS to understand if any existing online tools could serve as a basis for this or if learning could be taken from them

Alternative forms of dispute resolution may come to the fore during or after the pandemic period as individuals seek to resolve a variety of disputes, therefore it is crucial that consumers are informed and understand the options that are available to them. CAS will continue to participate in Scottish Government's Dispute Resolution Delivery Group. We will also continue to consider and engage with relevant stakeholders on any forthcoming legislation on mediation in the Scottish Parliament. More generally we will continue to raise awareness of mediation in all of our work on access to justice.

1.4 Strong Communities

1.4.3 Work to ensure the legal services market is truly responsive to all areas of need and improves access to justice for all consumers during and after the COVID 19 pandemic

Our aims:

- > Understand and assess the responsiveness of the legal system and legal services market in Scotland for all consumers during the COVID 19 pandemic so that no consumers are denied access to justice.
- > Continue consumer advocacy work around reforms of legal aid and legal regulation.
- > Continue to support CAS Legal Services Group as is appropriate during and beyond the COVID 19 situation.

How we plan to do this

Understand and assess the responsiveness of the legal services market

This will involve monitoring CAS data to understand if legal issues are remaining static or are rising during the pandemic period, and ensuring that relevant stakeholders are made aware of any significant changes in order that issues can be addressed. It will also involve monitoring of alterations made to the operation of the legal system during the pandemic period such as the operating of courts and tribunals to ensure that any decisions or lack thereof do not adversely impact upon CAB client groups.

Continue consumer advocacy work around reforms of legal aid and legal regulation

In terms of Legal Aid CAS will continue to advocate for access to Legal Aid for all who need it and using Legal Aid funds to support an early intervention and prevention approach through the ongoing policy and legislative development process.

In terms of legal regulation, CAS advocacy work should contribute towards greater public confidence and transparency on this issue and we will continue to advocate for this during the ongoing policy and legislative development process.

CAS will continue to engage with Scottish Government and other key stakeholders in a variety of circumstances on both of these reform agendas in advance of forthcoming legislation on both these issues. We will also utilize our Legal Services Group to help direct our work in these areas and gather intelligence from the network. Close engagement will also be needed with other teams within CAS on these issues. All of this will inform our ongoing advocacy work on these issues alongside data gathered from our on-line polling and focus group activity

Continue to support CAS Legal Services Group as is appropriate during and beyond the COVID 19 situation.

CAS will continue to support and facilitate its Legal Services Group which brings together CABs and external stakeholders to discuss issues related to access to justice and to help inform CAS advocacy work in this area.

1.4 Strong Communities

1.4.4 Consumers should not be negatively impacted by digital accessibility issues during and beyond the current COVID 19 period.

Our aims:

- > Explore, support and work with Scottish Government on the Connecting Scotland programme.
- > Explore and understand the good practice by telecoms providers shown during the COVID 19 pandemic period.

How we plan to do this

Explore, support and work with Scottish Government on the Connecting Scotland programme

The Connecting Scotland programme is helping to identify those that need extra support, training, or technology during the COVID 19 situation. CAS will engage in this work and explore how services offered by the Citizen's Advice Network can be promoted and fed in as part of this on-going work.

Explore and understand the good practice by telecoms providers shown during the COVID 19 pandemic period

This work will focus on two areas: non-digital communications options being offered to customers and telecoms debt.

In response to the COVID 19 pandemic, some telecoms providers are offering consumers a choice in how they wish to communicate with them. We would like to ensure that this choice

continues, particularly in relation to offering non-digital communications options. Learning from the COVID 19 situation should be built upon to ensure communications which suit consumers' needs long term are retained.

We will undertake further advocacy work in relation to the practices of telecoms providers and others, in providing and offering non-digital options building on our work on vulnerable customers in the telecoms market in 2019/20. This issue has again been heightened during the COVID 19 pandemic and good practice that has occurred as a result of this should be built upon.

We also wish to investigate good practice by telecoms providers which have taken account of individual situations in terms of telecoms debt. More long term solutions to this issue and greater consumer choice such as the introduction of social tariffs or targeted tariffs for low income customers by all providers should be taken forward and a staggered approach taken to any changes as we exit the pandemic period. While social or targeted tariffs are highlighted in Ofcom's plan of work for 2020/21 there is a need to ensure a strong consumer advocacy voice via CAS on this issue.

We will engage with relevant stakeholders including Ofcom and Scottish Government, and individual providers to ensure that current good practice during the COVID 19 continues and that potential solutions such as the introduction of social tariffs are taken forward. CAS considers that a solution focusing on social tariffs their use and promotion by providers may be of most benefit to CAB clients.

Section 2: Supporting Local Consumer Advocacy

Throughout 2020-21 we intend to put in place substantial additional measures to build capacity and capability in local consumer advocacy through the bureaux network. These measures will be designed in partnership and consultation with bureaux and will build upon our understanding of their current capabilities and constraints. The intended outcome is the delivery of a series of practical solutions that enable greater local engagement.

In the context of the initial phases of the COVID 19 pandemic, the implementation of this programme has been delayed, however has recently recommenced with the intention of delivering in full, subject to the changing environment in which we are working.

Governance and the Policy Forum

For this year, CAS has strengthened the governance arrangement supporting the advocacy function, with an enhanced strategic governance committee comprising 12 representatives from the network and with delegated authority from the CAS board which has the responsibility of ensuring the Impact Work Plan is reflective of the advice issues brought to the network, and that CAS undertakes effective engagement with the bureaux network on the developing Work Plan. Representation is drawn from governance, management and advice roles in bureaux and is geographically and demographically diverse.

Policy Conference

Building upon the pilot workplanning event held with stakeholders and the network in 2019/20 this virtual event in November 2020 will see each bureaux within the network invited to come together as part of the process of defining and agreeing the advocacy priorities for the following year.

Reference groups and training programme

Initially designed as regional events, these interventions will create opportunities for greater bureaux engagement in the delivery of policy and advocacy work, will provide for local co-design to take place as well as enhancing the knowledge and skills of the network through the sharing of knowledge and specific skills-building sessions such as campaigning or influencing. These events will also provide an opportunity for CAB to share best practice and learning gained from their local approaches. This, alongside other interventions, will help build local advocacy and campaigning capacity.

The delivery in 2020-21 will be through an online programme designed to meet the main aims of these days until face-to-face engagement can safely resume.

Advocacy grants

Alongside the campaign grants that CAS issues to CAB for participation in national campaigns, CAS proposes delivering a new form of grant funding that is designed to develop local advocacy capacity, helping to build and sustain capability in local communities.

2 Supporting Local Consumer Advocacy

National Campaigns programme

Following on from the success of the co-design process of Big Energy Saving Week 2020, CAS will develop a campaigns programme for this year through increased engagement with the Citizens Advice network. This will include collaborative work with bureaux to identify the best campaigning tactics during a period of prolonged social distancing and the associated challenges of digital-first campaigning. It will also include feedback from the network on the policy issues and subject areas in which our campaigning work could deliver the greatest impact for people. This work will take place over the summer with a view to developing a campaigns programme for the rest of the year which ensures key issues and support reach the public during the economic fallout of lockdown.

Local capacity building

Additional measures to strengthen local capacity will be developed and implemented in partnership with the network throughout the course of the year.





Section 3: Providing Intelligence to Consumer Scotland

2020/21 marks a period of transition for the Scottish Consumer Landscape, with the passage of the Consumer Scotland Act and the new body coming on stream in the coming financial year.

CAS's role in delivering advocacy will therefore complement the leadership role of Consumer Scotland, once it is established, which will conduct investigations into the most serious issues of consumer harm in Scotland and provide an intelligence-led approach to addressing consumer detriment.

CAS is already well placed to provide intelligence to Consumer Scotland, owing to the completion in the last financial year, of the CAS data hub. Until the new body comes on stream we will work as part of the Consumer Scotland Data Working Group to ensure there is a rich evidence base available when the new body becomes operational.



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