

# Positive change:

improving outcomes and supporting Covid response in 2020/21



# Contents

Introduction	3
Key Successes in 2020-21	4
National Advocacy	6
Social Justice	8
Financial Health	10
Fair Markets	12
Strong Communities	17
Supporting Local Advocacy	22
National Campaigns Programme	24
Future Direction and 2021-22 workplan	25

# Who we are

Citizens Advice Scotland (CAS), our 59-member Citizen Advice Bureaux (CAB) and the Extra Help Unit, form Scotland's largest independent advice network. Advice provided by our service is free, independent, confidential, impartial and available to everyone. Our self-help website Advice for Scotland provides information on rights and helps people solve their problems. During 2019-20, the entire Citizens Advice network provided advice and assistance to over 188,000 individuals; this equates to one in every 24 adults living in Scotland. The network put a little over £170 million back into people's pockets during this time, with every £1 invested in core advice funding returning £16 in gains for people. Our extensive footprint is important in helping us understand how issues impact locally and nationally across the country and the different impacts that policies can have in different areas.

# Introduction

The Impact Team at Citizens Advice Scotland helps deliver the second aim of the Citizens Advice network in Scotland; taking the issues we see across our network and using that to inform policy advocacy to deliver social change for people.

Our 2021-22 workplan was developed using the data generated by Citizens Advice network in Scotland. Following an analysis of in-year data, our team conducted an engagement and validation process with the network to ensure that the priorities identified through the data were the right areas to focus on to improve the situations of bureaux clients.

Since 2016, CAS has carried out a statutory advocacy function in regulated markets. 2020/21 saw the passage of the Consumer Scotland Act (2020) through the Scottish Parliament. As Consumer Scotland continues its progression towards being a fully functional body, 2021/22 represents a transitional year for Citizens Advice Scotland's delivery of advocacy on energy, water, and postal services. At present, our expectation is that levy funded activities on energy, water and post will transition to the new body once it is fully established and operational, which we anticipate happening in April 2022.

This report outlines the advocacy work in 2020/21 separated into our four key policy focuses: Social Justice, Financial Health, Strong Communities and Fair Markets. The report also includes key highlights from our local advocacy support programme which helps build capacity for local advocacy, research, and campaigning work across the bureaux network. Outcomes from our national campaigning programme which seeks to raise awareness and increase education on issues such as energy efficiency, social security benefit entitlements and redundancy rights are also included.

Most of the work listed in this report has been funded through the Consumer Advocacy Grant awarded by the Scottish Government, and our levy funded workstreams on energy, water and post.

Our work on Social Justice issues including social security, housing and employment is funded by the UK Government's Department of Business, Energy and Industrial Strategy (BEIS). All work funded by BEIS has been highlighted throughout the report.



# Key Successes in 2020-21

Despite being a challenging year owing to the unanticipated impact of the COVID pandemic, the new Consumer Advocacy Grant provided by the Scottish Government during 2020/21 allowed CAS to make a significant contribution to delivering outcomes for people during a difficult period:

- > Supporting consumers to improve financial health and resilience across a range of sectors.
- > Ensuring a better level of service across sectors and markets by representing consumer interests when working with government, industry, regulators and third sector partners to ensure the needs of people are taken into account in service delivery, and that accessibility is considered across all demographics, not just those which are profitable.
- > Successfully advocating for a range of measures that have the effect of mitigating the worst impacts of the pandemic, thereby assisting people to focus on their health and wellbeing and that of their families.
- > Ensuring that people have access to reliable sources of information and advice to assist them throughout this national crisis period.

# Sharing the network's data to inform national pandemic response and policy development

While not included in the initial business plan, at the outset of the pandemic CAS quickly recognised that timely and relevant data would be critical to the national response to the pandemic in order to protect citizens. Given CAS's unique and substantive datasets and particularly our view on how policy impacts traditionally hard-to-reach groups, significant efforts were put into providing this data in an accessible and engaging format to a wide range of stakeholders on a regular basis. Data was ultimately provided to UK Government COBR and Scottish Government Resilience unit alongside other Scottish Government departments and MPs/MSPs. Weekly and monthly packs were well received, and supplementary information provided on request.



# Key Successes in 2020-21

#### **Example of impact achieved**

The data packs have had positive comments from a range of individuals and teams across the Scottish Government including the Cabinet Secretary for Economy, Fair Work and Culture. CAS data was cited by Kevin Stewart as key to his decision to extending mitigations around evictions. In November, the members of the Public Audit and Post-legislative Scrutiny Committee stated CAS's data provision to be exemplary.



Impact of COVID-19 on the advice sought from the Scottish Citizens Advice network – December 2020

#### Introduction

This is the ninth monthly summary of data from the Citizens Advice network in Scalland since the COVID-19 outbreak and covers December 2020. It shows data from the 59 Citizens Advice Bureaux in Scalland and our online advice site. This edition includes the usua in Scalland and our online advice site. This delition includes the usua information around top advice topics and das has a particular facus on advice related to energy and utilities given that this advice need traded is increased, unlies the value of the site of th

#### **Key points**

- > In December Citizens Advice Bureaux issued 72,213 piece
- In December pages on the website were viewed a total of 287,757 times, which is 47% higher than in the same mon last year.
- December saw the usual decline in advice sought over the feeting period, as usually occurs year on year.

\*Note the term 'pieces of advice' is used throughout this report. An individual person seeking help from their Citizens Advice Bureau may be given several piece

(mpact of COVID-19 on the advice sought from the Scottish Citizens Advice network — December 20%

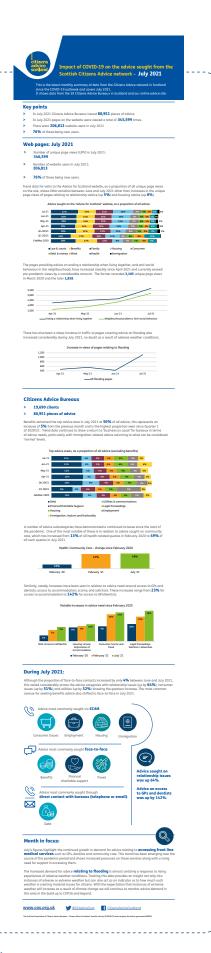
#### December 2020 - impact of COVID-19



Impact of COVID-19 on the advice sought from the Scottish Citizens Advice network – December 202

To view these monthly data packs, please visit cas.org.uk:

Data reports during COVID-19 | Citizens Advice Scotland (cas.org.uk)



# National Advocacy

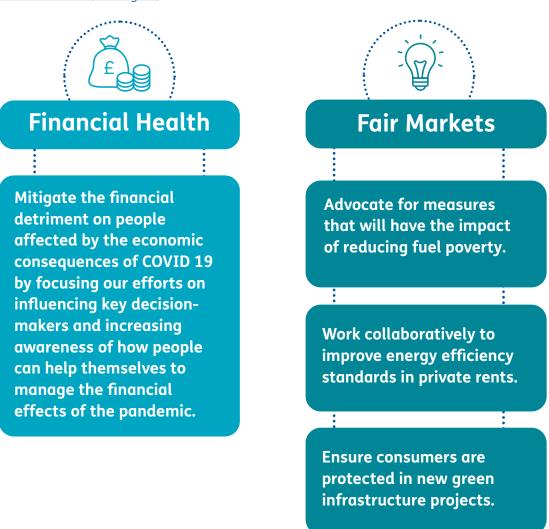
2020-21 was the first year of the new Scottish Government Consumer Advocacy Grant, and as such, the first year using a new data-driven development process for our workplan.

This shift in focus towards national advocacy drawn from the experience and insights of the Scottish Citizens Advice network, allowed CAS to draw upon its significant evidence base and successfully advocate for positive change on behalf of its client group, many of whom are in a vulnerable situation, during the pandemic.

Our national advocacy work is now naturally aligned to the advice given by the network, and therefore more rooted in the lived experience of bureaux clients. We are able to supplement the quantitative evidence with qualitative evidence gathered through our feedback system and network engagement, and we believe this enhanced understanding of the issues has led to improved outcomes overall.

The following national advocacy section, split into our four policy teams, summarises the outcomes we achieved for CAB clients and wider Scottish population last year. This section is introduced by our high-level outcomes table showing our priorities in 2020-21.

To read our full 2020-21 workplan, please visit <u>www.cas.org.uk</u>: <u>Impact Team Advocacy Work Plan 2020-21 | Citizens Advice Scotland (cas.org.uk)</u>



### National Advocacy



#### **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.



# **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.

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

# Social Justice<sup>1</sup>

The Social Justice Team has the remit for social security/benefits, employment and housing, which together make up over 50% of the advice given out by the Citizens Advice network in Scotland. The advocacy work of the team covers both reserved and devolved government.

# Key Outcomes delivered by Social Justice in 2020/21

#### **Income protection**

- > CAS successfully advocated for the continuation of the Coronavirus Job Retention Scheme throughout the pandemic.
- > Our written and oral evidence was reflected in the Low Pay Commission's recommendations to raise minimum wage rates, helping achieve a better deal for low paid workers.

#### **Universal Credit**

The focus of much of the year's work on Universal Credit has been ensuring that positive measures implemented at the start of the pandemic are maintained. The team has successfully advocated for the retention of these measures and changes to deduction policy, including:

- A six-month extension to the extra £20 a week Standard Allowance. Although not a permanent extension, this is a significant outcome and an area where CAS continues our advocacy work.
- > An extension to the initial six-month suspension of the Minimum Income Floor for a further six months in November 2020, followed by another extension until the end of July 2021 announced in the UK Spring Budget.
- > Changes to deduction repayments and advance payments that will lower the maximum deduction rate from 30% to 25% and mean advance payments will now be repaid over 24 rather than 12 months.

<sup>&</sup>lt;sup>1</sup> All work completed by the Social Justice Team is funded by BEIS.



#### Social Justice

#### **Scottish Social Security**

CAS has worked to ensure the devolution of social security leads to a more positive experience for disabled people, securing legislative change and ambitious future reform:

- > During the passage of the Social Security Administration and Tribunal Management Bill several amendments proposed and supported by CAS passed successfully, including a provision to suspend and then resume a benefit claim where someone is in a care home or hospital; better safeguarding around the appointee system, and the extension of the duty to inform people about their eligibility for other forms of assistance.
- > Revised Disability Assistance for Children and Young People Regulations reflected changes in line with CAS recommendations, including removing the terminal illness requirement of expected death within six months; and the addition of an explicit clause noting that when a child is in hospital or a hospice this has no effect on their entitlement to their care component of the benefit.
- > CAS, working alongside other members of the Scottish Campaign on Rights to Social Security, also achieved a commitment to a long-term review of Adult Disability Payment from the Scottish Government.

#### **Housing**

CAS has made evidence-led recommendations through the PRS resilience group and joint weekly ministerial meetings, resulting in numerous positive outcomes for citizens. Including:

- > Consistently and successfully advocating for numerous extensions to the eviction order notice period requirements and the eviction enforcement ban in tier 3 and 4 areas.
- > Providing key information to PRS tenants through the tenancy deposit schemes.
- > Developing a tenant support resource that went out in hard copy to all registered PRS properties in Scotland, accompanying a letter from the Minister.
- > Successfully advocating for increased funding for the Discretionary Housing Payment fund.
- > The launching of pre-action requirements for eviction orders on the ground of rent arrears, meaning landlords are expected to help their tenant find sources of financial support and advice.

The Scottish Government's recently published Housing to 2040 strategy, also reflects key CAS policy recommendations. Notably: developing a shared definition of affordability, collecting better information to allow the successful implementation of Rent Pressure Zones and retaining the pre-action requirements for the private rented sector.

#### Observations and learnings

CAS data has been valued by Scottish Ministers over the past year and as such, we've endeavoured to build in more regular analysis and publication of advice data in next year's work.

# Financial Health

With debt and money issues routinely being the second largest area of advice (after Benefits) which our Citizens Advice Network provide support on, the Financial Health team's primary focus is advocating for a fairer debt landscape to support those who may struggle with their finances and problem debt. During 2020/2021, this mainly involved mitigating the financial detriment on people affected by the economic consequences of COVID-19 by influencing key decision-makers including both devolved and reserved governments, regulators and the financial services market. Moreover, we worked to increase awareness of how people can help themselves to ensure they can have control over their day-to-day finances, are able to manage income shocks and financial emergencies as well as finding a suitable route out of debt.

# Key Outcomes delivered by Financial Health in 2020/21

#### Mitigating the financial detriment on people affected by COVID-19

- Successfully advocated for the extension of debt advice moratorium from 6 weeks to 6 months under the Coronavirus (Scotland Act 2020 to allow debtors during COVID-19 more time to make informed choices and have breathing space from creditor diligence.
- Influenced the introduction of a series of debtor friendly temporary measures to help people > in bankruptcy such as fee waivers and increasing debt thresholds during the COVID emergency legislation in May 2020. Similarly influenced these measures to be made permanent from 29th March 2021.
- > Secured through advocacy two separate extensions to the temporary measures contained in the Coronavirus legislation by engaging the Scottish Government with data and insight on the value of the measures and continuing need for them.
- > Successfully brought the debt advice sector together to speak as one influencing voice on debt through regular meetings, positioning on issues and coordination of advocacy such as writing to Ministers and engaging with the Accountant in Bankruptcy. This was a weakness in the sector. CAS took the initiative and lead in ensuring there is a stronger voice for those affected by money and debt issues.
- Developed the Money Map Tool which acts as a one-stop-shop sourcing the best information, advice and support for people needing to maximise their income, reduce costs and better manage their money. This development was part-funded by UK Government.
- Played a lead role in persuading the Minister to alter the planned wide review of Statutory Debt Solutions into a more focused activity which looked at making specific changes to existing measures that would help the increasing numbers of people caught up in money and debt problems due to the economic effects of COVID.
- Played a leading role in successfully advocating for a new "Low & Grow" option for the Debt Arrangement Scheme allowing debtors affected by COVID to start debt repayments at a lower rate with payments increasing once their circumstances change.
- Influenced the Scottish Renewal Advisory Board to include our proposal for a person-centred approach for helping people experiencing money and debt problems as one of its key recommendations in its Report to Scottish Government

#### Financial Health

- > Played a key role in the Scottish Government's Scams Prevention Strategy through regular contributions to the working groups set up to deliver the Strategy, providing data and insight from our Network
- > Helped secure additional funding for debt advisors from the Scottish Government to improve debt advice capacity across the Network via the debt levy.

#### **Observations and learnings**

In a year dominated by the economic impacts of COVID19 on people's financial health, the key observations and learnings were:

- > A newer demographic was affected by money and debt issues and in need of help from the CAB Service e.g., younger people, in employment, homeowners. This was highlighted in our Monthly Data Report for July and August which illustrated those new clients seeking advice from our bureaux were demographically different from repeat clients (https://www.cas.org.uk/system/files/publications/monthly\_report\_-\_july\_and\_august\_2020.pdf).
- > Financial institutions, creditors and lenders all showed really good support and forbearance in helping individuals and households cope with money problems caused by COVID through allowing payment breaks and more flexible payment options. This includes local authorities with regard to council tax payments and arrears.
- > The Scottish Government was open to ideas for helping people in COVID-created financial difficulty which made advocacy and influencing easier.
- > COVID provided an opportunity for everyone involved in financial health to have a common focus in supporting the people in Scotland and how that can shape our future landscape. We will continue to support this new way of thinking and consider how the lessons learned during the pandemic can be maintained when some elements revert.
- > That the demand for debt advice will significantly increase once the furlough scheme stops and along with the ending of payment support measures.



The Fair Markets team advocates for fairer terms and improved standards of service for all consumers in Scotland, with a particular focus on the energy and water markets<sup>2</sup>. CAS has held the consumer watchdog role within these markets since 2014. We deliver this function, alongside advocacy work on behalf of the citizens who seek advice from our network, through an evidence-based approach, championing consumer interests within industry forums and policy-making spaces.

### Consumer Advocacy Grant

#### **Key Outcomes delivered in 2020/21**

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

- > Published our 'Mind the Fuel Poverty Gap' report. This research has helped:
  - > secure the extension of the Warm Home Discount (WHD) scheme beyond 31 March 2021
  - > remove some restrictions in how WHD Industry Initiatives funding can be used, allowing suppliers to better assist consumers in fuel crisis
  - > prompted BEIS to undertake a call for evidence from suppliers, exploring the variation in eligibility criteria for Broader Group schemes
- > Successfully lobbied Ofgem to:
  - > enhance safeguards for prepayment customers in payment difficulty
  - > introduce a more co-ordinated approach to the provision of emergency fuel vouchers
  - > incorporate ability to pay principles for all consumers in the gas and electricity supply licence codes
  - > initiate enforcement action in response to evidence of malpractice in the smart meter rollout
  - > take action to clarify restrictions on backbilling
- > Supported a number of CABs and our Extra Help Unit to access funding for emergency fuel vouchers, which were then distributed to consumers in fuel crisis.

# Improve energy efficiency standards in private rents – and ensure landlords comply

- > Engaged private sector landlords in Scotland to explore real and perceived barriers to engagement with energy efficiency.
- > Published our 'Identifying opportunities and barriers to Energy Efficiency in the Private Rented Housing sector' report.

<sup>&</sup>lt;sup>2</sup> Our work on water policy is funded by the water industry levy. For energy, in 2021/22 we also received a proportion of the energy company levy in addition to the funding we received from the consumer advocacy grant. The outcomes achieved under our consumer advocacy grant and levy funded work are therefore reported separately below.

#### Ensure consumers are protected in new green infrastructure projects

- Published our 'Fit for the Future Putting consumers first in the move to net zero' report.
- Provided evidence to the Economy, Energy and Fair Work Committee and briefed MSPs and the Chair of the Energy Consumers Commission as the Heat Networks (Scotland) Bill progressed through the Scottish Parliament, successfully securing an amendment to integrate community engagement with the consent application process.
- Stood up for those impacted by Green Deal mis-selling, actively supporting CABs and clients > who are appealing to the First Tier Tribunal (General Regulatory Chamber) against unsatisfactory sanction notices. We also secured legal advice and support with written submissions from the Faculty of Advocates' Free Legal Services Unit to bolster this support.
- > Raised awareness of significant consumer detriment arising from the provision of infrared panel heaters in social housing in the North of Scotland.

#### **Observations and learnings**

- Our data revealed a significant rise in the number of consumers seeking advice on their prepayment gas and/or electricity supplies in 2020/21, and from those in fuel crisis.
- We also saw a surge in demand for advice on financial support for domestic energy efficiency as consumers grappled with the challenges of increased energy use; cold, energy inefficient homes; and interest in climate change. As COVID-19 resulted in diminished incomes, fuel poverty support schemes such as the Warm Home Discount became the most prevalent energy advice issue among CAB clients in Scotland.
- Stakeholders, including Ofgem and BEIS, are increasingly recognising the value of our data and insights.
- It became clear that there is a heightening role for the Citizens Advice network in providing advice > and support to consumers on the decarbonisation journey as we move towards net zero, which must be supported by policy expertise to ensure that the transition is grounded in people's lived experiences.
- Having advocated for increased consumer protections in the heat network market in Scotland since 2014 we firmly welcomed the passing of the Heat Networks (Scotland) Act and will continue to advocate for greater protections across all low carbon technologies.

### **Energy Levy**

In the 2020/21 financial year, CAS received a proportion of the energy company levy to advocate on behalf of energy consumers. Our workplan for the year, and that of the Energy Consumers Commission (ECC), were designed to complement each other ahead of the transfer of the levy to the ECC in the 2021/22 financial year.

#### **Key Outcomes delivered in 2020/21**

#### Improving outcomes for consumers with Restricted Electricity Meters

- Submitted evidence to an Ofgem investigation which returned £1.8million to consumers following compliance action which revealed the overcharging of around 11,400 GB consumers with non-Economy 7 restricted electricity meters, and insufficiently robust procedures relating to customer transfers.
- Successfully lobbied Ofgem to:
  - extend the provisions of Standard Licence Condition 22G of the electricity supply licence code to 30 June 2025
  - provide an improved SLC22G reporting framework for non-statutory stakeholders
  - provide improved SLC22G transparency for consumers

#### Representing consumers in the development of the Energy Networks in Scotland

- Published the results of consumer research on the gas and electricity distribution networks in Scotland.
- > Advocated on all consumers' behalf as the regulated gas and electricity networks in Scotland continue to invest to deliver the safe and reliable supply of energy and facilitate the transition to net zero. This year we successfully influenced:
  - revisions to the Draft Determinations for electricity transmission and gas distribution
  - the SPEN and SSEN RIIO-ED2 draft business plans

#### Small and Medium Enterprises (SMEs) in the energy market in Scotland

Published research into the experiences of Small and Medium Enterprises (SMEs) in the energy market in Scotland which identified that one in three respondents were concerned about energy prices rising.

#### Observations and learnings

- > The technical nature of our work in the energy levy workplan in 2020/21 means that many of its outcomes are likely to take time to be fully realised, with the Final Determinations for gas and electricity transmission and gas distribution currently the subject of appeals to the CMA and our work with Scotland's DNOs feeding into a price control planning cycle that extends into the 2022/23 financial year.
- > This work, together with aspects of our SME research and our work on non-Economy 7 restricted meters, will continue into the 2021/22 financial year, delivered by CAS with oversight from the Energy Consumers Commission, and we will work to ensure that future work is able to build upon our achievements in 2020/21.

### Water Levy

Partnership working and co-design with water industry stakeholders continued to flesh out and review Scottish Water's transformation process to meet its 25-year Strategic Plan commitments, and the next regulatory review period (2021-27).

CAS' time on the Interim Customer Group concluded and we are now supporting the establishment of Scottish Water's new Internal Customer Group and its National Engagement Strategy.

We continue to advocate for customers and communities within Scottish Water's transformation planning process to support the delivery of its 25-year Strategic Plan and investment management during 2021-27: Asset Management; Benefits; Net Zero Emissions; Reporting, Performance and Information; Investment Prioritisation Planning; Delivery Assurance; customer and community centricity leading to empowerment.

CAS' research evidence and ongoing advocacy for low-income households has supported a decision by the Scottish Government to increase the Water Charges Reduction Scheme from 25% to 35% during 2021-27, which will provide greater financial support to households that need it most.

#### **Key Outcomes delivered in 2020/21**

- > CAS research evidence and advocacy work for low income households supported a decision by the Scottish Government to increase the Water Charges Reduction Scheme from 25% to 35% during 2021-27, which will provide greater financial support to households that need it most
- > Supported the formation of, and Chaired, a non-household Working Group to review Covid-19 measures to deliver support to non-household customers impacted by the pandemic
- > Published two reports highlighting the issues facing those on a private water supply and advocating for greater measures to be undertaken to support them to improve their water quality and increase resilience against climate change impacts
- > Supported the simplification of connecting to the water mains for multiple properties on a private supply, by highlighting the consumer journey using CAS research
- > Worked collaboratively with the Scottish Government to include clear community context within the new national policy framework for improving surface water management 'water resilient places'

- > Promoted the need for strong and clear outcomes to the delivery of Scottish Water's commitment to 'empowering customers and communities', beyond operational processes
- > Supported the establishment of the new Internal Customer Group within Scottish Water providing insight to support decision making and improve customer and community centricity
- > Represented the needs and interests of public and private water customers in relation to reducing the volume of domestic lead water pipes, water efficiency awareness and messaging, and other relevant information that should be made available to consumers, as a member of newly convened groups to transpose into legislation the requirements of the EU recast Drinking Water Directive.
- > Presented a strong and clear consumer focused context within Hydro Nation International's 2021 'Valuing Water' conference

### **Observations and learnings**

- > The Scottish Government was open to working with CAS to embed community placemaking within surface water management policy
- > The application of ethical business practice principles within the Covid-19 Measures Working Group strengthened collaborative design between multi-agency stakeholders, as well as greater understanding of what was required to promote the interests of customers, meet Ministers' Principles of Charging and protect the Market's reputation
- > In addition to water quality issues related to private supplies, the drought in Spring 2020 and roll out of a Scottish Government bottled water scheme to individuals and communities affected, highlighted the need to strengthen policy around creating more resilient communities against climate change and promotion of targeted water efficiency messaging
- > Scottish Water's commitment to becoming customer and community centric, whilst welcome, will have to demonstrate how such a shift in focus and culture will deliver empowered customers and communities



Local Citizens Advice Bureaux remained at the heart of Scottish communities during the impact of the COVID-19 pandemic. Likewise, the issues considered by the Strong Communities Team during 2020/21 were also crucial to citizens during this year in terms of: access to justice, health, digital accessibility, and the postal sector.

### Consumer Advocacy Grant

#### **Key Outcomes delivered in 2020/21**

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

- The Strong Communities team at CAS has developed our understanding of how the network provided advice in healthcare settings, now or in the past, and considered how advice might be provided in future.
- We built relationships with key stakeholders in the health sector, ensuring that CAS understands how decisions about the design of advice services will be taken forward.
- > CAS analysed referral data from healthcare settings and were able to identify how clients accessing advice via this pathway differed from other CAB clients. A greater proportion of clients referred via healthcare settings are seeking advice on benefits, finance and charitable support and travel/ transport advice.
- We spoke to Bureaux who had provided advice in healthcare settings, or who were interested in doing so in the future and assessed the factors which promoted the establishment of successful partnerships between CABs and healthcare partners.
- Valuable insights were gained into the ways in which advice in healthcare settings can positively impact on client outcomes and the models which can be employed in delivering this advice. Learnings and insight from this have been shared with the primary care division in the Scottish Government so that this information can be considered as part of any future work on this issue going forward.

#### Empower consumers to access, and make effective and informed choices about their need for and use of, legal services

- Continued our participation in the Scottish Government's Dispute Resolution Delivery Group to explore possible mechanisms which might allow for earlier and more effective dispute resolution by CAB clients. Earlier resolution mechanisms may be quicker, cheaper and less stressful for clients, potentially saving them money and promoting wellbeing.
- CAS continued to work to ensure greater awareness of and take-up of various forms of Alternative > Dispute Resolution (ADR). We focussed on building partnerships that will help clients. Most notably CAS developed a relationship with Strathclyde University Law Clinic Mediation project; and interested CAB from the Glasgow area are now engaging with the project and can make direct referrals.

- > CAS ensured that the voice of vulnerable consumers is heard by continued participation in the Scottish Legal Complaints Commission's (SLCC) Consumer Panel during 2020/21. Participation helps to ensure that consumers understand the complaints process and can navigate it more confidently by providing insight from the Citizens Advice network. We also provided insight to the SLCC to help in their engagement with vulnerable customers on the basis of experience from the Citizens Advice network in Scotland.
- > Worked with the Scottish Legal Complaints Commission (SLCC) to ensure our public advice pages on complaints reflect current procedures and are up to date, as well as sharing details of relevant statistics and social policy feedback from the network on complaints related issues.
- > Promoted the results of online polling and focus groups on accessing legal services via the media. Conducting the polling allowed us to better understand how consumers make decisions about accessing legal services and when they are likely to seek external help, giving us a better understanding of the consumer experience.

# Ensure the legal services market is responsive and improves access to justice for all consumers

- > CAS convened meetings of the CAS Legal Services Group, which includes external stakeholders and Bureaux representatives as well as re-introducing meetings of our in-court advisors during 2020/21. These discussions provided valuable insight into the effects of the pandemic on legal services and on people's experience of accessing justice. Many of these discussions focussed on Simple Procedure and the experiences of clients and advisers were shared with the Scottish Courts and Tribunal Service (SCTS) and the Scottish Civil Justice Council (SCJC). CAS was able to highlight user experiences as well as resolving individual issues or anomalies for clients in relation to their use of and access to courts and court processes. Therefore, the direct experiences of the Citizens Advice network in relation to access to justice issues during the pandemic are being shared with both these organisations and are influencing ongoing policy development in relation to how services are developed post-pandemic.
- > During the last year, CAS has highlighted to SCTS several specific issues regarding the operation of court processes that have been raised by the Citizens Advice network in Scotland. This enabled SCTS to take measures to correct local issues, leading to better outcomes for clients.
- > The Strategic Lead for Strong Communities has been confirmed as a full member of the Scottish Civil Justice Council's Access to Justice Committee, meaning that first-hand experience of CAB clients will be able to be represented at this forum, with views being relayed directly to the SCTS and representatives of the judiciary.
- > While many planned policy developments on legal aid and legal regulation were paused due to the pandemic, CAS responded to the Scottish Government's consultation on changes to the legal complaints framework. Our response emphasised the need for consumers to be placed at the heart of any complaints process, and that speed and ease of administration should not trump this. We hope that our response results in consumers being placed at the heart of the process as the policy development process continues.
- > The Strategic Lead for Strong Communities continued to sit on the Scottish Legal Aid payment review panel, arguing for the needs of grant funded organisations to be considered alongside judicare model and for the needs and experiences of consumers to be key drivers of legal aid reform.

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

- Ensured CAS were embedded into the rollout of Connecting Scotland by becoming a member of the Advisory Board. This allowed us to highlight opportunities for client support as well as influencing the shape of later rollouts of this programme. One example being identifying ways in which devices provided can signpost to the Citizens Advice network and to our Money Map tool. This signposting is now effective and should allow clients with devices to access support and assistance more easily. Additionally, the asks around Connecting Scotland in the CAS manifesto were picked up by the Scottish Government in terms of recent commitments to further support and extend the scheme.
- > The team contributed responses to consultations on Scotland's digital strategy, identifying issues and arguing for a greater emphasis on digital skills and affordability.
- > CAS responded to a number of consultations, including Ofcom consultations on the retirement of copper wire technology, easier switching for consumers and the Giga-Tag advisory group, highlighting consumer interests and concerns. The CAS response to Ofcom's consultation on Implementing the new European Electronic Communications Code highlighted the potential impacts of the proposal on third sector bodies. As a result of CAS's submission, Ofcom revised their proposals which resulted in charitable bodies receiving similar protections to those enjoyed by consumers under the new regulations. This change benefits all third sector organisations in Scotland.
- > The team has begun a process of building relationships and liaising directly with providers, in order to relay client experiences and to influence the offers available to consumers. The team has also provided regulators with examples of poor client experiences or provider practices during the pandemic, especially in relation to vulnerable consumers, which has allowed regulators to take these examples up with providers, improving the experience of vulnerable clients.

#### Observations and learnings

- The areas covered by the Strong Communities team during 2020/21 were all impacted by the pandemic in one way or another.
- > It remains crucial that consumers/clients are placed at the heart of any processes, whether this be in relation to health, digital, or justice.
- There can and have been both positive and negative impacts as to how sectors have adapted to the pandemic. However, it is crucial that vulnerable consumers and their needs continue to be considered across all these areas to ensure there are no barriers to participation, for instance in relation to digital or justice. Therefore, an individual, person centered approach remains key to ensuring all individuals and communities can effectively participate.

### Post Levy

#### **Key Outcomes delivered in 2020/21**

#### Parcel surcharging and postcode misclassification

- CAS successfully distributed grants to 8 CABs in rural areas to undertake work on fair deliveries and supported the CABs involved in this process in terms of policy, research, and communications. As a result of this support, Bureaux were able to campaign on social media, hold online focus groups, create surveys on local consumers' and businesses' postal experiences, highlight issues to local elected representatives and publish articles in local newspapers. This resulted in strong cross-party support on this issue and highlights the vital role that CABs can play in campaigning on issues affecting their communities. The network's work on this issue was highlighted during a Westminster Hall debate held by Doualas Ross MP in December 2020. In addition, this issue was highlighted in Scottish Parliament manifestos, and a number of politicians continue to engage with their local CAB on this issue as a result of the work stemming from these grants.
- CAS conducted internal desk research exploring the extent to which e-commerce platforms influence decisions on geographical pricing.
- CAS has engaged with the UK-wide Consumer Protection Partnership at a strategic level in relation to the operation of the parcels market in Scotland. CAS is now leading a working group on this issue alongside the Competition and Markets Authority (CMA) and the Consumer Council for Northern Ireland (CCNI) in order to direct future work and obtain further information and understanding on this issue.

#### **Accessibility of Post Offices and Outreach branches**

- > We have continued our work on the accessibility of Post Offices and Outreach branches and have worked to focus attention on the communication needs of vulnerable groups, especially the elderly and disabled and those in remote rural locations.
- > We have continued to engage with the issue of Post Office Outreach services and Post Office accessibility by disseminating the findings of two research projects undertaken or started during 2019-20 and engaged with a range of stakeholders to understand and promote the issues raised by these projects.
- CAS met regularly with Post Office Ltd during the year to understand developments in these areas > and to keep abreast of changes to services as a result of COVID, the end of the transition period for the UK leaving the EU, and other matters.

#### **Access to post**

- CAS identified issues in accessing post for vulnerable groups such as people who may not have a permanent address or survivors of domestic abuse. CAS commissioned external research exploring the causes and effects of lack of access to post for vulnerable groups during 2020/21. The report also specifically addressed the impacts of COVID-19 on groups who may have already have issues in accessing postal services.
- An insight report on this issue has been published and contained a series of recommendations for Government, public bodies, regulators, and delivery operators. This has been widely shared in the media and with relevant politicians and stakeholders. Engagement and advocacy work on this will continue during 2021/22 as CAS seeks to ensure vulnerable groups can access their post. CAS is already aware that Royal Mail is reviewing its redirections service and support for survivors of domestic abuse. The insights gained will also be used by CAS in responding to consultation by regulators in 2021-22 on the shape of future regulation in the postal sector.
- CAS engaged regularly with key operators including Post Office Ltd and Royal Mail. This allowed CAS to highlight issues around quality of service during the pandemic as well as emphasising the importance of clear local communication where communities' access to post was disrupted due to the pandemic.

#### **Statement of Principles**

- CAS undertook desktop research into options for work in relation to the Statement of Principles and coordinated sector wide discussions.
- > Online roundtable meetings were held where stakeholders discussed their positions on the Statement of Principles and how to improve awareness. The events were attended by a range of participants, including regulators, enforcement bodies, and parcel companies and allowed for a valuable insight into how participants believe the issues have evolved since the development of the Statement of Principles, what progress has been made, and what challenges remain in promoting fairer deliveries. It is hoped this exercise will support future work and decision making on this issue going forward.

#### Observations and learnings

- From rural consumers experiencing delivery surcharges, or the need for vulnerable individuals such as those without a permanent address or survivors of domestic abuse to securely access their post; it is clear that post is vitally important to all communities in Scotland.
- > The pandemic has heightened the importance and reliance on post and the need for effective and strong regulation across the postal sector.
- > The is still a clear need for strong advocacy on behalf of postal consumers in Scotland to ensure everyone can access their post.

# Supporting Local Advocacy

#### **Key Outcomes delivered in 2020/21**

Despite significant delays to the initiation of our network capacity and engagement programme due to covid, CAS delivered all key milestones set out at the start of the year, including launching a new grants programme and an enhanced capacity building programme. The network has engaged with all aspects of the programme, and 20-21 has given us a strong framework to build on in the 21-22 grant cycle.

Following substantial consultation and co-design with the network, 2020/21 saw the implementation of a significant programme of local advocacy and campaigning, alongside delivery of a capacity-building programme intended to boost bureaux capacity for providing local advocacy. This was overseen by a refreshed governance committee - the Policy Forum, comprised of 12 representatives from the network and chaired by a CAS Trustee. The Policy Forum carries out an assurance role to ensure the work of the Impact Team reflects the priorities of the network as a whole.

The initial programme was designed to incorporate a number of face-to-face events and interventions which had to be adapted owing to COVID. The programme as delivered involved the creation of a number of issue specific reference groups – made up of bureaux representatives who provide a sounding board for CAS staff to understand better the issues and how they impact on bureaux clients. This was complemented by a series of capacity building workshops to build advocacy and campaigning skills in the bureaux, and the pilot of two local impact grants, which allows bureaux to put these skills into practice in their community.

The mitigating actions were effective as despite severe capacity constraints within the advice network, engagement in this programme has been strong with 49 out of 59 bureaux participating in one or more of the opportunities we offered them (83%).

Feedback from the network has been overwhelmingly positive with high levels of respondents to our evaluation surveys stating that they would be keen to take part in activities again (88%-100%). Bureaux have told us that they would like to see more resource and opportunities to help them engage with our national policy, advocacy and campaigning work, as well as more support for locally developed projects which benefit local communities.

#### Local Impact grants

We implemented a new local grants fund pilot to support the network to carry out local advocacy, research and campaigning work, with two awards of £5,000 being awarded.

#### Parkhead Citizens Advice Bureau

The team worked with the Parkhead CAB to deliver their "Inside Information" report and briefing in March 2021. The report analysed case studies of remand prisoners from Barlinnie who had received advice from the CAB. It assessed their advice needs and analysed the impact of this advice on the lives of prisoners and their families. Recommendations for changes in practice and policy were made and posters and advice leaflets were developed for use in the prison setting in relation to welfare, benefits and housing issues. These leaflets will be made available throughout the network, allowing other colleagues to draw on the specific expertise in this area developed by Parkhead. Being able to deliver advice tailored to prisoner needs will assist in delivering better client outcomes, ranging from maximising income to maintaining tenancies and generally minimising the extreme disruptive effects experienced by those on remand awaiting trial or sentence.

# Supporting Local Advocacy

#### Roxburgh & Berwickshire Citizens Advice Bureau

Roxburgh & Berwickshire CAB are leading a consortium of 6 bureaux from the Scottish Borders and Lothians. The consortium is working with the Scottish Fire & Rescue Service and key partners to act to assist householders across the Lothians and Scottish Borders to ensure the safe and affordable installation of the appropriate Fire Alarm following the recent law change. The new Scottish Fire Alarm Regulations will see all households across Scotland needing to install interlinked smoke and heat alarms and if the property has carbon fuelled appliances such as boilers, fires or heaters.

This issue was highlighted following a leaflet mailout by a leading fire and carbon monoxide protection manufacturer advising households of the law but doing so in a way to instil panic and encourage immediate action. This is a tactic often used by traders when mis-selling goods or services. The service offered by this company was also double the cost of a local electrician. To date the campaign key messages have been developed, designed and production of the campaign assets is underway, and the campaign team has agreed on a 3-tier approach to promotion to ensure the most vulnerable are supported first. A stakeholder engagement plan has been developed, and communications drafted and ready to send to all Cllrs, SMPs and MPs across the project area.

#### Observations and learnings

One of the key takeaways from 2020-21 on network engagement was the benefits of virtual meetings and online technology for our Scotland-wide network, and the opportunities these offer. When consulted on whether CAS should continue with online workshops and engagement events following the relaxation of restrictions, many bureaux agreed that these have been a valuable addition to our engagement activity and that they would like to see these continue.

In 2021-22, we plan to develop an online network of bureaux members interested in advocacy, research and campaigning work using Microsoft Teams.

In order to replace the discussion we would normally expect at the team's face-to-face network events, the team established a number of online Reference Groups on topics related to the workplan. These were successful in increasing understanding of the issues identified through the data, and will be taken forward in future years as a key part of our workplanning process



# National Campaigns Programme

#### **Key Outcomes delivered in 2020/21**

In addition to partnering with the Scottish Government for four separate marketing campaigns relating to advice and support for people during the pandemic, CAS developed a campaigns programme for the year through consultation with the network, which delivered the following outcomes:

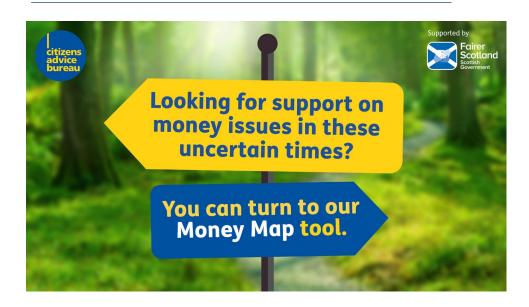
- > Our Redundancy Rights campaign ran from 26 October 6 November and reached over 3 million people through the press, media advertising and social media.<sup>3</sup>
- Our campaign to launch the Money Map ran from 23 November to 4 December and also reached over 3 million people through the press, media advertising and social media. The tool has had over 100,000 users since it launched.<sup>4</sup>
- > Big Energy Saving Month ran from 11- 31 January 2021. This campaign also reached over 3 million people. The campaign period saw £86,000 unlocked in client financial gains relating to energy issues, CABs helped people with energy advice over 5,000 times over the campaign period and online advice was viewed more than 6,000 times.

#### **Observations and learnings**

This was the first year we ran a full campaigns survey with the network after the workplan process to give the network a stronger say in what we campaign on. It was well received and led to better engagement in campaigns themselves. We will be continuing to run this approach next year.

A fourth campaign encouraging people to seek money advice early was shifted to the beginning of June so the Scottish government and CAS could partner on a campaign to promote the Money map tool.

CABs liked the flexibility and have asked for greater notice of campaign timings given their own capacity challenges, so next year we will look to give greater notice and run fewer, longer campaigns.



<sup>&</sup>lt;sup>3</sup> Our Redundancy Rights campaign was funded by BEIS.

<sup>&</sup>lt;sup>4</sup> The campaign to launch the Money Map Tool was joint funded by the Scottish Government and BEIS.

# Future Direction and 2021-22 workplan

CAS has reviewed and adapted our overall approach to advocacy further in 2021-22, developing approaches and tactics that focus on ensuring the delivery of outcomes can be achieved in the most impactful way and maximising the value for public money.

In 2021-22, and working in partnership with the Policy Forum, we have increased 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 local impact and campaign grants which will increase local engagement and action, and a larger allocation of CAS resources to engaging with and supporting the CAB. The Policy Forum has an aspiration, which CAS fully supports, to have participation in at least one element of the advocacy and campaigns programme from every single bureau across Scotland by the end of the financial year.

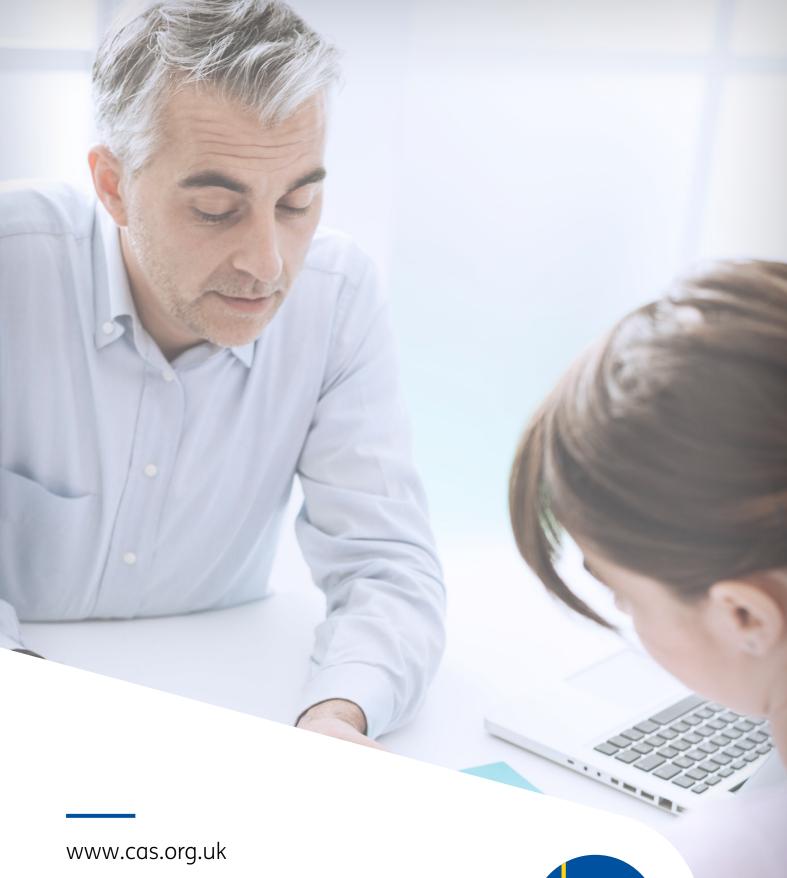
Our 2021-22 workplan has been published and is available to view at www.cas.org.uk: Impact Plan for 2021/22 | Citizens Advice Scotland (cas.org.uk)

Additionally, CAS has been building our understanding of effective advocacy and the priorities for delivering impact and outcomes for consumers. Ultimately this has led to a successful year in 2020/21 as indicated above, but we will build upon this further this year, focussing our attention on achieving improved outcomes for the network's clients. This has seen us focus on co-design and relationship building, both within the network and Scottish Government, but also more widely with regulators, industry and other public and third sector organisations.

Given the value placed on the data provided by CAS throughout the pandemic, we will embed and mainstream the provision of regular and accessible advice data to a public audience on a monthly basis, and also provide more granular information to a range of government departments on request.

These measures continue the transitional journey which sees CAS facilitating the lived experience of the network's clients in policy development, both locally and nationally, making space for Consumer Scotland to operate at a strategic level when it becomes operational.







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