



Debt Advice Provision

Final Report for the Scottish Government
Consumer and Competition Policy Unit

August 2018

EKOS Limited, St. George's Studios, 93-97 St. George's Road, Glasgow, G3 6JA
Reg 145099 Telephone: 0141 353 1994 Web: www.ekos-consultants.co.uk

Direct enquiries regarding this report should be submitted to:

John Kelly, Director, EKOS

Email: john.kelly@ekos.co.uk

Tel: 0141 353 1994

➡ As part of our green office policy all EKOS reports are printed double sided on 100% sustainable paper



SCOTTISH
**Business
Pledge**

**MCR
PATHWAYS**

Contents

EXECUTIVE SUMMARY	1
1. BACKGROUND	1
1.1 INTRODUCTION	1
1.2 STUDY OBJECTIVES	1
1.3 REPORT STRUCTURE	2
1.4 RESEARCH SUPPORT	2
2. SETTING THE CONTEXT	3
2.1 INTRODUCTION	3
2.2 OVERVIEW	3
2.3 THE GENERAL ADVICE LANDSCAPE	4
2.4 DEBT IN SCOTLAND	9
2.5 TYPES OF DEBT	13
2.6 TYPES OF LOANS	15
3. PROBLEM DEBT	16
3.1 A DEFINITION	16
3.2 SCALE OF PROBLEM DEBT	16
3.3 INDICATORS OF PROBLEM DEBT	18
3.4 CURRENT TRENDS	19
3.5 COST OF PROBLEM DEBT	22
4. CURRENT INTERVENTIONS	24
4.1 INTRODUCTION	24
4.2 SPECIFIC INTERVENTIONS	25
5. EMERGING ISSUES	29
5.1 INTRODUCTION	29
5.2 KEY EMERGING ISSUES	29
6. CONCLUSIONS	33
6.1 INTRODUCTION	33
6.2 ADDRESSING THE OBJECTIVES	33
APPENDIX A: DATA LOG	36
APPENDIX B: INTERNET SEARCH	52
APPENDIX C: STAKEHOLDERS CONSULTED	57

Executive Summary

1. Almost all of the population of Scotland are likely to carry some debt and for most of these it is not a problem. However, problem debt – sometimes referred as ‘over-indebtedness’ - is where normal debt spirals out of control to the extent that an individual can no longer keep up with servicing it, which can lead to other problems.
2. There are currently many public, private and third sector organisations in Scotland who provide a range of services to support individuals in dealing with debt problems. The public/third sector are supported by Government distributing funding which is raised through a levy on the wider financial sector.
3. The responsibility for distribution of Levy Funding¹ which funds debt advice in Scotland is soon to be devolved to the Scottish Government with demand for services expected to grow significantly over the next five years². To support the development of the Government approach this research has reviewed the current provision of debt advice in Scotland, as well as those factors which might influence take-up of advice, together with associated barriers.
4. In general, there currently appears to be appropriate provision for free debt advice currently within Scotland, with supportive signposting between organisations, although with a large numbers of organisations active in the market, this can sometimes cause confusion with the service users. That being said, there was particular comfort when these confidential services were provided through recognised public agencies including local authorities and/or central government as it was seen to give legitimacy in the eyes of the users.
5. In contrast, there are also a number of online providers who charge for services and who have “paid for” Ads through Google and Bing, and it is not always obvious at first sight that free debt advice is available as an alternative to these paid for services.
6. There has been a significant shift in the demand for advice and the types of debt that clients hold, including: a steady rise in: non-consumer priority debts [such as Council Tax and social rented housing arrears]; the number of ‘crisis’ issues advised

¹ The levy is charged to firms regulated by the Financial Conduct Authority (FCA).

² Money Advice Service

on, such as food parcels and Crisis Loans; and a steep fall in the number of consumer debts that is advised on in CAS offices.

7. Research has found that typically those people most affected by problem debt live in more deprived areas³; that women are more likely to seek advice than men; and that more than a third of debt clients are aged between 45 and 59 years of age.
8. Other characteristics highlighted in the research included a high propensity for renting (68% of debt clients rent their home), living on their own (57% of debt clients) and 37% of debt clients had dependent children that they cared for.
9. The take-up of free advice amongst minority and vulnerable groups appears to be variable, and depend on the levels of support provided to these groups.
10. The research identified a number of emerging issues which will impact on future demand and take up of debt advice services.
 - the continued roll out of Universal Credit is of particular and growing concern to all stakeholders;
 - improving/increasing the availability of financial education and related literacy/numeracy issues;
 - targeted and bespoke support for particular groups including
 - ethnic minority communities
 - asylum seekers
 - non-English speakers
 - ex-offenders, and
 - people with disabilities and other vulnerable groups;
 - increases in in-work poverty where employment is no longer a safeguard against debt problems;
 - improving public/private/third sector collaboration/raising awareness;
 - more flexible timing and budgets to support a more flexible approach; and

³ 30% live in the 20% most deprived Scottish Index of Multiple Deprivation areas (compared to 21% of the population).

- changing perceptions to improve accessibility by renaming “debt advisors” to “debt counsellors”.

1. Background

1.1 Introduction

This report presents the findings of research conducted by EKOS Economic and Social Research based on a commission from the Scottish Government's Consumer and Competition Policy Unit.

Its objectives were to undertake a review of existing research and evidence on debt advice provision to identify key issues, including the conditions which turn debt into problem debt and to identify emerging issues which are likely to impact demand for debt advice in Scotland.

The research findings will be used to support and inform the work of the Tackling Problem Debt Group, a body established by the Scottish Government bringing together expertise from across the sector. The aim of the Group is to help develop a vision of a Scottish debt advice system by 2025, and to set out the steps necessary to make the vision a reality.

A great deal of research evidence has already been carried out in this area, so a key focus of the study was to assimilate this information and identify where there are any gaps or duplication.

1.2 Study Objectives

The detailed objectives of the research were to conduct a literature review to synthesise the existing evidence base on debt advice including:

- How problem debt is defined;
- The current trends of problem debt in Scotland, including differences in type and scale of problems between different groups or regional areas/communities;
- An overview of the characteristics of those who take up free debt advice, including an assessment of take-up of free advice among minority and vulnerable groups;

- How national public funding is deployed and the effectiveness of current interventions; and
- An assessment of emerging issues that could impact the need for debt advice in Scotland in the period to 2025.

1.3 Report Structure

The proposal has been prepared in line with the specific and detailed tender instructions, and is structured as follows:

- [Chapter 2](#): Setting the Context;
- [Chapter 3](#): Problem Debt;
- [Chapter 4](#): Current Interventions; and
- [Chapter 5](#): Emerging Issues.

Appendix A provides details of the literature search, and **Appendix B** lists those organisations that took part in the primary research.

1.4 Research Support

In undertaking this research the consultants were aware that in order to develop a fine-grained understanding of the conditions that turn debt into problem debt, and to provide a full assessment of emerging issues likely to impact demand for debt advice in Scotland, it would be beneficial to speak to key stakeholders. This consultation process allowed us to explore those areas of the brief that were more difficult to obtain from desk research.

We are particularly grateful to the organisations and individuals who contributed to our understanding, and provided valuable insights and views on how best to tackle the issues associated with debt and problem debt.

We have included a list of those as an Appendix to this report and offer up our kind regards and thanks.

2. Setting the Context

2.1 Introduction

This Chapter considers the background and wider context within which this research study has been conducted. It also seeks to set out the scope of the research and some of the issues which have impacted on the outputs.

2.2 Overview

As this research will show debt in general and problem debt in particular is a big and growing issue across the country.

The Money Advice Service (MAS) was set up by the UK Government in 2010, and was tasked with promoting public awareness and understanding of financial services, and enhancing consumer's ability to manage their financial affairs⁴.

MAS has two main roles:

- Supporting and improving the provision of debt advice; and
- Promoting public financial understanding and capability and people's ability to manage their financial affairs.

MAS is funded by a levy on financial services, and delivers free, unbiased information and advice about money and debt advice.

The recent Financial Guidance and Claims Act⁵ will result in the creation of a single financial guidance body from the merging of MAS with the Pensions Advisory Service and Pension Wise⁶. As a result of this move to a single financial guidance body, the Scottish Government will take responsibility for overseeing levy funding for the provision of debt advice. It is anticipated that the scale of this levy funding (on the financial services industry) will be around £4.7 million from 2019/20. This will be used to support the priorities of the debt advice sector, and to drive improvement where needed.

⁴ MAS had a role covering the whole of the UK.

⁵ <https://services.parliament.uk/bills/2017-19/financialguidanceandclaims.html>

⁶ This could take place as early as autumn 2018.

The Tackling Problem Debt Group (TPDG) has been set up in response to these changes, and will play a key role in shaping the development of a 'debt route map', which will:

“outline the vision for and steps to achieve a sustainable, effective and user-centred debt advice system in Scotland by 2025.”

This levy funding represents only one part of a much broader advice landscape, and this is discussed in more detail below.

2.3 The General Advice Landscape

Demand for advice services is rising, and with the rolling-out of Universal Credit, this is likely to continue.

Money Advice Service website

The publicly-funded debt advice sector is broad in its scope and a wide range of public policy issues provide context for its work. The impact of changes to welfare reform⁷ taking place are believed by most debt agencies will result in longer term indebtedness for residents, and an increase in housing arrears. In addition, the 'self-service online access' element of Universal Credit will prove to be problematic for people who have low information literacy or are not able to access online services independently. As a result, the demand for advice is growing, and this growth is expected to continue. However, funding for advice is limited, which presents significant challenges to advice providers⁸.

Advice provision in Scotland is currently delivered by a wide range of (largely third sector) agencies (with a mix of local and national providers) – most delivering a holistic, person-centred service across a range of advice, with a smaller number focusing on single issues or individual target groups. The Scottish Government funds advice provision both indirectly through its block grants to Local Authorities, core funding to the Accountant in Bankruptcy, Scottish Legal Aid Board (SLAB) and the various NHS Boards. This Section now considers each of these in turn.

⁷ Including the introduction of Universal Credit, Pension Credit and Personal Independence Payments.

⁸ Review of Publicly-funded Advice Services in Scotland – Scottish Government

Local Authorities

Local authorities are the biggest providers (either directly or indirectly) of money and debt advice in Scotland⁹. Many local authorities support their local Citizens Advice Bureau and have strong links to credit unions in their area. Some local authorities support initiatives such as developing budgeting and money management skills, and access to banking facilities or access to alternative and cheaper credit. One example of this is Scotcash in Glasgow (see text box below).

Scotcash

Scotcash was formed in January 2007 as an outcome of Glasgow City Council's financial inclusion strategy and, principally, as a response to the high levels of doorstep lending taking place in the city. Scotcash began as a partnership between Glasgow Housing Association and Glasgow City Council who, along with the Royal Bank of Scotland (RBS), the Scottish Government and Communities Scotland, provided a mixture of initial funding and support.

Scotcash's continued mission remains to contribute to a reduction in financial exclusion in local communities by increasing access to affordable loans, basic bank accounts, high quality money advice and other financial products. Loans are offered at 113.3% APR, an interest rate designed to reflect the level of credit risk in their target market as well as seeking to cover the cost of provision.

Today, Scotcash has extended beyond Glasgow to cover substantial parts of Scotland's urban population who suffer from deprivation.

In 2014/15, Scottish local authorities invested around £21m into money advice¹⁰ - however, more recent research suggests that this figure has reduced in subsequent years, and that the level of investment by local authorities in money advice services currently stands at around £13 to £15 million¹¹. Around 36% of current local authority funding is allocated to in-house money advice services, with the remainder provided for outsourced provision.

⁹ Improvement Service Research - 2015

¹⁰ Improvement Services Research - 2015

¹¹ Carrick et al. 2016

Local authorities also offer advice on a range of related topics beyond money advice, including welfare benefits advice, consumer advice and adoption advice.

Accountant in Bankruptcy (AiB)

AiB is a non-departmental government agency responsible for administering the process of personal bankruptcy and corporate insolvency, administering the Debt Arrangement Scheme (DAS), and implementing, monitoring and reviewing government policy in these and related areas.

Its funding is made available through three different streams:

- [Money Advice Training Resources Information Consultancy Service \(MATRICS\)](#) - AiB has provided grant funding to finance a joint initiative between Citizens Advice Scotland and Money Advice Scotland to deliver second tier training to money advisers. The funding is used to ensure that money advisers are appropriately skilled, and ensures that those that need it are able to access quality advice when considering bankruptcy;
- [The Financial Health for Everyone Project](#) - The Bankruptcy and Debt Advice (Scotland) Act (2014) introduced a provision for mandatory financial education for debtors under certain circumstances going through statutory debt relief solutions; and
- [Scotland's Financial Health Service \(SFHS\) Helpline](#) – AiB funds this helpline which is operated by Money Advice Scotland. This allows Money Advice Scotland to make the information available on their website accessible by telephone, thus extending the ways in which they can offer advice. Money Advice Scotland works with partner organisations such as StepChange Debt Charity to monitor and obtain feedback on client outcomes. Other partners that they work with include Citizens Advice Bureau, Shelter Scotland, Christians Against Poverty and Scottish Local Authorities.

AiB also previously provided funding to the [National Debtline](#)¹² to ensure that Scottish-specific advice was provided as part of this UK telephone and web service. However, funding for this was withdrawn in March 2017.

¹² Run by the Money Advice Trust

Scottish Legal Aid Board (SLAB)

SLAB manages the legal aid system in Scotland, which provides access to legal help and advice for people who wouldn't otherwise be able to afford it. It also manages the budget for three key programmes:

- [Making Advice Work \(MAW\) programme](#) - supports organisations to help people in Scotland facing debt and other problems stemming from benefits changes and the on-going impact of the economic downturn. The initial investment in this programme was £7.45million. A range of organisations have received funding from this fund including national charities such as Shelter, a range of housing associations, a number of local authorities and a significant number of local voluntary organisations;
- [Economic Downturn Programme](#) – this programme has two funding streams:
 - Stream 1 provides direct assistance and representation for people facing court action related to mortgage repossession or tenancy repossession and direct assistance that tackles the multiple and serious debt issues underlying these court actions
 - Stream 2 delivers information, one-off advice and signposting to people with small claims, and deals with other civil court matters to increase people's ability to navigate the court process themselves or to seek further assistance and casework assistance to people with small claims-level cases enabling them to resolve matters pre-action or settle them early in the court process; and
- [Tackling Money Worries Programme](#) - designed to improve outcomes for low-income families with children facing a change in their circumstances which places them at higher risk of debt and money problems. The programme focusses on achievement of priorities of the Scottish Government and the Money Advice Service (MAS), with an initial investment of £2.4million.

NHS Boards

NHS Scotland carries out a wide range of activities – most relevant to the subject of debt advice is the provision of advice with a positive impact on health outcomes (as opposed to health advice).

The Scottish Government's "Mitigating the Impact of Welfare Reform on Health and NHS Health Services, Outcome Focussed Plan"¹³ provides a focused response to reduce the anticipated adverse impacts of welfare reform, involving:

- Securing personal/household income (referrals to money advice and employability services); Maintaining socio-economic status, (rehabilitation back to work or to stay in work when off sick);
- Keeping people close to the labour market (referrals to employability support, NHS work placements and volunteering, Modern Apprenticeships);
- Reducing household costs (food co-ops, growing schemes); and
- Reducing barriers to services (service design and location, reducing barriers relating to protected characteristics).

2.3.1 Delivery Mechanisms

Publicly-funded advice providers use a range of mechanisms to deliver advice – with some offering a multichannel approach to delivery.

Face-to-face support (including outreach-based) remains common, and is evidenced to be an effective way of supporting clients with complex cases and/or complex personal circumstances.

A range of other delivery channels are also used, including:

- Email/written support;
- Telephone; and
- Web-based support.

¹³ <http://www.healthscotland.scot/media/2041/mitigating-the-impact-of-welfare-reform-on-health-and-nhs-services-service-users-and-employees.pdf>

2.4 Debt in Scotland

Reasons for Debt

Based on our research we have identified many reasons why individuals find themselves in debt, including:

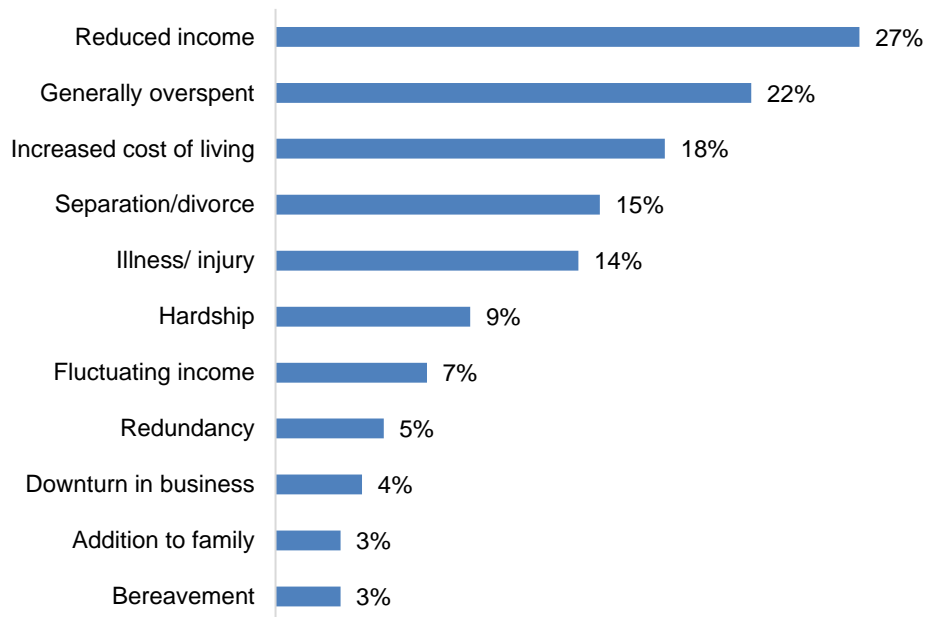
- Benefit sanctions;
- Addictions (alcohol, drugs, gambling);
- Bereavement;
- Breakdown of relationships;
- Loss of employment or underemployment;
- Medical or health problems;
- Mental health issues;
- Poor financial literacy (individuals unable to see through “quick fix” advertising);
- Poor spending habits / money management;
- Salaries not keeping up with inflation; and
- Starting bad habits early (it is easier for students to get credit cards than the general population).

Payplan is a UK-based private sector organisation offering a variety of debt-related services, including debt management plans, alongside other debt solutions such as individual voluntary arrangements. They offer free debt help to their clients and are funded by contributions from the credit industry and from other commercial partners.

Payplan provided detailed information on their debt advice activities to the Wyman review, including the reasons for debt problems. Among their clients, the most common sources of debt problems, besides general overspending (22%), are events over which they have relatively little or no control, such as reduced income (27%), increased cost of living (18%), separation/ divorce (15%), and illness/ injury (14%) -

Figure 2.1.

Figure 2.1: Reasons for Debt Problems (Payplan clients)



Source: Wyman Review

Characteristics of Debt Advice Clients

The Citizens Advice Scotland report ‘Debt Advice in Scotland¹⁴’ summarised the key characteristics of debt clients as follows:

- Debt clients are more likely to be middle aged;
- Clients who are unemployed are likely to seek advice on debt;
- Debt clients are likely to live in a single adult household;
- Clients who are renting their home are more likely to seek debt advice;
- The majority of debt clients are single; and
- Clients with dependent children are more likely to seek advice on debt than those without children.

¹⁴ <https://www.cas.org.uk/system/files/publications/Debt-advice-in-Scotland.pdf>

Demographic Profile

Citizens Advice Scotland (CAS) research has found that typically, those people most affected by problem debt live in more deprived areas – 30% live in the 20% most deprived Scottish Index of Multiple Deprivation areas (compared to 21% of the population).

CAS research also shows that women are more likely to seek advice than men, and that over a third of debt clients (36%) are aged between 45 and 59 years of age.

Other characteristics highlighted in the CAS research includes:

- Around two thirds (68%) of debt clients rent their home¹⁵;
- More than half (57%) of all debt clients live in single adult households; and
- 37% of debt clients had dependent children that they cared for.

Age Scotland have found an increasing trend for older people to be more indebted than they previously were. Some are simply where debts have been run up when the individual was younger, and now they have reached retirement age they have less free income to pay debts. Some individual are encountering a situation where their income goes down in retirement and then can get into debt because they do not alter their spending patterns.

Health and Social Factors

CAS research reported that nearly half of debt clients (48%) reported that they have a disability. This is reflected in a key finding highlighted from the Improvement Service - 53% of clients accessing debt advice reported having a disability or long term health condition, which is in stark contrast to the 20% of the general population who have a disability or long term health condition.

People with unmanageable debt are 24% more likely to have a mental health score in the bottom quartile of the population.

¹⁵ Private renters are nearly twice as likely as those with a mortgage, and five times as likely as those who own outright, to have debts worth six months of their income. (10%, 6%, 2% respectively)

Conversely, comparing the population as a whole with people with below average mental health scores, they are:

- Over a fifth more likely to have debts;
- Twice as likely to be behind on a household bill; and
- Nearly two thirds more likely to be behind on their council tax

The close relationship between unmanageable debt and poor mental health is the result of 'two-way' causation. Debt both contributes to, and is a product of, poor mental health¹⁶.

Financial abuse can be described as a situation where one person is in control of another person's money - or is racking up debts in their name. Money Advice Scotland (in partnership with SLAB and the Scottish Government) have set up a series of projects bringing together debt advice specialists and experts in working with people in abusive relationships in Scotland. This support will enable people who have experienced financial abuse to leave the abusive relationship, and get their finances back on track.

Around 14,000 Police Scotland officers are to receive specialist training in preparation for a new domestic abuse crime coming into force in Scotland, which is believed to be unique in law internationally¹⁷. The training will help police officers spot seemingly innocuous actions which are in fact part of a cycle of psychological abuse or coercive control.

This will result in questions being asked around financial abuse and it is likely that increasing numbers of people will be referred as the police identify those individuals that need help. There will therefore be a need for the police to liaise with money advice services.

In addition, although the numbers are small, there could potentially be a need for co-ordination between debt advice providers and the probation service.

¹⁶ A Debt Effect? How is unmanageable debt related to other problems in people's lives? – Citizen's Advice (<https://www.citizensadvice.org.uk/Global/CitizensAdvice/Debt%20and%20Money%20Publications/The%20Debt%20Effect.pdf>)

¹⁷ <http://www.parliament.scot/parliamentarybusiness/Bills/103883.aspx>

The Improvement Service has been undertaking case studies within Scotland and have identified that no support mechanisms are in place when individuals are released from prison with regards to managing their money and accessing support. This can be an additional barrier for early integration back into their local community. There are early indications that this group could suffer more disadvantage than the general population.

BME Communities

The Financial Capability Strategy for the UK reports that people in the black and minority ethnic (BME) population have some of the lowest levels of financial capability of any group. A Joseph Rowntree Foundation report from 2016 found that poverty is higher in Scotland among ethnic minority groups than within the majority white population¹⁸. However, there is a sense that whilst debt advice services are successful in targeting some groups of people (young people for example), there is less evidence that other groups are engaging with debt advice services - particularly people from BME communities.

There is a lack of evidence to support this though, and there is a case to be made for the formal recording of data relating to the levels of access of the BME population to public sector debt advice services. The provision of advice and guidance must also remain sensitive to the cultural and attitudinal differences to money often apparent in people from BME backgrounds. For instance, some people from BME communities are reluctant to approach public money advice services, and instead seek support from friends/family/the wider community and sometimes loan sharks (which in some cultures are an acceptable source of income).

2.5 Types of Debt

There are many different types of debt including consumer debt (include credit card debt, payday loans, and other consumer finance); government debt (such as child maintenance, benefit overpayments and tax debts), local authority debt (including council tax, council-run care home arrears, gym membership schemes, and parking permits), and other fiscal debts (such as community payback fines and speeding penalty tickets). **Table 2.1** provides a detailed breakdown of debt types.

¹⁸ Joseph Rowntree Foundation, Poverty and ethnicity: key messages for Scotland, January 2016

Table 2.1: Types of Debt

Consumer Debt	Government Debt	Other Fiscal Debts	Local Authorities Debt
<ul style="list-style-type: none"> • Bank overdraft charges • Car loans • Credit cards • Mobile phone bill debt • Mortgage debt • Payday loans • Personal loans • Private rental market arrears • Utility bill arrears 	<p>Payments due by individuals through:</p> <ul style="list-style-type: none"> • budgeting loans; • student loans; or • support for mortgage interest. <p>Repayments by individuals through:</p> <ul style="list-style-type: none"> ○ change in circumstances which are either not advised or advised late; ○ lack of knowledge that withdrawal of one benefit may impact on other benefits currently received; ○ administration errors made by government departments. <p>Types of Government Repayment Debt may include:</p> <ul style="list-style-type: none"> ○ child tax credits; ○ employment and support allowance; ○ housing benefit; ○ income support; ○ income based jobseeker's allowance; ○ income-related Employment and Support Allowance; ○ pension/savings credit; ○ personal independence payments (PIP); ○ working tax credit; ○ universal credit. 	<ul style="list-style-type: none"> • Community Payback Fines • Road Fund Licence • Police Issued Penalty Notices (typically between £45 and £85): <ul style="list-style-type: none"> ○ criminal damage (up to a value of £200) ○ disorderly or indecent behaviour ○ drunk in a public place ○ behaviour likely to cause a breach of the peace ○ obstructing police ○ theft (shoplifting up to a value of £100); • Speeding Penalty: <ul style="list-style-type: none"> ○ police issued (minimum of £100) ○ speed Camera; • TV Licence • Traffic fines 	<ul style="list-style-type: none"> • Council-run Care Home arrears • Council Tax • Gym Membership Schemes • Property Owner's Insurance (Ex-Council Property Owners Missive Obligation) • Non-Residential Care Services Contribution • Parking Permits • Pest Control • Planning and Building Control • LA Tenants Rent • Statutory Repairs • Meals on Wheels

Source: EKOS Research

2.6 Types of Loans

There are many different types of loans available, but typically, those people who have problem debt and who need to access a lump sum of money are likely to consider the following types of loans:

- **Bank and/or Guarantor Loan** - These generally come under the umbrella of long-term loans as the repayment period can be anything over a year (although, some banks can offer shorter loans). In order to be eligible, you usually need a good credit record and the ability to prove you have solid income. However, sometimes the loan applicant defaults on the loan leading to the guarantor being liable for the debt, which they are then unable to finance;
- **Payday Loan** - Available both on the high street and online, these are for relatively small sums borrowed for short periods and aren't secured against a valuable asset;
- **Doorstep Loan (Provident)** - Doorstep loans are short-term loans which are not secured against your home or car. You don't usually need to give your bank details because most lenders deliver cash to you and you pay your loan in cash; and
- **Online/Instalment Loan** - similar to payday loans, they can only be found online and often allow for more repayments over a longer period, instead of paying the balance off in one or a handful of payments.

This Chapter has focused on debt as a generic issue and Chapter 3 covers specifically problem debt.

3. Problem Debt

3.1 A Definition

Problem debt – sometimes referred as ‘over-indebtedness’ - is where normal debt spirals out of control (reasons for this are discussed later in this report) to the extent that an individual can no longer keep up with utility, mortgage, rent or credit payments, borrow from friends or family or pawn or sell something to meet day-to-day living expenses, or receive financial help from community organisations.

It is worth noting that problem debt can mean different things to different people – for instance, one person may be £200 in debt, whilst another has £200,000. However, whilst the smaller amount may appear significant, this has no bearing on the degree of shame, stigma and worry that they experience, and the wider picture (their family circumstances, mental health, household income and their perception of debt). In contrast, the individual with £200,000 of debt may have always had credit, and may have managed their debt in the past before becoming overcommitted – but don’t necessarily perceive this as problem debt.

3.2 Scale of Problem Debt

“Almost 16% of the population (696,859 adults¹⁹) in Scotland can be described as over-indebted”.

Money Advice Service (2017)

Last year, CAS carried out research into personal finances to explore Scottish people’s relationships with money, debt, credit, and planning for the future. This study²⁰ found that:

- 51% of consumers run out of money before payday;
- 23% report that they are finding it difficult to manage;
- One in five consumers had no savings;

¹⁹ Defined to be individuals aged 18+.

²⁰ https://www.cas.org.uk/system/files/publications/living_one_pay_day_to_the_next_report_0.pdf

- Low income consumers are less likely than higher income consumers to have accessed credit; and
- More than 1 in 8 consumers had been refused credit in the last year.

However, there appear to be significant variations in over-indebtedness levels among different local authority areas in Scotland – from just over 12% in both East Renfrewshire and East Dunbartonshire, to more than 19% of adults in Glasgow City (Tables 3.1 and 3.2).

Table 3.1: Most Over-Indebted Areas (Scotland)

Local Authority	2016	2017	Change
Glasgow City	16.66%	19.23%	2.57%
West Dunbartonshire	15.93%	18.49%	2.56%
North Lanarkshire	15.74%	18.16%	2.42%
Dundee City	15.28%	17.94%	2.66%
East Ayrshire	15.22%	17.84%	2.62%

Source: Money Advice Service

Table 3.2: Least Over-Indebted Areas (Scotland)

Local Authority	2016	2017	Change
Perth & Kinross	11.35%	13.66%	2.31%
Aberdeenshire	10.75%	13.47%	2.72%
East Dunbartonshire	9.94%	12.08%	2.14%
East Renfrewshire	9.83%	12.08%	2.25%

Source: Money Advice Service

CAS research found many consumers – particularly younger consumers – are struggling to afford essentials and to save. They lack financial resilience and are often one bill away from not being able to cope.

As a result of over-indebtedness, there is a greater demand for credit. Instead of using credit to cover the cost of one-off purchases such as home improvements, holidays or Christmas presents, some people are applying for credit to pay for day-to-day essentials and rent arrears – in 2016, nearly 9 million people in the UK used credit for essential living costs²¹.

²¹ StepChange research (http://www.parliament.scot/S5_EconomyJobsFairWork/Inquiries/PSE019-StepChange_Debt_Charity.pdf)

It is worth noting that low income in itself is not a major driver of problem debt.

Research has shown that money management was most difficult for people who were new to managing on a low income as a result of either job loss, being widowed, relationship breakdown, setting up home for the first time, or giving up work following the birth of a child. It was a time when they ran a high risk of getting into arrears, with bill juggling or use of credit common responses to managing on a low income. The longer that people spent living on a low income the better some got at being able to cope financially. Furthermore, once people had got into arrears, creditors required them to pay their bills in ways (e.g. pre-payment meters or direct deductions from benefit) that prevented them from getting into further arrears²².

3.3 Indicators of Problem Debt

When someone finds themselves in a situation where either their income has fallen significantly or their outgoings have increased significantly, this can lead to debt. Over time, this debt can build into a spiral of borrowing and repaying and borrowing more and more to try to make payments to service their debt. If an individual has problem debt, this can mean they may go without food or friends and family may notice that their relative is no longer using their heating, even in extremely cold weather.

Problem debt is a concern, not just because of the financial strain it can cause - households can end up paying back far more than they borrowed and their repayments can mean they don't have sufficient income - but because problem debt is closely related to wider problems in people's lives.

Problem debt has been shown to be related to financial exclusion, family breakdown and poor physical and mental health. Common physical, emotional and behavioural symptoms of people in debt can include:

- They have been in debt before;
- They have recently had a life event which may result in loss of income or higher spending;
- They are living beyond their means;

²² Poverty, debt and credit: an expert-led review - Joseph Rowntree Foundation (2014)
(<https://www.bristol.ac.uk/media-library/sites/geography/migrated/documents/pfrc1404.pdf>)

- They seem anxious, withdrawn or depressed;
- They are more secretive;
- They have changed spending habits;
- They seem tired or have trouble sleeping; and
- Their weight has suddenly changed.

The signs or issues that creditors should be aware of include:

- Changing use of credit card for everyday spending;
- Only making minimum repayments;
- Approaching spending limits; and
- Using multiple cards.

3.4 Current Trends

There has been a significant shift in the demand for advice and the types of debt that clients hold. For example²³:

- There has been a steady rise in non-consumer priority debts – such as Council Tax and social rented housing arrears. New issues related to these debts are 22% higher than five years ago;
- In addition, there has been a sharp rise in the number of ‘crisis’ issues advised on, such as food parcels (an increase of 89% since 2013/14) and Crisis Loans (increase of 47%); and
- Conversely, there has been a steep fall in the number of consumer debts that is advised on at bureaux, falling from 1 in 8 of all new issues to 1 in every 16. In particular, credit card debt (a fall of 42%) and personal loan debts (45% fall) have decreased in advice demand.

²³ Comparing 2016/17 CAS debt statistics with those of five years previous (2011/12).

Digital Delivery

Whilst studies show that vulnerable clients are more likely to use face-to-face support, many publicly funded advice organisations are already exploring new ways of delivering advice, and use of new platforms such as social media is becoming more common.

Research suggests that there is significant potential to grow the extent of advice provided through new technologies, but the sector (and advice clients) will require support and funding to ensure this is done effectively.

It is likely that an individual's personal preference will lead them to select the type of delivery they prefer for advice, but that is also influenced by the first type of advice they happen to access. A 2012 study by the Money Advice Trust found that preference can often be simply a matter of personal comfort, skills and experience, but that it is also heavily influenced by whichever provider the client, often in crisis, first comes into contact with and the first channel of advice that they access.

The study also found that there was little public awareness or understanding of advice providers and so provider choice is largely shaped by providers' Internet presence or brand visibility, and recommendations from family and friends.

Scotcash has recognised that with the need for cost efficiencies and the increasing use of digital platforms, there was a demand for 'at a distance' customer service. Customers can now apply for Scotcash loans over the phone and online as well as face-to-face.

Continual automation is being sought in the lending process although Scotcash requires a variety of 'documents and paperwork' (bank statements, photo ID, residence, etc.) in order to process loans and automation remains on-going (and in-line with broader developments in e-governance and digital banking). With the expansion of on-line provision, Scotcash is investigating the ability to provide on-line wrap-around services alongside lending (for example, through chatbots).

There are several examples of the current ways in digital technology is being used to deliver advice, including:

- The Money Advice Trust's National Debtline has a service called My Money Steps, which is an interactive online advice service that provides users with a personalised action plan, setting out practical steps to help them deal with their debts and manage their finances in future;
- StepChange's free online debt advice tool – Debt Remedy²⁴ - which can provide users with debt advice based on their circumstances, and recommend solutions; and
- Payplan offer an online 'Chat' service²⁵ which provides help and guidance around the range of debt solutions on offer. The online chat facility is staffed by experienced, UK-based debt help experts who can respond to debt queries anonymously. This service is available whenever they are open.

Illegal Money Lending

Illegal money lending operates below the regulatory radar. It can be difficult to identify and quantify this unauthorised lending activity, given the taboos that surround it and what is at stake.

Financial Conduct Authority²⁶

Whilst some people will require loans to cover the expenses associated with one-off events such as holidays, home improvements etc., there are others that will struggle to pay for day-to-day essentials, including rent payments, and household bills. The payday lending market provided easy access to credit for those individuals who would not – or could not – access finance from a bank.

However, since the introduction of stricter regulation of money lending from the Financial Conduct Authority (FCA), even these types of doorstep collectors have moved away from more vulnerable groups because of FCA regulation.

²⁴ <https://www.stepchange.org/DebtRemedy.aspx>

²⁵ <https://www.payplan.com/free-online-debt-help>

²⁶ <https://www.fca.org.uk/publications/research/shining-light-illegal-money-lending-consumer-experiences-unauthorised-lending-uk>

This has resulted in a cohort of people with even fewer borrowing options – often resulting in them approaching illegal money lenders and meaning they are further marginalised.

“Loan sharks live in the same block of flats that our customers live in, they live in the same council estates, they drink in the same pubs, they go to the same betting shops. You don’t find a loan shark, a loan shark finds you”²⁷

The Scottish Illegal Money Lending Unit (SIMLU) is part of Trading Standards Scotland and works in partnership other agencies and organisation across Scotland to deal with the problems associated with unauthorised lenders (otherwise known as loan sharks).

The Unit consists of specialist officers who investigate allegations of illegal money lending and related activity, submitting reports to the Procurator Fiscal as appropriate. The team also provide support for victims of illegal money lending and raise awareness of the dangers of borrowing from such lenders.

3.5 Cost of Problem Debt

Problem debt is a complex problem which can have severe impacts on individuals and families, as well as having wider costs to society. Problem debt costs the UK £8.3 billion through the damage it causes to family life, mental and physical health, productivity and employment prospects and costs to the welfare state, the NHS, local government and other agencies²⁸.

Some elements are inter-dependent in that individuals can experience mental health issues which were not previously present prior to being in problem debt, as well as some individuals with mental health issues experiencing higher levels of problem debt as they find it difficult to manage their money when their condition worsens.

²⁷ <https://www.theguardian.com/money/2017/sep/20/loan-sharks-uk-biggest-doorstep-lenders-morses-club#img-1>

²⁸ StepChange research (<https://www.stepchange.org/policy-and-research/social-cost-of-debt.aspx>)

“Killed By My Debt”²⁹ was aired recently on the BBC, depicting the harrowing experience of the family of one young man “Jerome”, highlighting his despair and untimely death due to problem debt. Prior to having debt, there were no indicators that “Jerome” had any mental health issues.

Following bereavement, problem debt can arise due to lost income and other debts in relation to burial costs. This not only affects those in work but also those on benefits. In the past, money was available to help with burial/cremation costs, but changes to Government policy mean that help is now only available to many in the form of a budgeting loan. Individuals/families who have no other means of burying their loved ones will have little option but to take on this debt, either through the Department for Works and Pensions or through another source.

StepChange has also reported that the biggest cost to the economy of problem debt is housing-related. As people fall behind on rent or mortgage payments, they end up at risk of losing their home or being forced to move. The net result is additional housing benefit payments, eviction costs, homelessness prevention and support, and moving costs.

Employment costs - the stress and anxiety caused by problem debt - undermines economic productivity, prolongs unemployment and leads to job losses, which adds substantial costs to the welfare bill.

“There is a need for debt advice to become more proactive in identifying situations before people get to the problem debt stage”

Quote from Industry Stakeholder.

There are also costs to the NHS and other mental health support services (as being in problem debt increases a person’s chance of suffering from mental health problems). Relationship breakdown accounts for further costs, as problem debts lead to separation and divorce, with the added costs of setting up a new home, legal fees, maintenance payments and costs for bodies such as the Child Support Agency.

Other costs arising from problem debt include elderly care costs; the costs associated with business failures; and childcare charges.

²⁹ <https://www.bbc.co.uk/programmes/p067bmlh>

4. Current Interventions

4.1 Introduction

Recent research from the Money Advice Service found that, overall, taking into account all the societal and economic benefits, debt advice servicing costs are between £445 and £960 million a year to the UK economy.

Advice provision in Scotland is currently delivered by a wide range of agencies (with a mix of local and national providers) – most delivering a holistic, person-centred service across the range of advice covered by this research (and beyond), and a smaller number focusing on single issues or individual target groups³⁰.

The main channels of delivery of debt advice services are:

- [Online debt advice services](#) – these are secure and provide immediate, personalised help. Some services are available 24 hours a day;
- [Telephone debt advice services](#) – these providers allow direct telephone contact with expert advisers, and are usually available weekdays, evenings and Saturdays; and
- [Face-to-face debt advice services](#) – these are often located in offices and shop fronts, or delivered through outreach services (such as home visits and mobile advice services). This type of approach is evidenced to be an effective way of supporting clients with complex cases and/or complex personal circumstances.

However, some debt advice providers offer a ‘multi-channel’ approach to delivery, for example, whilst Citizens Advice Scotland can provide advice by telephone, email and letter, their evidence shows that clients with debt problems prefer face-to-face support.

The Wyman review of funding of debt advice in the UK recognises the value of free-to-client debt advice – both to individuals, and the wider economy.

³⁰ Review of Publicly-funded Advice Services in Scotland – Scottish Government (February 2018)

It identifies the need for **increased funding**, and also the potential for **greater efficiency** and **collaboration across the sector**.

“As the single largest provider/funder of money advice services in Scotland, there is an important leadership role for local authorities to engage with other partners to ensure Scotland continues to have a strong, effective and vibrant money advice service”.

From “The Future of Money Advice Services in Scotland³¹”

4.2 Specific Interventions

The effectiveness of collaboration across the debt advice sector – and indeed beyond this into other public, private and third sector agencies is explored further below:

- **Supporting vulnerable people** - whilst the consumer credit industry has improved the ways in which it deals with vulnerable clients (this is largely driven by the FCA), this is not the case for public sector debt recovery. Indeed, there is a sense that there is a strong correlation between the ways in which debt recovery can make mental health issues worse. However, there are some initiatives – for example, the Advice in Mind Project (see text box over) – whose aim is to support people affected by mental health conditions to deal with financial issues affecting their lives by providing information, advice, advocacy, referral services and facilitation on claiming appropriate welfare benefits, as well as helping with financial planning and debt prevention. Another example of how collaborative approaches could support vulnerable people is where rent arrears lead to an eviction notice being served. A relatively small amount of housing debt could lead to a homelessness application - which could amount to many thousands of pounds. There is unlikely to be a repayment of that debt, but instead, this can lead to significant costs to another part of the local authority;

³¹ http://www.improvementservice.org.uk/documents/money_advice/future-of-money-advice-services.pdf

The Advice in Mind (AIM) Project

The AIM Project focuses on the delivery of a holistic, effective, high quality advice and support services to people affected by and at risk of mental health conditions in the Lanarkshire area. It works in partnership with NHS, Citizens Advice Bureaux (CAB) and other local community organisations to proactively engage with people experiencing mental health and who are vulnerable to financial hardship.

AIM offers early intervention to people with mental health conditions, so that solutions for their issues can be found and crises could be averted and receives referrals from NHS professionals, CAB and other organisations (clients can also self-refer). The beneficiaries have access to advice and support in a range of settings (including GP surgeries, hospitals, CAB, foodbanks, local community venues and clients' homes) to allow timely, effective intervention and maximise impact and accessibility.

Between April 2017 and March 2018, AIM supported 1,791 clients with 2,269 enquiries and 8,384 issues. The cases were complex, time consuming and multifaceted and each client presented on average 8 issues. In comparison, an average CAB client presents with 3 issues on average.

Source: AIM Project Annual Report 2017/18

- [Community Justice Outcome Plans](#) - the new model for community justice in Scotland is defined by an improvement culture. Analysing community needs is another important example of an intervention where intelligence around crimes committed (for instance, someone being arrested for stealing baby food, clothes etc) results in a holistic package of support being put into place for a family, rather than the police formally reporting this type of incident;
- [New FCA rules](#)³²: Under these new rules firms will be required to take a series of escalating steps to help customers who are making low credit card repayments over a long period, beginning when the customer has been in persistent debt over 18 months. After this time firms need to contact customers prompting them to change their repayment and informing them their card may ultimately be suspended if they do not change their repayment pattern;

³² [Helping customers with persistent debt - FCA](#)

- [Crackdown on High Interest Lending by FCA](#)³³ - Much work is being undertaken by the FCA, following on from their crackdown on payday lenders' charging exorbitant rates of interest, to ensure that high street lending rent-to-own, doorstep lending and catalogue shopping is made more affordable;
- [There are already signs of good collaboration between agencies](#) such as the funding through the Scottish Government to CAB network to work better with other groups to deliver support to those that are most vulnerable. However, this does not ensure that there is no duplication of effort. In order to avoid this, agencies should work together more efficiently (instead of simply increasing the number of agencies involved in collaboration). Referral and signposting across the advice and rights sector can often be patchy or ad hoc and depend on personal relationships between frontline staff. Services such as FORT³⁴ can help foster the development of a culture of advice in which referral and signposting is consistent and routine. We believe that the TPDG are best placed to encourage collaboration and the introduction of new collaborative systems between agencies, as well as identifying other potential group members not currently involved.

Some interventions are worth considering as they are likely to offer a return in supporting the priorities of the debt advice sector, including:

- Engaging with under-represented groups - more research and evidence is needed to further look at the specific needs of under-represented groups (for example people from minority ethnic backgrounds may require additional translation support, building capacity and delivering the advice within the community by the community; cognisance also needs to be taken of being sensitive to cultural differences such as attitude to debt, potential “fear factor” or mistrust of some individuals viz a viz “authority figures” (eg security guards within advice centres);

One way the advice sector can encourage more people to get help with their money is by providing more preventative money guidance - stepping in at key life stages to help people respond to those changes and avoid financial difficulties and make the most of their resources;

³³ [FCA Crackdown on High Interest Lending](#)

³⁴ <https://www.fortsupport.co.uk/>

- There is a sense that the advice sector may not fully understand the issues around people that get into debt – particularly where financial abuse has taken. This can clearly involve some very complex situations, so there is a requirement for collaboration between public sector support agencies and the advice sector;
- Financial education in schools - engaging young people in managing their money from a young age is a vital step to giving them the skills and confidence needed to cope financially in later life. Schools have a vital role to play in this – over 90% of young people who received financial education in schools said they found it useful, though less than half (46%) reported to have actually received financial education;
- Further roll out of the living wage not only for those organisations who deliver work on behalf of public sector organisations, but also ensuring that all public sector organisations pay the Living Wage (if this is not currently the case); and
- Payback of statutory debts should be allowed to roll over into subsequent financial year(s) – this will ensure that people are not evicted for relatively small sums of money. The Scottish Government sets targets for councils relating to rent arrears, which in order to meet these targets requires councils to sometimes deal more harshly with tenants. Evictions take place which then “moves the problem” to a different public sector budget holder but also increases the overall cost to the public purse. The only way that a tenant can remain in an RSL property is to declare themselves bankrupt – which can have long-term and lasting repercussions.

One suggestion to improve take up of debt advice may seem insignificant but could have a real impact. This is that debt advisers are renamed “debt counsellors” – this could potentially change the perceived relationship from those delivering advice/ seeking advice to one of collaborative working to solve the debt problem.

The aim of the counsellor would be to help an individual to understand their rights, enable the individual to go through that situation, giving them ownership of their decisions, and reach the other side with a healthy mind-set.

5. Emerging Issues

5.1 Introduction

To conclude, the demand for problem debt advice is already significant and is expected to grow, based on the anticipated increase in the population - and assuming the same proportion of the population have problem debt and then seek advice.

MAS has calculated that demand for advice in 5 years' time is likely to be just over 2 million people.

5.2 Key Emerging Issues

This Chapter looks at some of the emerging issues that will impact on the debt advice sector in the future.

- **Universal Credit** – with the rolling out of Universal Credit, the demand for advice services is growing and is likely to continue. In January of this year, 6% of Universal Credit full service claims in the UK had 40% deducted from their standard allowance (according to CAS research) with local CABx across Scotland reporting cases of Universal Credit claimants struggling to make ends meet after direct deductions were made to their payments. These types of cuts can have a significant impact on families who were already on low incomes, often leading to first approaches to both legal and illegal money lenders. The knock-on effect of this is often that individuals pay off these loans as a priority over public debts, the worst case scenario is sometimes leading to eviction and homelessness;
- **Literacy/numeracy support** – whilst digital delivery of services can make access to debt advice services easier for some people, allowances must be made – and support provided - for those people experiencing language barriers, or those with literacy or numeracy issues (including IT literacy). There is a growing need for adults to address their numeracy/maths and digital skills to cope with the impact of Welfare Reform and the introduction of Universal Credit, which demands adults manage budgets and become financially capable.

One of the key objectives identified by Money Advice Scotland in its 2015-2018 strategy document³⁵ was ‘Leading and improving the financial health and wellbeing of the people of Scotland’. To this end, MAS has developed a new financial capability scheme built around an e-learning module, as well as a holistic training and education programme (including qualifications) for those involved in the sector³⁶;

- **In-work poverty** – a recent report from the Royal Society of Arts³⁷ found that economic insecurity has become the “new normal” in the UK with at least 70% of the UK’s working population “chronically broke”. Almost 30% are concerned about their level of debt, whilst 43% of workers “do not have anyone in their household they could depend on to support them financially in the event of hardship”. Many people borrow money through loans and credit cards (in the UK, there is £200 billion of debt amassed on credits cards, car deals and other forms of loans). A survey by YouGov and Shelter³⁸ found that one in three private renters borrowed money to pay rent, which is indicative of the rise in living costs without corresponding wage rise;
- **Regulated industries** – UK consumers spend around £136 billion annually on services in water, energy, telecoms and financial services. A significant and increasing number of these consumers have conditions or circumstances which make them potentially vulnerable, often in multiple sectors. Regulators have improved their understanding of vulnerability, and have made some progress in working with their industries to improve support for vulnerable consumers. However, some of the biggest challenges for vulnerable consumers relate to access, affordability and debt, which regulators alone have limited powers to solve. Regulatory interventions often have limited impact, and the lack of clarity between the responsibilities of regulators and government can mean that systemic issues are not addressed.

³⁵ The strategy plan for Money Advice Scotland (the national umbrella organisation which promotes the development of free, independent, impartial, confidential money (debt) advice and financial inclusion) - <http://www.moneyadvicescotland.org.uk/sites/default/files/Strategic%20Plan%202015%20-%202018.pdf>

³⁶ <http://www.moneyadvicescotland.org.uk/content/financial-capability-e-learning-module>

³⁷ Thriving, striving, or just about surviving? – RSA (January 2018)

³⁸ <https://www.theguardian.com/money/2017/may/12/tenants-borrow-money-pay-rent-low-earners-shelter>

Until regulators/government work together to define roles and objectives, and prioritise the highest impact interventions, the overall arrangements in place to support vulnerable consumers may not be value for money³⁹;

- **Financial wellbeing in the workplace** – employers should use processes to identify employees who need help and create a culture for supporting the wellbeing of employees. Of particular concern are those employees (and their families) who are low earners and may be impacted by Universal Credit – if they are already stressed, debt performance can be impacted – real value of investing in workplace financial wellbeing;
- **Public/ private/ third sector collaboration** – the public are confused by the variety of debt advice services. Many will approach CABx as this is a known and recognised brand, but the Scottish Government have a role to play in starting conversations around debt, taking away the stigma associated with it, and educating the public about where to go for debt advice – perhaps think about introducing a ‘one-stop shop’ for debt advice. Although there may be a perception that people with problem debt would be reluctant – or frightened - to approach an organisation linked to formal agencies (such as the Government or the LA), there is anecdotal evidence that people are actually reassured by this connection, and view it as a ‘stamp of approval’;
- **Raising awareness of debt advice provision** – it appears that people are confused about where to seek debt advice, indeed only one in six people seek formal debt advice⁴⁰, and many organisations are also confused when it comes to signposting. Many people view advice services with trepidation and won’t seek support, and others don’t want to access debt advice either because of bad experiences in the past, poor trust issues, or through a lack of understanding around what is available. Debt advice organisations need to be supported in delivering earlier interventions instead of dealing with people at debt crisis point when options are limited. However, to reach successive cohorts of people with problem debt, any high-profile and broad consumer awareness campaign to alert people to the existence of free debt advice would need to be run constantly – and is likely to be prohibitively expensive as per the Wyman Report;

³⁹ Vulnerable consumers in regulated industries – National Audit Office (March 2017)

⁴⁰ From CAS

- [Sectoral issues](#) - for example, the drop in oil price in Aberdeen and related economic downturn has not only led to job losses, but also massive devaluation of property prices. Previously, there was little identified need for debt advice in Aberdeen, however individuals in the area are now in a situation where they are having to liquidate assets in a deflationary market with little hope of retaining any capital at the end of the process; and
- [The potential impact of Brexit](#) – the impact on jobs going forward is, as yet, unknown. This combined with the changes to Universal Credit can only lead to an increase in demand for debt advice services.

6. Conclusions

6.1 Introduction

This Chapter sets out our overall conclusions against each of the research objectives.

6.2 Addressing the Objectives

Each of the objectives is addressed in turn.

- [How problem debt is defined](#)

Problem debt is where normal debt spirals out of control to the extent that an individual can no longer keep up with utility, mortgage, rent or credit payments, borrow from friends or family or pawn or sell something to meet day-to-day living expenses, or receive financial help from community organisations.

- [The current trends of problem debt in Scotland, including differences in type and scale of problems between different groups or regional areas/communities](#)

There has been a significant shift in the demand for advice and the types of debt that clients hold, including:

- A steady rise in non-consumer priority debts – such as Council Tax and social rented housing arrears;
- A sharp rise in the number of ‘crisis’ issues advised on, such as food parcels and Crisis Loans; and
- A steep fall in the number of consumer debts that is advised on in CAB offices

CAS research has found that typically, those people most affected by problem debt live in more deprived areas⁴¹, and that women are more likely to seek advice than men, with more than a third of debt clients are aged between 45 and 59 years of age. Other characteristics highlighted in the CAS research included a high propensity for renting (68% of debt clients rent their home), living on their own (57% of debt clients) and 37% of debt clients had dependent children that they cared for.

- [An overview of the characteristics of those who take up free debt advice, including an assessment of take-up of free advice among minority and vulnerable groups](#)

The take-up of free advice amongst minority and vulnerable groups appears to be variable, and depend on the levels of support provided to these groups. For instance, the Improvement Service have identified that no support mechanisms are in place when individuals are released from prison with regards to managing their money and accessing support, which can be an additional barrier for early integration back into their local community.

Meanwhile CAS have reported that nearly half of debt clients (48%) have a disability. This is reflected in a key finding highlighted from the Improvement Service - 53% of clients accessing debt advice reported having a disability or long term health condition, which is in stark contrast to the 20% of the general population who have a disability or long term health condition.

The provision of advice and guidance must also remain sensitive to the cultural and attitudinal differences to money often apparent in people from BME backgrounds. For instance, some people from BME communities are reluctant to approach public money advice services, and instead seek support from friends/family/the wider community and sometimes loan sharks (which in some cultures are an acceptable source of income).

⁴¹ 30% live in the 20% most deprived Scottish Index of Multiple Deprivation areas (compared to 21% of the population).

- [How national public funding is deployed and the effectiveness of current interventions](#)

Advice provision in Scotland is currently delivered by a wide range of local and national agencies – most delivering a holistic, person-centred service, and a smaller number focusing on single issues or individual target groups.

The recent Wyman Review identified the need for increased funding, and also the potential for greater efficiency and collaboration across the sector.

However, there are examples of successful initiatives. The Advice in Mind Project supports vulnerable people to deal with financial issues affecting their lives by providing information, advice, advocacy, referral services and facilitation on claiming appropriate welfare benefits, as well as helping with financial planning and debt prevention.

Another interesting intervention is where community needs are analysed around crimes committed (for instance, someone being arrested for stealing baby food, clothes etc), which results in a holistic package of support being put into place for a family, rather than the police formally reporting this type of incident.

- [An assessment of emerging issues that could impact the need for debt advice in Scotland in the period to 2025](#)

There are a range of issues that could have an impact on the Scottish debt advice sector, including the rollout of Universal Credit, poor literacy and numeracy levels amongst the adult population, the increase of in-work poverty and the impact that has on debt levels, ensuring regulatory bodies (such as Ofgem, Ofcom etc) have suitable arrangements in place to support vulnerable consumers, addressing financial wellbeing in the workplace, helping to raise awareness of where to go to receive debt advice (through marketing and promotion and through public/ private/ third sector collaborations). There are also sectoral issues and the - as yet unknown - impact of Brexit to be considered.

Appendix A: Data Log

Including Debt Advice Organisations and Support Data Log
and Web Links

Accountant in Bankruptcy

The Accountant has responsibility for Scottish Government's policies in respect of personal bankruptcy, the Debt Arrangement Scheme, protected trust deeds, diligence and corporate insolvency in Scotland and to implement, administer, review, revise and monitor these policies.

In addition, the AiB provides access to sources of information and advice on debt and borrowing and provides access to a range of booklets produced by the Scottish Government which gives details of organisations throughout Scotland that give free, independent, impartial and confidential money advice. These are called "Dealing with Debt" and cover: [South Strathclyde, Dumfries and Galloway](#); [Tayside, Central & Fife](#); [Lothian & Borders](#); [North Strathclyde](#); [Grampian, Highland & Islands](#); and [Glasgow and Strathkelvin](#).

[Debt Arrangement Scheme - the way forward](#)

[Common Financial Tool \(CFT\)](#)

[Annual Reports 1986-Present](#)

[Age UK Scotland](#)

[Debt Advice and Management](#)

[Alzheimer's Scotland](#)

[Dementia - Money and Legal Matters](#) – care home debt, etc.

[Anxiety UK](#)

Trust Deed Scotland sponsors the [Stress](#) page on this website.

[BEMIS](#)

[Poverty and Ethnicity](#)

CEMVO

[BME Voluntary and Community Sector Literature Review - Page 7 – Education and Welfare Services](#)

Citizens Advice Scotland

April 2018

[Universal Credit 'clawbacks' hit vulnerable Scots](#)

December 2017

[Burial charges up 27% on average since 2014](#)

September 2017

[CAS Response to Scottish Government's Legislative Programme](#)

August 2017

[Department for Work and Pensions - Reforms to the Social Fund's Funeral Expenses Payments scheme](#)

June 2017

[Written evidence on homelessness and rent arrears](#)

July 2017

[Universal Credit Rollout must be halted](#)

May 2017

[Living from one pay day to the next](#)

August 2016

[Paying more to be poor](#)

July 2016

[Living at the Sharp End](#)

October 2015

[Sink or Swim: Consumer experiences of water and sewerage debt](#)

March 2015

[CAS Submission to the Devolution \(Further Powers\) Committee: Implementing the Smith Agreement - The UK Government's Draft Legislative Clauses](#)

Debt Support Trust

[Money Manager](#)

[Useful contacts](#)

[5 things to do when worrying about debt](#)

DWP

[Debt Management - Customer Service Standards](#)

[Customer Charter](#)

[DWP Digital Project to manage debts of 15 million citizens](#)
[\(www.publictechnology.net\)](http://www.publictechnology.net)

FCA

The FCA has issued an overarching [Policy Statement](#) which includes conduct rules for all consumer credit activities, for high-cost short-term credit, including payday loans, for debt advice providers and peer-to-peer lending platforms, Prudential standards for debt management firms and some not-for-profit advice bodies, proposals for debt management firms that hold their clients' money. They also have several other individual [policy statements](#) in relation to other responsibilities within their remit.

2018

[Information Sheet – If you have received an Arrears Notice](#)

[Information Sheet - If you have received a Default Notice](#)

[Policy Statement - Persistent Debt and Earlier Intervention](#)

[Persistent debt and earlier intervention remedies](#)

[Transforming culture in financial services](#)

2017

[Future Issues in Unsecured Debt \(Centre for Responsible Banking & Finance, University of St Andrews\)](#)

[Preventing financial distress by predicting unaffordable consumer credit agreements: An applied framework](#)

2016

[Can we predict which consumer credit users will suffer financial distress?](#)

[Potential market issues](#)

2014

Summary Extracts of 2014 reports from FCA website

[Consumer Credit Research - Logbook Loans](#)

[Consumer Credit Research - Debt Management](#)

[Consumer Credit Research - Cards](#)

[Consumer Credit Research - Overdrafts](#)

Full reports of above 2014

[Consumer Credit: Payday Loans, Logbook Loans and Debt Management Services \(ESRO 2014\)](#)

[Consumer Credit: Deep dives into Credit cards and Unauthorised overdrafts \(Jigsaw Research 2014\)](#)

[Low Income Report - Optimisa Research \(2014\)](#)

[Consumer credit and consumers in vulnerable circumstances](#)

GOV.UK

(Resource/Referrer only)

[Court Claims, Debt and Bankruptcy](#)

[Improvement Service](#)

[Improving outcomes in money advice](#)

[Welfare reform dashboard](#)

May 2018

[Aberdeenshire debt conference](#)

[Elected Members Briefing Note: Money Advice Services - Investing in the Future](#)

March 2018

[Evaluation of the Improving Outcomes in Money Advice \(MAO\) project](#)

[Data and Debt Arrangement Schemes](#)

July 2017

[Customer Journey Mapping](#)

January 2017

[Elected Members Briefing Note: The Importance of Financial Capability in Scotland](#)

No date

[Response to Call for Evidence: Independent Review of the Funding of Debt Advice in England, Wales, Scotland and Northern Ireland](#)

[Consultation Response: A Strategic Approach to Debt Advice Commissioning 2018-23](#)

[The future of money advice services](#)

2014-2017

[Case Study - WLC - Corporate Debt Policy putting the individual at the centre](#)

2013

[Local Incomes and Poverty in Scotland](#)

Institute for Fiscal Studies

[Problem Debt and Low Income Households](#)

Inclusion Scotland

[Briefing – Poverty and Disabled People](#)

[Inclusion Scotland MSP Briefing – Universal Credit and Disabled People](#)

[Inclusion Scotland Written Evidence – Child Poverty Bill](#)

Joseph Rowntree Foundation

[Poverty Causes, Costs and Solutions](#)

[UK Poverty Data](#)

[Household Problem Debt](#) – source Family Resources Survey

[Incomes, Savings and Debt](#) – source Family Resources Survey

MIND

[Money and Mental Health](#)

[Ending Charge for Doctor's Note to prove Mental Health Condition to Creditors](#)

[Housing and Mental Health](#)

[Support Not Sanctions Blog](#)

Money Advice Scotland

Money Advice Scotland provide second tier support to the money advice sector through their training and consultancy line. They also provide a Helpline which acts as a signposting service for the public and have resources available to the public - ie their financial capability modules.

[Resources](#)

[Money Advice Scotland Impact Report 2016/17](#)

Money Advice Trust

The Money Advice Trust works closely in [partnership](#) with a number of trade associations to help inform its work. Members of the British Bankers' Association (BBA), Building Societies Association, Credit Services Association, Energy UK and the Finance and Leasing Association (FLA) sit on the Trust's Funding Model Working Party

March 2018

[Self-negotiators: the experiences of people in debt who negotiate with their creditors](#)

November 2017

[Stop The Knock 2017](#)

November 2016

[Borrowed Years](#)

Money Advice Service

[Consultation - A strategic approach to Debt Commissioning Services 2018-2023](#)

[\(DASG\) supports Peter Wyman's Independent Review of Debt Advice Funding](#)

Publications include:

April 2018

[On the front foot: developing financial capability propositions to support the debt advice journey](#)

January 2018

[Peter Wyman Review of Debt Advice Funding](#)

[Debt Solutions in the UK: Recommendations for Change](#)

[The Economic Impact of Debt Advice](#)

December 2017

[A strategic approach to debt advice commissioning 2018-2023](#)

[Better Debt Advice](#)

[The Equalities Impact Assessment for 'A strategic approach to debt advice commissioning 2018-2023](#)

October 2017

[Pensions and Debt Advice](#)

[Making Advice Work programme \(stream 3\)](#)

[2016 outcome evaluation of debt advice funded by Money Advice Service](#)

September 2017

[An unavoidable challenge? Repeat Clients in the Debt Advice Sector](#)

[Over indebtedness in the UK - 2017 statistics](#)

[How to use behavioral science to increase the uptake of debt advice](#)

[Independent Review of the funding of debt advice](#)

July 2017

[Opportunities and challenges in the debt advice sector today](#)

[Creditor toolkit: Working collaboratively with debt advice agencies](#)

June 2017

[Symptoms of problem debt: June 2017](#)

[Journey into debt - Sudden Crisis](#)

[Journey into debt - Unstoppable Slide](#)

February 2017

[Peer Support](#)

[Peer Support Workshop Presentation](#)

[SFS Workshop Presentation](#)

March 2016

[A Picture of Over-Indebtedness](#)

[A Picture of Over-Indebtedness \(technical report\)](#)

Research includes:

April 2018

[Children and Young People and Financial Capability: Needs Analysis](#)

[Children and Young People Financial Capability Deep Dive: Vulnerability](#)

[Children and Young People Financial Capability Deep Dive: Parenting](#)

[Children and Young People Financial Capability Deep Dives Technical Report](#)

[Measuring Financial Capability in Children and Young People: What drives financial behaviour?](#)

[Measuring Financial Capability in Children and Young People: What drives financial behaviour? Technical Appendices](#)

[Vulnerable Children and Young People and Financial Capability: Literature Review](#)

[On the front foot: developing financial capability propositions to support the debt advice journey](#)

January 2018

[Peter Wyman Review of Debt Advice Funding](#)

[Young Adults and Money Management: behaviours, attitudes and useful rules of thumb](#)

[Debt Solutions in the UK: Recommendations for Change](#)

[The Economic Impact of Debt Advice](#)

December 2017

[Better Debt Advice](#)

November 2017

[The Financial Capability of Children & Young People and their Parents 2016 – Scotland](#)

[The journey from childhood skills to adult financial capability – analysis of the 1970 British Cohort Study](#)

[The journey from childhood skills to adult financial capability – Technical Appendix](#)

[Right Place, Right Time – Helping people with their finances when they need it most \(UK Wide\)](#)

[Numeracy and Financial Capability - Exploring the links](#)

[Adult numeracy and financial capability - a summary](#)

Numeracy and Financial Capability Technical documents

[Numeracy literature review](#)

[The Money Advice Service Numeracy Deep Dive](#)

[Modelling the impact of numeracy on financial capability](#)

October 2017

[2016 outcome evaluation of debt advice funded by Money Advice Service](#)

September 2017

[Rules of Thumb Evidence Review](#)

March 2017

[The Financial Capability of Children, Young People and their Parents in the UK - Technical Report](#)

Money and Mental Health Policy Institute

Founded and chaired by Martin Lewis OBE and run by former No. 10 special advisor Polly Mackenzie, the aim of the institute is to research, investigate and lobby for change on mental health issues and debt.

[Informal Borrowing and Mental Health Problems](#)

[Social Housing, Rent Arrears and Mental Health](#)

[Minimising financial harm caused by mental health crisis](#)

[How regulators can support consumers with mental health problems](#)

[Whose job is it anyway? - Integrating debt advice into mental health settings](#)

[The Shopper Stopper - people with mental health problems spend more when they're unwell](#)

[How fintech can support supporting financial management during periods of poor mental health](#)

[Money worries at work and how they influence performance](#)

[The Money and Mental Health Manifesto](#)

National Debt Line

Website advice sources:

[Debt Topics](#)

[Dealing with your debts](#)

Oxford Economics/ National Centre for Social Research

[Sainsbury's Living well index - Page 7 Parents' Money and Debt Worries](#)

Payplan

As well as being a provider, Payplan also provides help on debt and health and signposts to other organisations who can provide help such as the Samaritans, Citizens Advice, and also list disability benefits to which people may be eligible.

[Debt and your health](#)

[Debt and Stress](#)

Refugee Survival Trust

[Destitution Grants 2010-2018](#)

SAMH

[Debt and Mental Health](#)

Scottish Government News

March 2018

[£200 million repaid through debt arrangement scheme](#)

April 2017

[Drop in Scots accessing debt solutions](#)

January 2017

[Debt solutions in Scotland hold steady](#)

Shelter Scotland

[Dealing with Debt](#)

[Budgeting](#)

StepChange

StepChange are undertaking [policy campaigns](#) including:

- campaigning for the government to introduce a '[Breathing Space](#)' scheme to help people in problem debt;
- calling on government and banks to do more to provide a [savings boost](#) to struggling families;
- wanting to see an alternative supply of [affordable credit](#) for those that struggle to access commercial credit.

In addition, StepChange provide [briefings](#) for MPs, peers and MSPs, work with the All Party Parliamentary Group on Debt and Personal Finance ([APPG](#)), and lobby government on our evidence-led campaigns. They also provide practical resources so MPs can work with us to make a real difference to constituents' lives.

Their website has a useful [map](#) which shows local data and detailed debt statistics.

[Debt research](#) includes:

May 2018

[Scotland in the Red 2017](#)

May 2018

[Behind on the Basics](#)

March 2018

[Personal Debt Statistics Yearbook](#)

[Affordable alternatives to high cost credit](#)

December 2017

[Stuck in the red: Millions can't get out of their overdrafts](#)

September 2017

[The problems of third party deductions](#)

July 2017

[The high cost of credit: The need for more affordable alternatives to high cost credit](#)

May 2017

[DAS survey results: 2017](#)

October 2016

[DAS survey results: 2017](#)

UK Finance

UK Finance represents nearly 300 of the leading firms providing finance, banking, markets and payments-related services in or from the UK. UK Finance has been created by combining most of the activities of the Asset Based Finance Association, the British Bankers' Association, the Council of Mortgage Lenders, Financial Fraud Action UK, Payments UK and the UK Cards Association

2018

[Conduct, Risk and Culture Academy](#)

[Household Finance Update April 2018](#)

[Scotland re-mortgages at seven year high](#)

[Numeracy - the biggest hidden customer vulnerability](#)

<https://www.numeracyday.com/>

2017

[Home Ownership Safety Net](#)

[University of Bristol \(Personal Finance Research Centre\), Finance & Leasing Association, and The UK Cards Association](#)

[Vulnerability - A Guide for Debt Collection](#)

Welfare Conditionality, Department of Social Policy & Social Work,
University of York

[Final findings of the Welfare Conditionality project \(2013-2018\)](#)

World Bank

<http://www.worldbank.org/en/topic/debt/research>

Appendix B: Internet Search

An interesting (and worrying) aspect of conducting this search was that when you enter the search term “Debt Advice” in both Google and Bing, you are immediately met with four “paid for” [Ads](#). These [Ads](#), by nature, advertise goods and services which are not normally free.

- personaldebt.kpmg.co.uk/scotland/debt-advice
- www.moneyadvisor.co.uk/Debt-Help/Scotland
- www.changingsteps.co.uk/Step-To/Change-Free
- www.debt-help.scot/

Unless someone is “tech-savvy”, this means that people with debt/problem debt could potentially pay for services which are widely available free of charge. These [Ads](#) do change every time you start a search and are only examples.

The KMPG site advises that if an individual has unsecured debts of £4,000 or more, then they can help. If you scroll down to the bottom of the page you see the name of the Insolvency Practitioner providing the service, but there is no link provided to the free government Money Advice Service.

www.moneyadvisor.co.uk – This site advertises if you have debts of £5,000 or more that they can help. It is unclear initially from this website that this is a “paid for” service. It is only when you scroll right down to the bottom of the page that you see that “Money Advisor Limited are an Appointed Representative of Michael Alan Ltd... we offer our customers no-obligation referrals to trusted providers of appropriate solutions and receive a fee from these providers if customers agree to these solutions”. This organisation uses the logo of the Money Advice Service, but the print is so small, and is below a reference to “Our experienced advisors” that some users may assume that *moneyadvisor* is part of the Money Advice Service.

www.changingsteps.co.uk The name of this site is so alike to *Step Change*, it could easily be mistaken for same. They are upfront that this is a referral service but, again, it’s not until you scroll right to the bottom of the page, that a user can see that there would be a charge for referral.

It advises that “Free and Impartial Debt Advice is Also Available From: [Money Advice Service](#)”, but this is so far down the page, that users may miss it.

Scottish Charity Register⁴²

There are some 3,867 organisations registered with OSCR whose purposes include *the Prevention or Relief of Poverty*, with 255 stating their sole purposes as same.

Of these 255 organisations, 250 provide this service either within Scotland or the wider UK.

Interestingly, only 6 organisations of the 3,867 state *Debt Advice* within their objectives, with the majority of these organisations not only providing debt advice, but other services in combination. These are:

- Brooksbank Centre & Services, Dundee;
- Community Money Advice Ltd, Leicestershire;
- Debt Support Trust Ltd, Glasgow;
- Scottish Welfare Support and Advice Network, Glasgow;
- Restoration Renfrew, Renfrew; and
- The Wheatley Foundation Limited, Glasgow.

Brooksbank Centre & Services

As well as providing debt advice, Brooksbank provides other services including Financial inclusion advice, Free internet access, Access to free legal advice, Child safety equipment loan for low income households, Toy library loan for low income households, Arts and crafts group, 50+ social group, Carpet bowling, keep fit, Youth groups. Brooksbank Money Advice Section has an online Facebook presence but no website.

⁴² © Crown Copyright and database right [2018]. Contains information from the Scottish Charity Register supplied by the Office of the Scottish Charity Regulator and licensed under the Open Government Licence v.2.0

Community Money Advice Scotland (part of Community Money Advice)

This organisation provides debt advice and training to community groups and non-profit making organisations in order for them to assist individuals who have been affected by debt.

Debt Support Trust Ltd

As well as providing free unbiased debt advice, the Debt Support Trust promotes research into financial hardship releasing the information in the public interest with the objective of minimising the personal debt problem in the future; and educates people about financial planning in order to relieve financial hardship and reduce future personal debt problems through face to face seminars and training.

Scottish Welfare Support and Advice Network

SWSAN aims to advance/further the prevention or relief of poverty through the provision of money and debt advice, benefit check-ups, the negotiation of and administration of debt repayment plans for clients in debt and the running of educational outreach programmes to highlight the causes of and the wider implications of poverty and financial hardship.

In furtherance of this aim, SWSAN is also developing working relationships with food banks, furniture re-use schemes, social landlords and other charities and CVS groups with similar aims and objectives so as to provide a holistic and joined up approach to serving the needs of its clients and those in need. In addition, SWSAN:

- aims to advance/further the relief of those in need by reason of age, ill-health, disability, financial hardship or other disadvantage by/through offering , primarily, an online advice service covering a range of issues including welfare rights, housing, employment, consumer rights, debt, tribunal preparation and representation and the access to statutory services (SWSAN acts as a grant intermediary in this respect and applies for and manages grants for clients in crisis who qualify and meet the objectives of the individual grant giving body applied to); and will extend their advice giving reach and aim to develop drop-in surgeries with the assistance and cooperation of our other charitable partners in furtherance of this aim.

They are also working on identifying and developing social policy issues or other purposes which they deem analogous to any of the preceding purposes.

Restoration Renfrew

Restoration Renfrew states amongst its purposes the prevention or relief of poverty and disadvantage that result from debt, unemployment, addictions, marital and partnership breakdown by offering:

- classes on money management and debt advice;
- support, training, advice and access to work placement opportunities (paid and volunteer), including training in work skills, CV writing and preparation for interviews to improve employment prospects; and
- assistance and support for release from harmful habits and addictions.

It also aims to advance education by providing support for families; to advance religion by offering Spiritual and Emotional support; to provide recreational facilities or the organisation of recreational activities which will help to relieve the sense of worthlessness caused by idleness; to provide relief of those in need by reason of age, ill-health, disability, financial hardship or other disadvantage by combating these causes of isolation and exclusion.

The Wheatley Foundation Limited

The Company's objects are as follows:

- to relieve those who are in need by reason of financial hardship, ill health, disability or other disadvantage (whether as a consequence of changes in welfare provision or otherwise; and including, without limitation, those who may be at risk of homelessness) by providing them with financial assistance and/or referring them for support (with the Company reimbursing the relevant organisation/agency, where the directors consider that appropriate, in respect of all or part of the cost of such support) to organisations and/or agencies external to the Group, including (where appropriate) those who provide money advice, debt advice, advice on welfare rights, social work support, food banks/food parcels or assistance with meeting energy costs;

- to relieve unemployment by providing financial assistance to individuals who are in a state of poverty to enable them to access educational, training and/or work experience opportunities which will increase their prospects for obtaining paid employment;
- to prevent and/or relieve poverty, advance education, advance the arts, advance health, advance citizenship and community development, advance public participation in sport, advance environmental protection or improvement and/or relieve those who are in need by reason of financial hardship, ill health, disability or other disadvantage, by developing, supporting (whether financially and/or through assisting with funding applications and/or by other means), co-ordinating and/or delivering a range of programmes and initiatives directed towards one or more of those aims; in each case, to the extent that this would (a) promote or improve the economic, social or environmental well-being of those occupying the houses provided or managed by organisations within the Group (either alone, or along with other people) or (ii) promote or improve the economic, social or environmental well-being of the areas in which houses are provided by the organisation.

Appendix C: Stakeholders Consulted

Consultees Organisations:

- Improvement Service
- Scottish Legal Aid Board (SLAB)
- Citizens Advice Scotland
- Cemvo Scotland
- Money Advice Scotland
- Money Advice Service
- Scotcash
- COSLA