



Citizens Advice Scotland

Response to the Accountant in Bankruptcy
Diligence Review Consultation 2016

November 2016

Summary

As a general improvement to diligences CAS would like to see a set of pre-action requirements introduced into the process for public sector creditors to show that all reasonable attempts have been made to come to an arrangement prior to taking recovery action, and to ensure that using diligence is used as a last resort. The pre-action requirements should have a strong emphasis on:

- ensuring the debtor has been offered free independent debt advice
- not employing diligence where debtors or their representatives are making an effort to make repayment or to come to a repayment arrangement
- not employing diligence where the debt or the amount owed is disputed and enquiries have not yet been resolved (this is a particular issue with council tax summary warrants)
- not carrying out diligences on benefit dependent debtors, such as a funds arrestment on a bank account, where benefits are the debtor's sole source of income
- not using a secondary diligence where one is already in place e.g. carrying out a funds arrestment where an earnings arrestment is already in force

CAS would also like to see the development of a condensed, single page, plain English document to accompany the current debt advice and information package booklet. Such a summary sheet may be more accessible to the debtor, and could have a clear message that the debtor should seek advice.

Introduction

General comments on the consultation

- 1.1 Citizens Advice Scotland (CAS), our 61 member bureaux, and our consumer helpline together form Scotland's largest independent advice network. In 2015/16 the Scottish Citizens Advice Service helped over 310,000 clients living in Scotland with over 910,000 pieces of advice. During the same period, the Scottish zone of CAS's self-help website received 4 million unique page views¹.
- 1.2 CAS uses evidence from the Citizens Advice Bureau network across Scotland (CAB network), alongside further research, to challenge, influence, and shape public policy. CAS looks to ensure that the needs of our clients – the people of Scotland – are fully considered in policy decisions. CAS therefore welcomes the Accountant in Bankruptcy (AiB) consultation on their Diligence Review 2016, and the opportunity to respond to it.
- 1.3 On a daily basis the CAB network in Scotland advises clients who are experiencing financial difficulties, who are in debt, and who may be subject to creditors taking formal enforcement action against them. At the same time, the CAB network also advises clients who themselves are creditors, and who may need to resort to diligence to enforce their legal rights, for example an Employment Tribunal award or a Small Claims decree.
- 1.4 As an organisation which offers debt advice to debtors, employment advice to employees, and in-court advice to both creditors and debtors, it is difficult to address questions about the effectiveness of diligences. What may be effective for a creditor or Sheriff Officer can be harsh and upsetting for a debtor on the receiving end of the enforcement action. The effects on debtors can also be difficult to quantify.
- 1.5 Accordingly, CAS has sought to frame our response to questions around the effectiveness of diligences in terms of whether the diligence drove people to seek advice from the Scottish Citizen Advice Service. It is acknowledged that this is an imperfect means of measuring the effectiveness of diligences. It is arguable that if the system of enforcement was 100% clear, self-explanatory, and effective then creditors and debtors would generally not need to seek advice. In the Service's experience however, generally it is positive when people take advice about their rights around enforcement. The number of people who receive advice about enforcement can therefore be a good indicator of where diligences may be functioning reasonably effectively.
- 1.6 CAS has not responded to the consultation questions which are phrased as follows:

¹ <http://www.cas.org.uk/about-us/scottish-citizens-advice-network-statistics>

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“Would you use [insert diligence] in its current form to recover debt?” and “If you answered “No” to the above, why not?”

This is for similar reasons to those which led CAS to take the described approach to our interpretation of effectiveness. Some of our creditor clients may choose to use a diligence that our equivalent debtor clients may feel disproportionately negatively affected by. CAS has therefore chosen not to respond to these questions.

- 1.7 In sections of the consultation text there are references to feedback from Sheriff Officers and Messengers at Arms about particular diligences. It would have been helpful to have had some more detail around this feedback, firstly for transparency reasons, and secondly to allow these bodies’ perspectives to be better understood.
- 1.8 In certain areas of the consultation the wording of the questions are fairly prescriptive. Accordingly, at sections throughout this response, CAS has provided general commentary where there are related issues to be discussed, or where we have sought to provide fuller justification to our response to a yes/no question.

Background statistics on debt and enforcement advice

- 1.9 In 2015/16 the Scottish Citizens Advice Service provided 206,369 pieces of debt advice to clients. 11,625 pieces of this advice related directly to enforcement action.

Advice on enforcement action relating to debt	
Debt; Arrears - council tax, community charge; Enforcement action	6,859
Debt; Arrears - water and sewerage (council tax billing); Enforcement action	326
Debt; Arrears - hire purchase; Enforcement action	161
Debt; Arrears - maintenance and child support; Enforcement action	111
Debt; Bank and building society overdrafts; Enforcement action	312
Debt; Catalogue and mail order debts; Enforcement action	367
Debt; Court fines; Enforcement action	190
Debt; Court fines; Liaison with court fine enforcement officers	78
Debt; Credit, store and charge card debts; Enforcement action	884
Debt; Factor charges; Enforcement action	72
Debt; Fuel debts - non regulated (coal, natural gas, oil etc.); Court claim + enforcement	20

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Debt; Fuel debts - regulated (gas, electricity); Court claim + enforcement	97
Debt; Overpayments of Housing and Council Tax Benefits; Enforcement action	267
Debt; Overpayments of IS, JSA and / or ESA; Enforcement action	158
Debt; Overpayments of WTC and / or CTC; Enforcement action	275
Debt; Payday loan debts; Enforcement action	141
Debt; Social Fund debts; Enforcement action	126
Debt; Telephone debts; Court claim + enforcement	19
Debt; Telephone debts; Enforcement action	281
Debt; Unsecured personal loan debts (except payday loans); Enforcement action	881
Total	11,625

(Table 1)

- 1.9 A further 4,011 pieces of this debt advice related to deductions being taken from clients income.

Advice on deductions taken from clients income due to debt	
Debt; Arrears - council tax, community charge; Direct deductions from benefits	1,320
Debt; Arrears - water and sewerage (council tax billing); Direct deductions from benefits	190
Debt; Arrears - maintenance and child support; Direct deductions from benefit	18
Debt; Arrears - rent: LA; Direct deductions from benefit	323
Debt; Arrears - rent: private landlord; Direct deductions from benefit	26
Debt; Arrears - rent: registered social landlords; Direct deductions from benefit	173
Debt; Court fines; Direct deductions from benefit	57
Debt; Fuel debts - non regulated (coal, natural gas, oil etc.); Direct deductions from benefits	4
Debt; Fuel debts - regulated (gas, electricity); Direct deductions from benefits	219
Debt; Overpayments of Housing and Council Tax Benefits; Deductions from ongoing award	712
Debt; Overpayments of IS, JSA and / or ESA; Deductions from ongoing award	334
Debt; Overpayments of WTC and / or CTC; Deductions from ongoing award	316
Debt; Social Fund debts; Deductions from ongoing award	319

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Total	4,011
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(Table 2)

1.10 The Citizens Advice Service in Scotland also provided clients who were creditors with advice². These areas include the enforcement of Employment Tribunal awards, Small Claims and Summary Cause decrees, and Child Support awards.

Other advice on enforcement of awards, decrees, and fines	
Employment; Employment tribunals and appeals; Enforcement of award	209
Legal; Court - Sheriff: ordinary cause proceedings; Claimant enforcing a judgement	86
Legal; Court - Sheriff: small claims proceedings; Claimant enforcing a judgement	383
Legal; Court - Sheriff: summary cause proceedings; Claimant enforcing a judgement	168
Legal; Court - Sheriff: summary application; Claimant enforcing a judgement	35
Relationship; Child Support: non-resident parent + family pre 2012 cases; Enforcement	118
Relationship; Child Support: non-resident parent + family post 2012 cases; Enforcement	242
Relationship; Child Support: resident parent + family pre 2012 cases; Enforcement	37
Relationship; Child Support: resident parent + family post 2012 cases; Enforcement	161
Travel, transport and holidays; Parking; Enforcement methods + techniques	1,593
Total	3,032

(Table 3)

1.11 In addition to advice given directly on enforcement action, 3,803 pieces of advice were given in 2015/16 on summary warrants for Council Tax arrears. It should be noted that public sector diligence is generally increasing as an area of advice in bureaux. For example, enforcement action for Council Tax arrears increased by 5% in 2015/16 compared to the previous year, while Summary Warrant issues increased by 8% in the same period. Similarly, deductions from benefits have generally increased, with deductions for

² The advice statistics contained within Table 3 are indicative of the number of pieces of advice given to creditors in these areas. Advice provided to debtors in these areas would be more likely to be recorded under the statistics found within Tables 1 and 2.

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Housing Benefit/Council Tax Benefit overpayments increasing by 12%.
Although not a diligence in itself, it is also worth noting that cases relating to
eviction for rent arrears increased by 15% in 2015/16.

Exceptional Attachment

Effective?

- 2.1 No, CAS does not consider exceptional attachment in its current form to be an effective diligence. Due to its exceptional nature it only drives a small number of debtors to seek advice to deal with their debt situation, and CAS is unaware of it being widely used as an enforcement option.
- 2.2 Our clients are particularly fearful of this diligence as they relate it to bailiff activities in England and Wales. For most of our clients it would be a punitive and harsh intrusion into their homes for very little return. Given the low auction value of most household items it is difficult to see how this could be effectively used against many low or even middle income debtors.

Necessary improvements?

- 2.3 CAS would like to see the 7 day period for release of an article extended to at least 28 days to enable debtors to obtain advice about their situation. We would also like to see the aggregate value for items of sentimental value, which are exempted from attachment, to be increased from the current £150³, as this has not been reviewed for some time. Under Bankruptcy and Diligence etc. (Scotland) Act 2007 the exempted value for attachment of a vehicle was increased by a factor of three – from £1,000 to £3,000. A similar factor could be applied for re-evaluating the value of exempted sentimental items, making perhaps a more reasonable limit of £450.

Adjudication for Debt

Should adjudication for debt be abolished?

- 3.1 Yes, adjudication for debt is a hangover from more severe forms of diligences used in the past, and it does not have a place in our present day diligence system. It gives preference over other creditors and allows for a disproportionate outcome for those who cannot pay off what was originally an unsecured debt.
- 3.2 Although to the knowledge of CAS this form of diligence is rarely used, it was used by a state owned bank to recover relatively small consumer debts in 2008/9 to the significant detriment of those consumers. It should be abolished at the earliest opportunity to prevent any similar disproportionate enforcement from happening again.

³ s. 52(2) Debt Arrangement and Attachment (Scotland) Act 2002

Inhibition

Effective?

- 4.1 Yes, inhibition is effective in bringing debtors to seek advice from the Scottish Citizens Advice service.

Necessary improvements?

- 4.2 CAS is concerned about statutory interest accruing on debt where there is an inhibition, as this form of diligence is passive and does not secure payment. If left long enough the debt may become unpayable, resulting in sequestration. CAS would also suggest that the statutory interest rate is reviewed as part of this consultation process, as it has been significantly higher than base rates since the financial crisis began in 2008.

An inhibition prevents the debtor from entering into any dealings with their heritable property for a period of 5 years, after which time, the inhibition has no effect. Do you agree that 5 years is an appropriate period for an inhibition?

- 4.3 Yes, the inhibition should be renewed every five years to remind the debtor to do something about it and for the creditor to check whether the client's circumstances have changed and further payment is now possible.

Should inhibition be a diligence option after securing a summary warrant?

- 4.4 No. Most of the clients seeking advice from the Scottish Citizens Advice Service about summary warrants relate to council tax arrears. Non-payers of council tax are just as likely to accrue inhibitions that they don't pay. More active means of recovery are better for local authorities and debtors to prompt them to get on top of their debts and not leave them until the situation is unsustainable and sequestration is the only option. It is also against natural justice that a government body should be allowed to impose an inhibition on property without the debtor having had an opportunity to challenge whether the debt is owed.

Diligence on the Dependence

Effective?

- 5.1 No, diligence on the dependence is not an effective way of getting debtors to seek advice. It may be effective against debtors who may intend to abscond with the proceeds of assets, but this is relevant for a very small minority of the clients the Scottish Citizens Advice Service see, if at all.

Necessary improvements?

5.2 CAS has not identified any necessary improvements.

Do you agree that an additional copy of an arrestment schedule should be sent by recorded delivery when the arrestee is a bank or other financial institution? If you answered "No", why not?

5.3 No comment

Interim Attachment

Effective?

6.1 No, whilst interim attachment has not been effective at driving debtors to seek advice CAS acknowledges that it may potentially be effective in other ways. The potential attachment of goods would concentrate the mind of the debtor to seek advice, and from a creditor's point of view it would appear to be a cheaper option than diligence on the dependence.

Necessary improvements?

6.2 CAS has not identified any necessary improvements.

Should there be an automatic conversion from interim attachment, to attachment?

6.3 No, a non-automatic conversion allows more time for the debtor to come to an arrangement to pay their debts or seek advice before the actual attachment takes place. The debtor will hopefully be more motivated to seek advice having experienced the interim attachment.

6.4 If there was however a move to automate the conversion of interim attachment to attachment, careful consideration would need to be given to the period of time before an interim attachment was converted, and what information and opportunities are available to the debtor to allow them to avoid the conversion to attachment where possible and appropriate.

Money Attachment

Effective?

7.1 No, this diligence has not driven debtors to seek advice in any great numbers however this may be due to the particular audience it is often used against. Small businesses do not commonly seek advice from the Scottish Citizens Advice Services.

Necessary improvements?

- 7.2 CAS is concerned about a couple of issues. Firstly money attachment could interfere with payment of wages in some small businesses employing casual staff. There should be better safeguards for employee wages to ensure that problems in the business do not generate a knock on income crisis for employees.
- 7.3 Secondly, CAS believes that there should be a protection, similar to the Protected Minimum Balance (PMB), so that the business is able to continue after the money attachment has taken place. This is particularly important where a small business is operating on a hand to mouth basis, like a one person garage, hair dresser or street vendor. The numbers of these kinds of businesses have grown following the financial crisis. The Money Advice Trust carried out research in 2014 that showed that the UK has experienced the third largest percentage rise in self-employment since 2009 across the European Union. One in three business owners drew less than £100 income from their business each month, and 95 out of 104 Business Debtline clients had no savings whatsoever⁴. A money attachment could be devastating for a small business owner in this position, so a protected minimum balance is necessary.

Should the timings for executing a money attachment diligence be extended? If so, what timings do you consider are appropriate?

- 7.4 Qualified yes. The hours need to be extended to make the diligence more effective on whom it is meant to be carried out, but we would only support this if there were safeguards for employee wages and a PMB implemented as recommended above.

Should the definition of “money” for the purposes of the money attachment diligence be extended to include the attachment of debit and credit card counterfoils?

- 7.5 Qualified no. CAS are concerned that this option may cause difficulties unless it is researched and considered in more depth first. The business agreement with the merchant services provider (provider of the card machine) may not allow for the attachment of debit and credit counterfoils.
- 7.6 If this option is to be looked at it would presumably need to be with the permission of the merchant services providers, otherwise businesses affected may lose the benefit of the card machine due to breaking contractual terms.

⁴ Money Advice Trust, The Cost of Doing Business – Supporting the self-employed and small businesses (2014), available to download from:

http://www.moneyadvicetrust.org/SiteCollectionDocuments/Research%20and%20reports/MAT_BDL_COST_OF_BUS.pdf

Losing such a facility would no doubt exacerbate any money difficulties the business already had, which is not in the creditor nor debtor's interests.

- 7.7 It is also unclear if there was attachment of debit and credit card counterfoils who would assume liability if a customer proceeded with a request for a chargeback or a claim under section 75 of the Consumer Credit Act. Such consumers would need to be fully protected.

Diligence against earnings

Effective?

- 8.1 Yes, this diligence is effective in bringing debtors in to bureaux to seek advice, and in some cases it is the best option for the debtors in terms of an affordable arrangement to repay their debts.

Necessary improvements?

- 8.2 Since the original legislation came into force there have been developments with the various government child support agencies and the Department for Work and Pensions being able to take deductions in addition to the earnings arrestment. In some cases this leaves debtors with very little to live on and no incentive to continue working. CAS feels that some effort should be made to better consolidate the earnings arrestment, direct earnings attachment and deduction from earnings orders so that the debtor has one affordable deduction. This may involve conjoining the deductions. We would suggest that a debtor should not be left with less than living wage for the hours worked, due to deductions.

In relation to Conjoined Arrestment Orders, should there be a minimum amount of earnings recovered before employers are required to pay the earnings collected to the sheriff clerk? For example, where £4 is being arrested from an employee each week and a minimum threshold of £20 is in place, an employer would send payment to the sheriff clerk after 5 weekly collections. If you answered "Yes", what should the threshold be?

- 8.3 No comment.

Should funds collected through payroll deduction be batched and sent electronically?

- 8.4 No comment.

Should there be a defined timeframe for an employer to advise if an earnings arrestment has been successful? If you answered "Yes", what do you consider is an appropriate timescale?

8.5 No comment.

Arrestment in execution and action of forthcoming

Effective?

- 9.1 Yes, fund arrestment on bank accounts are very effective in driving debtors to seek advice, however they are often very distressing and many of the enquiries brought by such clients to the Scottish Citizens Advice Service concern scenarios where benefits have been arrested in their bank accounts.
- 9.2 The Service also occasionally receives enquiries from tenants who have been asked to arrest rent payments due to their landlords. Generally tenants are unaware of how to handle such requests, and CAS is concerned that it is potentially easy for them to make a mistake which they could be held liable for.

Necessary improvements?

- 9.3 Better protection for benefits only debtors is required as the Protected Minimum Balance (PMB) is not always enough to protect them. For example, the arrestment of a backdate of benefits paid into a bank account could have devastating consequences for somebody needing to pay for care needs or purchase specialised equipment and adaptations. Furthermore when universal credit is finally implemented rent will be paid into tenants' bank accounts as part of their UC payment, potentially taking benefits only debtors over the PMB and making them vulnerable to arrestment.
- 9.4 Sheriff Principal Kearney's decision in *North Lanarkshire Council v Shirley Crossan & Airdrie Savings Bank 2008*⁵ should be regarded as a precedent in this respect and made part of any legislation. If the sole source of the debtor's income is benefits, and these are clearly identifiable in the bank account, then these should not be arrested.
- 9.5 To extend this, where it has not been reasonable or possible for the creditor to identify that a debtors sole source of income is benefits, and an arrestment proceeds, the debtor should have a clear and accessible right to challenge the diligence by showing the income attached is from benefits.
- 9.6 Finally, to address the concerns highlighted at paragraph 9.2, non-professional arrestees such as tenants, should be removed from the scope of the legislation.

⁵ North Lanarkshire Council v Shirley Crossan & Airdrie Savings Bank, unreported, Airdrie Sheriff Court 2nd May 2008 see: <http://www.govanlc.com/nlc-crossan-judgment.pdf>

Should an arrestee have to respond to the arrestment where no funds are attached?

- 9.7 Qualified yes. This is okay for a bank or equivalent arrestee, however where rent has been arrested in the hands of a tenant there is often confusion around the requirements placed on the tenant. For this reason, non-professional arrestees such as tenants should be excluded from the scope of the legislation.

Should an additional copy of an arrestment schedule should be sent by recorded delivery when the arrestee is a bank or other financial institution? If you answered "No", why not?

- 9.7 No comment.

Landlord's hypothec

- 10.1 CAS are not aware of any debtors contacting a bureau for advice on this matter, and accordingly CAS has not identified any necessary improvements.

Maills and duties

Do you agree that maills and duties should be abolished?

- 11.1 Yes, CAS supports the abolition of this rarely used diligence.

Admiralty actions and arrestment of ships

- 12.1 CAS are not aware of any debtors approaching our services for help as a result of an admiralty action or arrestment of ships, and accordingly no comment is provided on the effectiveness or any identified necessary improvements.

Actions for removing from heritable property

Effective?

- 13.1 Yes, the pre-action requirements, court paperwork and charge for removing are all effective drivers for debtors to seek advice and for that reason are effective. However, there are still a number of debtors who do not seek advice

despite the number of documents given and more work needs to be done to find ways to engage with these tenants and homeowners.

Necessary improvements?

13.2 CAS has concerns that tenants do not always understand the documents they are given as part of the eviction or repossession process, due to the legal language used. Experience from other sectors would indicate that most people will act on simple and short documents in plain English telling them exactly how to take action. We would therefore recommend a simplified but specific housing DAIP constituting no more than a single page, with a strong emphasis on taking advice immediately.

Should regulations prescribe how effects left at a property after an ejection are to be disposed of?

13.3 Yes, a disposal process in regulation would provide clarity to all parties in the process.

Should regulations prescribe the timescale for the disposal of effects after an ejection?

13.4 Yes, to provide clarity to all parties in the process.

What do you consider to be a reasonable timescale for disposal of effects left in a property after an ejection?

13.5 CAS would recommend no less than 28 days, to give debtors time to seek advice and support.

Summary warrants (time to pay and charges to pay)

Effective?

14.1 Yes, summary warrants are an effective driver for debtors to seek advice.

Necessary improvements?

14.2 None identified.

Should summary warrants contain authority to execute an inhibition?

14.3 No, for reasons explained above under Inhibition, CAS does not want to see debtors building up council tax inhibitions on property, as the inhibition would not secure funds. It is a passive form of diligence, and would allow the debt to

continue to go unpaid until the situation is no longer viable. This could lead to the debtor being sequestered.

- 14.4 Whilst inhibition could be used as an alternative to sequestration in some cases (for example where the debtor is in ill health and sequestration would be unduly harsh) CAS believes the creditor obtaining a Decree in these circumstances is sufficient for the purpose of making the debtor see the seriousness of their situation. In addition, for reasons of natural justice, there should be an opportunity for a debtor to object to any diligence against their property through a Court process.

Should charges to pay contain details of multiple summary warrants incurred by the same debtor?

- 14.5 Yes, this measure would provide clarity to the debtor.

Land Attachment

Given that land attachment was intended to replace adjudication for debt, is there a need for something that operates like adjudication for debt?

- 15.1 No, CAS opposed land attachment in the original Bankruptcy and Diligence etc (Scotland) Act 2007 and our position remains unchanged. No creditor should have the power to force the sale of a debtor's property for an unsecured debt. Apart from removing the risk from the creditor to lend unsecured funds responsibly to property owners, it would also force creditors to act with less forbearance in order to be the first to secure their position. Neither of these outcomes are desirable or welcome.

Disclosure of Information

- 16.1 CAS has chosen to provide no comment regarding the disclosure of information that may be required to facilitate diligence. There are clients of the Scottish Citizens Advice Service that have difficulties enforcing their rights, such as Employment Tribunal awards. It is unclear however whether such provisions are likely to improve those client's chances of successfully enforcing their awards, given the debtor cannot be ordered to disclose information.

Residual attachment

Is there a need for residual attachment, in its proposed form?

17.1 No

Do you consider that there is a need for changes to residual attachment before being implemented? If you answered "Yes", what changes do you consider are necessary?

17.2 No comment

Diligence statistics

Do you find the diligence statistics helpful in their current format?

18.1 Yes

Is there anything that you would like to see incorporated into the diligence statistics? If you answered "Yes", what would you like to see?

18.2 CAS would welcome local authority level data on diligences, rather than the statistics relating to sheriffdoms which are too high level and not easily compared.

18.3 CAS would also welcome statistics on effectiveness of the diligences. If information was available about the sums recovered via the diligences this would help inform how various diligences are being used by creditors and whether they appear to be effective.

Debt advice and information package

Do you consider the issuing of a DAIP to debtors to be effective?

19.1 No, it is not clear that these are always being issued when they should be by creditors, or whether debtors understand the significance of them when they are issued. CAS would recommend the development of a condensed, single page, plain English document to accompany the current DAIP booklet.

- 19.2 The summary sheet should focus on recommending that the debtor should take advice as soon as possible. If more debtors are encouraged to take advice then they will be more informed about insolvency options and methods of enforcement. In addition however they will also benefit from the adviser being able to support them to defend against the diligence and provide assistance with an application for DAS where appropriate. This would be a win-win for both debtors and creditors, producing repayment without the crisis and ill-feeling arising from the use of diligence.

Have you identified anything that would improve the process of issuing the DAIP, or have you identified anything that could be incorporated into the DAIP which would help debtors? If you answered "Yes", what have you identified that would help?

- 19.3 See above comments.

APPENDIX – Respondent Information Form

Organisation

Citizens Advice Scotland

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Sector

Advice Sector

Permissions

CAS agrees to have the content of this response made publicly available.

CAS is content for the AiB or any other Scottish Government policy team to contact our organisation in the future in relation to this consultation.