

# **A Debt Advice Routemap for Scotland**

**December 2019**



## Ministerial Foreword

On 1 January 2019, with the support of Scotland's free debt advice sector, the Scottish Government took responsibility for overseeing levy funding to support free debt advice in Scotland. This represents only a small portion of the total money spent on free debt advice each year – likely around £4 million annually, under the current settlement – and it does not represent new money for advice provision. However, it means that for the first time, the Scottish Government will be able to shape how the money is spent.

I want to make sure what we do with that money makes a real difference. Problem debt can increase stress, put strain on families and friendships, exacerbate poverty, and, in the most serious cases, result in people being evicted from their homes. And often, it affects those who are already struggling – such as people with mental health issues or low incomes.

Intervention at an early stage can help mitigate many of these outcomes, and yet evidence consistently shows that people delay getting help, out of either fear or uncertainty over where to turn. Even so, advice providers struggle to meet demand for debt advice, or to ensure that those who seek it always get the help they need when they need it.

The levy funding devolved in January cannot alone resolve these issues. However, the Scottish Government has listened to the feedback of those who best understand the challenges of providing free debt advice, and we will work with the advice sector to ensure that the levy complements and builds on what already works, and targets areas where we have been told change is needed.

In doing so, we also recognise that problem debt often occurs alongside other issues, such as housing, low incomes and family breakdown. Although this routemap is focused on debt advice, we will not consider the issue in isolation, and will work to design integrated solutions and to use learning from the levy funding projects to influence Scottish Government policy across wider advice services.

Our first step was to form the Tackling Problem Debt Group (TPDG), to ensure our interventions are informed by real-world expertise. Their recommendations underpin this routemap. I am grateful to all who gave their time, and to those stakeholders from the sector who have attended events or spoken with us privately. The passion and dedication of those who work to provide free debt advice is our greatest asset.

This routemap sets out our ambition, and a commitment to undertake the hard work needed to deliver it in genuine partnership with those who work on the frontlines. I also acknowledge that this is only the beginning of our work – much of what is set out here recognises that there are significant challenges to overcome and does not propose specific solutions. Instead, we highlight where further work must be done, or greater involvement from advisers and funders is needed. This represents a greater chance to bring lasting change.

A handwritten signature in black ink, appearing to read 'Jamie Hepburn', with a long horizontal flourish extending to the right.

**Jamie Hepburn MSP**

Minister for Business Fair Work and Skills

## Introduction

The latest figures<sup>1</sup> show that 14.2 percent of people in Scotland are in what is known as problem debt or over-indebtedness, which is defined as people who say they find keeping up with their bills and credit commitments a ‘heavy burden’, or that they have missed payments for bills and/or credit commitments in three or more of the last six months. Of these, it is estimated that around 20.5 percent will seek advice from a free debt advice provider<sup>2</sup>. In Scotland, there are a range of options for receiving this help – from national helplines to local face-to-face providers, for example in local authorities or Citizens Advice Bureaux.



Although it is difficult to be certain, there is little evidence to suggest the number of people experiencing problem debt will decline in the near future, and many of those who provide frontline advice report that numbers are increasing and will continue to do so. Even at current rates, there is clear concern from advice providers that demand for debt advice far outstrips capacity to provide it<sup>3</sup>, and that this problem is exacerbated by and a cause of low staff morale and high turnover.

Technology offers some promise of alleviating this – automating parts of the advice journey, enabling those who can to help themselves, and freeing up advisers to focus on those who need the most support. However, many of these technological advances are nascent, and financial investment and careful deployment is necessary to ensure they reach their full potential whilst keeping users at the centre of the advice journey.

It is in this context that the debt advice levy was devolved to the Scottish Parliament, and the sector have urged the Scottish Government to look afresh at how the funding is distributed.

Since 2012, the levy has been used to support UK-wide helplines, and to fund a variety of face-to-face projects. These projects were in the main part of a programme designed and administered by the Money Advice Service (since merged into the Money and Pensions Service) and the Scottish Legal Aid Board. The programme trialled innovative approaches to offering debt advice or sought to reach under-served or harder to reach populations, such as those experiencing domestic abuse.

1 <https://www.moneyadvice.org.uk/en/corporate/a-picture-of-over-indebtedness-in-the-uk>

2 [https://masassets.blob.core.windows.net/cms/files/000/000/900/original/Peter\\_Wyman\\_Review\\_of\\_Debt\\_Advice\\_Funding\\_2018.pdf](https://masassets.blob.core.windows.net/cms/files/000/000/900/original/Peter_Wyman_Review_of_Debt_Advice_Funding_2018.pdf)

3 <https://www.moneyadvice.org.uk/en/corporate/a-picture-of-over-indebtedness-in-the-uk>

Most of the projects were established as pilots, although the majority were renewed on an annual basis. They ensured support was available to some of Scotland's most vulnerable citizens, and we must now understand how the levy funding can be used to expand this support across Scotland, while responding to new financial and technological challenges.

The TPDG was established for this purpose, and brought together expertise from across the free debt advice sector, including Money Advice Scotland, Citizens Advice Scotland, COSLA, StepChange, and the Scottish Legal Aid Board. Their remit was to consider how Scotland could develop a user-centred, sustainable and collaborative free debt advice system. They sought to identify practical steps to achieve that, and acknowledged throughout that the Scottish Government is a small part of a much wider advice system. Their recommendations are predicated on this basis, and so is the Scottish Government's response.

As such, this routemap will succeed only with the support of local authorities, advice providers and funders, and we must be open to learning from their experiences and successes. As a beginning, we will hold a series of forums to test and improve the practical detail of our ideas, and we will continue this in the longer term so that collaboration is meaningful. Our plans for 2020-21 are included in the "next steps" sections below and include support for debtlines, a new programme of projects overseen by SLAB, user testing and development of a model for allocating funding in future.

### **Work so far**

- In April 2018, the TPDG was established. It met five times between then and January 2019 and published its recommendations in June 2019.
- In November 2018, the Scottish Government held a summit with over 70 representatives of the free debt advice sector.
- In January 2019, devolution of levy funding occurred with no disruption to service users and a clear commitment from the Scottish Government to continue to work in partnership with the new Money and Pensions Service, as well as the other devolved nations.
- In January 2019, the Scottish Government funded StepChange to pilot a project to increase debt advice provision, with a focus on vulnerable clients. The project was extended in April 2019. 1,201 vulnerable clients were helped over the first half of 2019.
- The Scottish Government has funded two technology pilots: a cloud-based platform enabling better integrated client journeys, and a project to increase the proportion of people in Scotland entering the advice process through digital channels. The Scottish Government has now also taken over funding a local authority-based project to pilot the provision of digital advice and develop a digital advice strategy.
- In April 2019, the Scottish Government and Scottish Legal Aid Board continued to fund and oversee 13 projects offering face-to-face and telephone debt advice, ensuring continuity of service while longer term arrangements are developed.
- The Scottish Government funded a project to increase debt advice capacity in local citizens bureaux in the period after Christmas when demand is highest.

## The vision

The Scottish Government recognises that much of what we propose is already happening to varying degrees and in varying locations across Scotland. Our aim in creating this routemap is to support this good practice, while helping to overcome some of the challenges that prevent wider adoption. We also recognise that our vision is not revolutionary – these have been the goals of funders, providers and users for many years. We have set it out here to challenge ourselves and the sector to take the steps necessary to bring that vision closer.

Our vision is for a free debt advice system that is:

- **User-centred** – free debt advice must focus on responding to the needs of those who seek it. And while quality of service and availability should, as far as practicable, be comparable across Scotland, it should reflect the differing circumstances of communities and user groups, and allow them to make choices that are right for them on how and where to seek help.
- **Collaborative** – the free debt advice sector consists of many advice providers and funders. It is important that the expertise of each is recognised, as is the value of overlapping services where these reach different communities or groups. However, we must also recognise that user needs can be well-served by more joined up services, where users can easily be referred from one provider to another. Sharing expertise can also reduce costs and workloads for advisers, leading to better morale and service provision.
- **Sustainable** – a free debt advice service must have a range and breadth of providers supported by adequate funding to allow them to survive. In turn, these advisers must have the requisite staff and expertise to provide a high quality service to support users. Both goals require investment that finds the balance between supporting immediate service needs, and developing services for the future.

The parts of this vision are integrally linked – a user-centred system requires a sustainable workforce and certainty about future funding, and a collaborative workforce is more likely to reduce staff burdens. Therefore, achieving one should support achieving the rest. Below, we set out the actions the Scottish Government will take in each area.

## A user-centred free debt advice system

Free debt advice's purpose is to improve the lives of those who seek it. As a result, our actions are all aimed in some way to improve how users find and experience free debt advice. However, the actions set out below are particularly relevant to users.

The Scottish Government also recognises that these actions alone will not develop a user-centred system. That requires a cultural shift, particularly among funders. The Scottish Government therefore commits to working with the advice providers it funds to ensure that, going forward, monitoring and evaluation takes greater account of outcomes, rather than focusing on narrow performance indicators, such as advice sessions provided or call-wait times.

### **Action 1: The Scottish Government will work to understand the needs and expectations of those with problem debt.**

The TPDG noted that, while individual programmes seek to evaluate the impact of their advice on users, it is often difficult to understand the long term impact of debt advice, or to gain a comprehensive picture of user experiences across Scotland. By definition, this work also fails to capture the experiences of those who may benefit from debt advice, but do not seek it.

A comprehensive programme of user research is vital for almost every aspect of our work to deploy levy funding – from understanding technological innovation to designing future models and interventions. It should also benefit the whole network of free debt funders and advisers so that its impact goes beyond this routemap.

We will therefore develop a programme of user-testing to understand how and why users interact with advice services, their experiences of advice provision, and expectations of outcomes after receiving advice. In developing the programme, we will build on user experience work already carried out by the sector, and will learn from other efforts, such as work to develop a new Scottish social security system. We will focus on gathering a diverse range of views to represent the population of Scotland, including those who may not traditionally engage with advice services. In particular, although user panels will be a key tool, we will explore alternative approaches to reach different audiences and ensure we capture the widest range of voices possible.

As a first step, we have funded Money Advice Scotland to undertake a user testing project to research the perception of debt advice and the client experience. The research findings will be available shortly, and will be the foundation for a longer, more in-depth analysis. This will be developed in collaboration with the sector, and, once the programme is completed, the findings will be shared.

Next steps:

- We will publish the report on the initial programme of user testing.
- We will use this to design and carry out a comprehensive programme of user testing.
- We will share findings of the programme with the wider sector and ensure they influence future advice provision and funding agreements.



## **Action 2: The Scottish Government commits to funding helpline services that reflect Scotland's specific circumstances.**

The Scottish Government currently allocates a share of levy funding to support UK-wide helplines that offer support to those in either personal or business debt. This maintains the support given to them previously by the Money Advice Service. During financial year 2018/19, 9,792 clients in Scotland were supported by levy funds.



The TPDG highlighted many benefits in remaining as part of a UK-wide system: economies of scale; intelligence sharing; and the flexibility to respond to fluctuating demand levels. However, set against this were concerns that Scotland's different debt system requires specific expertise, and that debt lines had under-developed links with the wider debt advice landscape and lower than average take-up in Scotland compared to other UK nations.

The Scottish Government recognises that there is room for improvement. Nonetheless, the current helplines are well-established and already provide invaluable support to people across Scotland. Rather than immediately build a new system and potentially add confusion for funders, advisers and users, we will work to ensure that the concerns of the sector are addressed and Scotland's needs are being met. This work will include:

- strengthening partnerships between helplines and the wider advice landscape, particularly to increase links with local authorities and third sector organisations who may not deal directly with debt advice;
- exploring how uptake of current services by Scottish users can be increased, including identifying and removing barriers;
- ensuring helpline services keep pace with technological changes, while remaining committed to accessibility for all; and
- evaluating the impacts of current helplines in Scotland following these interventions.

The launch of a bespoke service for vulnerable users in Scotland run by StepChange is an example of how Scottish needs can be delivered as part of a wider UK system, and we will build on this good practice as we go forward.

Next steps:

- We will fund and develop a marketing campaign exclusively for Scotland.
- We will hold a roundtable with helpline providers and those with sectoral expertise to better understand longer term barriers to user take-up in Scotland.
- We will ensure future agreements with helpline providers are designed to overcome these barriers, for example by encouraging better referral links.
- We will evaluate the success of the above actions in increasing lasting user take-up and integration in Scotland.

### **Action 3: The Scottish Government commits to using the levy funding to drive technological innovation.**

In keeping with the findings of the Wyman Review, the TPDG noted that technology could have a profound impact on the delivery of debt advice, and is already altering how it is provided and received. Options for seeking advice have expanded even in the last few years – video calling and chatbot, for example, are now commonly offered alongside the more traditional options of email, phone or face-to-face. More efficient mechanisms for sharing and storing data can also give users more control over their information and improve the quality of advice sessions, for example by lessening the time taken to collect complex financial information.

Evidence is mixed on current preferences of advice users. However, Money Advice Trust research on channel choice found that service users tend to use the channels offered by the service provider they first approach, which does not necessarily reflect actual preferences<sup>4</sup>. What is clear is that telephone and online support is significantly less costly than face-to-face advice. This means new technology and channel shift are a vital part of any strategy to improve value for money.

**EIGHT IN TEN**  
**CLIENTS WOULD FEEL**  
**COMFORTABLE WITH DEBT**  
**ADVICE DELIVERED BY PHONE**   
**IF THEY WERE CONFIDENT IT WAS INDEPENDENT,**  
**PROFESSIONAL AND PERSONALISED**

Nonetheless, the Scottish Government agrees with the TPDG that we should not set rigid targets for making efficiency savings or moving users from one channel to another. Instead, we must develop a system where every user can access debt advice through their channel of choice, and can switch between these as circumstances or preference require.

To achieve this, we will focus on pursuing solutions that offer real value to users and providers. In particular, we must seek to understand how users want to interact with debt advice and design solutions to match.

We recognise that individual advice providers or local funders may struggle to support trialling innovations or upscaling technology once it has proved successful, and we will use the levy funding to bridge this gap. We have already begun, through our support of Advice Direct Scotland and Money Advice Scotland projects. To ensure value for money, we will build on these kinds of partnerships, and involve organisations that have experience in delivering technological change, such as Fintech Scotland.

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<sup>4</sup> [http://www.moneyadvicetrust.org/sitecollectiondocuments/research%20and%20reports/mat\\_policis\\_channel\\_strategy\\_research\\_vol\\_2\\_channel\\_shift\\_200212.pdf](http://www.moneyadvicetrust.org/sitecollectiondocuments/research%20and%20reports/mat_policis_channel_strategy_research_vol_2_channel_shift_200212.pdf)



Next steps:

- We will ensure the findings of the user testing and workforce strategy projects inform our understanding of channel preferences and the areas best placed for innovation.
- We will include technological innovation as part of the criteria for future levy funded programmes.
- We will evaluate 2019/20 projects, sharing findings so that lessons can be learned, and upscale these projects if results are positive.

## A sustainable debt system

The TPDG noted that sustainability is driven by a variety of factors. Nonetheless, their recommendations focused on two key themes – workforce and funding – and our actions do the same.

### **Action 4: The Scottish Government commits to working with the sector to develop a workforce strategy.**

Our aim is for a workforce that is diverse, well supported, and recognised for their professionalism and expertise. The TPDG and attendees at the sectoral event on the future of free debt advice conveyed a clear message that failure to achieve this threatens the quality and quantity of debt advice. The trend of rising demand without funding to match demoralises staff. This is compounded by the relatively small size of the workforce, and its aging profile, which leaves the sector vulnerable to the loss of collective knowledge and expertise.

Many of the steps taken throughout this routemap should have a positive impact on debt advisers, in particular longer term funding, investment in new technologies, and a more thoughtful approach to monitoring and evaluation. However, the Scottish Government also recognises that a more active programme is needed, and that the voices of those who work to provide free debt advice must be heard and responded to.

The TPDG identified five broad principles that will underpin the development of a successful workforce strategy:

1. **Retaining expertise** – high turnover rates can be detrimental to both the quality of advice provided, and the relationships between organisations and users. The fundamental aim of a workforce strategy must be to ensure that debt advice is seen as a desirable career that can offer security, satisfaction and a path to progression if desired.
2. **Attracting new talent** – the need to build long term expertise must be matched by a commitment to continually encourage new entrants into the profession who will bring new ideas and perspectives to the sector.
3. **Driving learning and development** – quality of service depends on consistent training, and it should be of a level that recognises the difficulty and professionalism required by debt advisers.
4. **Maximising adviser time to focus on clients** – both the quantity of time and the quality matter. Reporting requirements should be streamlined wherever possible to ensure the former, and technological innovations and smoother referral processes must be developed to aid the latter.
5. **Protecting adviser wellbeing** – providing free debt advice can be an intensive experience, often involving users who are in emotional distress, and this can be exacerbated by the numbers of users seeking help. Ensuring advice organisations have measures in place to support and protect their workers is essential to maintain a sustainable workforce.

With these principles in mind, the Scottish Government have asked Money Advice Scotland to begin an exploratory programme to understand the concerns of advisers. This will inform development of the workforce strategy over 2019/20.

Next steps:

- We will publish the exploratory MAS report shortly, and use its findings to progress the final strategy.
- We will hold a series of consultation events to inform and test development of the strategy.
- We will publish the strategy by summer 2020, and monitor its impact at regular intervals thereafter.

### **Action 5: The Scottish Government will begin rolling out multi-year funding cycles for free debt advice projects.**

As the TPDG noted, the majority of project funding for free debt advice is currently awarded on an annual basis. This leads to insecurity for advice providers, meaning it is difficult to retain staff or develop clear career progression. It also makes it challenging to develop and test innovative ways of working, and by creating an ever-more competitive funding environment, it creates barriers to collaboration between advice providers.

The current funding model exists for a variety of complex factors, and is a challenge for funders and advice providers across the entire free advice sector. The Scottish Government will continue to explore how these challenges can be overcome in general, and specifically, we are exploring how to deliver lasting change to the way levy funding is allocated and evaluated.

However, developing this lasting solution is likely to be longer term work, and the negative impacts of short term cycles should be addressed as a matter of urgency. Ahead of any decisions on the long term model, we will therefore support the majority of levy-funded projects on a multi-year basis from April 2020/21. We recognise that there will be a small minority of projects – such as pilots or short term gap-filling – that benefit from shorter funding cycles, and we will continue to provide that flexibility.

Next steps:

- We will work with the Scottish Legal Aid Board to design a new programme of projects using part of the levy funding that will offer multi-year funding starting in 2020-21.
- We will evaluate the new projects to ensure the opportunities and challenges of this new approach are well understood.
- We will use the experience of multi-year funding to understand and overcome challenges that currently prevent its adoption by other free debt funders and across the wider advice sector.

## **Action 6: The Scottish Government commits to developing a more sustainable system of levy funding that complements the wider free debt advice system.**

The TPDG recommendations acknowledge that levy funding cannot ensure sustainability of the free debt advice sector. However, its application should complement and not duplicate resources from funders and provide support to advice providers.

The Scottish Government will therefore develop a new model to allocate levy funding that complements local delivery and sets national priorities. The new model will ensure the sector has the opportunity to influence how levy funding is spent.

The new model must:

- assess provision of free debt advice across Scotland and how it complements or interacts with other provision;
- recommend where levy money could have the most impact; and
- evaluate outcomes of interventions to monitor impact.

With these criteria in mind, we have commissioned work to explore alternative delivery models for levy funding. The findings of the first stage of this work have recently been published and identify potential models<sup>5</sup>. This report will form the basis for a much wider consultation on the final model. We recognise that transitioning to a new model will bring challenges, and we will ensure adequate time to explore the impacts of changes and the views of users, providers and funders.

Next steps:

- We will use this report as the basis of consultation with the sector on the way forward.
- Where there are opportunities, we will test the applicability of these potential models between 2020 and 2023.
- We will develop a long term model for allocating funding and ensure it is implemented by the beginning of the 2023/24 financial year at the latest.

## **Action 7: The Scottish Government commits to exploring new sources of funding for free debt advice.**

The TPDG – along with many others – highlighted that investment in free debt advice is falling. Tightening budgets in the face of ongoing austerity measures and the uncertainties of Brexit mean this is unlikely to change. The Wyman review already considered this in detail, and recommended an interim increase in the levy funding and an expansion of voluntary Fair Share Contributions. Although welcome, concerns persist among advice providers that these recommendations do not go far enough.

The Scottish Government recognises that there are other potential models to fund free debt advice. These include moving Fair Share contributions from a voluntary to a statutory scheme; increasing central or local government funding; or expanding the levy currently paid by financial firms to cover other sectors. Each of these brings its own challenges, and none are likely to be a short term solution.

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5 <http://www.improvementservice.org.uk/debt-advice-funding-and-delivery-models-report.html>

The Scottish Government also notes that the UK Government are considering the challenges around the adequacy of debt funding, and that, even where the Scottish Government can act alone, it would be wise to act in collaboration where possible.

Next steps:

- We will undertake work to understand the long term impact to Scotland's free debt advice providers of the Wyman recommendations around Fair Share Contributions.
- We will ask the TPDG to advise on viable options for new funding sources.
- We will look to work with the UK Government and the Money and Pensions Service to ensure any solutions are practical and take account of UK-wide interventions.

## A collaborative debt advice system

The TPDG identified clear benefits to increased collaboration, including smoother user journeys around the advice system, expertise focused where they are most needed, and efficiency savings. Although many organisations already have processes in place to aid collaboration, there is a consensus that more can be achieved. Funders must work to drive this, and seek to facilitate organic collaboration between organisations by building trust and shared goals.

### **Action 8: The Scottish Government commits to embedding the Funders Framework into its decision-making and to championing it with funding partners.**

In 2015, the Scottish Government, the Improvement Service and Scottish Legal Aid Board launched the Funders Framework, which sets out good practice principles for funders entering or reviewing funding arrangements with advice providers.

For advice providers, the Framework should result in projects established with clearer outcomes and more focus on solving specific problems. For funders, it should encourage a more strategic approach to identifying the need for funding, and encourage partnership building with other funders, for example by exploring match funding opportunities or joint commissioning.

Although some or all of the principles are often upheld by funders, the TPDG discussions suggested that the Framework is not always well understood or considered, making it more difficult to realise its full potential. The Scottish Government seeks to have the good practice it promotes more widely adopted, both within and beyond the Scottish Government.

We are already funding the Improvement Service to support ongoing work to implement the Framework. This will include an analysis of its limitations as well as examples of successful implementation. We will use this work as a platform to further develop the effectiveness of the framework.

Next steps:

- We will publish guidance on how the Scottish Government uses the Funders Framework to inform the allocation of the debt levy (from next financial year) to show leadership, increase transparency and inform best practice.
- We will work with the Improvement Service on a communication strategy to raise awareness of the benefits of the Framework amongst funders of debt advice.
- We will develop a strategy to ensure the Framework is more widely adopted across the Scottish Government.

### **Action 9: The Scottish Government commits to supporting a more integrated landscape for free debt advice provision.**

The TPDG highlighted that collaboration faces a number of barriers, most notably a highly competitive funding environment made more so by scarce resources and short term funding cycles. Collaboration therefore requires a substantive change in both funder and provider behaviour. However, the TPDG also stressed that collaboration can take many forms – from submitting joint funding bids to sharing best practice and developing strong referral links – and they are all important.

Some of the actions set out above, in particular moving to multi-year funding cycles and developing a more inclusive process for using levy funding, should assist in overcoming some of the barriers. However, these steps alone will be insufficient.



Levy funding is a small proportion of the funding devoted to free debt advice available and the Scottish Government cannot drive the priorities and methods of other organisations. However, we will use our influence to bring funders and advisers together and encourage strategic decision-making and the sharing of best practice.

Next steps:

- We will develop along with the sector, a transparent process to share priorities and funding decisions.
- We will host a funders forum, including local authorities, to share learning, best practice and common challenges, and identify short, medium and long term opportunities for collaboration.
- We will establish a parallel advice network for debt advice providers to share learning, best practice and expertise.

# Annex A

## Tackling Problem Debt Group Recommendations

Below is a list of the Tackling Problem Debt Group's recommendations. The full report of the Group's recommendations, along with details of membership and minutes of meetings, can be found on the Scottish Government website<sup>6</sup>.

1. Ensure that levy funding reflects the needs and experiences of users and potential users of debt advice.
2. Develop a debt helpline offering that is Scottish-focused and better integrated with Scotland's advice landscape.
3. Develop a three year funding model for levy-funded debt advice.
4. Operationalise the Funders Framework to bring more consistency and clarity to advice funding.
5. Develop a model of Scottish Government levy funding that is transparent, independent and rigorously reviewed and evaluated for impact.
6. Develop a more integrated funding landscape for free debt advice.
7. Harness the potential of technology in a way that practically improves the experience of both providing and receiving debt advice.
8. Develop a workforce strategy for the free debt advice sector.
9. Ensure sustainable funding is available to achieve the outcomes identified above.

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<sup>6</sup> <https://www.gov.scot/groups/tackling-problem-debt-group/>



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