High-cost credit: Overdrafts

Citizens Advice response to CP18/13

Introduction and summary of responses

The arranged and unarranged overdraft markets work badly for consumers. There is a lack of competition in the arranged overdraft market which means consumers pay over the odds for the product. A lack of competition and consumer engagement means arranged overdraft users could gain considerably from switching. The nature of unarranged overdrafts, the incentives on banks to lend, and the conduct of lenders mean people can too easily get stuck in persistent debt and pay a high price for a product which badly serves their needs.

The unarranged overdraft market is worse still. The relationship consumers have with a product they don't plan, and normally don't mean, to use means that there is barely a market for unarranged overdrafts. That means consumers pay a very high price and banks have strong incentives to let them continue to use the product in ways that lead to consumer detriment.

The FCA have build on the work of the CMA - and over a decade of work before that - that highlights how badly overdraft markets function. The remedies set out in this consultation paper will go some way to addressing that detriment. But, crucially, the remedies consulted on will do very little. The FCA should act as soon as possible to protect consumers from the very high prices in both overdraft markets by introducing limits to what consumers can pay by:

- **Banning the use of fixed fees**. Fixed fees lead to overdraft users, particularly frequent unarranged overdraft users paying a very high price for low levels of borrowing.
- **A single interest rate on each account, which should be advertised using a representative APR.** The complexity of overdraft fees means they are difficult to compare and interpret discouraging shopping around and making staying on top of costs harder than it needs to be.
- **The interest rate should be aligned between arranged and unarranged overdrafts.** The FCA's proposal to align the costs of arranged and unarranged overdrafts would mark a significant improvement for consumers - and would form an important part of the process of ensuring that overdrafts are used as intended, rather than as a long-term source of credit.
- **A backstop price cap.** A backstop price cap should be used to build on the CMA's monthly maximum charge. An FCA enforced cap would limit the possibility of unintended consequences of the alignment of charges.

The competition and information remedies set out in Section 3 in the report are largely positive and will help at the margins but are not proportionate to the level of harm identified in the FCA's own research or the CMA's market investigation.

A. Overdrafts: Consultation Questions

Background

Citizens Advice helped 30,000 people with overdrafts last year. The most common problem we help people with is simply struggling to afford to repay their overdraft. We also helped 2,916 people with problems specifically related to overdraft charges.

More generally, our research shows that overdraft costs are more likely to be paid by people in financial difficulty and who are financially insecure or have volatile incomes:

- More than a third (35%) of people in problem debt have paid overdraft fees, compared with 17% of all UK adults.[1]
- A quarter (25%) of people with volatile incomes used an overdraft to pay for essential costs like food, utilities or rent in the 12 months, compared with only 10% of people with stable incomes.[2]
- People with volatile incomes are more likely to have paid fees or charges on credit cards, overdrafts, and 4 times more likely to have paid other late payment fees.[3]

Research by the FCA and CMA shows that those costs are often concentrated on small numbers of consumers. In 2016, over half of unarranged overdrafts - around £700 million - were paid by just 1.5% of customers.

For individuals, the impact of those fees can be severe. For example, in the case outlined below, overdraft fees played a role in compounding the impact of ill-health.

Hannah contacted Citizens Advice after a period of ill-health. She had been admitted to hospital a few months and had undergone an operation, meaning she was unable to work and was getting by on income from her Employment Support Allowance. Despite having contacted her creditors before her operation, Hannah incurred late payment fees and was threatened with enforcement action. She also incurred overdraft charges, further reducing her income. Although Hannah was due to start a new full-time job, she was concerned that the gap in income whilst she was waiting to receive her first month's pay would make her situation worse.

The consultation element of CP18/13 concerns 'competition remedies'. This response splits those remedies into 2 sections; competition remedies and usage remedies. The usage remedies are likely to have an effect on competition but indirectly. Additionally, it is important to consider both sets of remedies as they apply to arranged overdrafts and unarranged overdrafts separately. The markets for arranged and unarranged overdrafts are very different so the 2 sets of remedies will have different effects.

[1] Citizens Advice, *Stuck in debt,* August 2017
[2] Citizens Advice, Walking on Thin Ice, February 2018
[3] Citizens Advice, Walking on Thin Ice, February 2018

Q2: Do you agree that firms should be given 12 months to comply with the proposed rules?

Yes, 12 months is a reasonable timeframe for large banks to implement information remedies. Crucially, we agree with the FCA's decision to take action now rather than waiting to see what the impact of PSD2 is. As the CMA set out in the final review of their market study. There is a long list of information remedies that have been tried and have failed to improve the overdraft market.[4]

i. Competition Remedies

Q3: Do you agree with our draft rules to require firms to offer an online overdraft eligibility tool which indicates the likelihood of a consumer being eligible for an overdraft facility?

We agree with the rules targeted at helping arranged overdraft customers, but consider the impact on people's behaviour, consumer outcomes, and market competition will be low.

People's engagement in overdraft markets is very low for a number of reasons. As set out in the FCA's consumer research - people often don't consider overdrafts to be a debt, with less than 1 in 5 people agreeing it was.[5] In addition, the same research found people find the charges confusing, and say they struggle to work out the costs of overdrafts.

For arranged overdraft customers, an eligibility tool is likely to have a small marginal positive effect on competition. Overdraft users tend to be less engaged with their current account usage, they are less likely to switch than non-overdraft users. Heavy overdraft users are even less likely to switch. On top of that, overdraft users have a limited awareness of their use of an overdraft. The CMA found that more than half of overdraft users underestimated their usage by two or more months in a year and over a third were not aware that they had gone into overdraft.[6] Despite many having a lot to gain through switching. Overdraft users who are in their overdraft for between 1 and 2 weeks a month could save £180 year.

Interventions to change that behaviour and engage people with their overdraft need to combat a wide range of factors that discourage engagement despite the cost. The CMA in its market study, set out a wide range of reasons behind people disengaging from current account use - a lack of trigger points, perceptions of limited gains, and low up front costs for the majority of consumers.

Qualitative research for the CMA did find that some overdraft users believe they wouldn't be offered an overdraft by a new bank and so are less likely to switch.[7] And that 35% of overdraft users said they would be more likely to consider switching if they were able to check (against 6% who said it would make them less likely and nearly 2 thirds who said it would make no difference).

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[4] CMA, (2016) PCA Market Study, Final report, p. 181
[5] FCA (Atticus), (2019), Consumer research on overdrafts, p. 9
[6] CMA, Final report, p. 173
[7] CMA (GfK), 2016, p. 65

That impact has to be considered in the context of the current situation:

- Only 8% of customers have switched their bank account in the last 3 years
- Only a further 21% had looked around but not switched. 65% of customers had done nothing.

To be a success for arranged overdraft users, the eligibility tool would need to dramatically encourage people to search for better accounts, rather than just improve that searching process. The fact that only a minority said one would make it 'more likely' for them to switch means the practical impact is likely to be small.

Ultimately, an eligibility tool only addresses a small part of the reason arranged overdraft users don't engage with their current account usage.

Q4: Should we require firms to design tools in a way that could be provided through APIs to third-party providers so that the same comparison can be run for a consumer across different banks?

We agree that tools should be designed so they can be provided through APIs.

Q5: Do you agree with our draft rules to require firms to provide clear, easy-to-read, prominent information about overdrafts to their customers before they apply for an overdraft?

Clearer information about financial products is always positive for consumers. However, requiring firms to provide certain information to people opening a current account will do little to improve competition between banks to provide better overdrafts.

The report presented by the FCA doesn't provide evidence on how important overdraft costs and features are for consumers when choosing a current account. So while there is good evidence that consumers misunderstand what overdrafts are, how they work, and their costs, it isn't clear that these misunderstandings play an important role in the way people choose accounts, or decide to switch.

More prominent information about overdrafts is targeted at both arranged and unarranged overdraft users. But, due to the nature of customer behaviour in those markets, the remedy is predominantly designed to change engage customers in the arranged overdraft market.

For arranged overdraft users, improved information is aimed at changing people's decision making when choosing a product and improving market discipline on firms so they provide better value overdrafts.

There are a number of reasons the impact of that information will be limited. First, the touch point for consumers is rare. Only 3% of consumers switch account each year and a further 16% searched for different accounts.[8] The information is targeted at that small minority of consumers.

Second, and as described above, people's engagement and understanding of their overdraft use is poor, meaning that even if they do switch, and read the information, its impact on their decision is only likely to be marginal.

[8] CMA, (2016) Final report

For unarranged overdraft users, the impact will be still more limited. As found by the CMA, 'unarranged overdraft usage is more likely to be inadvertent than arranged usage' and so will not play a role in people's decision making. Unarranged overdraft users are also less likely to switch or search accounts.

Q6: Do you agree with our draft rules that online calculators should be made available to show consumers how much they will be charged for their overdraft and allow consumers to calculate their costs?

Requiring firms to provide an online or in-app calculator is a good way to help engaged consumers improve the searching process when looking for a current account with an arranged overdraft facilities. In the same way as the information sheet requirement, the benefits are likely to be marginal and mostly benefit arranged overdraft users.

The draft rules are at-odds with the findings of the research that show overdraft prices are too complex and often incomparable between providers. Rather than adding an additional stage of comparison, providers should be required to have a single APR price for their overdraft provision (as set out in the discussion section below).

It is in large providers' interests to make pricing structures complex and to make prices difficult to compare. The draft rules which require the creation of hypothetical overdraft calculators will do little to outweigh that incentive and so comparisons are still likely to be difficult and time consuming.

The draft rules could be improved by requiring providers to create calculators that enable customers to calculate the cost of their actual overdraft usage, and to compare that across providers where they had an open API. A further improvement would be to make that calculation an automatic element of people's online banking experience. Opt-in rates to services that help people manage their overdraft usage are low. An opt-out, automatic calculator would make engagement more likely.

ii. Remedies to improve people's use of their overdrafts

The remedies targeted at improving people's use of their overdrafts are more straightforward and they would benefit both arranged and unarranged overdraft users. Research suggests their impact would be significant but small and would mostly accrue to consumers who rarely use an overdraft. That should be taken into account when considering the remedies in the discussion element of this consultation.

Q7: Do you agree that rules requiring consumers to be automatically enrolled into unarranged overdraft and refused payment alerts should be included in the FCA Handbook?

Yes

Q8: Do you agree with our draft rules to require firms to automatically enrol their customers into arranged overdraft, unarranged and refused payment alerts?

Yes

Q9: Do you agree with our draft rules regarding alert channel, content, scheduling and grace periods?

Yes. However it's important that providers are supervised on the impact of their alerts. If the impact is found to be significantly below that of those in the FCA trials, or is significantly lower for one or more banks, the implementation of these rules should be reconsidered.

Q10: Do you agree with our draft rules to require that if a firm refers to 'balance', 'available funds', or 'available balance', this must exclude any arranged overdraft available to the customer?

Research shows that the way consumers view their balance can affect people's behaviour. We agree that this change could help.

B. Overdrafts: Discussion questions

Background

Overdrafts are associated with negative effects for consumers on a huge scale - affecting nearly 19 million people, and to a significant extent - with just 1.5% of personal current account users paying more than half of all overdraft fees.[9]

The FCA's proposals therefore, must ensure that overdrafts are used as an emergency credit facility - rather than a means for banks to accumulate disproportionately high fees or leaving people trapped in long-term overdraft debt.

To address the scale of this detriment, the FCA needs to intervene in a more fundamental way to lower the costs associated with overdrafts.

Crucially, these interventions need to reduce the costs charged to consumers while reducing the incentives for account providers to manage an overdraft facility proactively in a customer's interests.

We propose that the FCA:

- Ban fixed fees on overdrafts;
- Align the interest rates between arranged and unarranged overdrafts; and
- Introduce a backstop price cap to ensure that the cost of arranged overdrafts does not significantly inflate.

Q11: Do you agree with our approach to harm in this chapter? Do you have any comments, observations or evidence which would be relevant to this part of our analysis?

The harm caused by overdraft charges seen by Citizens Advice is often severe. Overdrafts are often excessively expensive and persistent. At times, we see unarranged overdraft charges play a key role in pushing people deeper into financial crisis and problem debt.

The broader problem outlined by the FCA outlines is the result of the high prices paid for overdrafts and the fact that those charges are most likely to be paid by the most deprived - particularly unarranged overdraft charges. The complexity of prices is regarded as a key driver of that harm due to the difficulty it imposes on consumers when choosing a product, comparing products, or adjusting the way they use overdrafts.

We agree that prices are too complex, that complexity is incentivised by the nature of the product and that fundamental intervention is needed to counter those incentives. However, there are wider drivers of harm in the overdraft market that relate to the way consumers use overdrafts rather than the way they are priced. In particular, much like credit cards, overdrafts are often used by consumers as long-term credit products and people get stuck in persistent debt. The FCA should should conduct further work into protecting persistently indebted overdraft users.

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[9] FCA, High-cost Credit Review: Overdrafts, May 2018.

As a starting point it should look at extending the rules in the credit card market to overdraft users.

Q12: Do you have any comments, observations or evidence about the range of potential remedies we have discussed?

In addition to the range of measures that we have already discussed, the FCA is 'considering the case for more interventionist measures' on overdrafts. It mentions a number of potential remedies:

- A ban on the use of fixed fees,
- A single interest rate charged on each overdraft account,
- Firms must advertise a representative APR on arranged overdrafts
- Alignment of arranged and unarranged overdrafts
- A backstop price cap

The FCA has effectively made the case for the scale of the detriment associated with overdraft usage, and the unusually high profitability associated with this financial product.

Below, we set out our position on each of these measures:

I. A ban on the use of fixed fees

Fixed fees are a common way of charging customers for the use of their overdrafts. They can come in the form of daily, weekly or monthly fees.

Central to the issue with fixed fees is that they are often perceived to be less costly than they are. This is compounded by a number of other problems associated with these fees:

Fixed fees are unfair as they don't relate to the amount borrowed. Fixed fees charged on unarranged overdrafts tend to cause disproportionate costs for consumers, driving up the cost of borrowing small sums through an overdraft by up to 20%.[10] In addition, fixed fees disproportionately fall on those who can least afford to pay.[11] Effectively, these disproportionate charges provide a source of revenue to banks- often unfairly distributing the costs of banking amongst those who struggle to manage their finances.[12]

Fixed fees particularly affect those who face financial insecurity. Research we conducted earlier this year, showed that overdraft charges are often incurred by those who struggle with insecure or fluctuating incomes. A quarter (25%) of people with volatile incomes used an overdraft to pay for essential costs like food, utilities or rent in the 12 months, compared with only 10% of people with stable incomes.[13]

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[10] The FCA's analysis shows that 15% of those incurring charges for unarranged use are paying over 20% a day. FCA, High-cost Credit Review: Overdrafts, May 2018.
[11] On average, consumers in more deprived areas pay twice as much in charges for unarranged overdrafts than consumers living in less deprived areas. FCA, High-cost Credit Review: Overdrafts, May 2018.
[12] The CMA found that banks generate £1.2billion a year from unarranged overdraft fees. CMA, Retail Banking Investigation, February 2016
[13] Citizens Advice, Walking on Thin Ice: The Costs of Financial Insecurity, February 2018.

People with unpredictable incomes are twice as likely to have paid overdraft charges and five times more likely to have used high-cost credit as those with stable incomes. With high rates of interest and expensive fixed rates fees, far from helping people to gain greater financial stability, overdrafts effectively punish people for insecurity.[14]

These fees should be **banned to prevent current account providers from profiting from those who struggle to manage their finances.**

II. A single interest rate charged on each overdraft account with an advertised representative APR

As the FCA have identified, the complexity of pricing structures associated with overdrafts makes it hard for consumers to select accounts based on their needs when it comes to overdrafts. A single interest rate combined with an advertised representative APR would significantly simplify the process by which customers could select a current account.

These combined features would enable consumers to clearly compare costs when it comes to their arranged overdraft. As the FCA notes, the role of a representative APR to provide an indication of a less expensive financial product relies on the banning of fixed fees. As consumers struggle to identify the difference in price when comparing between fixed fees and a representative APR. It's particularly important therefore, that the FCA does ban these fees - to ensure that consumers are better able to identify more affordable financial products.

III. Alignment of arranged and unarranged overdrafts

The FCA's proposal to align the costs of arranged and unarranged overdrafts would mark a significant improvement for consumers - and is an important step in ensuring that overdrafts are used as intended, rather than as a long-term source of credit.

In addition, aligning the costs of the two products would reduce lack of clarity over the distinction between arranged and unarranged overdrafts. Providing a single overdraft facility - alongside a single interest rate and representative APR would ensure that this financial product better resembles other forms of credit. This an approach might also better enable consumers to recognise overdrafts as a form of debt.

Alignment between arranged and unarranged overdrafts would also reduce the level of punitive fees associated with unarranged overdrafts, and enable consumers to identify lower cost overdraft products - enabling competition to play a bigger role in lowering the prices.

Buffers on overdraft charges should be removed, since these are often associated with unexpected costs for consumers when they tip over the edge. Buffer pricing would also no longer serve a useful purpose if fixed fees were removed, and if retained would contribute to the excessive complexity of overdraft pricing models.

The risk associated with aligning arranged and unarranged overdraft fees is that the costs of arranged overdrafts would significantly increase. If fixed fees are not banned,

[14] Citizens Advice, Walking on Thin Ice: The Costs of Financial Insecurity, February 2018.

the threat of increasing overall overdraft costs would be best addressed through the use of a backstop price cap.

IV. A backstop price cap.

The alignment of interest rates for arranged and unarranged overdraft charges is likely to have a significant effect on the revenue model for banks - introducing the risk of arranged overdraft fees becoming less competitively priced.

We would propose then that the FCA introduce a backstop price cap for both arranged and unarranged overdrafts. Similar to the payday loan cap, this would involve two key components:

- A cap on the daily rate of interest at 0.8%
- A total cost cap of 100% ensuring that people never pay back more than twice what they borrowed.

These interventions in combination would help to ensure that arranged overdraft interest rates do not inflate with a clampdown on the cost of unarranged overdrafts. The structure of the cap - as a daily maximum interest rate would reduce the need for fixed fees - and the total cost cap would prevent those who find themselves in an overdraft over the longer term from facing excessive prices.

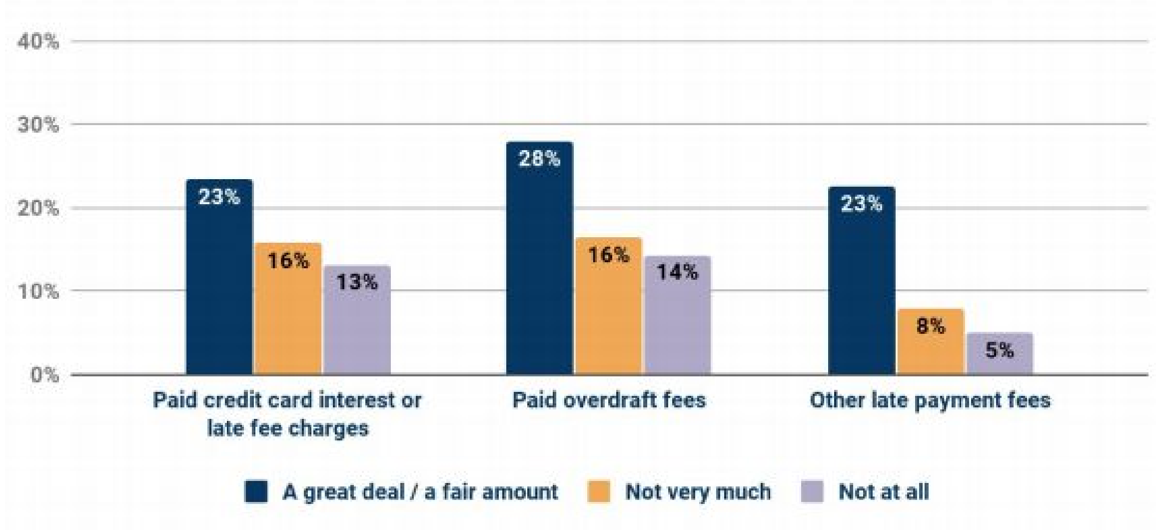
This cap will be important in addition to the CMA's MMC. The MMC, whilst an improvement on the massive charges levied by banks, is set at an excessively high level at present. In addition, its efficacy is limited to those who find themselves in their unarranged overdraft, and does not provide sufficient clarity to consumers.

V. Refused payment fees

The FCA is right to identify the overlap between refused payment fees and those who engage in prolonged overdraft usage. Our research on insecurity found that people with volatile incomes are more likely to have paid fees or charges on credit cards, overdrafts, and 4 times more likely to have paid other late payment fees.

Figure 1 - Paying additional costs

Frequency of additional charges by extent of income volatility



Source: YouGov online survey of 2,116 UK adults asked about the level of fluctuation in their income conducted on behalf of Citizens Advice (June 2017)

At a minimum, these fees should be cost reflective. Alternatively, it is possible that such refused payment fees should be included into the 100% total cost cap. Including these fees would prevent costs accumulating over the year, and encourage providers to proactively support those who were struggling financially.

Q13: Are there other remedies we could consider to address the high level of fees or complexity of price structures? Please explain what the impact might be, why such remedies would be appropriate, and any evidence you have to support your views.

No

Q14: Do you agree that repeat overdraft use is a harm that we should address? Please explain what pattern(s) of repeat use that you would consider problematic, and provide any evidence that you may have to support your views?

Yes, we agree that repeat overdraft use is a harm that the FCA should address. Overdrafts can be a useful tool for consumers to manage one-off unexpected payments or a specific financial pinch-point. Unfortunately, however, for many of our clients repeated overdraft use is very extensive - leaving some struggling to get out of debt, whilst others find themselves subject to frequent charges for dipping in and out of their overdraft.

The move from occasional use to regular use of overdrafts appears to correlate with the most harmful effects for our clients. StepChange for example, has found that clients with overdraft debt have tended to be in their arranged overdraft 11 out of the last 12 months.[15] This compares to an average of eight months in the last 12 for all arranged overdraft users. Clearly, for certain users of overdrafts, repeat use becomes a habit that can become hard to kick, especially as interest and fees accrue overtime.

[15] StepChange Debt Charity (2016) Falling into the red: How overdrafts can lead to problem debt

Other concerning patterns of overdraft use is associated with clients who use overdraft facilities to meet the cost of other credit payments, such as credit cards or payday loans, when they are struggling financially. These practices are also more likely to facilitate the shift from more occasional overdraft use towards persistent use of overdrafts.

The fact that consumers are not required to pay even minimum payments exacerbates this risk, with many people allowing overdraft debt to accumulate with no driver to commence repayments.

The other circumstance in which overdraft usage is common and can become an indicator of more severe financial difficulty, is when people face a sudden shock to their income such as sickness or job loss. At this point, monthly fees can significantly exacerbate the financial difficulties which clients face. See the case study below as an example.

Case Study: June
June is a pensioner who is seeking to sell her house. Her bank is aware of this, but in the interim June has been struggling financially, with an income of just £600 per month.

A major high street bank has charged June more than 50 times for going overdrawn, amounting to nearly £600. June spoke to the bank to ask them to put a hold on additional charges until the money comes through from her house sale. The bank haven't agreed to do this and have given no guidance to June to stop the overdraft fees accruing. This means that when June's pension enters her account the majority o of it is swallowed by the overdraft fees, June's daily living costs then push her back into her unarraged overdraft over the month. Until June's house is sold, she will be forced to rely on the help of local charities and food-banks to get by.

Q15: Do you have any comments, observations or evidence about the range of potential remedies we have discussed, or when we should intervene?

The potential remedies set out in the FCA's discussion paper are a promising start towards a more proactive approach from banks when it comes to consumers in financial difficulty. We strongly agree that banks should be engaging with consumers on their use of overdrafts, and trying to understand if this credit product best suits their financial needs - rather than overlooking the high levels of indebtedness common amongst repeat and long-term overdraft users.

- **Adequate systems in place to assess whether customers are in, or at risk of, financial difficulties and take appropriate action.**

  We propose that the FCA further consider how the definitions of 'financial difficulties' associated with rolling credit products, such as credit cards and catalogue credit could be extended to overdraft facilities.

  In particular, we would invite the FCA to consider how existing credit principles on persistent debt - for example, those who are paying more in fees or interest on an overdraft facility over 18 months could be identified and provided with more proactive support from banks.

- **Interventions at prescribed intervals to prompt consumers to change behaviour, remind those who have not responded, offer plan for repayment possibly with restructuring or suspension of facility.**

  We agree that banks should intervene at multiple stages to support consumers to repay their overdrafts. The thoughts outlined below are preliminary, but suggest a broad outline which the FCA could adopt for doing so.

  The model for intervention could follow a three stage approach; with early warnings, providing additional information on the function of overdrafts and their cost, as well as signposting to free debt advice.

  This might be followed by an advice based intervention for consumers who have used a significant proportion of their overdraft facility, instructing consumers of means to set up a structured approach to repayments and including the option of referral to free debt advice agencies.

  The final intervention would be likely to be an affordability check and the establishment of a clear phased repayment plan. In these instances, banks should apply early forbearance including separating debt, turning overdraft debt into a low cost personal loan and freezing interest rates and charges.

- **Removing or reducing an overdraft facility**

  Removing or reducing an overdraft facility may be an appropriate measure where consumers are consistently struggling to manage their finances. The case for doing so should, however, be based upon the specific circumstances of individuals, and we would not advocate introducing a 'hard' trigger to reduce an overdraft facility.

  Better systems to identify customers at risk of persistent overdraft debt, would enable banks to become more effective at matching an overdraft facility to a customer's needs. In turn, this might lead to gradual reductions or adaptations to a consumers' overdraft facility without a customer necessarily having first experienced persistent overdraft debt.

Q16: Are there other remedies we could consider? Please explain what the impact might be, why such remedies would be appropriate, and any evidence you have to support your views.

The problems associated with overdrafts amount a to a significant market failure. As we have set out in this part of the consultation, overdrafts should work as an emergency reserve to help people get through pinch points or manage one-off unexpected payments.

Whilst we recognise that it can be challenging for overdraft providers to accurately assess affordability with this credit product, due to a lack of agreement over its exact function. We think more exploration could be done to develop a simple, proportionate creditworthiness framework for overdrafts which should be used to guide lending decisions, including the regular review of a customer's overdraft facility.

In addition, we would encourage the FCA to strengthen current account overdrafts. If consumers were to actively select their overdraft, over and above their personal current account characteristics consumers might be more likely to recognise overdrafts as a form of debt. At the moment, customers often receive an overdraft ‘automatically’ alongside opening an account. Opt-in rules would also place the onus on the provider to make a case for why each customer would meet the characteristics of needing an overdraft, rather than overdrafts only being refused in exceptional circumstances.

Q17: Do you have any comments on our cost benefit analysis?

No

Q18: Do you have any views on the outcome of our EIA or the equality and diversity implications of the issues set out in this paper?

No

For Further information

If you have any questions please contact joe.lane@citizensadvice.org.uk

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Published August 2018