



North East Scotland Advice Forum is a local network for people working in advice services to share information and experiences. The Forum meets quarterly throughout the year.

## May 2023 Newsletter

If you would like an article included in the next bulletin, please contact [admin@nesaf.co.uk](mailto:admin@nesaf.co.uk)

### New posts on our website

- [Debt and arrears levels in Scotland rocket](#) 26 April 2023
- [ADM Memo 09/23: UC – Changes to Benefit Cap annual limit 2023](#) 26 April 2023
- [Help Your Colleagues Save Energy & Money](#) 26 April 2023
- [Energy Advice to Suit You](#) 26 April 2023
- [Warm Homes Prescription](#) 26 April 2023
- [Briefing: Cost of Living and Child Poverty](#) 18 April 2023
- [Deepening poverty in Scotland – no one left behind?](#) 18 April 2023
- [New DWP guidance – ADM Memo 08/23](#) 18 April 2023
- [2 Child Limit turning the screw on families in cost of living crisis](#) 17 April 2023
- [Income thresholds updated for FSM/SCG](#) 17 April 2023

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Register to add and comment on our Message Boards at [www.nesaf.co.uk/wp-login.php?action=register](http://www.nesaf.co.uk/wp-login.php?action=register)

### Benefit calculator



Our benefits calculator will help you Find out what benefits you can claim.

If you are affected by Coronavirus please go through the calculator and we will tell you about your entitlements. Also see our guide To [benefits for people affected by Coronavirus](#).

The calculator is free to use, and the details you provide are anonymous.

Before you start, make sure you have information about your savings, income, pensions and existing benefits (for you and your partner).

If you run out of time, you can save your calculation and come back to it later, and pick up right where you left off.

- ⇒ *Should take 10 minutes to complete*
- ⇒ *Please complete all fields with an asterisk(\*)*

**START >>>**

### AMI Lunch and Learn event

The next AMI Lunch and Learn event will be taking place on **Wednesday 3 May at 11pm**

Fergus Reid from TV Licensing will be joining us and I will also look to do my usual round-up of debt advice news and useful information.

If you would like to attend then please register for your place via Eventbrite using the following link: <https://www.eventbrite.co.uk/e/ami-lunch-and-learn-for-free-sector-debt-advisers-tickets-617813114657>

If you are unable to book this way for some reason then please just reply to me directly instead - [kevin.mapstone@amifinancialsolutions.com](mailto:kevin.mapstone@amifinancialsolutions.com)

Feel free to forward this link on to any colleagues that may be interested.

I look forward to seeing you then!

**Kevin Mapstone**  
**Insolvency Practitioner**  
**AMI Financial Solutions Ltd**



## Increased flexibility of alternative fuel payments

More households using heating oil, LPG, biomass and other alternative fuels will receive **£200 in energy bills support**, thanks to the government's expansion of the scheme, announced today.

The UK government is continuing to get help to those households across the UK that need it most – which is why today, Energy Security Secretary Grant Shapps has increased the period of time that applicants can evidence purchase of alternative fuels, **by 3 months to June 2022, instead of September 2022**. This ensures that households who purchased fuel in bulk ahead of the winter are able to receive the £200 energy bill support they are entitled to.

**This means those eligible for £200 Alternative Fuel Payment can now apply using receipts from June 2022 – a 3-month extension – until May 2023.** This is to recognise that many will have bought fuel ahead of winter price rises – and it is right that these households aren't penalised.

Only a small number of households using alternative fuels as their main heating source need to apply to receive bills support. The vast majority of alternative fuel users will have already received payments automatically. Earlier this year Mr Shapps also increased the number of receipts that households can submit to claim the Alternative Fuel Payment from 2 to 10.

This is just one of a range of ongoing schemes supporting households and businesses with energy costs at this time – which the government is urging all eligible customers to apply for and take full advantage of:

- the **[Non-Domestic Alternative Fuel Payment scheme](#)** is providing top-ups starting at £750 for organisations using large quantities of kerosene heating oil, such as farms, hotels, charities and public buildings like schools and hospitals. Organisations have until 28 April to apply for this support via GOV.UK. The scheme is also offering £150 payments to organisations using alternative fuels. A minority of those eligible will also need to apply for this extra support by 28 April if they haven't received payments automatically through an electricity supplier
- the **[Energy Bills Support Scheme](#)** has provided £400 payments to help households with winter energy bills. While most will have already received this automatically, those on traditional prepayment meters need to redeem support through vouchers from their electricity supplier at either a Post Office or PayPoint outlet, as listed on the voucher. Vouchers that have been lost, damaged or have expired can be replaced – customers should contact their supplier directly in these circumstances. All vouchers must be redeemed by 30 June 2023
- the **[Energy Bills Support Scheme Alternative Funding](#)** provides equivalent £400 payments to households who do not have a domestic electricity supply and were not eligible to receive the Energy Bills Support Scheme automatically. Eligible applicants include residents in partially or wholly self-funded care homes and residents of park homes. These households must apply either via GOV.UK or the contact centre helpline by 31 May 2023



## Benefit and pension rates 2023 to 2024

Updated 18 April 2023

[www.gov.uk/government/publications/benefit-and-pension-rates-2023-to-2024/benefit-and-pension-rates-2023-to-2024](https://www.gov.uk/government/publications/benefit-and-pension-rates-2023-to-2024/benefit-and-pension-rates-2023-to-2024)

## Making it easier for parents and carers to prove they're entitled to Child Benefit

HMRC has launched a new online service so it's quicker for parents and carers to prove they claim Child Benefit.

They often need this proof for housing benefit, council tax and other services, and it's previously involved calling or writing to HMRC. Now it can be done within minutes at a time convenient to them.

From 28 February 2023, customers will be able to prove they have a valid claim by going to the HMRC app or online. This is a new digital service – just one of our improvements providing quick and easy online access for customers.

Parents or carers can access it online, then print or save it as a document to use as proof of entitlement. They no longer need to call HMRC for this service.

An example of the online proof of entitlement is included below for information:

### Action to take

If customers require a proof of entitlement, please direct the customer to access this through: <http://www.gov.uk/child-benefit-proof>

## Social Security Benefits: Disability

Question for Department for Work and Pensions  
UIN 182088, tabled on 20 April 2023

### Question

To ask the Secretary of State for Work and Pensions, what the average waiting time was on calls to the disability service centre for queries on

- Personal Independence Payments,
- the Disability Living Allowance and
- the Attendance Allowance in the latest period for which data is available.

### Answered on 26 April 2023

There are no current targets for the Average Speed of Answer (ASA) for calls to the PIP, DLA and AA telephone enquiry lines.

The average waiting times for the PIP, DLA and AA telephone enquiry lines for the month of March 2023 were:

- PIP - 00:37:01
- DLA - 00:33:36
- AA – 00:02:11
- DLA65+ - 00:06:22

We are currently experiencing higher than forecast call volumes to the PIP and DLA telephony enquiry lines. We have recruited additional staff onto our telephony teams and have on-going recruitment to further increase resources.

The average speed of answering calls within AA and DLA65+ is within acceptable levels.

<https://questions-statements.parliament.uk/written-questions/detail/2023-04-20/182088>



## Cost of Living Payments 2023 to 2024

Guidance on getting extra payments to help with the cost of living if you're entitled to certain benefits or tax credits.

- [Low income benefits and tax credits Cost of Living Payment](#)
- [Disability Cost of Living Payment](#)
- [Pensioner Cost of Living Payment](#)
- [2022 Cost of Living Payments](#)
- [Other help](#)

You may be able to get up to 5 payments to help with the cost of living if you're getting certain benefits or tax credits.

You do not need to apply. If you're eligible, you'll be paid automatically in the same way you usually get your benefit or tax credits. This includes if you're found to be eligible at a later date.

These payments are not taxable and will not affect the benefits or tax credits you get.

Low income benefits and tax credits Cost of Living Payment

You may be entitled to up to 3 Cost of Living Payments of £301, £300 and £299 if you get any of the following benefits or tax credits on certain dates

You will not get a payment if you are only getting New Style ESA, contributory ESA, or New Style JSA.

If you're entitled, you will get:

- £301 paid between 25 April 2023 and 17 May 2023 for most people on DWP benefits
- £301 paid between 2 and 9 May 2023 for most people on tax credits and no other low income benefits
- £300 paid during autumn 2023 for most people
- £299 paid during spring 2024 for most people

If you're getting both Child Tax Credit and Working Tax Credit, you will receive a Cost of Living Payment for Child Tax Credit only, which will be paid by HMRC.

If you're getting tax credits from HMRC and a low income benefit from DWP, you cannot get a Cost of Living Payment from both HMRC and DWP. You will usually be paid by DWP only.

### Disability Cost of Living Payment

You may be entitled to a Disability Cost of Living Payment of £150 if you get any of the following benefits on a certain date

Most people will be paid the £150 Disability Cost of Living Payment during summer 2023.

### Pensioner Cost of Living Payment

If you're entitled to a Winter Fuel Payment for winter 2023 to 2024, you will get an extra £150 or £300 paid with your normal payment from November 2023.

### 2022 Cost of Living Payments

This guidance is about Cost of Living Payments being made in 2023 and 2024. You can read about the Cost of Living Payments in 2022 in separate guidance.

Find out what other [benefits and financial support you might be able to get to help with your living costs](#). Use an independent [benefits calculator](#) to find out what benefits you could get.

[www.gov.uk/guidance/cost-of-living-payment](http://www.gov.uk/guidance/cost-of-living-payment)



Social Security Scotland  
Tèarainteachd Shòisealta Alba



## New campaign promoting disability benefits in Scotland

Disabled people are being urged to find out if they are eligible for Scottish Government disability benefits as part of a new campaign to increase benefit take-up.

The nationwide campaign, which launched on 10 April, aims to raise awareness of the financial support available to help with the extra costs disabled children and adults may face.

The campaign is running on [television](#), online and on billboards and buses across Scotland.

Child Disability Payment provides financial support to help families and carers with the extra costs of caring for a disabled child or young person or a child or young person with a long-term health condition.

Adult Disability Payment is available to people aged between 16 and state pension age who are disabled, have a long-term health condition or a terminal illness.

These benefits are administered by Social Security Scotland and replace the Department for Work and Pensions' Disability Living Allowance (DLA) for Children, DLA and Personal Independence Payment.

People already getting disability benefits from DWP will see their award transfer automatically and they do not need to apply separately.

Stakeholder organisations who would like to share the video advert are encouraged to do so. Additional resources for stakeholders on [Child Disability Payment](#) and [Adult Disability Payment](#) are also available. Anyone who thinks they may be eligible for disability benefits can find out more [here](#).

## Eligibility dates for 2023 Carer's Allowance Supplement

The eligibility dates to receive [Carer's Allowance Supplement](#) for 2023 are 10 April and 9 October.

Carer's Allowance Supplement is an extra payment, **administered by Social Security Scotland, for people already getting Carer's Allowance from the Department for Work and Pensions (DWP).**

**The payment recognises the important contribution of unpaid carers across Scotland.**

People who are getting Carer's Allowance on the qualifying dates will automatically receive Carer's Allowance Supplement. Eligible carers will receive two payments of £270.50 as the supplement is paid as a six-month sum.

Payment dates will be announced later on in the year. People do not need to apply separately as it will be paid automatically to eligible carers and we will write to people in advance so they know when to expect a payment.

Some people do not get Carer's Allowance from DWP because they get other benefits instead. This is called an 'underlying entitlement'. If people have an 'underlying entitlement', they will not get Carer's Allowance Supplement, but they may be entitled to other benefits.

To find out about eligibility for Carer's Allowance Supplement or any other support, carers may wish to contact their local Citizens Advice Scotland (CAS) Bureau or Local Authority welfare advisors.

<https://www.socialsecurity.gov.scot/news-events/news/eligibility-dates-for-2023-carers-allowance-supplement>



## Income thresholds updated for FSM/SCG

### Free School Meals

Pupils are eligible for free school meals if their parents or carers receive one of the following benefits:

- Income Support
- Income-based Job Seeker's Allowance
- Pension Credit (Guarantee Credits)
- Any income related element of Employment and Support Allowance
- Child Tax Credit, but not Working Tax Credit, with an income of less than £18,725
- Both Child Tax Credit and Working Tax Credit with an income of up to £8,717
- Support under Part VI of the Immigration and Asylum Act 1999
- Universal Credit with a monthly earned income of not more than £726
- Universal Credit, with a single parent/carers working less than 16 hours per week with an annual earned income from employment of less than £18,725
- Universal Credit, with both parents/carers working less than 24 hours per week with an annual earned income from employment of less than £18,725

Pupils are eligible for free school meals in their own right if they are between 16-18 and fall into any of these categories.

All pupils in P1 to P5 receive free school meals when in school.

Where a child is in P1 to P5 and parents meet the eligibility criteria above, the parent should apply for Free School Meals in order to receive vouchers during holiday periods.

### Free School Meal Vouchers

### School Clothing Grant

You can apply for a school clothing grant if you or your family receive any of these benefits:

- Income Support
- Income-based Job Seeker's Allowance (JSA)
- Any income related element of Employment and Support Allowance (ESA)
- Child Tax Credit (CTC), but not Working Tax Credit, and your annual income is less than £18,725
- Both maximum Child Tax Credit and maximum Working Tax Credit and your annual income is under £8,717
- Universal Credit, and your monthly earned income is not more than £726
- Support under Part VI of the Immigration and Asylum Act 1999
- Housing Benefit and/or Council Tax Reduction

<https://www.aberdeency.gov.uk/services/education-and-childcare/school-life/apply-free-school-meals-and-school-clothing-grant>

## DWP figures show 600,000 could be missing out on disability benefits

More than 600,000 disabled people could be missing out on thousands of pounds a year of disability benefits they are entitled to, according to new figures released by the minister for disabled people.

They show that 632,000 people are receiving out-of-work disability benefits that only those with the highest support needs are eligible for, but not receiving the extra costs disability benefits disability living allowance (DLA) or personal independence payment (PIP).

[www.disabilitynewsservice.com/dwp-figures-show-600000-could-be-missing-out-on-disability-benefits](http://www.disabilitynewsservice.com/dwp-figures-show-600000-could-be-missing-out-on-disability-benefits)



## Benefits health assessments system continues to let people down, say MPs

The health assessments system to access vital benefits for those who cannot work or face extra costs due to disability or ill-health continues to let down those who rely on it, according to the Work and Pensions Committee.

- [Read the full report \(HTML\)](#)
- [Read the full report \(PDF\)](#)
- [Read the report summary](#)
- [Find all publications related to this inquiry, including oral and written evidence](#)

In its latest Report, the Committee calls for the implementation of several measures that would be relatively quick and easy wins to improve trust, drive down the high rate of decisions reversed on appeal and reduce waiting times.

It says assessments should be recorded by default, with claimants having the option to opt-out, adding that footage could be used to review cases more accurately without having to go to appeal, and help assessors learn from past mistakes.

Some of the improvements the Committee suggest could drive down the high rate of decisions reversed on appeal, which still stands at 69% for Personal Independence Payment (PIP). Although the Work Capability Assessment used for Universal Credit and Employment and Support Allowance is due to be abolished, it will remain in place until at least 2026. Meanwhile, PIP assessments will continue, so retaining the status quo is not an option.

MPs on the Committee also recommended allowing claimants to choose between remote or in-person assessments, extending the deadline to return forms, targets to reduce assessment waiting times, and payments to people who have been forced to wait beyond the new targets.

The predecessor Committee originally published a [report on significant problems in assessments](#) in 2018, but many of the recommended changes have not been made.

Committee Chair Sir Stephen Timms MP said:

*“We surveyed eight and a half thousand people as part of our inquiry and found a profound lack of trust in the system as a consistent theme.*

*Many will welcome abolition of the Work Capability Assessment. The Government’s process improvements, and recognition that the system causes undue stress and hardship, are steps in the right direction.*

*However, waiting years for changes won’t cut it when quicker wins are available: flexibility of choice on assessment by phone or face-to-face; recording assessments by default; extending deadlines to reduce stress; and sending claimants their reports. All this will give much-needed transparency to a process that so few trust yet affects their lives so fundamentally.*

*All efforts must be made for unnecessary limbo and stress for claimants to be put to an end.”*

<https://committees.parliament.uk/work/1468/health-assessments-for-benefits/news/194649/benefits-health-assessments-system-continues-to-let-people-down-say-mps/>



## Free access to the fuel rights handbook online

CPAG’s [Fuel Rights Handbook](#) is now free to access online, thanks to a partnership with The Indigo Trust and The Clothworkers Foundation.

The handbook covers all aspects of the rights of gas and electricity consumers., including liability, dealing with arrears and preventing disconnection, complaints, and the latest energy efficient schemes.



## 2 Child Limit turning the screw on families in cost of living crisis

Survey finds deep hardship after 6 years of the policy

On the sixth anniversary of the two-child limit, a Child Poverty Action Group (CPAG) survey finds widespread suffering and hardship among families affected by the policy with parents struggling to meet children's basic needs as living costs soar.

The two-child limit restricts child allowances in universal credit (UC) and tax credits (worth up to £3,235 a year) to the first two children in a family, unless the children were born before April 2017 when the policy was introduced.

Read the full article on CPAG's website — [cpag.org.uk/news-blogs/news-listings/two-child-limit-turning-screw-families-cost-living-crisis](https://cpag.org.uk/news-blogs/news-listings/two-child-limit-turning-screw-families-cost-living-crisis)

MPs on the Work and Pensions Committee want to hear from members of the public currently in receipt of working-age benefits, or who have been in receipt of these benefits within the last five years, to take part in a roundtable discussion on the issues raised in [their inquiry](#) into the matter.

[Members of the public can register their interest in participating.](#)

**The deadline is 10 May.**

**nawra**  
national association of  
welfare rights advisers

## New DWP study on sanctions may not be all it seems

Published on 6 April 2023

This comment investigates the robustness of a new DWP report suggesting that benefit sanctions reduce employment.

[ifs.org.uk/articles/new-dwp-study-sanctions-ay-not-be-all-it-seems](https://ifs.org.uk/articles/new-dwp-study-sanctions-ay-not-be-all-it-seems)

## Help Your Colleagues Save Energy & Money



Through interactive workshops, e-learning and tailored solutions for your organisation, Home Energy Scotland advisors can help you and your colleagues reduce their bills and improve their wellbeing.

Workshop topics include:

- Energy efficiency
- Sustainable travel
- Saving water

They can be delivered online to suit your needs

[Find out more / book a session](#)

WITH COMPASSION  
AND JUSTICE WE  
CAN END POVERTY

CHALLENGE  
POVERTY  
WEEK

2 - 8 October 2023

@CPW\_Scotland #ChallengePoverty #CPW23

[povertyalliance.org/CPW](https://povertyalliance.org/CPW)



## Challenge Poverty Week 2nd - 8th October 2023

- Wed 24 May, 2-3pm, Everyone Welcome
- Wed 31 May, 2pm-3pm, Everyone Welcome
- Thu 15 Jun, 11am-12pm, Everyone Welcome
- Wed 21 Jun, 11am-12pm, Everyone Welcome
- Wed 28 Jun, 2pm-3pm, Everyone Welcome

In these Get Inspired meetings we'll showcase the different ways your organisation can take part in #ChallengePoverty Week in from 2nd - 8th October 2023.

We'll take you through examples of what other groups have done in previous years, and tell you about all the advice and resources we'll make available to you, helping make sure your event is a success.

Some of the Get Inspired meetings are open to everyone, some are for particular groups. They're all online. **Click a date above that suits you and Get inspired!**

[www.povertyalliance.org/cpw/](https://www.povertyalliance.org/cpw/)





As NAWRA members are aware, we have been working hard with other organisations to try and resolve the issue of UC50s not being reliably issued following the submission of fitnotes leading to claimants not being put through the WCA and therefore being left for months, or sometimes years, without the LCWRA element being added to their claim. Following our [letter to the Minister](#) last year, we had a meeting with officials in January 2023. At this we were told that –

- **DWP are in the process of developing a digital UC50** – they believe this will solve the problem but we have sought clarification of the point at which it becomes digital – it needs to be triggered by the fitnote being submitted in order to ensure the WCA is started
- **DWP do not currently do any data analysis to assess the scale of the problem themselves** – however, they agreed that one of their user researchers would speak to advisers to find out more – some of you have been involved in this – thank you
- **A digital solution is still some way away** – we therefore asked for a manual solution in the meantime where work coaches put a standard message in a claimant's journal at the point the first fitnote is issued (this should be a trigger point for reviewing the claim anyway) – this could explain the WCA process and that the claimant should receive a UC50 after 4 weeks at the latest and advise to let their work coach know if the form did not arrive. While not infallible, this would put claimants in a better position than currently.

Separately to our negotiations with the DWP, NAWRA gave both written and oral evidence to the [Work and Pensions Committee's inquiry into health assessments for benefits](#). The [Committee's report](#) was published on 14 April 2023 and, as a result of our evidence, it put forward a specific recommendation (paragraph 51) –

*'The process of issuing a UC50 form should be automatic, and claimants should not have to remind the Department to send it to them. **DWP should investigate the process for issuing UC50 forms urgently and confirm in its response to this Report what steps it is taking to fix any points of failure identified to improve the process while the Work Capability Assessment and UC50 forms remain in use.***

Since then we have had a follow up meeting with officials (on 18 April 2023) and there have been some developments –

- They have undertaken research with five advisers recruited through NAWRA, and two of their clients
- They acknowledge that there are problems reporting deteriorating conditions and that it is not clear how to report changes of circumstances effectively and they are looking at ways to improve this
- They are looking to tighten up the day 1 referral process – this should be initiated if the fit note lasts more than 29 days apparently!

However, they did not yet seem to have addressed the issue of the UC50 just not being issued either when a first fit note is submitted or one highlighting a worsening condition. Nor had they addressed our request that standard wording be put in the journal setting out the WCA process as soon as a fit note is submitted on a manual basis pending a digital solution.

A follow up meeting to look at progress is due to happen in three months.

Thanks to Daphne Hall for all her work on this.

**nawra**  
national association of  
welfare rights advisers



## Debt and arrears levels in Scotland rocket

### Debt charity StepChange announced the figures for 2022.

A Scottish debt charity has warned the amount of its clients behind on household bills is up by more than two-thirds in 2022 as the cost of living continues to bite.

StepChange Debt Charity Scotland's '[Scotland in the Red' report](#) reveals the toll a year of increased living costs has had on Scots' finances.

Despite government interventions to help with soaring costs, the average amount a StepChange client is behind on household bills has increased by a shocking 68%, from £1,739 in 2021 to £2,920 in 2022.

Among arrears on essentials, energy bills were a particular pressure point for clients last year.

In 2022, 75% of all clients and 85% of vulnerable clients were in arrears with their electricity bills, rising from 63% of all clients and 75% of vulnerable clients in 2021.

To address the increase in energy arrears, StepChange Scotland is calling for more tailored support for struggling households from providers, including the write off of energy debt where someone simply cannot afford to pay.

The report also reveals a 27% increase in average unsecured debt levels, rising from £12,730 in 2021 to £16,174 in 2022.

This stark rise reflects a cost of living-driven shift in the profile of a typical StepChange Scotland client, as more middle-income families are contacting the charity for support.

Average monthly income among all clients increased by 10% from £1,397 in 2021 to £1,543 in 2022.

Sharon Bell, head of StepChange Debt Charity Scotland, said: "Looking at our clients' finances from 2022, it's clear this crisis is sweeping a wider pool of people into financial difficulty. For the most financially vulnerable households, the struggle of keeping up with the cost of essentials is nothing new, but after the pandemic and many years of stagnating wages, the safety nets to catch people affected by a sudden jump in inflation are simply not there, and they are running out of tools to cope."

Despite clients' average income increasing, the average amount remaining in a client's budget after they account for their essentials, fell by 9% from £153 in 2021 to £139 in 2022.

There has been a similar decrease in vulnerable clients' budgets too, falling by 33% from £107 in 2021 to £71 in 2022, suggesting the disproportionate impact that the cost of living crisis has had on vulnerable clients.

The trends seen last year show little sign of improvement as StepChange Scotland has also published its quarterly client data for January – March 2023, which shows over one quarter (26%) of clients cited increases in living costs as their main reason for debt – up on the previous three months and on previous years.

StepChange Scotland says these figures are worrying but not surprising, representing a culmination of years of stagnating incomes in which financial resilience has been consistently low, leaving many households particularly vulnerable to economic shocks.

The charity wants to see targeted support for households continue in 2023 and beyond, to prevent people from remaining trapped in long-term financial difficulty.

Ms Bell added: "It's important the Scottish and UK Governments, as well as creditors, are attuned to the difficulties people are facing, as well as the pressure on advice providers at this time. With energy debt so high, action is needed to prevent just coping households falling deeper into difficulty, including the writing off of arrears where someone cannot afford to pay. Where there is a build-up of arrears, creditors must take a fair approach to enforcement action, with a focus on engaging and supporting struggling customers over punitive debt collection."