The Debt Arrangement Scheme:

Is it Broken?

das
Debt Arrangement Scheme

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He has previously worked as a trainer for one of Scotland's leading money advice charities, delivering training on the Debt Arrangement Scheme. He has written numerous articles on the Scheme, including for the Journal of the Law Society of Scotland.

He is also a licenced Personal Insolvency Practitioner in Ireland and remains an Approved Money Adviser.

He is an independent money advice trainer and consultant and blogs on debt issues for his own Scottish Adviser Blog and other sites.

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Summary

Is it broke?

The Scottish Debt Arrangement Scheme (DAS) has long been the Scottish Government's flagship formal, debt remedy.

Not because it was better than any other formal debt remedy, like sequestration or protected trust deeds, but because it was unique in the UK and was a first. The first formal debt management remedy which didn't involve the courts, could freeze interest, and had no financial limit as to the level of debt that could be included.

It also heralded a change in how Scots Law dealt with debt: no longer the land of poinding and warrant sales, but a country that took an enlightened and progressive view of how to help struggling consumers manage their debts, whilst still being able to maintain a reasonable standard of living.

> *"there remains deeply engrained in the Scottish political psyche a deep suspicion that many debtors are not can't pays, but won't pays."*

To now witness the numbers of consumers accessing it falling by 50% is disappointing. Particularly as all the evidence suggests with increasing levels of unmanageable debt, the need for it is as great as before.

There may be specific reasons why certain agencies and firms are now doing less Debt Payment Programmes (DPPs), but the substantial reduction in numbers cannot be dismissed by this alone. There is clear evidence that the decline is linked to a change in policy that was introduced by the Debt Arrangement Scheme (Scotland) Amendment Regulations 2014.

That policy change was that consumers had to pay more: they were getting their debt management too cheap. The truth is that despite the lip service often paid to understanding the reasons for debt and the causes of debt, there remains deeply engrained in the Scottish political psyche a deep suspicion that many debtors are not "can't pays", but "won't pays".

There has now been a reduction of 64% in the number of Debt Payment Programmes (DPPs) in the private sector and a reduction of 38% in the free sector. This suggests what is happening is not linked to one firm or sector, but has a commonality that is applicable across the board.

"the benefits of the Scheme were eroded for many consumers."

Reversing the decline

This report has been written with the view the Debt Arrangement Scheme remains an excellent solution for many consumers, but is currently at risk of withering and going into irreversible decline.

This decline can be arrested and reversed, but some key changes are necessary.

First a different financial tool must be used for the Debt Arrangement Scheme than that which is used for personal insolvency solutions to determine how much consumers must pay.

Second, it should not be necessary for all debts to be included into a Debt Payment Programme (DPP) when circumstances justify them being excluded or given priority status, such as hire purchase debts, mortgage and secured loan and rent arrears.

Finally, the Scottish Government must do more to attract other providers into the market to increase access and encourage competition. This should be done by abandoning the practice of having payment distributors tender before being allowed to provide the service.

Joining the dots

The decline of the Debt Arrangement Scheme over the last two years has unquestionably been linked to the introduction of the Debt Arrangement Scheme (Scotland) Amendment Regulations 2014.

The Regulations were introduced at the end of the third quarter of 2014/15 and the number of DPPs being approved after that point fell from 1,097 in the third quarter to

633 in the fourth quarter (a 43.3% decrease).

Although that reduction can be primarily attributed to what appears to have been the decision by one firm to focus less on this market, the reduction continued after April 2015 when additional provisions in the 2014 Regulations were commenced in relation to placing all debts into Programmes and the use of one Common Financial Tool.

That reduction has continued ever since, with only a slight recovery being anticipated in 2016/17.

"private sector firms since 2011/12 have been key providers of the Debt Arrangement Scheme and a key component of its success."

The reasons for this reduction are complex, but speaking simply when emphasis moved away from creating sustainable repayment plans and onto plans that would recover money quicker for creditors, the benefits of the Scheme were eroded for many consumers.

It's a self-evident truth for most money advisers, that when consumers are given the choice of living with austere budgets they would rather do that for as a short a period as possible.

When there is no difference in what you have to pay, personal insolvency for 4 years is a more attractive option than a repayment plan that may last up to 10 years.

This is more likely to be true when the option of the DPP means credit ratings will be damaged for longer.

The simple fact is, unless a consumer has a home they need to protect and cannot do that through personal insolvency, then where their debts cannot be repaid within 4 years, DAS is not a very attractive option.

This is bad news for creditors, as although a more generous income and expenditure in a DPP may mean lower contributions, the creditors still begin recovering their money sooner and ultimately recover more over the lifetime of a DPP.

It also means that DPPs are more likely to break or need variations carried out over the duration of the Arrangement, as life's unexpected crises occur and the cost of living increases.

This interrupts the pattern of getting consumers paying again, adds to the cost of administering the DPP and ultimately, make it less certain from the outset whether the DPP will succeed for the debtor.

Public Awareness

Disappointingly, after 2 years of decline the Scottish Government's response has been to be launch a public awareness campaign, suggesting there is a lack of understanding or willingness to acknowledge the reasons why the Scheme has become far less attractive for many debtors.

The damage that has been done to the Debt Arrangement Scheme, however, will not be reversed with a public awareness campaign across mainstream and social media.

Some hard truths must be faced: that although it may be preferable consumers use free sector providers, such as Citizen Advice Bureaux or Stepchange, the truth is that private sector firms since 2011/12 have been key providers of the Debt Arrangement Scheme and will be key to its success going forward.

Between 2011/12 and 2014/15 they were in every year the largest providers of the Scheme, often filling the postcode gaps in the market, where free sector providers didn't or couldn't deliver a high volume of DPPs, due to lack of resources.

Payment Distribution

Since 2011/12, of the top five providers of the Debt Arrangement Scheme over that period, three of the five have been payment distributors.

"The regulation of Payment Distribution by the AiB is a function that is already performed by the Financial Conduct Authority"

Being a payment distributor in the Scheme allows firms to distribute client's funds to creditors as part of their DPP, and to charge a statutory fee to creditors for doing so.

The role of payment distribution, however, at present is restricted to a small panel of four providers, who competitively tender to fulfil the role. The logic behind this being is it provides better value for creditors.

However, it also acts as a barrier to private firms entering the market, as many will be reluctant to provide the Scheme as a service if it requires them to transfer work to a competitor firm.

The objective of providing better value for creditors would be better served by allowing more competition in the market by allowing firms to be more competitive in relation to the management fees they charge and, therefore, would likely increase the level of contributions being paid into the scheme.

Also, a set maximum statutory fee could be introduced into the regulations to cap the fees that payment distributors can charge, to prevent excessive fees.

The logic for tendering out the payment distribution contract is also not clear, considering payment distributors legally act for the consumer, so it is not a service the Accountant in Bankruptcy is buying in for itself.

Consumers also don't have the choice of payment distributor they can use, meaning they can't switch between distributors, which would encourage improved services and greater returns for creditors.

This appears strange and is almost unheard of in relation to any other financial service, where the provider works for the debtor.

The function of regulating Payment Distribution should also be reviewed.

"the cost of administering the DAS is believed to be £1.2 million, which with revenue from the Scheme being only £600k, suggests it is a loss-making service."

There are reports that the cost of administering the DAS is believed to be £1.2 million, which with revenue from the Scheme being only £600k, suggests it is a loss-making service for the AiB.

To address this, it has been suggested that the AiB fee of 2%, which they charge on all payments being made through DPPs, may be increased to 4%, reducing the returns for creditors.

As an alternative, it may be wiser to look at what functions the AiB are performing in the Scheme to see if further cost savings can be made.

The regulation of Payment Distribution by the AiB is a function that is already performed by the Financial Conduct Authority, who all payment distributors must be authorised by, as they handle client funds. The AiB is, therefore, performing a superfluous function.

Conclusion

The Debt Arrangement Scheme remains an excellent remedy for debtors in certain circumstances, but the reality is there are little benefits at present for many debtors entering the Scheme and alternatives such as personal insolvency and voluntary repayment plans offer more.

If the Scottish Government want to change this, rules changes would be more effective than public awareness campaigns.

Alan McIntosh
April 2017

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Distribution Of DAS

Figures produced by the Accountant in Bankruptcy (AIB) show that there were approximately 115 agencies delivering access to the Debt Arrangement Scheme to consumers between 2011/12 to 2015/16.

These agencies included all of Scotland's Citizen Advice Bureaux and local authority money advice services, which were automatically passported into delivering the service as approved advisers.

In addition to that all licenced Insolvency Practitioners were approved to deliver the Debt Arrangement Scheme, although not all offered the service.

Distribution between free and fee charging services

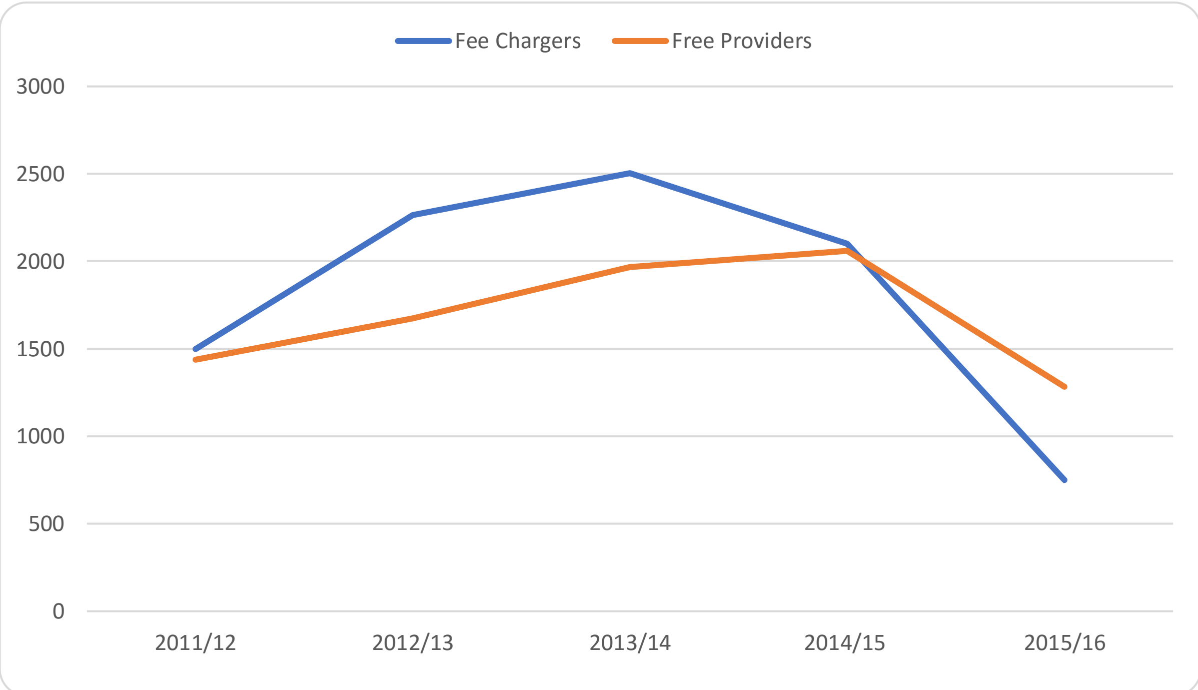
Of the 115 agencies, 86 of them, or approximately 75% of them, were free providers of the service.

However, in terms of the number of Debt Payment Programmes that were provided year on year, figures show that the private sector until 2015/16 were the main providers of DPPs.

The private sector has, therefore, been a major contributor to the success of the Debt Arrangement Scheme since then.

Geographical Distribution

Of the free sector providers, 84 of the 86 providers were agencies geographically restricted, meaning due to their funding streams, could



only provide services to consumers living in specific geographical areas across Scotland. In total these agencies delivered 850 Debt Payment Programmes in 2015/16, representing 42% of all DPPs, and constituting 66% of the 1,283 that were provided by the free sector.

This represents, however, a reduction of 566 (or 40%) from the 1,416 they provided in 2014/15, which constituted 69% of all those provided by the free sector and 34% of all DPPs provided overall.

"in terms of the number of DPPs that were provided year on year, figures show that the private sector until 2015/16 were the main providers"

Agencies not doing DAS

In 2015/16 of these 115 agencies, 26 (23%) entered no clients into Debt Payment Programmes.

Of these 26, 62% were free sector providers, with the remaining 38% being fee charging practices. In the preceding year, 2014/15, these providers had placed 79 consumers into Programmes, which accounted for just under 2% of all Debt Payment Programmes for that year.

It must be acknowledged that of these agencies, several were no longer providing money advice services, but 11 were Citizen Advice Bureaux and 3 were local authority services.

Agencies with less than 5 DPPs

Of the agencies in 2015/16 which delivered less than 5 Debt Payment Programmes (DPPs) under the Debt Arrangement Scheme, these were 69 out of the total 115 (or 60%).

Of these 69 firms, 74% were free providers and 26% were fee chargers.

Of the fee providers, 28 were Citizen Advice Bureaux and 9 were local authority services.

In total, they placed 103 consumers into the Debt Arrangement Scheme, accounting for 5% of all DPPs for 2015/16, compared with 381 for 2014/15, or 9% of the total number of Debt Payment Programmes for that year.

Agencies with less than 10 DPPs

81 agencies, of the 115 listed as providers by the AIB, delivered less than 10 DPPs each for 2015/16.

Of these agencies, 62 were free sector providers (77%) as opposed to 19 being fee charging services (23%).

Thirty-four were Citizen Advice Bureaux and 12 were local authority services.

They delivered 193 Debt Payment Programmes in 2015/16, down from 555 in 2014/15, representing a reduction of 65%.

Agencies with less than 20 DPPs

In total these 83% of agencies accounted for 390 Debt Payment Programmes in total or 19% of all DPPs in 2015/16. This was down on the 906 they done in 2014/15, which represented 22% of the total for that year.

Seventy-five (78%) of them were free providers; 21 were fee charging agencies (22%).

Remaining providers

Of the remaining providers of DPPs, who delivered more than 21 or more in 2015/16, there are 19 agencies, 11 of which are in the free sector and 8 of which are private sector providers.

"Ninety-six agencies produced 20 or less DPPs each in 2015/16, representing 83% of all those providers listed by the AiB."

Of the free sector providers, 10 of the 11 providers are geographical services, meaning they do not provides services outside their local authority areas or to specific client groups (housing associations).

These agencies cover only 8 of Scotland's 32 local authority areas, namely:

- Dumfries and Galloway
- Edinburgh
- Fife
- Inverclyde
- Moray
- North Lanarkshire
- South Lanarkshire
- Stirling

The only national provider for the free sector providing more than 21 cases was Stepchange, the debt charity, which provided 424 DPPs in 2015/16, which made them the largest provider overall in 2015/16. Their figures however, were still down by 203 from the 632 they delivered in 2014/15, representing a 49% reduction.

Overall the 11 free sector agencies delivered 914 DPPs in 2015/16, down from 1,277 in 2014/15, representing a 28% reduction.

Of the 8 private sector providers, they delivered 718 DPPs, down 1,220 from the 1,938 they delivered in 2014/15, representing a 63% reduction.

One firm, Gregory Pennington only delivered 41 programmes, down from 633 in 2014/15, and 1,408 in 2013/14, suggesting the firm is no longer focusing on providing the service or is finding there is less need for it.

Other volume providers in the private sector have also seen large drops in numbers, with the Carrington Dean Group only delivering 185 programmes in 2015/16 as opposed to the 300 cases they done in 2014/15, representing a reduction of 38%; whilst Knightsbridge only delivered 320, down 483 from the 803 DPPs they set up in 2014/15, representing a 60% reduction in number.

In Conclusion

It is clear there has been significant reductions across the board from providers of the Debt Arrangement Scheme, including both private sector and free sector providers. The reduction has also affected agencies in the free sector that are restricted to providing their services to people belonging to certain groups (housing associations) or live in certain geographical areas.

It is clear though, that the greater reduction in the private sector has had the greatest effect, as primarily it has been the private sector, with one or two notable exceptions, which has provided the capacity to do any volume of DPPs.

It may be that the reason the reduction has been greater in the private sector has been because commercially the changes introduced by the 2014 Regulations has meant that for private sector providers, DAS is no longer a commercially viable option for them.

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The 2014 DAS Regulations

The Debt Arrangement Scheme (Scotland) Amendment Regulations 2014 were commenced on the 11th December 2014.

They amended the Debt Arrangement Scheme (Scotland) Regulations 2011.

Key components of the Regulations, however, were not introduced until April 2015, most notably in relation to the Common Financial Tool.

Why a Common Financial Tool?

The decision to introduce a Common Financial Tool into all Scottish formal debt remedies was primarily driven by the introduction of a Certificate of Sequestration into Scots Law by the Home Owners and Debtor Protection (Scotland) Act 2010.

Certificates allowed debtors to bypass the necessity of having to prove apparent insolvency to access sequestration by showing they couldn't pay their debts as they fell due.

This, however, created the problem that an approved money adviser may have found a debtor unable to pay their debts as they fell due and grant a certificate. However, a trustee administering their sequestration may have used a different financial tool and found they could have afforded to pay their debts as they fell due.

However, the need for a common approach to assessing someone's income and expenditure, only really was applicable to personal insolvency.

> *"There was... a need to ensure the same financial tool was being used across the sector and in the same manner, to ensure consistency"*

By introducing the same common financial tool to cover all formal debtor remedies and ensuring expenditures were all treated in the same manner, meant that debtors would pay the same each month, regardless of the remedy they chose.

This, therefore, presented many consumers with a stark choice of having to choose between being left with no disposable income for 4 years in a protected trust deed, sequestration or possibly up to 10 years in a debt payment programme.

The reality is unless there are good reasons why personal insolvency is not an appropriate option for consumers, such as the effect it will have on their employment or home, most will choose the shortest route to be debt free as possible.

This is reasonable when you consider living on an austere budget denies many consumers life opportunities, such as going on holiday, buying a car, or saving money.

The truth is long term debt management plans, whether statutory or not, do not do much for increasing the financial capability or inclusion of consumers.

Even where personal insolvency is not an option for a consumer, a voluntary repayment plan may be preferable for many than a formal repayment plan like DAS, if it allows more disposable income in the short term than a DPP does.

For some this is a simple trade-off as they may pay back more over the long term, but in return they have more disposable income in the short term.

For creditors, many realise they may not obtain as much back in the short term, but they do begin receiving funds quicker than they normally receive in personal insolvency and get more back over the long term.

The problem, however, is voluntary debt management plans rarely are long term solutions for consumers.

Creditors can continue to charge interest, or choose unilaterally to reapply interest during the programme. Debts can be sold, and creditors can initiate legal and recovery action. All of which were the main reasons underpinning the creation of the Debt Arrangement Scheme in the first place.

Inclusion of all debts

One of the other significant changes that were introduced by the 2014 Regulations was the requirement of debtors to include all their debts into a DPP.

On the face of it, this was not an overly controversial proposal, as for a debtor to apply to enter the Debt Arrangement Scheme, they had to first seek advice from an approved money adviser, who as a matter of good practice would always include all unsecured debts into a DPP. This prevented any creditor receiving unfair preference, but also protected the debtor by providing a holistic solution.

However, although the Debt Arrangement Scheme protects debtors from diligence and being made bankrupt, it does not prevent secured lenders raising repossession action. Equally, it does not prevent a landlord raising an action for eviction.

Although, it must be hoped that most secured lenders or landlords would not initiate such action once a debtor has entered into a Debt Payment Programme, the fact that such an action may be raised, or that a sheriff hearing such an action may not consider the Programme reasonable, means for obvious reasons that debtors may choose to leave these debts outside programmes and deal with them as priority creditors.

The 2014 Regulations prevented this option and in doing, removed the flexibility the Scheme had previously had to deal with these types of debts.

Conclusion

The introduction of one formal Common Financial Tool for all statutory debt remedies and the treatment of all expenditures in the same manner, regardless of the remedy, has been by far the biggest contributory factor resulting in the declining number of consumers accessing the Debt Arrangement Scheme.

It presents consumers with a choice of either having to repay their debts in a personal insolvency arrangement over 4 years, living with no disposable income, or in a Debt Payment Programme for up to 10 years.

The reality is where they chose the Debt Payment Programme, there are no tangible benefits, unless they own their own home and cannot protect it through insolvency.

They are left with no ability to save money during that period and have limited resources to deal with the financial challenges that life presents, such as affording holidays or buying new cars.

For the period the consumer remains liable for their debts throughout the Programme the debt remains on their credit file until it is paid off, meaning their credit rating is often damaged for longer than were they to choose an insolvency option.

As a result, more consumers are probably opting for insolvency solutions or voluntary repayment plans, where interest may still be added or legal action raised.

Other debtors are also probably being excluded as they are not wishing to use the DAS where they have mortgage or rent arrears.

This is unfortunate, as DAS would allow many of these debtors to manage their unsecured debts whilst addressing their secured debts.

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Payment Distribution

The role of Payment Distributor has always been a key role in the Debt Arrangement Scheme, since its introduction in 2004.

Payment Distributors did not necessarily provide access to the Debt Arrangement Scheme itself as money advisers, although many private firms that began providing the Debt Arrangement Scheme as a service, also acted as Payment Distributors.

Payment Distributors were authorised by the Accountant in Bankruptcy, acting in her role as the Debt Arrangement Scheme Administrator. They were paid from the Scheme by the creditors, with the Regulations allowing them to charge a fee of up to 10% on all payments made.

After the introduction of the 2011 Debt Arrangement Scheme (Scotland) Amendment Regulations, who could become a payment distributor and how much they could charge, changed.

"The role of the Accountant in Bankruptcy should be to approve payment distributors, not to restrict access to the market, skewering competition."

Firms had to tender to provide the service, with fees being capped at 8%, although most firms tendered much less. This allowed the DAS Administrator to begin applying a 2% management fee to help cover the costs of providing the service and ensure there was no additional cost for creditors.

The basis for this change was to provide better value for creditors, as although Payment Distributors previously could charge less than 10%, most charged the maximum they could.

However, it was also generally understood that the payment distribution service was being provided to the Debt Arrangement Scheme Administrator who operated the scheme.

The Scottish Government, therefore, in putting payment distribution out to tender, were adopting a common practice often used when buying in a service.

However, the justification for this practice has been eroded by the Debt Arrangement Scheme (Scotland) Amendment Regulations 2013, which amended the 2011 Regulations and made it clear the Payment Distributor acted on behalf of the consumer, not the Debt Arrangement Scheme Administrator.

The Scottish Government, therefore, are not buying in a service when they put payment distribution out to tender.

"The Scottish Government should take the opportunity when the existing contracts for payment distribution end in 2018, to not put the contracts up for re-tender"

They, however, arguably are obstructing other firms from entering, not only the payment distribution market, but the Debt Arrangement Scheme market itself.

It is clear, some large providers of debt solutions in the UK have been reluctant to provide the Debt Arrangement Scheme, because they cannot provide payment distribution services.

It is also clear that some of the largest providers of the Debt Arrangement Scheme have in the past been payment distributors.

One of the other peculiarities of the current system is consumers who enter Scheme are not allowed to choose their own payment distributor. This is despite the Payment Distributor acting on behalf of the consumer.

This is like no other financial service in the UK, where its normally accepted that consumers should be able to switch between providers should they wish to.

Conclusion

The role of the Accountant in Bankruptcy should be to approve payment distributors, not to restrict access to the market, skewering competition.

Consumers should also have the freedom, as they did prior to 2011, to choose who they wish to use as a payment distributor and to be able to switch providers if they wish.

To protect creditors, a statutory cap should be placed on what fees payment distributors can charge, but they should be free to charge less than the statutory maximum should they choose.

It also must be considered to what extent the Accountant in Bankruptcy should supervise payment distributors going forward, as this is a role that is already performed by the Financial Conduct Authority, as firms must be authorised by them to manage client funds.

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Appendix A

Data as provided by AIB

Money Advisor	DPP proposed 2011/12	DPP proposed 2012/13	DPP proposed 2013/14	DPP proposed 2014/15	DPP proposed 2015/16	DPP approved 2011/12	DPP approved 2012/13	DPP approved 2013/14	DPP approved 2014/15	DPP approved 2015/16
Aberdeen Citizens Advice Bureau	6	12	7	2	3	6	12	7	1	3
Aberdeen City Council	29	30	24	14	13	29	31	19	16	14
Aberdeen Debt Solutions Limited	10	1	0	0	1	6	5	0	0	1
Advice Works (Renfrewshire Council)	25	23	27	19	0	25	21	28	19	0
Ag Taggart & Co Ltd	0	0	12	10	11	0	0	9	7	13
Aib Money Advisor	4	6	5	4	0	4	6	5	4	0
Airdrie Cab	30	35	60	43	22	27	34	61	40	21
Ami Financial Solutions Ltd	0	2	5	3	3	0	1	4	2	0
Angus Cab	3	4	14	10	0	2	4	11	13	0
Angus Cab Arbroath	0	0	0	1	0	0	0	0	1	0
Angus Council	17	17	19	14	1	16	18	14	15	1
Argyll & Bute Citizens Advice Bureau	0	0	1	5	1	0	0	1	4	1
Argyll & Bute Council	26	25	16	16	15	20	25	16	14	11
Ayrshire Housing	0	0	0	1	1	0	0	0	1	1
Banff & Buchan Cab	20	9	2	1	2	19	9	1	2	2
Bdo Llp	3	12	7	11	4	3	11	8	7	3
Begbies Traynor Central Llp	58	75	128	90	36	48	76	121	81	42
Bellshill & District Cab	13	7	2	9	0	8	7	3	7	0
Bicali Debt Consultancy	7	7	7	8	5	7	7	7	8	4
Bute Advice Centre	0	0	1	0	2	0	0	1	0	2
Caithness Cab	0	5	7	8	2	0	5	6	7	2

Campbell Dallas Llp	24	25	75	42	41	21	24	71	41	42
Carrington Dean Group Limited	207	209	321	331	183	182	206	326	300	185
Castlemilk Law & Money Advice Centre	0	0	0	6	5	0	0	0	5	6
Central Borders Citizens Advice Bureau	0	0	8	9	2	0	0	6	9	3
Chai Advice Service	0	6	11	17	9	0	5	11	15	6
Chap	0	0	0	2	3	0	0	0	2	2
Choices - Opfs	0	0	1	0	0	0	0	1	0	0
Christians Against Poverty	2	7	11	13	9	2	7	10	12	9
Citizens Advice & Rights Fife	297	199	186	175	159	267	209	177	166	154
Citizens Advice Edinburgh	0	0	0	0	3	0	0	0	0	2
Clackmannanshire Council	6	8	10	3	1	4	8	9	4	1
Clydesdale Cab	0	0	7	8	4	0	0	7	7	4
Coatbridge Cab	4	21	23	21	3	2	21	23	20	4
Cumbernauld & Kilsyth Cab	8	19	19	15	10	8	16	20	11	8
Dalkeith & District Citizens Advice Bureau	9	13	17	20	8	9	14	17	18	8
Dumfries & Galloway Cas	60	50	65	51	45	55	51	62	44	44
Dumfries & Galloway Council	1	2	0	0	1	1	1	0	0	0
Dundee Cab	1	24	25	18	12	1	24	24	18	9
Dundee City Council	2	7	11	8	3	2	6	10	8	2
East Ayrshire Cab	33	38	33	11	11	26	41	35	10	8
East Dunbartonshire Cab	55	43	23	29	19	51	38	23	29	18
East Renfrewshire Citizens Advice Bureau	4	21	23	13	15	4	19	17	15	14
East Renfrewshire Council	22	38	45	31	14	20	33	44	31	13
East Sutherland Cab	0	2	1	1	0	0	2	1	1	0
Easterhouse Cab	11	4	8	8	6	9	5	8	8	4
Falkirk Cab	34	46	48	38	15	35	47	44	35	16
Falkirk Council	10	10	8	9	1	5	11	7	10	1
Fife Council Money Advice Service	15	4	0	0	0	13	3	0	0	0
First Choice Finance Scotland Ltd	5	18	52	28	1	5	17	47	27	3

French & Duncan	0	0	5	3	0	0	0	3	3	0
French Duncan (Edinburgh)	3	3	5	6	8	3	3	5	3	2
Glasgow Central Cab	0	0	0	10	7	0	0	0	5	11
Glasgow City Council	101	58	45	22	7	91	62	43	20	7
Gordon Rural Action	35	24	23	20	13	32	25	22	14	12
Grant Thornton Uk Llp	0	0	0	7	9	0	0	0	4	8
Granton Information Centre	0	0	7	14	5	0	0	5	15	3
Greater Pollok Cab	7	6	22	23	13	7	6	18	22	12
Gregory Pennington (Wilson Andrews)	1,170	1,326	1,417	595	41	1,036	1,322	1,408	633	41
Haddington Cab	39	26	33	24	13	31	24	35	23	11
Hamilton Cab	22	38	62	71	39	19	37	56	51	34
Henderson Loggie	33	22	7	2	0	30	18	10	2	0
Inverness Badenoch & Strathspey Cab	23	16	20	9	2	23	14	20	8	1
Invocas Financial	0	0	0	0	1	0	0	0	0	0
Knightsbridge Insolvency Service Ltd.	210	283	353	837	330	70	412	334	803	320
Kpmg Llp	0	0	0	10	47	0	0	0	5	44
Legal And Debt Solutions Ltd	0	6	6	2	0	0	6	3	2	0
Link Housing Association	0	1	1	2	1	0	1	1	2	1
Lochaber Citizens Advice Bureau	5	22	16	14	2	5	21	16	12	4
Maryhill & Possilpark Cab	1	0	0	0	0	1	0	0	0	0
Meston Reid & Co	0	2	1	1	0	0	1	2	1	0
Mitchell Farrar Insolvency Practitioners (Uk) Limited	0	0	0	1	0	0	0	0	0	0
Mlm Cps Ltd	80	123	91	67	34	67	120	80	43	23
Mmg Archbold	0	0	3	1	0	0	0	3	1	0
Money Alba	4	5	10	31	3	3	6	6	29	3
Money Matters	77	63	85	37	21	69	66	84	32	21
Money Matters Money Advice Centre	1	2	4	1	4	0	1	4	0	3
Motherwell & Wishaw Cab	6	12	25	24	16	6	11	26	21	17
Murray Stewart Fraser Limited	0	0	0	0	1	0	0	0	0	1

Musselburgh Cab	1	3	10	3	0	1	2	9	3	0
Nairn Cab	2	14	27	28	9	2	13	26	30	9
North Ayrshire Council Money Matters	70	44	24	2	0	63	44	24	2	1
North Lanarkshire Council	95	109	98	136	62	80	109	95	134	57
Orkney Cab	1	0	0	0	0	1	0	0	0	0
Parkhead Cab	0	0	1	1	0	0	0	1	1	0
Penicuik Cab	6	12	13	9	0	6	9	16	8	0
Perth Cab	21	30	47	32	14	18	32	45	30	11
Renfrewshire Cab	45	24	29	25	5	44	21	28	25	5
Ross & Cromarty Citizens Advice Bureau	0	0	1	0	1	0	0	0	1	1
Roxburgh Cab	13	12	22	6	2	12	12	21	5	4
Rsm Tenon	0	1	1	0	0	0	1	0	0	0
Rutherglen & Cambuslang Cab	3	11	5	0	5	2	11	6	0	4
Saltcoats Citizens Advice Bureau	4	30	38	15	5	3	27	42	15	4
Shelter Scotland - Dundee	0	0	0	0	3	0	0	0	0	2
Shelter Scotland - Stirling	0	0	0	0	1	0	0	0	0	1
Shetland Islands Cab	0	5	1	5	0	0	5	1	5	0
Simple Financial Solutions Ltd	0	0	0	33	13	0	0	0	28	5
Skye & Lochalsh Citizens Advice Bureau	0	1	0	0	1	0	1	0	0	1
Smart Money Advice Project	0	0	0	1	0	0	0	0	1	0
South Lanarkshire Council - Money Matters Advice Service	104	130	122	117	83	86	128	119	104	77
Southside Housing Association	0	0	0	0	4	0	0	0	0	3
Stepchange Debt Charity Scotland	6	3	222	632	444	5	3	183	632	424
Stirling Cab	34	30	28	15	19	31	28	28	13	21
Stirling Council	6	10	5	4	8	6	10	5	4	6
The City Of Edinburgh Council	29	55	75	79	42	27	51	65	70	43
The Highland Council	2	8	3	3	1	1	8	3	1	2
The Moray Council	24	59	62	42	43	22	58	58	42	43
Thomson Cooper	0	10	36	58	16	0	8	35	56	17

West Dunbartonshire Cab	42	53	58	23	14	40	48	55	25	12
West Dunbartonshire Council Working 4 U Money	30	38	29	28	6	26	38	31	27	6
West Lothian Cab	1	13	16	3	2	1	13	15	3	2
West Lothian Council	4	7	25	31	17	4	6	24	29	12
Westhill And District Cab	0	0	2	2	1	0	0	2	2	1
Wicas Money Advice	5	2	12	4	1	5	1	11	5	0
Wylie & Bisset Llp	17	17	16	14	2	15	16	17	11	3
Total	**3,443**	**3,853**	**4,644**	**4,361**	**2,146**	**2,936**	**3,939**	**4,471**	**4,161**	**2,043**

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