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Evaluation of the Illegal Money Lending Prevention Programme





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Purpose

The Scottish Illegal Money Lending Unit (SIMLU) is part of Trading Standards Scotland and works in partnership with other agencies and organisation across Scotland to seek to prevent illegal money lending. The Unit consists of specialist officers who investigate allegations of illegal money lending and related activity, submitting reports to the Procurator Fiscal as appropriate. The team also provides support for victims of illegal money lending and raises awareness of the dangers of borrowing from such lenders. For the past three years the SIMLU has supported a grants programme that seeks to enable organisations to deliver activities that are likely to contribute to a reduction in the long-term use of illegal money lenders. This paper presents the findings of the evaluation of three projects funded by Trading Standards Scotland through the Illegal Money Lending Prevention Programme. These are:

- Save Wise/Money Skills Project (Positive Action in Housing)
- Preventing Illegal Money Lending Project (Wheatley Housing Association)
- Be More Squirrel (Denny & Dunipace CAB)



Context

One of the main triggers for the use of illegal money lenders is the requirement to borrow money to meet an immediate need and the lack of any alternative options. Although the economic effects of the pandemic have, to an extent, been mitigated by government support schemes and the introduction of payment holidays, this relief is temporary, and it is generally accepted that when such measures cease debt levels will rise. There is already evidence that the pandemic is having an adverse effect on those individuals who are most socially and economically excluded.¹ A survey commissioned by Joseph Rowntree Foundation found that, in Scotland, almost a third of households have experienced a drop in incomes since March 2020 and, of the individuals reporting this reduction who lived in rented accommodation, almost half were concerned about their ability to pay rent.²

The reforms in consumer credit introduced by the Financial Conduct Authority³ to protect consumers have resulted in individuals with limited incomes finding it harder to access credit. The risks this poses to increasing illegal money lending activities have been well documented and the need for further research, particularly in relation to the use of digital media to promote illegal money lending, highlighted.⁴

Tackling illegal money lending is challenging because of the secrecy and shame which surrounds it. As well as measures designed to address the problem directly, initiatives that seek to reduce the likelihood of it occurring by raising awareness and offering alternatives such as improving financial capability, increasing household incomes and improving access to affordable credit are crucial. All three projects have delivered activities that seek to both raise awareness and reduce risk.

1 https://www.improvementservice.org.uk/_data/assets/pdf_file/0013/16402/Poverty-inequality-and-COVID19-briefing.pdf

2 <https://www.jrf.org.uk/press/almost-third-scots-incomes-have-reduced-lockdown-half-affected-renters-worried-about-paying>

3 <https://www.fca.org.uk/firms/high-cost-credit-consumer-credit>

4 <https://www.carnegieuktrust.org.uk/publications/advancing-affordable-credit/>



Limitations of the Evaluation Process

The pandemic impacted on the ability of all the funded projects to deliver their planned outcomes and adjustments had to be made. This included an extension to the timescale for completion of the projects. The methodology adopted in the evaluation process also had to be revised.

There is an acknowledgement that, in many cases, the planned activities did not proceed, or had to be significantly changed and as a consequence it was not possible to achieve the expected outcomes.

In relation to the evaluation process, in the later, more crucial stages, engagement was challenging. It had been intended to interview key stakeholders and beneficiaries to independently assess the impact of the funding, but this was often not possible. This has resulted in a greater reliance on comparing project reporting with the purposes for which the grant was made and conducting a limited number of interviews. It must be stressed that the findings should be considered in this context.

Save Wise/Money Skills Project (Positive Action in Housing)



Positive Action in Housing is an independent, anti-racist homelessness and human rights charity dedicated to supporting women, children and men from refugee and migrant backgrounds to rebuild their lives.

Purpose of Funding

Funding of £22,919 was given to support Positive Action to build on the success of their Money Skills Project by introducing a new 'Save-Wise' scheme. This sought to help prevent disadvantaged people from refugee, new migrant, and other minority ethnic communities from using loan sharks by raising awareness of the dangers of illegal money lending as part of activities to maximise income and improve financial capability.

Activities

A combination of one to one financial health checks and group activities were offered. In the course of each type of engagement, participants were given leaflets warning them about loan sharks along with take-home tips on safe borrowing options. The following activities were offered:

1. One to one financial health checks

These were provided to 472 service users (this exceeded the original target of 250). Participants were offered a financial health check and supported to maximise their incomes and improve their financial capability. It had been hoped to identify and support individuals using, or likely to use, illegal money lenders and to refer them for further support, however this was not achieved to any significant extent. As well as the challenges around getting individuals to be open about illegal money lending, it was reported, anecdotally, that in some communities various types of informal lending operate and these are not perceived as being wrong. This may be an area that should be explored further.

2. Financial literacy workshops

Although it had been intended that advisors, supported by volunteers would deliver

ten multi-lingual workshops, covering a range of issues related to improving money management, across Glasgow the actual number delivered was eight. In the course of the project it became apparent that people preferred to engage when they had a problem to be addressed and were reluctant to attend a workshop dealing with general financial issues. As there was better engagement with the volunteer-led sessions it was decided to focus on these. Having this focus on group activities was a new development for Positive Action in Housing and they were able to review which elements were most effective and make adjustments to their delivery model.

3. Volunteer-led financial capability information sessions

Eight of these sessions designed to improve financial capability, based in local communities and led by Community Champions were provided. Targeting specific communities and delivering locally based sessions in an individual's native language proved to be a much better way of engaging with people, and as a result it was decided to focus resources on these sessions.

200 members of the BME community participated in the sessions and workshops.

Community Champions

Locally based sessions were led and delivered by volunteers who acted as Community Champions and who were supported by an existing volunteer development programme. The recruitment and use of Community Champions to support activities has proved to be very effective. Part of the success of this approach appears to be that becoming a Community Champion offered benefits for both the individual and the community in which they live. By becoming Community Champions individuals were able to take part in a dedicated training programme lasting six months during which they gained skills and knowledge and became more confident. Throughout the process they were mentored by existing advice workers and gained practical experience delivering support to people in their own communities. At the end of the training programme some individuals secured sessional work with Positive Action for Housing, whilst others moved onto opportunities in volunteering or employment. In most cases links were maintained and individuals were called on to assist at events or offer translation skills. Unlike other attempts to recruit Community Champions to raise awareness of illegal money lending, this approach has worked well and those elements that have made it successful – intensive well supported training, raising awareness of illegal money lending as part of a wider remit and the provision of opportunities to progress in a way that meets an individual's needs and aspirations could be tested in other areas.

Nine new Community Champions from BME communities speaking French, Urdu, Cantonese, Mandarin, Latvian, Punjabi, Hindi, Arabic, Somali and Yoruba were recruited. Community Champions were able to convey information about illegal money lending to these communities using their own language and adopting approaches that reflected cultural requirements. It was found that being able to provide support to BME

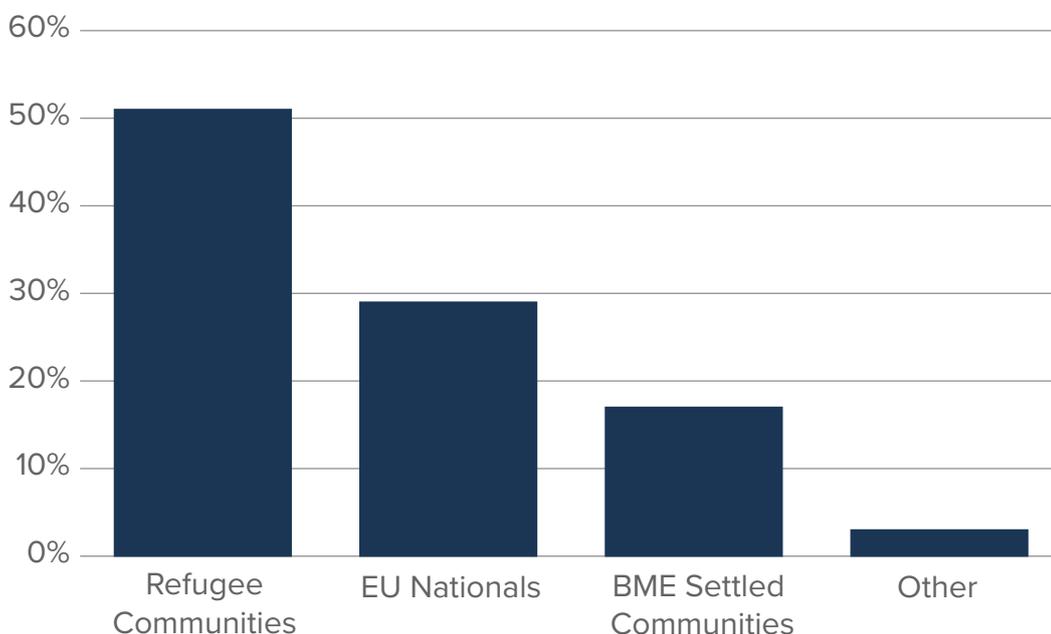
communities locally using their own language were essential elements in facilitating engagement. This was particularly important for the Chinese Community.

However, whilst it had been hoped to support individuals to open bank accounts this was not achieved. Identifying a bank or organisation to which direct and seamless transfer could be made proved challenging. This is an area which will be explored further with Scotcash.

Demographics of Participants

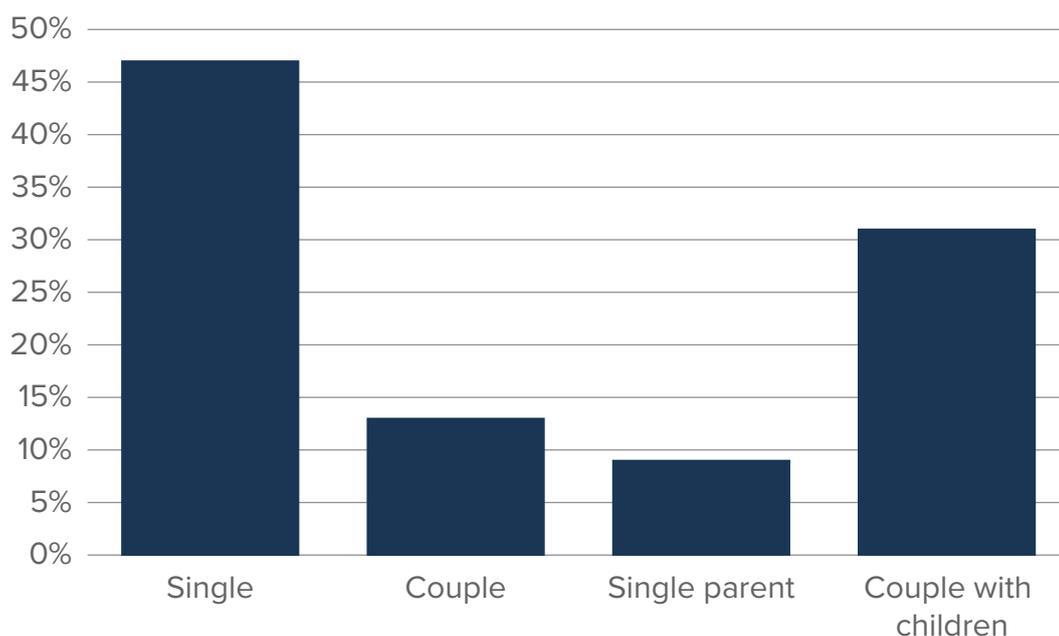
Around half of the participants came from Refugee Communities which would indicate that the project reached those who were particularly vulnerable financially.

Fig One: Legal status of participants



Around a quarter of participants came from China, a little over 10% from Latvia and about 5% from Romania, Sudan and Iran with around 3% from Syria, Nigeria, Estonia and Iraq. The remaining third came from 40 other countries of origin. This illustrates the wide reach of the project.

A little under half of participants were single and slightly under a third were couples with dependent children.

Fig Two: Participant household type

Positive Action in Housing report that the majority of participants are living in poverty.

Outcomes

The project was able to increase knowledge and raise awareness of illegal money lending and the harm surrounding it in refugee, new migrant, and minority ethnic communities in Glasgow through embedding information in its existing services and offering additional services targeted at those most at risk.

A sample of participants suggests that by accessing the one to one services and group activities provided:

- 95% stated they are better off financially
- 55% are aware of agencies to approach in case of financial difficulty/crisis
- 85% feel more confident in dealing with money matters and benefits

The project contributed to achieving the following;

- Delivering financial gains of c£857,600 for participants by helping them access welfare benefits and other sources of money
- Supporting 254 individuals in social and private rented housing to sustain secure tenancies and reduce rent arrears and other priority debts
- Managing or writing off debts of c£54,000

Key Findings

The project engaged well with individuals at high risk of using illegal money lenders

Research by the Fraser of Allander Institute⁵ suggests that poverty rates are higher in minority ethnic groups due, in part, to a combination of low pay and high rates of economic inactivity. As has been demonstrated, living in poverty increases the chances of using illegal money lenders. This project has proved extremely effective at engaging with groups who would not usually access money advice.

The approach to recruiting and retaining Community Champions has been successful.

The provision of an extensive training programme and opportunities to meet individual needs in a variety of ways -from improving connections within communities to offering employment opportunities has worked well. Linking Community Champions to an existing effective volunteer development programme was critical.

Providing information about illegal money lending as part of a wider offer has worked well.

The project raised awareness of illegal money lending in a discrete way as part of wider advice and information about income maximisation and financial capability. This was done by using a variety of approaches that enabled individuals to have a range of engagement opportunities.

There is increased awareness and understanding in BME communities of illegal money lending.

At the start of the project Positive Action in Housing had limited awareness and understanding of illegal money lending. Staff now understand the threats posed by illegal money lending and the circumstances that are likely to trigger individuals using them and are better placed to support individuals in BME communities. There is some evidence of increased awareness of the risks of illegal money lending in BME communities in Glasgow.

5 <https://fraserofallander.org/economic-outcomes-for-minority-ethnic-groups-in-scotland/>

Preventing Illegal Money Lending Project (Wheatley Housing Association)



Wheatley is a housing, care and property-management group, owning or managing c93,700 homes and delivering services to c210,000 people across 19 local authorities in Scotland. The Community Improvement Partnership tackles antisocial behaviour, criminality and customer vulnerabilities through a multi-agency partnership approach. The team is made up of personnel seconded from both Police Scotland and Scottish Fire & Rescue to work collectively with Wheatley staff to address the challenges and issues faced within communities.

Purpose of funding

Funding of £57,000 was awarded to meet the costs of a dedicated officer, whose role was to support awareness raising/communication across the group in relation to illegal money lending and to provide direct guidance and support to staff to encourage them to identify and report any suspected incidences of illegal money lending. The worker (Partnership Liaison Officer) also promoted partnership working, both internally and externally, with a range of key stakeholders including the money advice sector, learning providers and local community groups.

Activities

A wide range of activities were provided which included raising awareness of illegal money lending and signposting potential sources of support - with both staff and customers, developing and delivering a bespoke staff training package and establishing a process to improve reporting incidents involving illegal money lending.

1. Delivering staff awareness raising sessions on Illegal money lending

As part of wider awareness raising activities, the Partnership Liaison Officer used data from a variety of sources to identify and target those Wheatley employees who were most likely to be engaging with individuals who were at risk of using illegal money lending. This was considered to be ,” those staff whose role specifically deals with the

financial information of customers and their financial capability”. Presentations were made to 350 frontline staff at 22 locations. These were intended to raise awareness amongst staff of illegal money lending, provide information on sources of support for those individuals likely to be affected and details of how and where to report instances of illegal money lending.

2. Engaging with Wheatley customers

The Partnership Liaison Officer attended 16 local community events which were attended by 1087 individuals. At these events information on illegal money lending, sources of support and reporting mechanisms were provided using a wide range of materials.

As the majority of community events take place between spring and summer, events scheduled between March – May 2020 had to be cancelled as a result of COVID and this impacted adversely on the reach of the project.

3. Creation of a bespoke training package for staff

An e-Learning module has been developed. It was felt this using this approach, as opposed to traditional face to face learning programmes, would be more effective. Providing access to training in this way enables it to be offered to a higher number, or indeed all, staff members and provided it is updated when necessary is a sustainable model. The intention was to make the e-Learning module available on Wheatley’s My Academy learning platform for all 2700 Group staff. This would include frontline teams, Neighbourhood Environmental Staff, Wheatley Care staff and support services.

The e-learning module will enable staff to:

- Understand what constitutes illegal money lending and the forms it takes
- Recognise the signs of illegal money lending
- Have an awareness of the support available for victims – including internal Money Advice services through Wheatley;
- Know how to report illegal money lending.

The module will also seek to dispel myths and preconceptions.

At the start of the lockdown to reduce the spread of COVID in March 20, understandably, priority was given to ensuring that learning related to core activities,(e.g. rents, void management, systems training etc) was shifted to on- line platforms. Staff were under pressure to do this at a time when many were furloughed or working from home. Limited resources and different priorities resulted in a delay in making the e-learning module available. However, it must be pointed out that as yet, the module is not available on- line and it is not intended , as suggested in the grant application, to make it a mandatory requirement.

4. Targeted Communication campaigns

Working collaboratively with the Communications and Marketing team, the Partnership Liaison Officer established a marketing and communications strategy which sought to convey information about illegal money lending using a wide range of approaches. These included the following:

- two blogs on illegal money lending on the staff intranet site, reaching 1067 staff
- leaflets and posters for use in Local Housing Offices, Loretto Tenancy Support Staff and at community engagement events
- publication of an article in a range of customer publications reaching c 50,000 customers
- posting information on 30 customer facing screens within local offices and Multi Storey sites
- regular posts on Facebook pages

This approach ensured that a range of different audiences were reached and engaged.

5. Increased intelligence sharing between the organisations

A formal process was established for intelligence submissions to be routed to the Scottish Illegal Money Lending Unit via the Police Scotland Intelligence Team based within the Community Improvement Partnership. This was supported by the development of guidance notes for frontline staff on how to submit intelligence in relation to illegal money lending. This has resulted three referrals being made, one of which is likely to develop into an active investigation.

It is suggested that the project has increased uptake of support services and hence contributed to a reported c£8 million financial gain for customers as a result of 5297 Welfare Benefits appointments and c£400,000 in financial gain for customers as a result of 2540 Fuel Advice appointments.

Key Findings

There is increased awareness and understanding amongst Wheatley staff and customers of illegal money lending.

The project developed a marketing and communication strategy which included a wide range of approaches to raise awareness of the risks of illegal money lending and the sources of available support. Producing information on a regular basis in a range of formats ensured that there was engagement with a wide audience. At the same time, the project was able to identify and target key staff and customers who were most likely to experience illegal money lending.

A formal process on reporting illegal money lending with guidance for staff was developed.

Prior to the commencement of the project there was limited awareness amongst staff of how to identify and report instances of illegal money lending. The introduction of a formal process and accompanying guidance ensured that staff across the organisation have a shared understanding of how to identify and report illegal money lending activities.

At some point in the future all staff will have access to online training on illegal money lending.

The provision of an online training package will ensure that all staff have an awareness and understanding of illegal money lending, the actions that can be taken to support customers who are affected and how to report the perpetrators.

Embedding this knowledge in the work of the Wheatley Group will have wider benefits for the communities they support.

As a result of their activities the Wheatley Group have been awarded the Stop Loan Sharks Scotland Charter Mark, *“in recognition of their commitment in supporting and promoting the work of the SIMLU and for taking a zero-tolerance stance on illegal money lending within their communities”*.

Be More Squirrel (Denny & Dunipace Citizens Advice Bureau)



Denny and Dunipace Citizens Advice Bureau (CABx), a member of the Scottish Citizens Advice network, offers free, impartial and confidential advice to communities in West Falkirk: Denny and Dunipace, Bonnybridge, Banknock, Dennyloanhead, Haggs and the surrounding area. Based in Denny, advisors offer support and guidance on a wide range of topics.

Purpose of Funding

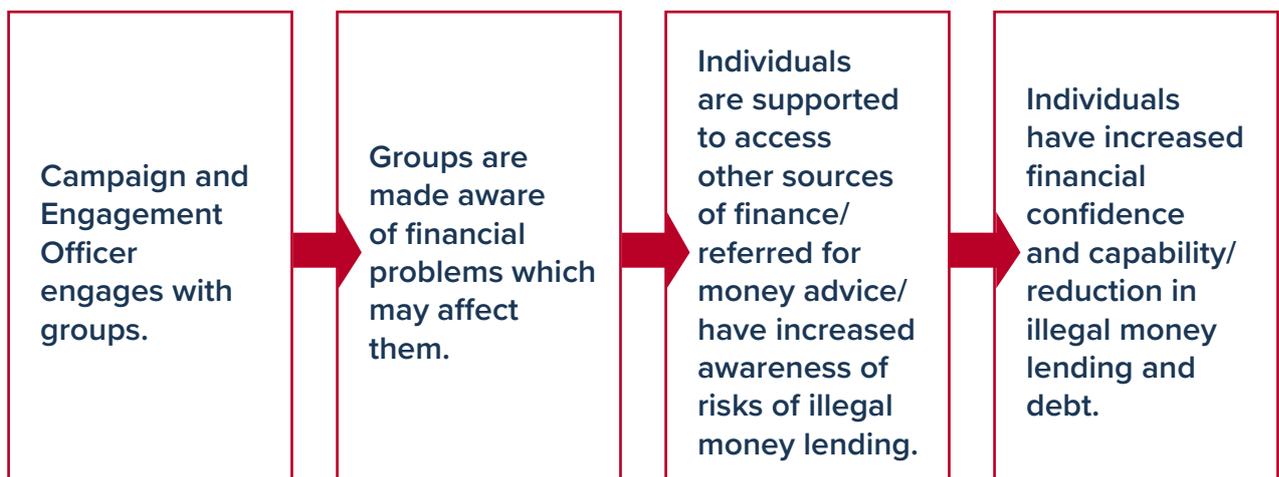
Funding of £40,000 was awarded to Denny & Dunipace CAB to employ a Campaign/Engagement Officer. Operating on a Falkirk wide basis, the role of the Campaign/Engagement Officer was to deliver the “Be More Squirrel” income maximisation and savings campaign. The purpose of the campaign was to proactively target people who were most at risk of resorting to using illegal money lending and high cost sources of credit through the use of evidence-based early interventions.

This was to be achieved through developing campaign materials, promoting key campaign messages, delivering vital information and, by working with partners, to facilitate access to holistic support for vulnerable people.

Theory of Change

The theory of change on which the project is based is outlined below.

Fig Three: Theory of Change



Activities

1. Encourage children and parents to “Talk Money” to help reduce parents’ debt levels.

The Campaign/Engagement Officer sought opportunities to engage with parents by identifying organisations that worked with parents and also by attending events for parents. An approach was made to Home Start, a community network that supports parents, and it was agreed that the Campaign/Engagement Officer would deliver four weekly sessions to help inform parents and to provide advice on an individual basis. The sessions focussed on children’s transition points in schools.

The Campaign/Engagement Officer also attended six parent’s evenings in two schools and, in addition, two sessions for adults were delivered.

2. Deliver trainer-led group sessions in mainstream schools to lay the building blocks for financial capability.

The original plan had been to deliver sessions in schools using the CABquest resource which provides an interactive and engaging way of increasing knowledge of financial products and budgeting. However, it took much longer than anticipated to get access to schools. This was because of the process used locally by education services and the permissions it required. Eventually after making a request in July 2019, information was sent to schools in November 2019 with an accompanying request to contact the CABx if there was interest in having a session delivered. In the intervening period the Campaign/Engagement Officer approached the local Community Learning Team and other youth organisations. As a result, whilst the ability to access schools was delayed, sessions to children and young adults were able to be delivered in out of hours school activities and to youth groups.

Class based workshops were delivered to 56 school children. A further 38 children and young adults were able to access the workshop in other settings. At these workshops, as well as getting the opportunity to engage directly in activities, participants were made aware of Online tools.

3. Establish effective referral routes to facilitate individual access to advice and support.

The CABx recognised the value of working in partnership with other organisations which had experience of supporting the individuals with whom the Campaign/Engagement Officer wished to engage. A range of organisations were approached, including those with which the CABx did not have any existing connections. It should be stressed that while the project wanted to target specific groups who were particularly vulnerable it was recognised that vulnerability also existed in the wider community and that this too should be addressed. A balance was struck between targeted approaches with small groups and individuals and reaching out to the wider community by providing services in libraries and community centres. Consideration was also given to placing information in charity shops.

Cyrenians and the Salvation Army were approached as they were identified as supporting individuals who were homeless or were ex-offenders. It was agreed that the Campaign/Engagement Officer would deliver regular sessions, including budgeting and energy advice workshops, and outreach services. This would take place alongside ongoing group activities. Contact was also made with the Signpost Recovery Café, and sessions were offered, but it was agreed that, as the Café already had support mechanisms, it would be more effective to make referrals for individuals on the basis of need.

Adopting a person-centred approach ensured that advice was provided in partner offices, neutral venues or in clients' homes depending on individual needs.

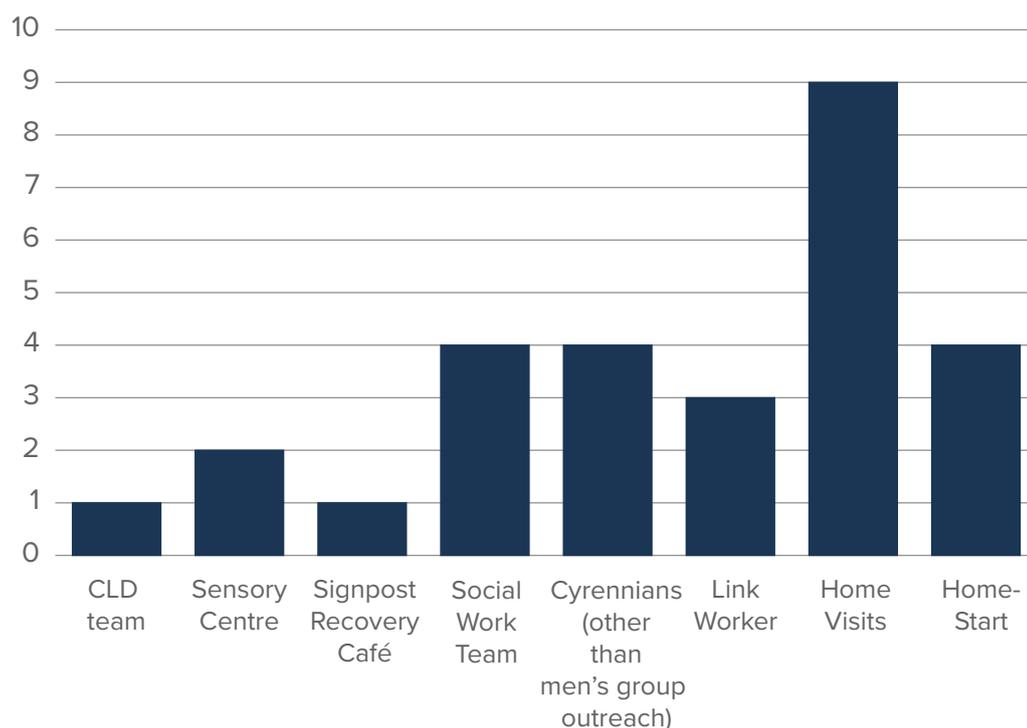
For those organisations in which a partnership arrangement was not required, a referral process was established. This was promoted to key agencies and resulted in successful referrals from Community Learning and Development and Social work at Falkirk Council, Sensory Centre Home Start and other arms of the Cyrenians project.

In relation to the wider community, the support offered by the project was publicised through CVS Falkirk and partner organisations. Promotion of project was also made to Falkirk Council's Fairer Falkirk group and through it to a wide network of frontline staff-referrals.

Bi-weekly stands were provided in Stenhousemuir, Bonnybridge and Denny libraries – in the latter in conjunction with Universal Credit adviser.

It had been intended to recruit Community Champions from within the ranks of workers with direct contact with the public, but this proved challenging. This will be considered further.

Fig Four: Number and sources of referrals



4. Deliver good advice at specific trigger points to secure housing and ensure that ex-offenders and others at financial risk to claim the correct benefits.

As part of the activities provided in partnership with Cyrenians and the Salvation Army, individuals were able to access advice and information on illegal money lending. Referrals for assistance for clients with complex needs, and who were at increased risk of using illegal money lending, were received and these individuals, wherever possible, were supported on a face to face basis in outreach offices throughout Falkirk .

A targeted campaign aimed at new tenants in council and social housing was supported by a Council leaflet drop.

5. Events in local communities to co-locate a range of useful advice and guidance services in accessible community venues

Information stands were put in place in three libraries and contact was made with lead officers responsible for community centres. Through events 86 front line workers and 141 members of the public were able to access information.

Response to COVID

Given the nature of the activities being delivered by the project, COVID had a significant impact but this was to some extent reduced by the ability and agility of the staff team who were able to adopt new ways of working.

All outreach and planned school activities had to be cancelled. It was recognised that there might be a significant delay in schools re-opening and when they did it was likely that the focus would be on core curricular activities. The Campaign/Engagement Officer began creating alternative school education materials through six short videos for children and young adults. Covering, financial matters, including illegal money lending, these were sent to education partner organisations and Falkirk Council's education development team.

All staff moved to home working and accordingly advice and support had to be offered at a distance. Referral mechanisms were put in place with partners still providing activities (e.g. the Salvation Army were offering take away food facilities) through which vulnerable individuals could access advice. This included 'borrowing' the Salvation Army worker's mobile and arranging telephone/ video appointments. A new referral mechanism with the link worker at Bonnybridge and Denny health centres was set which replaced the previous system of signposting.

There was an increased emphasis on social media promotion which linked in with other partner organisations not running sessions (e.g., HomeStart Bo'ness) to enable service users to continue to receive information and updates.

Use of local assets

A major contributory factor in the success of the project was an awareness and

understanding of the variety of local assets and how they might best be used to support the project objectives. For example, partnerships were formed with local organisations who were successfully supporting groups with which the Campaign/Engagement Officer wished to engage, and local community spaces such as libraries were used to reach out to the wider community.

Sustainability

Alternative referral paths have been agreed with partners in relation to access for advice. This consists of referrals for one off advice to Denny and Dunipace CABx with the expectation that wider access will be made available by the relevant CABx. Given the restrictions required by COVID there have been limited opportunities to consider how the organisational partnerships that were formed to support vulnerable individuals and improve their access to advice and increase awareness of illegal money lending will be sustained. Whilst referral processes have been established, the role of the Campaign/Engagement Officer was outward facing and enabled direct contact to be made on a regular basis and to establish a strong rapport with individuals and organisations. This is an area that would benefit from further discussion in the future.

Community Champions

It had been hoped to recruit Community Champions from workers who delivered community services, such as, librarians and community workers. However, this proved problematic. Whilst a training programme was developed, and there was some interest from two individuals, potential participants found it difficult to take time away from their paid roles.

Outcomes

122 Individuals were able to access advice in settings in which they feel comfortable, either in person or by phone, and which is likely to increase their incomes and reduce the likelihood of them accessing illegal money lending. The project contributed to individuals making financial gains of £340,000.

141 individuals were able to access information about support services on offer in their local area and are more likely to get support when they need it

98 children and young adults have increased understanding of financial products and budgeting and are likely to be more financially capable

Key Findings

The project engaged well with individuals at high risk of using illegal money lenders.

The Campaign/Engagement Officer quickly established partnerships with organisations that were supporting vulnerable individuals who are more likely to use illegal money lending services. By adopting this approach, it was possible to engage with individuals in a supportive way and to subtly raise the issue of money lending. It should be noted that the project was not able to identify any individuals who used or were thinking about using illegal money lending.

Partnerships and referral agreements were formed with a wide range of local organisations.

The project recognised the importance of establishing structures which would support organisations to work together in both formal and informal ways. A referral process was established and widely circulated through local networks.

There is increased awareness and understanding of illegal money lending amongst communities in west Falkirk.

'Be More Squirrel' has delivered information on money advice and the risks of illegal money lending using a variety of approaches in different settings. These have included workshops, information leaflets and social media.

The project team reviewed progress regularly and made changes to try to ensure the intended impact was achieved.

The project team faced several challenges in the course of delivery. As these arose they were discussed and solutions found. For example, instead of not providing activities when there was a delay in accessing schools other ways were found to engage with children and young adults.

Conclusions and Recommendations

Each of the three projects has delivered activities that there is evidence will directly, or indirectly, both raise awareness of, and reduce the risk of, illegal money lending.

Looking at the key findings in relation to each of the funded organisation it is suggested that the following be considered:



Ensure that in the activities delivered there is a clear and explicit connection with their contribution to reducing reliance on illegal money lending.

All the projects included some element of providing, or enabling, access to money and welfare rights services as a way of seeking to reduce demand for illegal money lending by increasing the income of individuals. It is accepted that maximising income and reducing levels of indebtedness for individuals will lessen the risk of them using illegal money lenders and hence funding activities that seek to do this has merit. However, in relation to the money advice activities supported by this funding stream it may be helpful to be clear that there is a requirement to ensure that information about illegal money lending is embedded in all activities and is provided in a proportionate and sensitive way.



Account should be taken of the routes by which individuals access advice and information – and the increased use of digital methods.

As a result of COVID there has been a significant shift in how advice services are delivered, and it is likely that in future this reliance on digital access routes will continue.⁶ There are already concerns about illegal money lending activities having an increased presence on social media. There would be value in exploring how raising awareness of illegal money lending can be linked to the digital delivery of wider advice services.



The concept of ‘Community Champions’ is sound but difficult to deliver and would merit further investigation.

Different approaches have been tried to recruit Community Champions who can raise awareness of illegal money lending. The programme has, over the years, funded a range of organisations to test this approach. Several have been tried but only one appears to have been successful - Positive Action in Housing. The factors that made it effective appear to be that it was developed using an existing volunteer programme, offered intensive support and training and was seen as an opportunity by potential participants for personal development as well as providing wider community benefits. It is

⁶ https://www.improvementservice.org.uk/_data/assets/pdf_file/0011/22241/Impact-of-Covid-on-LA-Money-Advice-Services.pdf

accepted that a single methodology is not possible and different approaches will be needed- indeed the approach adopted by 'Be More Squirrel' might have been more successful if there had been support from local employers. If it is believed that there is a role for Community Champions then it might be appropriate to produce guidance on the factors that should be taken into account when seeking to establish a Community Champion's programme and to draw on the learning from individual projects.



It should be acknowledged that projects based in schools are likely to require a long lead in time.

Even without the challenges posed by COVID there are can be issues in getting access to schools, and it often takes time to make arrangements when operating within the constraints of the length of school terms and competing educational priorities. If it is considered that information and awareness raising activities on illegal money lending should take place in formal education then, as opposed to funding individual programmes, it might be better to include this element in a more strategic way within existing financial education programmes. One way of achieving this might be to contact the Scottish Financial Education Forum to see if information on illegal money lending can be included in the work they are doing.



There could be benefits in reviewing the funding and reporting process.

The funded organisations all reported on the extent to which they had achieved their objectives in different ways and with varying levels of supporting evidence. On occasion, explanations for changes in delivery were not provided or were not clear. It might be helpful for both the funded organisations reporting on their results and the SILMU assessing the impact of the funding provided if a simplified and consistent process was adopted. This could be achieved without affecting the ability of organisations to adapt to changing circumstances or adversely affect the excellent relationships that have been developed. The IS would be pleased to assist with this as part of our agreement.

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