



HM Government

# Debt Management Communications Toolkit

Created by Government Debt Management Function

Version 1: March 2025



# The Fairness Group

The Government Debt Management Function (GDMF) Functional Centre provides strategic leadership and sets the cross-government policy and strategy for managing debt owed to government. The GDMF comprises around 7,000 public servants that work across over 20 ministerial departments and Arms Length Bodies to resolve and recover debt. In 2016, the GDMF Functional Centre established the Fairness Group, bringing together central and local government, the debt advice sector, and the debt collection industry.

The Fairness Group is responsible for examining fairness in government debt management and making evidence-based recommendations for change. Fairness means identifying and supporting vulnerable people while protecting taxpayers' money by taking a proportionate response to those who can repay debts but choose not to.



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# Purpose of this toolkit

This Communications Toolkit was produced by the GDMF Functional Centre in collaboration with the Fairness Group to help public sector bodies who are recovering debt to understand and implement effective debt communications. It aims to bring together the latest evidence, insight, and good practice in debt communications and apply it to a public sector context. The guidance can be applied to both inbound and outbound communications, as appropriate.

This toolkit is the first comprehensive guide to debt communications for government, detailing what good communication looks like and its importance. It serves as a framework for updating communications.



# Context of the toolkit

8.5 million adults of working age in England have low competence in literacy, numeracy or both<sup>1</sup>. As such, communication needs to be clear in managing and resolving government debt.

Effective communication can build trust and provide reassurance, encouraging people in need to seek support and facilitating debt repayment from those who can.

The Fairness Group have also produced an [Economic Abuse Toolkit](#), a [Vulnerability Toolkit for Service and Policy Managers](#) and a [Vulnerability Toolkit for Frontline Staff](#). Together, these [Public Sector Toolkits](#) are a suite of resources for public sector organisations to help strengthen the fairness of their debt management practices.

Members of the Fairness Group Communication Subgroup helped develop and shape this toolkit to ensure it will be relevant and effective across the public sector:

- HM Treasury Government Debt Management Function Functional Centre

- Christians Against Poverty
- PayPlan
- Money Advice Trust
- Citizens Advice
- Surviving Economic Abuse
- Department for Work and Pensions
- His Majesty's Revenue and Customs
- Home Office
- Department for Education
- Student Loans Company
- Driver and Vehicle Licensing Agency
- Money and Pensions Service
- NHS Business Services Authority
- Local Government Association
- Credit Services Association
- TDX Group

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<sup>1</sup> Department for Education (2024), [Survey of Adult Skills 2023 \(PIAAC\): National Report for England, page 59](#).

Standards for communication are a key part of cross-government guidance for the Government Debt Management Function. The [Debt Fairness Charter](#) promotes clear, open, and respectful communication, and good practices are included in the [Debt Functional Standard](#). This toolkit also conforms to the requirement of accessibility in the [Government Communication Standard and Government Digital Standard](#).

Fairness in debt communication continues to be a key consideration for all public sector bodies, however, what this looks like in practice may vary across government depending on debt type.

Legislation sometimes dictates the way debt should be managed and this toolkit assumes that legal and regulatory requirements are always met.

Primarily for central government organisations and their Arm's Length Bodies, this toolkit may also benefit Local Authorities, provided legal requirements are met.



# Accessible communications

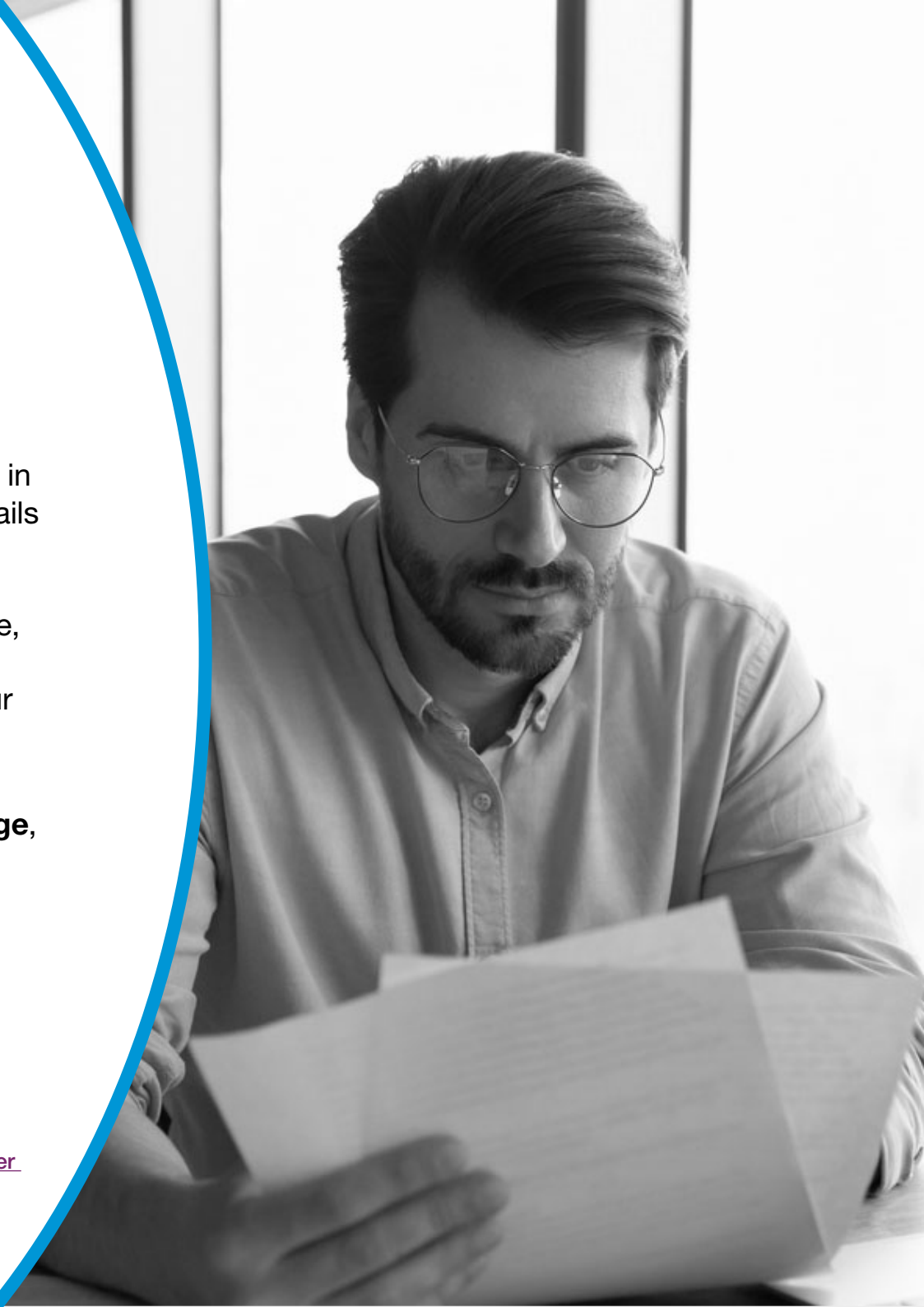
## Structure of communication

The structure of all written communications is important in determining how the message is received, including emails or webpages as well as letters. Research has shown that communications which simply demand immediate repayment can feel berating and spark feelings of shame, particularly for those who are experiencing financial or personal difficulty<sup>2</sup>. When looking at the structure of your communications, you should consider the following:

- Place the **most important information related to the purpose of the communication on the first page**, making it clear what the reader needs to do or know. Additional details can be included in online accounts or on subsequent pages.

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<sup>2</sup> Ofgem (2021), [Debt communications messaging: Evidence from customer and behavioural insights](#)



- Check that information is presented in a way that is **easy to understand** and is as concise as possible. Where possible, comprehension is improved by use of bullet points, boxes and pictograms<sup>3</sup>.
- **Have supportive text, such as where to get help, as a primary emphasis of communications.** Highlight the potential consequences of non-payment only as a secondary focus, or only after all other avenues have been exhausted.
- Avoid mentioning legal proceedings or potential negative impacts in early communications unless necessary. Instead, **emphasise that your organisation is committed to helping resolve the situation.**
- Ensure the structure of communication does **not make people feel threatened or pressured** into entering a payment arrangement that is not affordable to them, or has a detrimental impact on their finances.

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3 Dewies, Schop-Etman, Merkelbach, Rohde and Denктаş in Behavioural Public Policy (2025), [Call first, pay later: stimulating debtors to contact their creditors improves debt collection in the context of financial scarcity, Volume 9, Issue 1, January 2025, pages 88-105](#)





## Clear and understandable English

18% of adults between 16 and 65 in England are categorised as having low literacy proficiency<sup>4</sup>, defined in part by a reliance on explicit cues and an absence of distracting information to understand text<sup>5</sup>. For this reason and many others, some people may not fully understand communications about debt. You should consider:

- **Clearly explaining the debt situation**, including details about the outstanding amount, any additional fees, fines, penalties, accrued interest (if relevant), and reason for the debt. While the reason may be obvious to government, it may not be for the person in debt. For example, it is worth clearly explaining debts as the result of overpayments.
- **Presenting key information in each communication.** Keep in mind the amount of information people are expected to remember, as they may have multiple balances owed to multiple creditors. Some people, due to reasons such as mental health conditions, disabilities, and learning difficulties, may struggle to recall information they have been provided before.

- Legal and regulatory language is rarely understandable to anyone without a technical background. Assess whether this is relevant information, and if it is, **use plain English to describe what the law or regulation says.**
- Using straightforward words, recognising that **people may not understand words that are familiar to debt management professionals**, including “arrears”, “secured”, “judgement”, “defaulting”, and abbreviations. You might want to refer to the [Plain English Campaign](#) list of alternative words. Tools like [Hemmingway](#), currently used by DWP, may also help with this.
- People may have poor literacy, or English might not be a first language. **Be mindful of your audience** and frame your communications so they are equally understandable to these audiences. AI tools like those developed by Swindon and other councils can support you in creating documents in accessible formats (see later [case study](#)).

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4 Department for Education (2024), [Survey of Adult Skills 2023 \(PIAAC\): National Report for England, page 58](#)

5 OECD (2024), [Do Adults Have the Skills They Need to Thrive in a Changing World, PIAAC Survey of Adult Skills 2023, Table 2.4, page 59](#)

## Case Study 1: Easy Read documents – DWP Easy Read Standards and Campaigns

Easy Read is about making information accessible to people with learning disabilities and for people who speak English as a second language. Easy Read documents combine images with simplified text to clearly communicate information.

DWP has developed Easy Read Standards, to present complex concepts and information in the easiest format. In written communication, these may include things such as:

- Write your information in short, clear sentences.
- You are writing for adults. Do not use wording or images as if speaking to children.
- Use active and personal language. Using ‘you’ and ‘we’ makes written content more direct and understandable.

- Use the number and not the word. For example, 3 instead of three, 4 instead of four and so on.
- Avoid questions – questions can confuse readers.
- Each sentence should contain one idea or point.
- Do not use complicated words that are hard to understand.

You may wish to consider where it is appropriate to produce Easy Read documents for your target audience.

Examples of DWP Easy Read products include for understanding [Personal Independence Payments](#) and [Universal Credit](#).

## Tone of communication

Recent research from Behavioural Insights reveals that the tone of your communication may influence a customer's intentions to engage, their attitude towards the communication, and the emotional impact of receiving it. Financial concerns experienced by people in debt may reduce their mental capacity to manage the stress<sup>6</sup>. This experience is especially intense when financial concerns are secondary to larger life events that may have caused the debt<sup>7</sup>.

It's also important to consider the cumulative impact of multiple creditors' collections activities, as the person being contacted may have multiple outstanding debts and may not be experiencing communication in isolation.

Communications that are received as 'friendly' rather than 'harsh' are more often read in full, resulting in higher comprehension and engagement rates<sup>8</sup>. To achieve this effect, you should consider the following:

- **using a personal and empathetic tone** - personal pronouns like 'I' and 'We' are received better than reference to organisation titles<sup>9</sup>

- acknowledging financial challenges and **avoiding judgemental language**
- avoiding the presumption that paying the bill is not the priority, **assuming good faith** unless you have evidence otherwise
- **using terms that evoke cooperation**, such as 'work together', 'affordable', and 'finding a solution' which may reduce any perceived divide between them and a creditor
- **demonstrating the use of every contact as an opportunity to listen** and gain more information about a customer, their ability to repay, and the ways they can be supported
- if all other avenues have been exhausted and the situation is progressing towards enforcement, **clearly explaining the consequences for the person in a respectful way while still encouraging engagement**

6 Dewies, Schop-Etman, Merkelbach, Rohde and Denktas in Behavioural Public Policy (2025), [Call first, pay later: stimulating debtors to contact their creditors improves debt collection in the context of financial scarcity, Volume 9, Issue 1, January 2025, pages 88-105](#)

7 Ofgem (2021), [Debt communications messaging: Evidence from customer and behavioural insights](#)

8 Ofgem (2021), [Debt communications messaging: Evidence from customer and behavioural insights](#)

9 The Money Advice Service & Ogilvy Change (2017), [How to use behavioural science to increase the uptake of debt advice](#)

## Case study 2: HMRC Writing to Customers Guidelines

HMRC's Customer Content Team has created internal guidelines for HMRC correspondence, including debt management letters. The guidelines are built around four principles.

### 1. Give clear information:

- focus on what you want the customer to know and do
- only include relevant information
- help the reader navigate using headings

### 2. Make it easy to read:

- be concise
- keep your sentences short and simple
- use everyday language, contractions and the active voice

### 3. Show empathy:

- demonstrate you understand someone's circumstances
- show the availability of support
- say please, thank you, and (if necessary) sorry

### 4. Assume good intentions:

- focus on the positives
- avoid accusatory language
- only escalate the tone when you need to

The below graphic demonstrates changes that have been made to an HMRC letter sent to employers who had not paid their PAYE tax.

What's changed from before to after?

- give clear information – **a call to action has been added** as a subheading (“please call us now if you can’t pay”)
- make it easy to read – **made the payment instructions clearer and easier to follow**

### Before

Our records show you haven't paid the above amount.

This amount may include specified charges. These are amounts we've estimated to be due when we haven't received all of your monthly submissions. We do this under Regulation 75A The Income Tax (Pay As You Earn) (Amendment) Regulations 2012.

We've based any specified charges on your previous filing and payment history.

If you haven't done so, you must now:

- send in the year-to-date figures for all your employees
- make a claim for amounts such as statutory payments
- make any necessary changes to information you've already given us
- tell us if you haven't paid anyone for a tax period

Please pay what you owe now. When paying late you need to use the 13-character reference shown above and add 4 numbers or the year and the month (YYMM). The quickest way to pay is electronically.

- show empathy – have **acknowledged the customer's situation and used more supportive language** to acknowledge the potential impact of the Covid-19 pandemic
- assume good intentions – **avoided accusatory language** by saying “we haven't received payment” rather than “you haven't paid”

### After

Our records show we haven't received payment for your overdue PAYE.

We know many of our customers are facing financial difficulties because of the coronavirus (COVID-19) pandemic. We're here to help if you need to talk about how to pay.

Please pay now if you can. If you can't pay, please contact us.

#### **Please call us now if you can't pay**

Our customer support advisers will work with you to explore payment options – for example, a payment plan where you can pay in instalments.

When you call, you'll need to have details of your income and spending so we can make sure your payments are affordable.

#### **If you can pay**

You can pay online.

1. Go to GOV.UK and search 'paying HMRC'.
2. Choose 'PAYE'.

### **Case study 3: Student Loans Company commitment to customers who require additional support**

In February 2024, SLC published its Charter commitment to supporting customers who need additional assistance. This is a public recognition that a one size fits all approach doesn't always work and more needs to be done to tailor the experience for those who need support.

The Charter provides information on:

- accessing information in different formats
- contacting SLC in a different way, beyond the telephone
- if someone needs more time because of their personal circumstances
- consent for someone else to deal with SLC
- being in financial difficulty
- getting in touch about how SLC can support

Published commitments such as this Charter are effective ways to increase confidence in how someone will be treated, and for organisations to hold themselves to account. Charters proactively offering help and demonstrating understanding can help to breakdown barriers and open up constructive communication.

For more information, see their [commitment to supporting customers who need additional support](#).

## Simple presentation of numbers

At least one in five adults experience maths anxiety<sup>10</sup>. Communication about debts will naturally feature numbers, however it is possible to take steps to present numbers and mathematical concepts like interest simply. You should consider<sup>11</sup>:

- **Ensuring numerical calculations are not left to interpretation.** Where possible, do the maths for people. This might include working out the exact date payment is due rather than using the number of days or imprecise timelines ('in the next six weeks').
- **Setting the numbers in context** by using human, non-technical language to increase understanding of what each of the numbers mean. For example, avoid using abbreviations or terms that may be unfamiliar to most people.
- **Presenting options containing numbers consistently** to allow easy comparison and remove all numbers that are not absolutely necessary.

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<sup>10</sup> The Maths Anxiety Trust (2022), [YouGov polling commission: Official Figures](#)

<sup>11</sup> Plain Numbers (2024), [The Plain Numbers in Practice Report](#)



## Case Study 4: The Plain Numbers approach

Research conducted by the organisation Plain Numbers has effectively demonstrated that people often do not understand the numerical information they are presented with, despite thinking that they do.

In 2021, Plain Numbers worked with the six organisations in different sectors to test comprehension using Randomised Controlled Trials.

Five communications were tested, including a household water bill, a car insurance renewal, and a monthly household energy account summary.

For example, for the water bill, the first question was 'How much water has the household used in the period?'

Comprehension was judged by reviewing the percentage of people who could answer at least four out of five of these kinds of questions correctly.

Across the five trials of the original communications, no more than 35% of people answered at least four comprehension questions correctly. There was also a stark disconnect between perceived and actual understanding. In all the trials at least 60% of people either agreed or strongly agreed that the communication was clear, fair and that they had understood it.

When the Plain Numbers approach was applied to these five communications, comprehension increased significantly; on average the number of people who understood the communication doubled.



## Encourage action

Research by StepChange and Amplified Global revealed that 53% of people wait over a year before seeking debt advice<sup>12</sup>, during which time their debt situation may worsen. You should consider:

- **Plainly outlining the options available**, including arranging payment or getting in touch if the customer cannot pay.
- Providing **clear information on the availability of free and independent debt advice**, while encouraging people to access if they need additional support. You may wish to include an explanation of how debt advice has assisted others, to try and remove any associated stigma<sup>13</sup>.

- A **recognition of the general economic conditions or specific circumstances** like the COVID-19 pandemic, if appropriate. HMRC Customer Content Guidance suggests that the more organisations show they understand people's circumstances, the more likely they are to respond in the way needed.

Phrases such as *“we know the festive period can be a busy and expensive time”* or *“we understand that cost of living pressures have made it difficult for some people to keep up with their bills”* can go a long way.

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<sup>12</sup> StepChange and Amplified Global (2022), [Mixed Messages](#)

<sup>13</sup> Cabinet Office Behavioural Insights Team (2012), [Applying behavioural insights to reduce fraud, error and debt](#)

## Legal accessibility standards

Almost one in four people in the UK have a disability as defined by the Equality Act (2010)<sup>14</sup>. To reach all your audiences, and avoid harming those who need additional support, it is critical to make effective use of accessible communication formats and requirements outlined in the Equality Act. Accessible content allows the widest range of people possible to engage with information.

More information on [accessibility requirements for public sector bodies](#) can be found on gov.uk. These standards should be upheld across all communication formats. You should consult dedicated [guidance for government communicators](#), although the information may also be useful for communicators in other sectors. This guidance covers:

- **audio** will make communications more accessible to people with visual impairments and literacy challenges
- **braille and Moon** will make communications more accessible to people with visual impairments
- **British Sign Language (BSL)** will make communications more accessible to people who use British Sign Language (BSL) to communicate

- **Easy Read and Makaton** can be used by people with learning difficulties
- **accessible** print publications can be particularly helpful for people with visual impairments or dyslexia
- **subtitling** is an important format for those with hearing impairments
- **telephone** for those who are disabled, elderly, and/or have low digital literacy and/or poor access to the internet
- **textphone** provides accessible communication for those with hearing impairments

In addition, it's estimated that 10% of the UK population are dyslexic and one in 100 people are autistic. Cognitive impairments can be permanent, temporary, situational or a combination. They can also be temporary for people who are generally considered to be neurotypical – as an example, fatigue, stress or bereavement can happen to anyone at any time. DWP have published a useful [blog on designing accessible services for the neurodiverse](#), with guidance and links to accessibility standards.

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<sup>14</sup> Department for Work and Pensions (2024), [Family Resources Survey: Disability](#)

## Case study 5: Martin's story

Martin's experience of navigating a debt owed to government shows why accessible communication is important, given the particularly deteriorating impact communications had on his mental health and sobriety.

'I live in Bournemouth and am part of a Poverty Truth Commission (PTC) there. A PTC is made up of people experiencing the struggle against poverty and local leaders in civic and business life. We build relationships and work together on solutions to the causes and impact of poverty.

In 2021 I received a letter from a government department informing me that I was in over £3,000 debt and would have to pay this back. This would be bad news for anyone, and for me paying back this much money would cause deeper, longer poverty than I was already experiencing. I wasn't sure why I was in debt - the communication wasn't clear - and when I tried to get in touch it just got more confusing. Over 22 months my appointee and I spent over 10 hours on the phone and received around 14 letters, often saying contradictory things about how much I owed.

Over this period, with the weight of this debt hanging over me, my mental health suffered, and

I felt like drinking again after years of sobriety. I depended on support from others in my PTC as I couldn't face this alone.

However, after 22 months of stress and concern, just as abruptly as the threat of this debt arrived, it disappeared again. I received a letter explaining that there had been a mistake and that I was not actually in debt. The whole experience left me feeling despondent that something that wasn't real in the first place had made me feel so stressed.

After this experience, I joined a group exploring a "Brown Envelope Code" as part of the Poverty Truth Network, amplifying the voice of local PTCs to set a standard for communication around bills, debts, benefits and services. We think the best way to communicate is to:

- 1. keep it kind**
- 2. keep it accurate & transparent**
- 3. keep it simple**
- 4. keep it realistic**
- 5. keep talking**

To find out more about our Brown Envelope Code, visit <https://povertytruthnetwork.org/brown-envelope-code/>

# Communication channels and preferences

Offering multiple communication options acknowledges that customers have diverse preferences and aims to meet them where they are most comfortable. This approach allows organisations to reach a broader audience. More effectively and personally engaging with those who owe money benefits government, and people benefit through the increased convenience of communicating through their preferred channel.

The [Debt Functional Standard](#) emphasises the importance of informing people about their communication choices, as well as thinking about how the timing of communications might impact someone.

Personal circumstances can affect communication method preferences. For instance, those with mental health conditions might avoid letters due to the distress of opening them, while low digital literacy can hinder online use. Ensuring access to preferred



methods prevents disengagement and can lead to better outcomes.

There are several potential communication channels, most notably:

- telephone
- email
- letter
- web chat or online portal
- face to face
- video call
- WhatsApp
- social media
- text

While it may not be possible to deliver across all communication channels, flexibility is crucial. Improvements may include piloting newer communication methods to determine impact or refocusing existing resource against the preferred communication channels.

### **Case Study 6: Financial Conduct Authority Guidance for Firms on the Fair Treatment of Vulnerable Customers**

A customer in hospital who was incurring overdraft penalties wanted to discuss this with their bank. Due to illness and unreliable signal, they did not want to do so over the phone.

Instead, they found the customer services email address and were able to talk to the team by email. Despite the situation, the customer appreciated the flexibility in communication options that allowed their preferences to be met.

For more information and case studies, read the [full report](#).

With a multi-channel approach, you should consider:

- making communications **options clear to customers**.
- proactively **collecting customer information on preferred communication** channel and meeting their preferences.
- **ensuring consistent experience** across all communication channels.
- **allowing customers to switch channels**, without needing to restart their journey again. Signposting is most effective when it is directly to the most relevant webpage or phone number rather than a generic triage point.<sup>15</sup>

While the popularity of digital channels may be growing, digital exclusion remains a significant issue in the UK. It is thought that up to 8.5 million people lack basic digital skills and 1.5 million people don't have a smartphone, tablet, or laptop from which to access online public services<sup>16</sup>. Without digital access, individuals may struggle to obtain up-to-date information about their debts, repayment schedules, debt advice, and may find it challenging to make timely payments.

It is important to take the digitally excluded population into account when designing communications strategies, to ensure there remains an equally accessible way for those who are digitally excluded to work with government on repaying their debts.

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<sup>15</sup> Dewies, Schop-Etman, Merkelbach, Rohde and Denктаş in Behavioural Public Policy (2025), [Call first, pay later: stimulating debtors to contact their creditors improves debt collection in the context of financial scarcity, Volume 9, Issue 1, January 2025, pages 88-105](#)

<sup>16</sup> Good Things Foundation (2024), [Our Digital Nation](#)

# Communicating with those who need additional support

Some people may be in difficult or extreme crisis situations that are not appropriate or possible for one organisation to assist in isolation. Those needing additional support can benefit from help provided by third-party organisations. Establishing partnerships with local and national charities and other service providers is key to providing a complete offer of support.

Guidance on identifying and supporting those who are vulnerable can be found in the [HMG Public Sector Toolkits](#), including the Vulnerability Toolkit for Service & Policy Managers, the Vulnerability Toolkit for Frontline Staff and the Economic Abuse Toolkit.



## Connecting people to debt advice

If a person is in financial difficulty and struggling to repay what they owe, or if they have multiple debts to manage, they may benefit from free and independent debt advice.

Connecting people to debt advice can allow someone to take stock of their financial situation and take recommended steps to getting back on track. This is also beneficial to government, as it means people are taking appropriate steps and may be more likely to agree a suitable repayment plan. Engagement with the debt advice sector can also help government get to a more complete view of someone's situation, where disclosure is permitted, allowing for more specific signposting.

The following guidance has been adapted from the Money and Pensions Service Creditor Toolkit<sup>17</sup>. You should consider:

- **Communicating early** about the availability of free debt advice, doing so in all communications across all channels. Information on free independent debt advice is good practice to include from the first communication.

- **Connecting people directly** to sources of debt advice, including to Money Helper's [Debt Advice Locator Tool](#). Engagement rates are higher when people are linked straight to debt advice, rather than having to navigate to it themselves<sup>18</sup>. This may also include referrals through the Money Advisor Network if suitable.
- **Signposting to no more than two debt advice agencies**, as too much choice may cause anxiety and risk disengagement.
- Ensuring letters signpost to **a debt advice agency in the correct nation**.
- Allowing people **sufficient time to engage with debt advice** prior to agreeing a repayment plan, as also outlined in the [Debt Fairness Charter](#)
- Ensure a process is in place **to capture authority to act** and honour it when this agreement is in place. Actively work with anyone with established delegated authority.

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<sup>17</sup> Money and Pensions Service (2020), [Creditor Toolkit](#)

<sup>18</sup> The Money Advice Service & Ogilvy Change (2017), [How to use behavioural science to increase the uptake of debt advice](#)



## Case Study 7: Money Advisor Network and DWP

The Money Advisor Network (MAN) brings together a network of debt advice providers to help people access free, independent, confidential, and regulated debt advice.

The Money and Pensions Service runs the MAN. It enables partner organisations to refer people to debt advice, where they can receive a callback straight away, or arrange an upcoming appointment at a convenient time.

DWP have partnered with the Money and Pensions Service to enable the provision of debt advice to certain service users. It has been embedded in 16 Debt Management operational sites and in all Job Centre Plus sites in England.

For more information on the MAN and how it can support, visit the [Money and Pensions Service](#).

## Connecting people to wider sources of support

Some people may be experiencing life events that make repaying debts even harder. People's personal circumstances are best handled with care and in most situations, specialist help may be required.

Building signposting and referral partnerships with local and national charities, organisations and other service providers is key to providing comprehensive support to people in difficult situations.



## Case Study 8: Money and Mental Health Policy Institute (MMHPI)

*“I didn’t realise how much my mental health affected my finances and vice versa. I lived for years in shame and horrific anxiety about money which caused my mental health to spiral.”<sup>19</sup>*

*“When my illness starts to decline, I lose the ability to organise and deal with everyday tasks.”<sup>20</sup>*

Debt and mental health problems are intricately linked. Research from the Money and Mental Health Policy Institute has found that 46% of people in problem debt also have a mental health problem<sup>21</sup>. People in problem debt are three times as likely to have thought about suicide in the past year, while more than 100,000 people in England attempt suicide while in problem debt each year.<sup>22</sup>

The stigma around being in debt can be isolating, and debt collection practices – such as being bombarded with threatening communications – often exacerbate existing mental health problems.<sup>23</sup> Further, common symptoms of mental health problems such as increased impulsivity and memory problems can affect financial decision making or reduce capacity to engage with support services.<sup>24</sup> Furthermore, 75% of people who have experienced mental health problems have serious difficulties engaging with at least one common communication channel, which can prevent them from accessing support.<sup>25</sup>

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19 Money and Mental Health Policy Institute (2023), [Breaking the cycle](#)

20 Money and Mental Health Policy Institute (2019), [Debt and Mental Health: A statistical update](#)

21 Money and Mental Health Policy Institute (2019), [The Facts](#)

22 Money and Mental Health Policy Institute (2018), [A silent killer](#)

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23 Money and Mental Health Policy Institute (2016), [Money on your mind](#)

24 Money and Mental Health Policy Institute (2017), [Seeing through the fog](#)

25 Money and Mental Health Policy Institute (2018), [Access essentials](#)

### **Case Study 8: cont.**

Mental health problems can also reduce resilience – one of the key drivers of customer vulnerability. People with mental health issues are more likely to earn a low income, have lower savings and higher expenditures. This can place people with mental health problems at particular risk of harm from, and more likely to experience, income shocks, with long term sickness absence not always covered by full income replacement schemes, so many will experience a drop in income during or following a period of illness.

Having a wide-ranging set of partnerships in place will help facilitate access to a range of services across the spectrum of need. This may include, but not be limited to:

- mental health
- domestic and economic abuse
- gambling
- bereavement
- homelessness

Please refer to the [Vulnerability Toolkit for Service and Policy Managers](#), in particular their best practice checklist for signposting vulnerable customers.

## Connecting people well across the spectrum of need

The University of Bristol identified steps for strong referral partnerships<sup>26</sup>: You should consider:

- **Ensuring people understand where they are being referred and why.** This is important as they may have limited knowledge of available help and support. Inform them that free debt advice involves speaking with an impartial, trained expert who will assess their financial situation and recommend actions to help them get back on track. It may also be helpful to mention that debt advice is an independent, confidential, and regulated activity.
- **Making referrals as smooth and effective as possible.** If not connecting directly, give people the key, appropriate information needed to follow-up, such as **providing contact details (ideally multiple options such as phone and email) opening times, website and address.**
- **Formalising the way people are referred to relevant organisations.** You might want to compile a list of organisations to connect people to, cross referenced against the spectrum of customer need. Signposting is most effective where this information is available to all frontline agents.

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<sup>26</sup> Evans, J. and Collard, S. Personal Finance Research Centre, University of Bristol (2023), [Joined up: supporting debt advice clients through strong referral partnerships](#)

# Good practice for managing change to communications

User testing is a critical part of ensuring that communications achieve their desired outcomes. When testing and updating communications, it is important to think about the impacts on customers who have additional needs and ensure potentially harmful changes are avoided. You should consider:

- **Mixed Testing Strategy:** use of both qualitative and quantitative methods is recommended for a complete understanding of your communication's effectiveness.
- **Targeted Testing:** avoid testing your communications with the 'average person'. Instead, keep in mind the people your communications are intended for and tailor your testing towards this population.



- **Qualitative Lived Experience Testing:** once documents or draft communications have been produced, engage real people representative of your population. Instead of asking 'is this ok' or 'do you understand', which may lead to false positives, adopt the approach of 'how can you help us improve this'. Encourage active input by asking open-ended questions that aren't just a yes or no answer.
- **Testing understanding:** it's more useful to test people's actual understanding, not their perceived understanding. Be careful and precise in the way you gather data. While testing may initially look at recall, such as how much money is owed or interest applied, it's important to explore further. Does the person understand the consequences of this information to them?
- **Third party support:** working with a debt advice or advocacy charity might help a review of changes to communications from the viewpoint of a particular customer, as they have access to different customer bases and bring a different perspective to the testing.
- **Monitoring and continuous improvement:** once change has been implemented, it is essential to see how people respond in the real world and to have appropriate processes in place to evaluate where the needs of customers are not met.

Management Information needs to be gathered and used effectively, for more information you might want to refer to the associated section in the [Public Sector Vulnerability Toolkit](#).

You should consider the following aspects of monitoring and evaluation:<sup>27</sup>

- **decision making:** are your methods of communication meeting the needs of people when providing information and support to help them make decisions?
- **engagement:** are your communications meeting the needs of vulnerable customers? Are customers experiencing difficulties effectively engaging?
- **encouraging disclosure:** are people encouraged to get in touch to discuss their situation and any factors that may impact their ability to repay what is owed?

You might put this into practice by:

- looking at complaints data related to communications
- using insights from organisations with an understanding of the lived experience of vulnerable customers, for example charities or voluntary sector organisations
- having a regular schedule for reviewing and updating communications, if appropriate
- monitoring the use of different communication channels
- securing formal and informal customer feedback to identify trends and areas for improvement

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<sup>27</sup> FCA (2021), [Guidance for Firms on the Fair Treatment of Customers](#)



# Communicating in times of crisis

A crisis is a time of heightened difficulty or danger, disrupting normal operations and demanding immediate attention. It can impact debt management and increase stress for both people in debt and government. Crisis situations may require changes in the type, frequency, tone, or method of communications to accommodate affected individuals and their financial situations.

Much of the guidance suggested in this Toolkit still applies, however, you should also consider:

- A **suitable level of communication** that is proportionate to the situation. Extended periods of time with no contact could cause stress when contact is resumed, so make sure people are not left in the dark.
- The **inclusion of an additional 'keep in touch' letter, or dedicated support leaflet**, earlier in the debt journey, maintaining engagement.
- A **focus on clarity**, setting out early any changes for the person repaying their debts, using everyday language.



- **Offering information on support available**, a key part of all communications, may be more important in times where households are under additional financial pressure. Check you are sufficiently and actively promoting:
  - Internal support offered within your organisation, including contact details
  - External support, including free debt advice, payment plans and other charitable support
- **Specifically recognising the crisis** to demonstrate you understand additional pressure someone may be going through<sup>28</sup>. Where possible, testing communications with users can check how messages land. Sentences like “*we understand that the Covid pandemic has impacted some household finances and you may be finding it harder to keep on top of bills*” can go a long way.
- **Introducing additional information in communications** upfront to reduce the impact of uncertainty and minimise demand via telephone at a time when resources are stretched. Coordinating with other organisations or sharing templates will also reduce demand on time and resource.

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<sup>28</sup> Ofgem (2021), [Debt communications messaging: Evidence from customer and behavioural insights](#)



# Technology, AI, and the future of debt communication

Technology can complement human advice in government debt management. Live chats or triage systems are examples of digital tools that have supported debt communication, and organisations may now be integrating Artificial Intelligence (AI) into their communication approach. As with live chats, when introducing AI technology, think about how it can best support the work of human agents and help your organisation meet expectations, as detailed in the [Debt Functional Standard](#).

If you're introducing AI technology into your communications, you should consider:

- **Chatbots can respond quickly and accurately to a customer** and use previous interactions to provide the most suitable response. However, poorly trained **AI chatbots can provide false**



**information** to its user. If a chatbot is trained on data that contains bias, the chatbot will extend the bias rather than correcting it.

- A project with **smaller scope involves far less risk of misinformation** and prototypes can be trained to abide by General Data Protection Regulation (GDPR) guidelines before being scaled.
- **AI tools can improve accessibility** by giving another option to people who find telephone calls stressful<sup>29</sup> or translating documents for those whose first language isn't English<sup>30</sup>, but AI can also refer customers to support. If using an AI tool in this way, be mindful of the way it makes such a referral and how it does so with different customer bases.
- The complexity of machine learning decisions can lead to **a lack of accountability**. A formalised governance process, a log of all interactions or a survey for each user of the chatbot are all possible ways to reduce this risk.

- **Privacy and use of data by government is a concern** for customers<sup>31</sup>. Hosting the chatbot on your own website and replacing sensitive data with a proxy removes the risk of data leaving the organisation.

If you work in government and are thinking about proceeding with an AI project, there is plenty of government support available. For guidance, please contact the Government Digital Service, Central Digital and Data Office, Cross Government AI security working group and AI incubator team in Department for Science, Innovation and Technology. The Central Digital and Data Office have also published a **Generative AI framework for UK Government**.

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29 Money and Mental Health Policy Institute (2021), [The State We're In: Money and mental health in a time of crisis](#)

30 Swindon Borough Council (2023), [How Swindon Council used machine learning to cut translation costs by 99.6% – AWS Public Sector](#)

31 Department for Science, Innovation & Technology (2024), [Public Attitudes to Data and AI Tracker Survey](#)

## Case Study 9: Swindon Borough Council

*“Easy Read and pictures are important to help me understand.”*

*“When I see the Easy Read, it makes me feel happy because I find reading difficult.”*

Simply Readable is an AI tool developed by Swindon Borough Council that helps you more quickly create Easy Read versions of official documents, allowing better access for those with cognitive disabilities or literacy issues.

Swindon Borough Council’s Emerging Technology team and their steering group, Experts by Experience of a Learning Disability, designed Simply Readable as an additional capability inside a previously developed tool which converts documents into different languages.

To use Simply Readable, copy and paste the complex text into the tool, which will then generate simplified sentences, which you can choose to complement with images, in a ‘friendly’ or ‘formal’ tone. This process occurs in seconds, at dramatically lower cost than manual conversion to Easy Read documents, and as such has allowed for greater scalability.

To learn more, [read](#) about the tool and access the [source code](#)

# Safeguarding against fraudulent communications

People may be cautious when dealing with communications that appear to be from government. This may be due to the perceived threat of scams or fraudulent activity, or personal experience of this in the past. People may take advantage of those who are vulnerable, or take advantage of schemes offering grants or financial assistance.

A scammer's job is to convince people and pretend to be someone they are not, so it is important to understand if a person is sceptical and take appropriate steps to put their mind at ease.

As your communication channels diversify and you may explore new methods of communicating with customers, such as text messaging, it is important to put yourself in the customer's shoes and understand how this may be received.



You should consider<sup>32</sup>:

- **Contacting people via their preferred communication method**, when this is logged and known. Ensure that communications sent to people are clearly from official government channels.
- Any communication experienced as threatening or that makes someone feel rushed to take immediate action, particularly making a payment, may be a scam. **Show understanding, patience, and acknowledge diligence** if someone would like to verify any communication they receive.
- Reminding people to **only use government contact details found on gov.uk** and not any other source.
- Advising people not to share their personal information online, as this can be used to create personalised disinformation or scams. In particular, remind people **not to share their government sign in details**, if any online portal is used for repaying debts.
- Actively **warning people about any known scams within your organisation**, for example, any known phishing emails or misleading phone calls. This may assist people in identifying misleading tactics.

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<sup>32</sup> Government Communications Service (2021), [RESIST 2 Countering Disinformation Toolkit](#)

# Staff wellbeing and financial difficulty

It is important to remember that staff members working within debt recovery may emotionally invest in a case or may be discussing circumstances that resonate with them personally, as they may be in their own financial difficulty. For example, frontline staff may themselves be claiming benefits to boost their income, or they may be behind on payments to other creditors. This may be challenging for staff and lead to increased anxiety, burnout, or discourage them from seeking help.

Information on supporting staff resilience can be found in the [HMG Vulnerability Toolkit for Service and Policy Managers](#).

