



Money and Mental Health submission to the Cabinet Office call for evidence: Fairness in government debt management

Introduction

The Money and Mental Health Policy Institute is a research charity, established in 2016 by Martin Lewis to break the link between financial difficulty and mental health problems. The Institute's research and policy work is informed by our Research Community, a group of 5,000 people with lived experience of mental health problems or of caring for someone who does.

This written submission has been informed by this powerful, lived experience testimony, as well as our wider body of research. In responding to this consultation, we recognise that the range and scope of debt collection practices vary hugely across central and local government departments. As such, there are pockets of best practice and pockets of poor practice too. The insights and experiences reflected within this report reflect a wide range of central and local government debt management practices as experienced by Research Community members across the country.

Unless otherwise specified, all quotes in this response are drawn directly from our Research Community. In particular, it draws on a survey of 50 Research Community members, conducted between 28 August - 4 September 2020, specifically on their experiences of central and local government debt collection practices.

Background

- In any given year, one in four people will experience a mental health problem.¹ However, we do not always know when we are unwell or receive treatment. Over a third (36%) of people with a common mental disorder have never received a diagnosis, and 62% are not currently receiving treatment.²
- People with mental health problems are three and a half times more likely to be in problem debt as those without, and nearly half (46%) of adults in problem debt also have a mental health problem.³

¹ McManus S et al. Adult psychiatric morbidity in England, 2007. Results of a household survey. NHS Information Centre for Health and Social Care. 2009.

² McManus S et al. Mental health and wellbeing in England: Adult Psychiatric Morbidity Survey 2014. NHS Digital. 2016.

³ Ibid.

- Common symptoms of mental health problems, like low motivation, unreliable memory, limited concentration and reduced planning and problem-solving abilities, can make it harder for people to earn and manage money, and to engage with debt collection activity.⁴
- People with mental health problems are more likely to be living on low incomes or in insecure work,⁵ which can mean they have less savings to fall back on when their income falls.
- Mental health and financial problems can form a devastating and reinforcing cycle. Over 420,000 people in problem debt consider taking their own life in England each year, and more than 100,000 people in debt actually attempt suicide.⁶
- The coronavirus crisis has exacerbated these difficulties, putting pressure on the nation's mental health and financial wellbeing. One in five adults (19.2%) were likely to be experiencing some form of depression during the coronavirus pandemic; this had almost doubled from around one in ten (9.7%) before the pandemic.⁷
- Adults who were unable to afford an unexpected but necessary expense of £850 were more than three times more likely to develop moderate to severe depressive symptoms than people able to afford such an expense.⁸

Our response covers questions 1, 2, 5, 6, 9, 10, 11, 12, 17 and 18 of the Cabinet Office call for evidence.

In addition to this response, we recommend that Cabinet Office staff working on the consultation review our reports '*Seeing through the fog*'⁹, which explores how mental health problems can affect a person's financial capability and '*A silent killer*', which looks at the links between financial difficulty and suicide.¹⁰

Q1. Please provide details of any debts owed to central and local government organisations you believe should not be considered as part of this call for evidence.

People with lived experience of mental health problems are impacted by a wide range of local and central government debt collection practices. In light of this, we believe that all central and local government debts should be considered as part of this call to evidence. Common government debts which were raised repeatedly by Research Community survey respondents included benefit overpayments and deductions and council tax arrears.

All government debts can prove problematic for people with mental health problems

⁴ Holkar M. *Seeing through the fog: How mental health problems affect financial capability*. Money and Mental Health Policy Institute. 2017.

⁵ The Mental Health Taskforce. *The Five Year Forward View for Mental Health*. 2016.

⁶ Bond N and Holkar M. *A silent killer: Breaking the link between financial difficulty and suicide*. Money and Mental Health Policy Institute. 2018.

⁷ ONS. *Coronavirus and depression in adults, Great Britain: June 2020*.

⁸ Ibid.

⁹ Holkar M. *Seeing through the fog: How mental health problems affect financial capability*. Money and Mental Health Policy Institute. 2017.

¹⁰ Bond N and Holkar M. *A silent killer: Breaking the link between financial difficulty and suicide*. Money and Mental Health Policy Institute. 2018

People with mental health problems are more likely to be living on low incomes and in financial difficulty which can increase the risk of falling into arrears. The cognitive and psychological effects of many mental health problems can make it harder for people to earn money and to engage with debt collection activity.¹¹

Central and local government debt management practices have a huge impact on people with mental health problems. Rates of government debt are higher for people with mental health problems: 9% of people with mental health problems were in council tax arrears, compared to 3% of people without mental health problems. And 1.7% of people with mental health problems were in arrears on road tax, compared to just 0.3% of people without mental health problems.¹²

Common symptoms of many mental health problems, like memory problems and low motivation, can also make it harder for people to keep on top of the management of their bills and people can quickly fall into arrears. When people are acutely unwell they can disengage with managing their bills altogether.

“I defaulted on my council tax whilst I was struggling with PTSD. The council wrote to me but my mental health had deteriorated to the point that I had withdrawn and had stopped opening my post.” Expert by experience

Focusing on government debt management practices is even more important at the current time as indebtedness across commercial and government sectors has increased. A report by Citizens Advice on local government debt estimated that as many as 1.3 million households fell into council tax arrears in the first three months of the crisis.¹³

One in four (26%) people with experience of mental health problems have missed a bill or debt repayment following an income drop due to the pandemic.¹⁴ Local government debt, such as council tax, was among the top three debt repayments people missed, only slightly lagging behind credit card repayments and mortgages.¹⁵ This underlines the importance of all government debt being included in this call for evidence.

Q2. Do you have any concerns about the way affordability is assessed by central and local government organisations agreeing debt repayments?

We welcome the focus on considering the appropriateness of central and local government affordability assessments for agreeing debt repayments. We recognise that broad

¹¹ Holkar M. Seeing through the fog: How mental health problems affect financial capability. Money and Mental Health Policy Institute. 2017.

¹² Jenkins R et al. Debt, income and mental disorder in the general population. Psychological Medicine. 2008

¹³ Citizens Advice. 1.3 million households have fallen behind on council tax due to coronavirus. June 2020

¹⁴ Money and Mental Health Survey. Base for this questions: 153 who had experienced an income drop due to the coronavirus crisis

¹⁵ Bond N and D’Arcy C. Income in crisis: How the pandemic has affected the living standards of people with mental health problems. Money and Mental Health Policy Institute. June 2020

improvements have been made over recent years, and pockets of best practice exist within the sector.

In the commercial sector, specifically those organisations regulated by the FCA, a standardised approach to affordability assessments exists in the form of the Standard Financial Statement. However, central and local government affordability assessments fall well short of practices in commercial organisations. There is a clear need to improve and standardise how central and local government assess affordability of debt repayments. A framework for assessing affordability to repay government debt should be developed and adopted by all government bodies. It should be proportionate in balancing the needs of people in vulnerable circumstances, including those with mental health problems, and the need to repay debts owed to the public purse.

Research Community members shared with us their experiences of the way in which a range of government bodies assessed their ability to repay debts.

Many government bodies fail to assess affordability

Many Research Community respondents reported that their ability to repay government debts was never assessed. Instead, outstanding amounts were demanded with no exploration of the affordability for customers.

“After not being able to pay one month, the next month they upped the figure to cover the deficit. I wasn't able to pay that any more than not paying half of it the previous month. So it didn't get paid either.” Expert by experience

Even where repayment plans were drawn up, these were often done *to* customers rather than *with* them. There was little consultation, and an unwillingness to negotiate affordable repayment amounts.

“They overpaid me on benefits when I was in hospital for mental health problems and they just deducted the amount from my benefits over a number of months and would not negotiate over the amount they were deducting.” Expert by experience

Putting unrealistic repayment plans into place serves neither the needs of the creditor or the debtor, and sets people with mental health problems and financial difficulties up to fail. Although completing a thorough and accurate affordability assessment takes time and staff who are well trained, setting affordable and realistic repayment plans reaps financial rewards and is conducive to supporting people's mental wellbeing.¹⁶

Open Banking offers great opportunities for compiling pre-populated affordability assessments, which are accurate and up to date. These technological advances provide an opportunity to streamline the process of affordability assessment and make the whole process swifter.

¹⁶ National Audit Office. Tackling problem debt. 2018

An alternative response to negative budgets

For many people with mental health problems who are on low incomes, either due to low pay or relying solely on benefits, negative budgets are a common occurrence. Requiring people to make repayments out of low wages or benefits can plunge people into destitution, and exacerbate mental health problems.

Another approach less used by central and local government is debt write-off. A decision on whether to write off a debt depends on a range of factors including: a person's circumstances, how their situation has changed, their future ability to repay debt, the duration of the debt and if it has been defaulted on. But acknowledging this variation, there should be greater use of write-offs for government debt, as in the commercial sector. While government debts are taxpayers' money and are therefore somewhat different to private sector debts, the impact of adverse debt collection practices on people with mental health problems is just the same.

Q5. Do you have any evidence of how issues with central and local government organisation communication can aggravate mental and physical impacts on people in problem debt?

The way central and local government communicate with people in arrears is key to engaging customers and recouping debts owed. Good practice can offer huge support to people with mental health problems. Conversely, poor practice often aggravates and exacerbates existing problems.

Many people with mental health problems struggle with certain forms of communication. Previous research of people's experience of communicating with essential service providers found that:

- Three quarters (75%) of customers who had experienced mental health problems had serious difficulties engaging with at least one commonly used communication channel.
- More than one third (37%) people who had experienced mental health problems had exhibited significant levels of anxiety when dealing with essential service providers, indicative of at least a mild phobia of this situation.
- Overall, three quarters of people (78%) had experienced at least one sign of anxiety when dealing with essential services providers.
- Substantial numbers of people report that dealing with essential services providers when they are unwell can lead to panic attacks and even suicidal ideation.¹⁷

Over-reliance on a limited number of communication channels

People with mental health problems can find certain communication channels tricky. Some have difficulties using the telephone, opening letters or face-to face contact, while others may struggle with digital channels. Research Community respondents told us they were typically communicated with about their debts via letters and phone calls. However, these were often experienced as relentless and inaccessible.

¹⁷ Holkar M, Evans K and Langston K. Access Essentials: Giving people with mental health problems equal access to vital services. Money and Mental Health Policy Institute. July 2018

“They were belligerent and frightening and heavy handed. Far too heavy handed. I was terrified and felt persecuted and abused and out of my mind with anxiety. They used post and telephone.” Expert by experience

People told us how they wanted to be able to liaise with central and local government departments through a range of communication channels. Insistence that customers with mental health problems communicate via central or local government’s preferred communication channel can lead to distress, exacerbate mental health problems and be a cause of perceived non-engagement.

Frequency of communications

Research Community respondents told us that they felt bombarded and overwhelmed by what seemed like relentless letters and calls from government debt management departments. Central and local government organisations should be mindful that their collections activity is likely just part of what the customer is dealing with. The average StepChange debt charity client has 5.8 different unsecured debts.¹⁸ What seems a reasonable level of contact in isolation may quickly become overwhelming for a person with multiple problem debts, especially in combination with a mental health problem.

Tone of communications

The tone and design of written communications can have a significant impact on how people respond to collections activity. While most bills and arrears notices will contain information on sources of support, often these only come after a stark reminder of the consequences of failing to pay. Too often, people in financial difficulty see these warnings, and frightened, isolated and hopeless, they ignore the rest of the letter.

Research Community respondents told us that they perceived letters notifying them of debt escalation processes as threatening and intimidating. Often what is intended as a notification and warning of possible consequences of non-payment, for a person in arrears with no means to pay, these warnings can be experienced as threats and can be frightening and overwhelming.

“It was a case of pay your arrears or the bailiffs will come.” Expert by experience

For people with mental health problems this can be even more difficult, and these approaches can often be experienced as hostile and threatening. For people who are already struggling with the cognitive and psychological effects of mental health problems such as difficulties with problem solving, reduced clarity of thought or difficulties articulating themselves or advocating for themselves, people can receive these notices, but are too unwell to act upon them. This approach can push people to retreat from communication with creditors, taking them further from seeking help and leave them more entrenched in their debt and isolation.

¹⁸ Warner J (eds). Statistics Mid-Year Book. Personal Debt: Jan-Jun 2017. StepChange Debt Charity. 2017

This disengagement can lead to lower repayments, more reliance on escalation processes and enforcement action and, ultimately, less money paid back into the public purse.¹⁹

Encouragingly, the pandemic has evidenced how universal adjustments to processes can be made which can be received as supportive rather than punitive.

"It was via phone they were ok but if I'm late I get warning letters in red which cause me high anxiety...It's only now since COVID-19 they send texts in a gentle way." Expert by experience

Q6. How can central and local government organisations most effectively communicate with people who owe them money, including people who may be vulnerable? Please include any thoughts on the role of technology in communications or how best to reach people without access to technology.

We have identified two key ways that central and local government organisations can be more effective in their communications with people experiencing mental health problems.

Gather information about communication preferences and communicate via these channels

Government organisations should routinely collect information about customers preferred communication channels, and communicate with them via these channels. When people are communicated with via channels which are most suited to their needs, they are more likely to be able to engage with services in a timely and meaningful way, this is specifically the case for people with mental health problems, who may have particular challenges to using certain communication channels.

"Both on phone and email our local council have been helpful and supportive." Expert by experience

Communicate clearly

Central and local government organisations need to ensure that communication is clear and simple, using plain language. Research respondents told us how communication from government organisations was often unclear. The language used in letters can be intimidating, or the terminology used by collections staff can be technical and difficult to understand.

"I received a notice that I was in arrears. The letter wasn't easily understood and wasn't offering help in any form." Expert by experience

"[Central government has a] very universal approach. [I was] scared by [the] terminology used [and it was] quite intimidating wording. [Which caused me to] panic." Expert by experience

¹⁹ Evans J. Debts to public bodies: are Government debt collection practices outdated? House of Commons Library. 2020

Q9. In your opinion, what impact could poor debt management activity have on potential vulnerability?

As has been illustrated in our responses to previous questions, poor debt management practices can be a cause of huge stress for people in financial difficulty. When people do not have the means to pay their debts, relentless communications, demands for payments, unaffordable repayment plans, rapid escalation in debt collection activity and aggressive collection tactics, can be a cause of, or contribute to the onset of mental health problems.

Collections and enforcement activity can lead to serious psychological distress, with frequent phone calls and letters sometimes leaving people feeling trapped and with no way out.

The psychological impact of poor debt collection practices can be particularly detrimental for people who are experiencing mental health problems and can exacerbate these difficulties.

People told us about their experience of disclosing mental health problems to unsympathetic staff who demonstrated limited understanding or interest in their mental health problems. These negative interactions had a huge impact on people, impacting already low levels of self worth or diminishing their emotional reserves and knocking motivation.

These types of negative interactions drove people to retreat from their creditors' efforts to engage them. Worrying about the threat of debt collectors can wear away at people's resilience and reduce their chances of recovery. Trapped in unrelenting debt, these approaches served to exacerbate mental health problems and can prolong recovery.

Q10. How can central and local government organisations recovering debt best identify potentially vulnerable people? Please provide evidence of existing effective approaches. This could include evidence on the role of technology.

Create environments that encourage disclosure and offer appropriate support to customers who disclose

Local and central government organisations must create environments that encourage people who are aware they are experiencing mental health problems to disclose that information. Disclosing a mental health problem can be difficult. It can be hard to overcome the stigma associated with mental health problems. Sharing details of something deeply personal when you're not sure of the response you will receive can be incredibly frightening.

"Those [staff] who were knowledgeable were compassionate, other times it felt like it fell on deaf ears." Expert by experience

This can be even more tricky, when people are unclear if disclosing their mental health problem would make a difference, and if services are even able to offer support or adjust to meet their mental health needs.

"I did not expect them to care or adjust their request / requirement in any way because of my health issues." Expert by experience

Research Community respondents overwhelmingly told us that current practice did not encourage disclosure. In instances where people did manage to disclose their mental health problems, people were often met with unsympathetic responses or adherence to rigid processes and protocols.

“The advisor said not to be rude but they don’t care. They just want their money. Which I feel was not really needed or could have been told in a different way.” Expert by experience

Government organisations could begin to overcome these barriers through public-facing information that encourages disclosure, reassuring people of a compassionate, fair and proportionate response.

Proactively identifying customers who may be experiencing mental health problems

Creating environments that encourage disclosure is just one part of the puzzle. Organisations must also be proactive in identifying customers who may be vulnerable, and not rely solely on disclosure. Some people don’t share details of their mental health problems because they are too unwell to do so. Stigma and shame, together with thoughts that there is nothing anyone can do to help, can leave people feeling like they are completely stuck and alone. Others may be experiencing a mental health problem but not be aware of it. Over a third (36%) of people with a common mental disorder have never received a diagnosis, and 62% are not currently receiving treatment.²⁰ Therefore, processes that rely solely on disclosure are insufficient.

Central and local government departments should ensure that collections staff are appropriately recruited and trained to have compassionate and curious conversations with customers, ensuring they gain a thorough understanding of why a customer has fallen into arrears in the first instance.

Government departments should also have a keen awareness of the heightened vulnerability of their customers in specific client groups. For example, people with mental health problems make up a high proportion of people receiving certain benefits, with data showing that nearly half (48%) of ESA claimants had a long term mental health condition.²¹ Furthermore, people who received ESA were almost six times more likely as those who did not to have thought about or attempted suicide or self harmed in the past year.²² While the reasons for suicidality are many and varied, aggressive collections activity can exacerbate feelings of hopelessness which can be a driver for suicidality.²³ This means that when dealing with overpayments, perceived non-compliance or fraud, particularly for claimants of disability-related benefits, government should take special care.

Utilise existing data points to understand and assist customers

²⁰ McManus S et al. Mental health and wellbeing in England: Adult Psychiatric Morbidity Survey 2014. NHS Digital. 2016.

²¹ NatCen analysis of NHS Digital, Adult Psychiatric Morbidity Survey, 2014. Covers England only.

²² NatCen analysis of NHS Digital, Adult Psychiatric Morbidity Survey, 2014. Covers England only.

²³ Bond N and Holkar M. A silent killer: Breaking the link between financial difficulty and suicide. Money and Mental Health Policy Institute. 2018

Many of the government bodies that people owe money to already have a wealth of information about customers. The DWP holds data about people's health circumstances, and local authorities hold information about people's vulnerability and care needs. Some of our respondents who were receiving disability-related benefits from the DWP or other mental health services from their Local Authority assumed that different parts of the system were aware of their challenges and that data was shared within agencies. People we spoke to felt let down that government bodies did not act on information they already held about them.

"As they are taking the repayment from my ESA I would have thought they would be aware of my mental health problems." Expert by experience

To protect privacy, central and local government organisations should provide customers with choice and control over whether and how their data is used to identify potential vulnerability. But by routinely collecting this information, and doing so in a way that can be used supportively, debt management practices could ensure that they begin to proactively identify more customers with mental health problems.

Q11. How can central and local government organisations recovering debt best support potentially vulnerable people? Please provide evidence of existing effective approaches. This could include evidence on the role of technology.

We have identified three ways that central and local government organisations can best support potentially vulnerable customers, specifically, customers experiencing mental health problems.

Minimise psychological harm by offering meaningful support

Mental health problems can make it harder for people in problem debt to understand arrears notices, to ask for help and to locate and access free debt advice. Signposting messages, placed in supplementary material sent with bills or at the end of lengthy statements, often don't get through, leaving those in arrears unaware that help is available.

Given that half of customers in financial difficulty also have a mental health problem, the government must ensure that people who fall behind on their debt repayments are treated fairly, and that collections practices do not cause unnecessary psychological distress which can raise the risk of suicide. To achieve this, government organisations should:

- Signpost customers in problem debt to free debt advice more effectively. Information on bills and arrears notifications should be prominent, ideally placed at the top of letters, before details of balances due or sanctions
- Offer a warm referral (e.g. the ability to book an appointment) to free debt advice services.

Central and local government departments should invest in training to support staff to understand the impact of mental health problems on people's ability to engage with debt collection practices and tailor support to their needs.

People told us that they want staff who are trained to understand how mental health problems can impact on their ability to engage with services, and repay debts owed.

“They should all go on a course and learn about how difficult it is dealing with money for people with mental health problems and particularly be taught to understand that it is very very frightening indeed to some people and that makes them put their head in the sand, not keep up with payments because it is too frightening to look at what is coming in and out of accounts.”

Expert by experience

Where disclosure of mental health problems was listened to, and understood, it had positive results. However, for the majority of people who had managed to share details about their mental health problems, these were not acknowledged and communication was intimidating and alarming.

Referrals to external agents exacerbate mental health problems and should be a last resort

Local and central government organisations often have some of the most rapidly escalating debt management practices and the most severe consequences for non-payment. Research Community respondents told us of enforcement action which was overzealous and disproportionate to amounts owed.

“Using [a] bailiff company to collect an amount less than £100 resulting in costs nearing £200 with little communication.” Expert by experience

There may be instances when local and central government organisations need to escalate collection of debts to an external agency. This, however, should be a last resort, after all other avenues of support and engagement have been exhausted. Where external collect agents are utilised, the government should commit to only using regulated collections and enforcement firms, or those who comply with similar industry standards.

Enforcement agents are required to halt enforcement action and refer back to the creditor where the debtor is vulnerable. In many cases, vulnerability is only identified in the latter stages of debt management processes or at the point of enforcement action. If central and local government were to improve their identification of vulnerable customers and customers with mental health problems, this would avoid significant and unnecessary distress.

We support the Money Advice Trust’s proposal that those in receipt of Council Tax Support who fall into council tax arrears should be exempt from bailiff action. Using the most aggressive collection tactics on a group of people who are known to be financially vulnerable is disproportionate.

Q12. In your opinion, what are the benefits of an effective disputes process in debt management?

An effective disputes process fosters trust in organisations and government, and allows people to challenge the liability of their debts. In order to be effective, disputes processes should be accessible to people with mental health problems.

The cognitive and psychological effects of many mental health problems can mean that people may struggle to navigate bureaucratic processes and lengthy forms. Therefore, for a dispute process to be effective and beneficial to people with mental health problems it needs to be easy to navigate, transparent and not hidden behind complex processes and hurdles.

Disputes process should also be accessible via a range of channels. People with mental health problems can have difficulties using certain communication channels. Some people find the telephone difficult, others find letters tricky, or others still may find digital channels overwhelming. For a disputes process to be effective, it needs to be accessible via a range of channels, and allow customers to choose the channel most appropriate to their needs and abilities.

In considering dispute processes, the government should ensure that arbitrary time periods are not stipulated within which people must raise their dispute. When disputing a debt involves engagement in an adversarial process, this requires a person to advocate for themselves or access support from a third -party. Mental health problems can mean people may be too unwell to engage in such a process for lengthy periods, making tight, inflexible deadlines problematic.

People experiencing mental health problems may struggle to advocate or articulate for themselves. Therefore effective disputes processes, must have a sound understanding of how mental health problems can impact on a person's ability to engage, manage their finances or liaise with debt collection practices. Dispute services should be curious about a person's circumstances, and open to understanding the role a person's mental health problems or barriers within the system have played.

Q17. In your opinion, what is the value in central and local government organisations facilitating access to their debt management policies and processes?

Facilitating access to central and local government debt management practices fosters a culture of transparency and opens up organisations to external scrutiny. This encourages fairer and more proportionate debt management policies.

Greater transparency would also go some way to redress the power asymmetry between customers and government debt management departments. Customers would have access to information about the process of debt management and how they should be supported.

Openness about debt management practices across central and local government would help government organisations to understand different approaches to debt management. This could create a culture where departments can learn from each other, raise awareness of different approaches and help to spread good practice.

Q18. How can central and local government organisations get better at identifying and tracking debt arising from serious non-compliance or fraud?

It can be difficult for central and local government organisations to differentiate between debts that have arisen as a result of willful fraud or deliberate non-compliance, and those that are due to difficulties navigating processes, making claims or understanding eligibility. Differentiating between the two can be even more tricky when customers are experiencing mental health problems and not engaging in debt management processes.

The cognitive and psychological effects of mental health problems can impact on people's ability to navigate systems or manage money. Difficulties understanding and processing information can make understanding complex repayment plans tricky. Difficulties with planning and problem solving can mean budgeting and adhering to repayment plans can be impossible, and memory problems can mean people may struggle to provide accurate information. These common effects of many mental health problems can be misinterpreted as fraud or serious non-compliance.

"They were claiming that I was defrauding the housing benefit because I was overpaid by two months. I actually hadn't cashed the cheques at all and was going to do something about it eventually, but it was all too puzzling and frightening and too much to handle at the time."
Expert by experience

Government should seek to differentiate between wilful fraud or non-compliance, and customers who are struggling with their mental health problems. In order to get better at identifying debt that has arisen from serious fraud or non-compliance, and to deal with it appropriately, central and local government organisations must first improve their processes for identifying vulnerability and mental health problems. Our response to Question 10 includes tangible steps that could be taken.