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Enterprise & Regulatory Reform

EMPLOYMENT RELATIONS
OCCASIONAL PAPER

Vulnerable workers:
preliminary findings from the
Citizens Advice client
research

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CITIZENS ADVICE
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About EMAR

Employment Market Analysis and Research (EMAR) is a multi-disciplinary team of economists, social researchers and statisticians based in the Employment Relations Directorate of the Department for Business, Enterprise and Regulatory Reform.

Our role is to provide the evidence base for good policy making in employment relations, labour market and equality and discrimination at work. We do this through:

- Conducting periodic benchmark surveys
- Commissioning external research reports
- Conducting in-house research and analysis
- Assessing the regulatory impact of new employment laws
- Monitoring and evaluating the impact of government policies

We publicly disseminate the results of this research through the BERR Employment Relations Research Series and other publications. For further details of EMAR's work, including PDF versions of all our publications, please see our web pages at:

<http://www.berr.gov.uk/employment/research-evaluation>

About this publication

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The views expressed in this report are the authors' and do not necessarily reflect those of the Department or the Government.

Foreword

The Department for Business, Enterprise and Regulatory Reform (BERR) leads work to create the conditions for business success through competitive and flexible markets that create value for businesses, consumers and employees. It drives regulatory reform, and works across Government and with the regions to raise levels of UK productivity. It is also responsible for promoting choice and quality for consumers through competition policy and for ensuring an improved quality of life for employees.

As part of that work the Employment Market Analysis and Research branch (EMAR) of the Department manages a research programme to inform policy making and promote better regulation on employment relations, labour market and equality and discrimination at work issues.

This report provides preliminary findings of a collaborative research project between BERR and Citizens Advice and has been prepared to inform discussions at the Vulnerable Worker Enforcement Forum. The research will improve our understanding of the types of adverse treatment that workers experience, how it impacts on their well-being and what action workers take (or don't take) to resolve their employment problems. A second phase of the research is underway, involving follow-up interviews with clients as well as focus groups with Citizens Advice advisors. A full report of findings will be published in the summer in the Employment Relations Research Series.

We hope you find this report of interest. Copies of this and our other research reports can be downloaded from the BERR website.

Please contact us at emar@berr.gsi.gov.uk if you wish to be added to our publication mailing list, or would like to receive regular email updates on EMAR's research, new publications and forthcoming events.



Grant Fitzner

Director, Employment Market Analysis and Research

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Executive summary

In October 2007, BERR and Citizens Advice embarked on a collaborative, two-phase research project to develop the evidence base on vulnerable workers. This interim report sets out the key initial (and provisional) findings of Phase 1, based on a *preliminary* analysis of the data collected. This phase consisted of face-to-face interviews of 311 selected CAB clients, conducted by CAB advisers in 18 Citizens Advice Bureaux using a survey questionnaire designed by BERR (with input from Citizens Advice). Phase 2, shortly to get underway, will consist of follow-up interviews of up to 226 clients, focus groups with advisers, auditing and further analysis of all the data collected, and preparation of a final report for joint publication in June 2008. Key provisional findings of the research and data analysis to date include:

- In general, the 311 clients were relatively low paid, relatively low skilled, and employed in a small, non-unionised workplace. A small but significant minority (at least 11 per cent) appeared to be *migrant* workers. The clients were employed in a wide variety of occupations, with the most common being: cleaners (ten per cent); drivers (six per cent); care assistants/managers (five per cent); and sales/retail assistants (five per cent).
- A clear majority (59 per cent) of the clients had already left or been dismissed from the job in question by the time of the approach to the CAB.
- In the vast majority (95 per cent) of cases, the client was (or had been) employed on a *permanent* basis, and a small majority (54 per cent) had been in the job for at least two years. Only a very small minority (two per cent) of clients were 'agency temping'.
- The great majority (76 per cent) of clients were (or had been) employed in a small workplace (fewer than 50 workers), and one-third were (or had been) employed in a micro workplace (fewer than 10 workers).
- The most commonly involved breaches of rights (as perceived by the adviser) were: unfair dismissal; non-payment of owed wages, pay in lieu of notice, and owed holiday pay following dismissal or voluntary termination; a failure to follow the statutory grievance, disciplinary and dismissal procedures; and breach of contract. One-third of the 257 clients judged by an adviser to have been subjected to a breach of their employment rights were perceived to have been definitely or possibly subjected to unfair dismissal. In the great majority (74 per cent) of cases, the client knew of or suspected the breach.
- In five cases the 'problem' that had led the client to seek advice from the CAB was non-payment of a COT3 settlement or Employment Tribunal award.

- Perceived breaches of the National Minimum Wage and other rights covered by the existing statutory enforcement bodies were *relatively* rare (and on a par with, for example, perceived breaches of the rights to paid holiday and sick pay).
- A clear majority (56 per cent) of clients had taken some action to try and resolve the problem before approaching the CAB. A significant minority (19 per cent) of these 171 clients had raised a formal grievance with the employer, and eight per cent had submitted an ET1 to an Employment Tribunal.
- The most commonly proposed 'next courses of action' were: put in a grievance or appeal in writing to the employer; contact/speak to a manager at work; *consider* submitting a claim to an Employment Tribunal; and put in a complaint to an Employment Tribunal. Only in three cases was either the client or the adviser going to call the NMW helpline, the EASI helpline, or the GLA helpline.

CHAPTER ONE

Introduction

In October 2007, BERR and Citizens Advice embarked on a collaborative research project with the primary objective of developing the evidence base on worker vulnerability. This interim report to the BERR Vulnerable Worker Enforcement Forum sets out the key initial findings of the first phase of this two-phase project, based on a *preliminary* analysis of the data collected.

Citizens Advice is the national body for the 450 Citizens Advice Bureaux in England, Wales and Northern Ireland.¹ The Citizens Advice service has an important role to play in contributing to the evidence base on worker vulnerability. During 2006/07, Citizens Advice Bureaux dealt with some 505,000 employment-related problems experienced by an estimated 276,000 clients (both workers and employers). And BERR's own survey evidence shows that Citizens Advice Bureaux are the external advice provider most commonly cited by employees who have experienced a problem at work.

Overall research design

The research project consists of two phases. Phase 1, now complete, involved initial face-to-face interviews of 311 CAB clients, conducted by CAB advisers using a survey questionnaire designed by BERR (with input from Citizens Advice). The key aim of this phase, led by Citizens Advice, was to gather data on a range of factors associated with worker vulnerability, including: reports of adverse treatment; impact on well-being; perceived breaches of employment rights; action taken by the client before approaching the CAB, and proposed next courses of action; and the characteristics of the individual workers, their employment situation and their employer.

Phase 2, which is now getting under way, will involve: auditing and additional coding of data collected during Phase 1; conduct of two focus groups with CAB advisers; follow-up telephone interviews with 226 CAB clients who took part in Phase 1 and consented to be followed up; full analysis of all the data collected; and preparation of a final report by 30 May 2008, for joint publication by BERR and Citizens Advice in June. This phase will be conducted by a research agency and has been put out to tender.

¹ The 73 Citizens Advice Bureaux in Scotland belong to a separate organisation, Citizens Advice Scotland.

Phase 1 research design

Approximately 100 of the 430 Citizens Advice Bureaux in England and Wales employ either a paid or volunteer specialist employment adviser, and only these bureaux were invited to participate in the research project, on the basis that they would have the necessary skills and resources. Initially, a target of 500 initial interviews was contemplated, to be completed within one month (November) by ten bureaux. The bureaux were to be paid £10 per completed client interview.

However, as the survey questionnaire turned out to be considerably longer than originally anticipated, in the event 20 bureaux (two of which later dropped out) were recruited to conduct a projected 250 interviews between 1 November 2007 and 4 January 2008, and the bureaux were paid £20 per completed client interview. See Annex on page 29 for a list of the participating bureaux.

The 20 participating bureaux received direct training as well as paper guidance from BERR on the selection of clients for interview. The agreed criteria were:

- the main focus of the client's enquiry is employment related (but excluding *recruitment* related enquiries); and
- the client is perceived to be experiencing a breach of one or more employment rights; **OR** the client is experiencing a serious problem which is not a breach of employment rights; and
- a 'next action' is suggested to the client by the adviser.

In establishing these criteria, consideration was given to whether they would lead to the 'target' clients being selected (i.e. those who are vulnerable); those who are not 'target' clients not being selected; and ensuring that the selection criteria could be easily understood by CAB advisers and could be applied as consistently as possible by different advisers at different bureaux. It was acknowledged that there would be some subjectivity in application of the second criteria, where advisers would have to make a judgement about the severity of a client's problem.

Accordingly, the sample of clients is **not** a random or otherwise representative sample of all CAB clients, or even of all employment-related enquiries to Citizens Advice Bureaux. It excludes, for example, not only those worker clients judged not to have experienced a 'serious problem at work', but also those seeking employment-related advice from the CAB who are an *employer*.

To ensure that non-English speaking but otherwise eligible clients were not excluded, BERR undertook to meet all interpretation/translation costs associated with conducting the research interviews, on a cost basis.

In the event, survey questionnaires were completed for a total of 311 clients during the fieldwork period (1 November 2007 to 4 January 2008). Of these, 226 clients (75 per cent) consented to being contacted for a follow-up interview during Phase 2.

CHAPTER TWO

Worker mistreatment

The survey questionnaire began by asking the adviser to describe, in free text, “the treatment which the worker has experienced which has led to this problem”, i.e. the problem that led them to seek advice from the CAB.

Whilst there is, as one would expect, huge variation in the circumstances of the clients and the treatment they had experienced and/or were still experiencing, some key themes emerge:

- Summary/unfair dismissal, including pregnancy-related dismissal, sham redundancy, illness- or disability-related dismissal, and dismissal without reason
- Failure to follow the statutory grievance, disciplinary and dismissal procedures
- Non-payment of pay in lieu of notice, owed wages and owed holiday pay following termination of the employment (both voluntary and involuntary)
- Bullying, sometimes linked to discrimination (most commonly on grounds of age, gender, disability, race, or sexual orientation)
- Failure to follow proper redundancy procedures
- Denial of maternity, paternity and parental rights, including denial of paid time off for ante-natal care, non-payment of statutory maternity pay, denial of right to return, unreasonable refusal of a request to work flexibly, and denial of paid paternity leave
- Persistent late- and/or non-payment of wages
- Non-compliance with the National Minimum Wage
- Denial of statutory entitlement to paid holiday
- Non-payment of Statutory Sick Pay
- Non-payment of an Employment Tribunal award or COT3 settlement

These themes will be familiar to readers of our social policy reports on employment matters in recent years. Indeed, a preliminary thematic analysis indicates that the pattern of adverse treatment experienced by these 311 clients is broadly consistent with the evidence of such adverse treatment reported to Citizens Advice by Citizens Advice Bureaux, and which has formed the evidence base for such social policy reports on employment matters and vulnerable workers in particular.

Further thematic analysis will be possible in Phase 2 of the research project, and the case examples that follow are illustrative, rather than strictly representative, of the descriptions of adverse treatment experienced by the 311 clients. However, more detailed and quantitative information on the perceived breaches of employment rights involved in this adverse treatment was captured in a subsequent section of the questionnaire, and a preliminary analysis of this data is set out in section 4.3 on **Perceived breaches of employment rights**, below.

A 57-year-old man had been dismissed from his job of 12 years as a bus driver, whilst off work sick due to a series of assaults and abuse by passengers. His employer had not followed the statutory disciplinary and dismissal procedures.

A pregnant woman with an 18-month-old child had been selected for redundancy whilst on holiday, shortly after advising her employer of her pregnancy.

A 25-year-old gay man training as a hairdresser had resigned from his job of eleven months due to bullying and perceived discrimination on account of his sexual orientation.

A woman working part-time as a cleaner in a major supermarket, through an employment agency, had been denied her full entitlement to paid holiday.

A 41-year-old Slovakian man working as a chef in a restaurant had been summarily dismissed by text message, and had not received pay in lieu of notice, his last two weeks' wages, and owed holiday pay.

A 23-year-old man living in a hostel for the homeless and working as bar staff in a pub owned by a national chain had been off work sick for six weeks, and had not received any Statutory Sick Pay.

A 42-year-old Sudanese man working full-time as a security guard had been told he did not have a right to paid holiday. He had also not been fully paid for overtime worked.

A 43-year-old disabled woman working as a section supervisor in a major high street retail store had been summarily dismissed whilst off sick due to her disability. The client's employer had not followed the statutory disciplinary and dismissal procedures.

A man who sought advice from a CAB in Somerset had previously, with the assistance of Acas, settled his ET claim for unfair dismissal from his job as a roofer for a small roofing company (COT3). However, he had not received any monies from his former employer, despite having initiated enforcement action in the County Court.

A 59-year-old woman had resigned from her full-time, permanent job as a school cleaner with a contract cleaning company after repeated failure to pay her wages and Statutory Sick Pay, and repeated denial of paid holiday.

CHAPTER THREE

Impact on well-being

The clients were then asked to describe, and the adviser to record in free text, the impact that this problem at work has had on them. The recorded comments reveal the very real damage done to individuals' mental and physical health, to their relationships with family, friends and others, and to their future employment prospects. Key themes are:

- Financial loss/difficulty, in many cases leading to debt (mentioned by 52 per cent of all clients)
- Anxiety, stress, depression and other health problems (mentioned by 64 per cent of all clients)
- Marital problems and other relationship difficulties (mentioned by six per cent of all clients)
- Unemployment, reliance on welfare benefits, and reduced employment prospects

The case examples that follow are illustrative, rather than strictly representative, of the 'impact on well-being' described by the 311 clients. Again, however, preliminary thematic analysis indicates that the experience of these clients is broadly consistent with the totality of the evidence reported to Citizens Advice by Citizens Advice Bureaux, and which has formed the evidence base for our recent social policy reports on employment matters. Further thematic and other analysis will be possible in Phase 2.

A 60-year-old man, seemingly constructively dismissed from his job as an HGV driver for a haulage contractor following repeated late payment of wages, and whose formal grievance had been ignored by his employer, described the impact as: "stress and worry each pay day, serious financial problems [with] bank charges and penalties leading to debt".

A 37-year-old woman who sought advice from a CAB in Oxfordshire had previously, with the assistance of both the CAB and Acas, settled her ET claim for pregnancy-related unfair dismissal from her job as a sheet metal worker for a small engineering company. However, her former employer had not fully paid the COT3 settlement (hence her current approach to the CAB, which offered her assistance with enforcement in the County Court). The client described the impact on her as "Horrendous. No

money and pregnant. Very hurt and upset after seven years employment. Problems at home [and] financial difficulties”.

“Emotionally upset, causing stress in whole family, everybody crying” was how a 29-year-old Portuguese man with four children (and very limited English) described the impact of being subjected to formal disciplinary procedures for failing to turn up for overtime on a Sunday due to one of his children being ill. The client worked full-time as a line operative in a meat processing company.

A 22-year-old woman who had been prevented from returning to her own job as an office assistant in a small manufacturing company after taking maternity leave, described herself as being “deeply stressed” and her confidence “shattered”. The client was £3,000 per year worse off in her new job.

“Unable to pay mortgage. May lose [my] home if no other employment can be found” was how a 57-year-old woman described the impact of being bullied and summarily dismissed from her job as a hotel receptionist (possible age discrimination, unfair dismissal, and non-payment of wages, pay in lieu of notice, and owed holiday pay).

A woman (age not given, but with grown-up son) who sought advice from a CAB in Suffolk had previously won an ET award for non-payment of final wages, pay in lieu of notice and owed holiday pay after leaving her job as cleaner in a small factory due to persistent bullying. However, her former employer had not paid any of the award (hence her approach to the CAB, which offered her assistance with enforcement of the award in the County Court). The client, who had not worked since leaving this job, described how this had “caused me financial problems, stress and upset. I can no longer trust employers.”

A 28-year-old woman who had been prevented from returning to her job as deputy manager of a child care nursery after taking maternity leave described how “it has affected my health and family life and to some extent my ability to bond with my child as I would still have had my job without the pregnancy. Have taken anti-depressants and been signed off work for 8 months.”

CHAPTER FOUR

Perceived breaches of employment rights

The survey questionnaire then asked the adviser to:

- (a) describe 'any circumstances which may explain why this treatment is **not** a breach of rights', OR
- (b) record detailed information on which employment rights the adviser thinks have **definitely** been breached *and* which employment rights he or she thinks **may** have been breached, using a grid listing 46 employment rights under seven headings: written statement of particulars; discrimination or less favourable treatment; pay; working time; maternity/paternity/parental rights; termination; and other rights (see Table 1, on page 14).

In the case of (b), for each right definitely or possibly breached, the adviser was also asked to indicate whether, when the client first approached the CAB, he or she already knew that this right had been breached, suspected that this right may have been breached but did not know for sure, or did not know that this right was being breached.

Furthermore, for up to three rights definitely or possibly breached, the adviser was asked to describe *how* the right was being breached, and to code the severity of the perceived breach using the following scale: (1) *not as severe* as the average breach which I deal with; (2) *as severe* as the average breach; (3) *more severe* than the average breach.

No perceived breach of employment rights

In 54 cases (17 per cent of all 311 clients) the adviser noted one or more reasons why the problem experienced by the client was **not** a breach of his or her rights, i.e. option (a) above. However, in six of these 54 cases the reasons noted related *only to part of the problem experienced by the client*, i.e. the adviser still perceived *some* of the client's rights to have been breached. Also, in another of these 54 cases the adviser indicated that, in fact, there *may* have been a breach but it was not yet clear either way (because the client had not yet provided the adviser with the necessary documentation), and in a further four cases it was not yet clear to the

adviser whether there had been a breach due to the client's uncertain employment status.

In a further two cases, the adviser indicated that, in his or her view, there had in fact been a breach of the client's rights, but that the issue was now 'out of time' for an Employment Tribunal claim. And in five cases the adviser recorded his or her view that, whilst there had not *yet* been a breach of the client's rights, the client's current situation carried real potential for a *future* significant breach of his or her rights.

Furthermore, in nine of these 54 cases (17 per cent) the adviser indicated that there may well have been a breach of the client's rights, and in particular the right not to be subject to unfair dismissal, but for the fact that the client had not yet completed 12 months service. Also, in a further nine cases (17 per cent) the adviser indicated that there was 'no breach' simply because there is no right relating to the particular adverse treatment experienced by the client, namely bullying and abuse *not linked to discrimination*.

Only in 22 of these 54 cases (seven per cent of all 311 clients) was it recorded that, in the view of the adviser, there had clearly been no adverse treatment or treatment with the potential to lead to a future breach of the client's employment rights. This included, for example, two cases where the client had had their request to work flexibly refused: one (male) client was not covered by the current provisions; and the request of the other (female) client appeared to the adviser to have been reasonably refused. Further cross-tabulation and analysis will be possible in Phase 2.

Perceived definite and possible breaches of employment rights

In the great majority (83 per cent) of cases, therefore, it was recorded that, *in the view of the adviser*, the client's rights had definitely been breached, and/or may have been breached. In relation to these 257 clients, there were 418 recorded instances of a right *definitely* having been breached, and 228 instances of a right *possibly* having been breached. This is an average of 2.5 definite or possible perceived breaches per client.

The most commonly recorded *definite* perceived breaches of an employment right were:

- unfair dismissal (53 cases)
- use of statutory procedures (50 cases)
- holiday pay (44 cases)
- illegal deductions from pay (41 cases)

- pay on termination (31 cases)
- minimum notice period of termination (25 cases)
- breach of contract (25 cases)
- reasons for dismissal (24 cases)

The most commonly recorded *possible* perceived breaches of an employment right were:

- unfair dismissal (32 cases)
- breach of contract (19 cases)
- illegal deductions from pay (15 cases)
- minimum notice period of termination (13 cases)
- pay on termination (13 cases)
- reasons for dismissal (13 cases)
- holiday pay (12 cases)
- use of statutory procedures (11 cases)

Dismissal and termination

It is clear from this data that the single most dominant issue among the 311 clients is that of dismissal/termination, including payment of owed wages, pay in lieu of notice, and owed holiday pay upon termination. Indeed, overall, and including 'holiday pay' and 'redundancy pay', 52 per cent of *all* perceived breaches (i.e. both definite and possible) related to dismissal/termination.²

No fewer than 85 clients with at least 12 months' service in the job – 27 per cent of all 311 clients, and 33 per cent of the 257 clients judged by the adviser to have been subject to a definite or possible breach of their rights – had definitely or possibly been unfairly dismissed (in the view of the adviser, at least). And, as already noted above, a further nine clients with less than 12 months service in the job had been summarily dismissed and, in the view of the adviser, had grounds (but no entitlement) to claim unfair dismissal.

² We assume here that advisers have interpreted 'holiday pay' as non-payment of owed holiday pay upon termination, and '4.8 weeks paid leave' as denial of paid holiday entitlement.

These are significant findings, and further cross-tabulation and analysis will be possible in Phase 2. Furthermore, the follow-up interviews of many of these clients will provide information on action taken subsequently in relation to the dismissal/termination.

Discrimination

Advisers perceived 16 definite or possible instances of race discrimination, 14 of sex discrimination, 13 of disability discrimination, nine of age discrimination, and seven of pregnancy-related discrimination. Overall, 12 per cent of *all* perceived breaches (i.e. both definite and possible) were a form of discrimination.

Interestingly, the proportion of perceived instances of discrimination in which the client knew or suspected the discrimination (76 per cent) was little different to that overall (74 per cent). See also *Client awareness of perceived breaches of employment rights*, below. However, prior client awareness of *disability* discrimination was notably low, with only five of the 13 clients suspecting the perceived discrimination and none knowing of it.

Rights covered by the statutory enforcement bodies

Significantly, perhaps, advisers recorded only six definite, and four possible, perceived breaches of the National Minimum Wage, and only nine definite, and nine possible, perceived breaches of 'health and safety' (not including the 48 hour maximum limit on working time). In comparison, for example, advisers recorded eight definite or possible perceived breaches of the right to '4.8 weeks paid leave', and 17 definite or possible perceived breaches of the right to 'sick pay' – rights not covered by any statutory enforcement body.

Client awareness of perceived breaches of employment rights

Of the total of 646 definite and possible breaches of an employment right, the client is recorded as 'knowing' of the perceived breach in 186 instances (29 per cent), and of 'suspecting' the perceived breach in 288 instances (45 per cent).

Perceived breaches with notably low levels of prior client awareness include (with percentage of all perceived breaches of that right not known or suspected by client in brackets): use of statutory procedures (44 per cent); disability discrimination (61 per cent); written statement of particulars (42 per cent); minimum notice period (29 per cent); reasons for dismissal (32 per cent); accom'd at disc/grievance hearings (50 per cent); maternity pay/leave (50 per cent); and paid time off for antenatal care (33 per cent).

The full recorded data for this section is set out in Table 1, on page 14. Further, more detailed cross-tabulation and analysis will be possible in Phase 2.

Severity of the perceived breach of employment rights

A considerable amount of information relating to a total of 481 perceived breaches (74 per cent of all perceived breaches recorded), and in particular *how* these rights were being breached, is recorded in the responses to this section of the questionnaire. In the short time available, it has not been possible to conduct more than a very preliminary analysis of this data. Full thematic and other analysis will be possible in Phase 2.

Severity was coded in respect of 463 of these 481 perceived breaches, as follows: not as severe (eight per cent); as severe (63 per cent); more severe (26 per cent).

Table 1: Perceived breaches of employment rights

		Rights definitely been breached	Rights may have been breached	Breach of right: the worker...		
				Knew	Suspected	Did not know
Written Statement	Written Statement of Particulars	16	3	3	8	8
Discrimination or Less Favourable Treatment	Race	7	9	7	6	3
	Sex	7	7	1	11	2
	Equal pay	2	3	2	2	1
	Sexual orientation	1	5	1	3	2
	Disability	4	9	0	5	8
	Age	5	4	3	5	1
	Religion / Belief	1	1	1	1	0
	HIV status	0	1	0	1	0
	Pregnancy	3	4	3	3	1
	Spent conviction	0	0	0	0	0
	Part time	2	1	1	2	0
	Fixed Term Contract	0	0	0	0	0
	Whistle-blowing	1	3	1	2	1
Pay	Minimum Wage	6	4	2	6	2
	Itemised pay statement	12	2	5	5	4
	Illegal Deductions	41	15	29	17	10
	Holiday Pay	44	12	16	27	13
	Sick Pay	8	9	6	8	3
	Redundancy Pay	8	5	5	5	3
	Pay where employer is insolvent	3	3	2	0	4
Working Time	48 hour maximum / opt-out	2	2	1	0	3
	Limit on night hours	0	0	0	0	0
	Daily 11 hour rest-break	0	0	0	0	0
	20 minute rest-break after 6 hrs	4	0	3	1	0
	One day off per week	0	0	0	0	0
	4.8 weeks paid leave	6	2	0	6	2
Maternity / Paternity / Flexible Working / Parental leave	Maternity Pay / Leave	1	3	0	2	2
	Paid time off for antenatal care	2	1	1	1	1
	Return to work after maternity	4	2	2	4	0
	Paternity Pay / Leave	2	0	1	1	0
	Adoption Pay / Leave	0	0	0	0	0
	Emerg'y time off for dependents	0	0	0	0	0
	Flexible working	1	2	1	2	0
	Parental leave	0	0	0	0	0
	Pregnant women – H & S	0	1	0	0	1
Termination	Minimum Notice Period	25	13	10	17	11
	Pay on termination	31	13	20	15	9
	Use of statutory procedures	50	11	12	22	27
	Reasons for Dismissal	24	13	7	18	12
	Unfair Dismissal	53	32	24	44	17
Other rights	Accom'd at Disc/Grievance Hearings	5	5	1	4	5
	Assert a statutory employ. right	3	0	0	1	2
	Join / not join a union	0	0	0	0	0
	Time off for selected duties	0	0	0	0	0
	Breach of contract	25	19	10	23	11

	Health and Safety Issues	9	9	5	10	3
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CHAPTER FIVE

Individual characteristics

Gender, family/caring responsibilities, age, and disability

A small majority (53 per cent) of the clients interviewed were female. In this respect, the sample of 311 clients is broadly representative of all CAB clients: in 2006/07, 56 per cent of all CAB clients were female.

A significant proportion of all clients (i.e. both male and female) had dependent children (39 per cent) or other caring responsibilities (seven per cent). Sixty-one per cent were living with a partner, and the average age of all clients was 38. See Table 2, below, for a breakdown of the clients by age.

A significant proportion (17 per cent) of all clients are recorded as having a 'long term illness, health problem or disability'. In this respect, the sample of 311 clients is broadly representative of all CAB clients: we estimate that, in 2006/07, at least 17 per cent of all CAB clients had a disability.

Table 2: age of client

	number of clients	per cent
Under 18	2	1
18 – 25	58	21
26 – 35	74	26
36 – 45	58	21
46 – 55	60	21
56 – 65	26	9
Over 65	4	1

Ethnicity

The great majority (85 per cent) of clients are recorded as 'white', with most of the remainder recorded as 'Asian or Asian British' (six per cent) or 'Black or Black British' (four per cent). Two per cent of clients are recorded as 'mixed', one per cent as 'Chinese', and three per cent as 'other'.

In this respect, the sample of 311 clients is broadly representative of all CAB clients: in 2006/07, the breakdown by ethnicity of all CAB clients was: white (87 per cent); Asian or Asian British (five per cent); Black or Black British (five per cent); Chinese or other ethnic group (two per cent); and mixed race (one per cent).

Migrant workers

A significant proportion (22 per cent) of the 311 clients interviewed were born outside the UK. These 68 clients were born in 35 different countries, with the most numerous nationalities being Polish (12 clients), Portuguese (six clients), Nepalese (four clients) and Pakistani (four clients). However, whilst we refer here to 'nationality', the survey questionnaire in fact sought information on the client's 'country of birth'. It is possible, therefore, that some of those born outside the UK were in fact British nationals.

Data relating to when the client first entered the UK was recorded for 50 of these 68 clients. Nine of these 50 clients had first entered the UK during 2007; 14 had first entered the UK after 1 January 2006; and 33 (eleven per cent of *all* clients) had first entered the UK after 1 January 2000. It seems reasonable to conclude that most if not all of these 33 clients, at least, were migrant workers. However, 12 of these 50 clients had first entered the UK before 1 January 1995, and it seems reasonable to conclude that many if not all of these 12 clients were in fact British nationals born outside the UK.

In terms of English language ability, only eight clients (2.6 per cent of all clients) are recorded as having 'severe difficulty understanding' English, and none as having 'no English'. These eight clients were born in Poland (three), Portugal (two), Slovakia (one), Czech Republic (one), and China (one), and four of them were working as cleaners. The vast majority of clients are recorded as being 'fully fluent and understandable' in English (90 per cent) or 'not fully fluent, but understandable' in English (five per cent).

Further cross-tabulation and analysis will be possible during Phase 2.

CHAPTER SIX

Employment situation

Size of workplace

The great majority of the clients interviewed were employed in *small* workplaces, with 76 per cent employed at a workplace with fewer than 50 workers, 55 per cent employed at a workplace with fewer than 25 workers, and 32 per cent employed at a workplace with fewer than ten workers. Only 16 clients (five per cent) were employed in a workplace with more than 500 workers. See also Table 3, below. For 184 clients (61 per cent), their place of work was their employer's *only* workplace.

Table 3: number of workers at client's workplace

	number	per cent
From 1-4	35	11
From 5-9	65	21
From 10-24	67	22
From 25-49	51	17
From 50-99	20	7
From 100-249	19	6
From 250-499	8	3
From 500 +	16	5
Don't know, but fewer than 50	17	6
Don't know, but 50 or more	8	3
Blanks	5	

Time in job, and permanency of employment

The 311 clients had been employed in the job in which the problem had arisen for an average of 4.3 years. A small majority (54 per cent) had been employed in the job for at least two years, and 44 per cent had been employed in the job for at least three years. The longest period of service in the job was 36 years, and 39 clients (12 per cent) had been employed in the job for at least 10 years.

However, a significant proportion – 95 clients (31 per cent) – had been employed in the job for less than 12 months, and so did not qualify for e.g. protection against unfair dismissal. Among these 95 clients were nine apparent migrant workers who had been in the UK for less than 12 months (see also the section on *Migrant workers*, above). And, as already noted in section 4.3, nine of these 95 clients had been dismissed and were perceived by the adviser to have grounds (but no entitlement) to claim unfair dismissal.

In the vast majority of cases (95 per cent), the job was permanent, with only six clients (two per cent) recorded as 'agency temping', four clients recorded as doing 'seasonal work', and one client recorded as doing 'casual work'.

Similarly, the vast majority of clients (96 per cent) were paid directly by their employing organisation, with only nine clients (three per cent) paid by an 'employment agency'.

However, a significant proportion (25 per cent) of all clients had not received a written contract stating their terms and conditions of employment, and only 48 per cent had a written job description.

Pay and hours worked

The clients worked an average of 36 hours per week. On pay, the survey questionnaire asked for one of: an hourly rate; a daily rate; a weekly rate; a monthly rate; and an annual rate. Furthermore, this data could be recorded as either 'take home' pay, or 'pay before deductions'. The design of this section of the questionnaire makes full analysis of the recorded data somewhat complicated, and there has not been time to conduct such an analysis in time for this interim report. However, the average recorded rates for both take home and gross pay are set out in Table 4, below.

Table 4: average pay rates

	Take home pay		Pay before deductions	
	<i>clients</i>	<i>average rate</i>	<i>clients</i>	<i>average rate</i>
Hourly	42	£6.58	31	£6.84
Daily	2	£55.82	0	–
Weekly	65	£228.69	9	£202.30
Monthly	89	£1,107.74	8	£1,046.02
Annual	19	£18,504.11	24	£25,973.08

Further analysis of pay rates and hours worked will be possible in Phase 2 of the research project. However, initial analysis indicates that, in general, the 311 clients were *relatively* low paid. In comparison, for example, the 2007 Annual Survey of Hours and Earnings reports a median gross hourly pay rate of £10.22, and a mean gross hourly pay rate of £13.37.

Relatively few of the clients received additional services from their employer, with only 11 clients being provided with 'accommodation', 23 with 'transport', and 17 with 'food'. Of the six clients recorded as 'agency temping', none were being provided with 'accommodation', one with 'transport', and none with 'food'. Only nine clients (three per cent) indicated that they owed money to their employer, with the average amount of debt being £136.00; in each case, the debt was made in the UK, rather than 'abroad'.

Route to employment

The great majority of clients had found their job through an advertisement (26 per cent), direct application to the employer (14 per cent), or word of mouth (31 per cent). Only a minority had found their job through a JobCentre (10 per cent) or employment agency (nine per cent).

Further, more detailed analysis will be possible in Phase 2.

CHAPTER SEVEN

Worker occupation

The survey questionnaire captured information on the client's job title and the principal nature of the client's work, as well as information on what the employing organisation 'mainly makes or does'. The data relating to the client's occupation has been coded using the Standard Occupation Classification 2000 (SOC). This reveals considerable variety of client occupations, with 118 separate SOC occupations recorded for the 311 clients. For the purposes of this interim report this data has been grouped, and the most common grouped occupations (five or more clients) are set out in Table 5, below.

Table 5: occupation of client

	number of clients	per cent
Cleaners	30	10
Drivers (HGV, bus, coach, van, & taxi)	18	6
Care assistants and care managers	15	5
Sales and retail assistants	14	5
General office assistants/clerks	9	3
Chefs, cooks	8	3
Retail & wholesale managers	8	3
Kitchen & catering assistants	7	2
Nurses and nursing auxiliaries	7	2
Machine operatives	7	2
Assemblers and routine operatives	7	2
Bar staff, waiters & waitresses	6	2
Hairdressers, barbers	6	2
Security guards	5	2
Other occupations	164	53

As an indication of the variety of jobs undertaken by the clients, the following are examples of the 58 SOC occupations for which only one client was recorded: road construction operatives; sports & leisure assistants; plasterers; bookbinders & print finishers; legal secretaries; actors & entertainers; youth & community workers; vehicle spray painters; estate agents & auctioneers; social workers; marketing associate professionals; and refuse & salvage occupations.

This data suggests that, in general, the 311 clients were employed in relatively low skilled jobs. This is broadly consistent with the totality of the evidence reported to Citizens Advice by Citizens Advice Bureaux, and which has formed the evidence base for our series of social policy reports on vulnerable workers. For example, in *Rooting out the rogues* (December 2007), we stated that, typically, vulnerable CAB clients are working in “small, non-unionised workplaces such as care homes, retail outlets and distribution warehouses, hairdressers, bars, restaurants and hotels, or for contract cleaning, food processing, security and transport companies”.

Further, more detailed analysis of the recorded data relating both to clients and their employer will be possible in Phase 2.

CHAPTER EIGHT

Action taken prior to approaching the bureau

Seeking of information

Just over one-third (36 per cent) of all clients had actively sought 'information' about their rights at work prior to approaching the CAB, with the most common sources of such information being the Internet (24 clients), Acas (20 clients), the same or another CAB (20 clients), a solicitor (seven clients), or a trade union (six clients). Other sources from which information was sought included friends (four clients), work colleagues (three clients), family members (two clients), and line/area managers (two clients).

Prior action to try and resolve the problem

However, rather more – 56 per cent – of the 311 clients had, before approaching the CAB, taken action to 'try and resolve the problem' (although it is evident that, in some cases, the 'action' described by the client was no more than the seeking of information about his or her rights referred to in the client's response to the previous question). These 171 clients were then asked, in relation to up to three separate actions taken, to state what action they had taken and, in each case, to indicate whether the action had made the problem 'better', or 'worse', or had made 'no difference'.³

Between them, these 171 clients described a total of 201 separate actions taken. In the vast majority of cases this prior action involved writing, telephoning or speaking directly to, or attending a meeting with a line manager, other manager, or HR department.

However, at least 32 of these 171 clients (19 per cent) had raised a formal grievance with their employer, and 14 clients (eight per cent) had submitted an ET1 to an Employment Tribunal. Of these 14 claims to an Employment Tribunal, two had been rejected by the Tribunal as either out of time or no jurisdiction; seven were awaiting a hearing; two had been settled (COT3); and three had resulted in an award to the client. However, one of the COT3

³ It is perhaps worth noting that, excluding 'blanks' and 'don't knows', the proportion of these 171 clients who were no longer in employment with the employer complained about by the time they sought advice from the CAB (57 per cent) is almost exactly the same as that among all 311 clients (59 per cent).

settlements had not been paid in full, and the other not paid at all, and all three awards had not been paid at all. Two of these five clients had already initiated enforcement action in the County Court, without success. See also the section on **Proposed next course of action**, below.

Consequences for the client of prior action taken

Only in 13 instances (six per cent of the 201 actions taken) had the action made the problem 'better', and only in one case had the client's problem been *fully* resolved by the taking of this prior action (the client seemingly having approached the CAB now simply to check that his rights had indeed been fully met). In the great majority of instances the action had 'made no difference' (or, at least, not yet), but in 32 instances (16 per cent of the 201 actions taken) it had made the client's problem 'worse'. This included actual or threatened dismissal in three cases, and the initiation of disciplinary action in another three cases, but in general it involved a further deterioration in the relationship between the worker and their employer (in one case leading the client to resign).

Further, more detailed analysis, including analysis of which actions had made the problem 'better' and which had made the problem 'worse', will be possible in Phase 2.

Decision to seek advice from the CAB now

Asked what it was that had made them 'decide to come into the CAB', the majority of clients cited the recommendation or suggestion of a friend or family member (28 per cent), previous experience of using a CAB (12 per cent), or their own general awareness of the CAB Service (50 per cent). Relatively few clients cited the recommendation or suggestion of another organisation such as Acas (six clients), a solicitor (two clients) or a JobCentre (one client). Typical comments made in response to this question include:

"I wanted to understand [the] legalities without the expense of a solicitor"

"One-to-one contact – Acas is phone only"

"I needed help with Employment Tribunal paperwork"

"Because [named trade union] had refused to act for me"

"I felt something was wrong and wanted to check it out"

"Only place [the client] knew she could come to"

"I could not afford a solicitor and friends suggested I try the CAB"

"I had used the CAB before"

"[CAB] suggested by son. Rather speak to someone than look on [Internet]"

"I wanted to know my rights [and] could not afford a solicitor. My trade union had not been helpful"

"Internet not clear, [my] sister suggested CAB"

"I knew the CAB would help without charging"

"Nowhere else to go"

CHAPTER NINE

Proposed next course of action

Excluding the unusually high number of blanks and don't knows (37 clients), a clear majority of the 311 clients interviewed were no longer in employment with the employer complained about (161 clients, 59 per cent). This is a significant finding, with obvious implications for the likely course of any future action. The survey questionnaire sought information on proposed action by the *client*, by the *adviser*, and by 'someone else'.

A total of 590 proposed next courses of action were recorded, of which 406 were to be taken by the *client*, 182 by the *adviser*, and two by 'someone else'. Initial analysis indicates, as one would expect, an uneven spread of action across the clients and their advisers, with two or more courses of action for each of the client and/or adviser being proposed in some cases, and none by either party in others.

Further, more detailed cross-tabulation and analysis will be possible during Phase 2.

Proposed action by the client

The five most commonly proposed next courses of action to be taken by the *client* were:

- put a grievance or appeal in writing to the employer (142 clients)
- contact/speak to a manager at work (85 clients)
- *consider* submitting a claim to an Employment Tribunal (33 clients)
- contact speak to someone in Human Resources at work (30 clients)
- put a complaint in to an Employment Tribunal (22 clients)

In 13 cases the client was going to 'contact/speak to a trade union representative' (nine clients) or 'join a trade union' (four clients), and in 29 cases the client was going to seek further legal advice from a Specialist Employment Officer (16 clients) or solicitor (13 clients). Only in very few cases was the client going to 'call the Acas helpline (seven clients), the 'National Minimum Wage helpline' (two clients), or the 'Employment Agency Standards Inspectorate helpline' (one client). See also Table 6, below.

Other action, recorded under 'other action – please specify'

In three cases recorded under 'other action' the client, armed with advice from the CAB and/or with the assistance of the CAB, was going to take action (or further action) to try and enforce an unpaid Employment Tribunal award (two cases) or COT3 settlement (one case) in the County Court. And in a fourth case, the client, armed with advice from the CAB, was going to apply to the National Insurance Fund in relation to an unpaid Employment Tribunal award in respect of unpaid redundancy pay.

Also, one client was going to report their employer to HMRC for non-payment of tax and National Insurance; two clients (armed with advice from the CAB) were going to lodge a claim in the Small Claims Court due to being 'out of time' for a claim to an Employment Tribunal; and one client was, on the advice of the CAB, going to withdraw her Employment Tribunal claim because "the claim is weak and the client will find the process stressful".

Proposed action by the adviser

The four most commonly proposed next courses of action by the *adviser* were:

- put a complaint in to an Employment Tribunal (45 clients)
- *consider* submitting a claim to an Employment Tribunal (39 clients)
- put a grievance or appeal in writing to the employer (37 clients)
- contact/speak to a Specialist Employment Officer (29 clients)

Somewhat surprisingly, only in nine cases was the adviser going to 'contact/speak to a manager' or 'someone in Human Resources at [the client's] work'. And only in three cases was the adviser going to 'call the Acas helpline'. Furthermore, in no case was the adviser going to call the National Minimum Wage helpline or the Employment Agency Standards Inspectorate helpline. See also Table 6, below.

Table 6: Proposed next course of action

Action	By client	By adviser	someone else
Contact/speak to a manager at work	85	5	0
Contact/speak to someone in HR at work	30	4	0
Contact/speak to a trade union representative	9	3	0
Put a grievance or appeal in writing to the employer	142	37	0
Join a trade union	4	0	0
Call the Acas helpline	7	3	0
Call the NMW helpline	2	0	0
Call the EASI helpline	1	0	0

Call the Gangmasters Licensing Authority	0	0	0
Consider submitting a claim to an ET	33	39	0
Contact/speak to a solicitor	13	3	0
Contact/speak to a Specialist Employment Officer	16	29	0
Put in a complaint to an ET	22	45	1
Other action (please specify)	42	14	1

CHAPTER TEN

Key initial (and provisional) findings

The field work for this research concluded as recently as 4 January 2008, some of the most recently completed questionnaires were not received from bureaux by Citizens Advice until 11 January, and the main strand of data analysis was completed only on 16 January. This has left relatively little time for interrogation of the data, further data analysis, and the preparation of this interim report.

Phase 2 of the research project will allow for further, more detailed analysis of the recorded data, together with the gathering of additional information through follow-up interviews of up to 226 clients and focus groups of advisers. The final report of both phases of the research will set out key findings and conclusions in the light of such further analysis, and at this stage all findings must be seen as no more than provisional.

The sample of 311 clients is not, and was not designed to be, a random or otherwise representative sample of all CAB clients, or of all employment related advice enquiries to Citizens Advice Bureaux, or even of all CAB worker clients. However, the sample of clients does appear to be *broadly* representative of all CAB clients in a number of respects, including gender and ethnicity.

More generally, in terms of individual characteristics, employment situation and perceived mistreatment, the sample of 311 clients and their experience appears broadly consistent with the totality of evidence relating to the mistreatment of vulnerable workers reported to Citizens Advice by Citizens Advice Bureaux, and which has formed the evidence base for our series of reports on such matters in recent years.⁴

Key provisional findings of the research and data analysis to date include:

⁴ See, in particular, the Citizens Advice briefings *Fairness & Enterprise: the CAB Service's case for a Fair Employment Commission* (October 2001), *Somewhere to turn: the case for a Fair Employment Commission* (October 2004) and *Rooting out the rogues: why vulnerable workers and good employers need a 'fair employment commission'* (December 2007), as well as the Citizens Advice reports *Wish you were here* (September 2000), *Birth rights* (March 2001), *Nowhere to turn: CAB evidence on the exploitation of migrant workers* (March 2004), *Empty justice* (September 2004), *Still wish you were here* (December 2004), *Hollow victories* (March 2005), and *Hard labour* (November 2005).

- In general, the 311 clients were relatively low paid, relatively low skilled, and employed in a small, non-unionised workplace. A small but significant minority (at least 11 per cent) appeared to be *migrant* workers.
- The 311 clients were employed in wide variety of occupations. The most common occupations were: cleaners (ten per cent); drivers (six per cent); care assistants & care managers (five per cent); sales and retail assistants (five per cent); general office assistants/clerks (three per cent); chefs & cooks (three per cent); and retail and wholesale managers (three per cent).
- A clear majority (59 per cent) of the clients had already left or been dismissed from the job in question by the time of the approach to the CAB.
- In the vast majority (95 per cent) of cases, the client was (or had been) employed on a *permanent* basis, and a small majority (54 per cent) had been working in the job for at least two years. Only a very small minority of clients were 'agency temping' (two per cent) or otherwise working on a temporary or casual basis.
- However, one-third of the clients had been employed in the job for less than 12 months, and so did not qualify for e.g. protection against unfair dismissal. And nine of these 95 clients had been dismissed and were judged by the adviser to have grounds (but no entitlement) to claim unfair dismissal.
- The great majority (76 per cent) of clients were (or had been) employed in a small workplace (fewer than 50 workers), and one-third were (or had been) employed in a micro workplace (fewer than 10 workers).
- The most commonly involved breaches of employment rights (as perceived by the adviser) were: unfair dismissal; non-payment of owed wages, pay in lieu of notice, and owed holiday pay following dismissal or voluntary termination; a failure to follow the statutory grievance, disciplinary and dismissal procedures; and breach of contract. One-third of the 257 clients judged by the adviser to have been subjected to a breach of their employment rights were perceived to have been definitely or possibly subjected to unfair dismissal. Including a further nine clients with less than 12 months service judged to have grounds (but no entitlement) to claim unfair dismissal, just under one-third (30 per cent) of *all* 311 clients were perceived by the adviser to have been unfairly dismissed.

- In five cases the 'problem' that had led the client to seek advice from the CAB was non-payment of a COT3 settlement or Employment Tribunal award.
- Perceived breaches of the National Minimum Wage and other rights covered by the existing statutory enforcement bodies were relatively rare (and on a par with, for example, perceived breaches of the rights to paid holiday and sick pay).
- Of the total of 646 perceived breaches of an employment right, the client is recorded as 'knowing' of the perceived breach in 186 instances (29 per cent), and of 'suspecting' the perceived breach in 288 instances (45 per cent). Perceived breaches with notably low levels of client awareness include disability discrimination and use of statutory procedures.
- A clear majority (56 per cent) of the clients had taken some action to try and resolve the problem before approaching the CAB. A significant minority (19 per cent) of these 171 clients had raised a formal grievance with the employer, and a small minority (eight per cent) had submitted an ET1 to an Employment Tribunal.
- The great majority (78 per cent) of the 201 separate actions taken had 'made no difference', but 16 per cent had made the problem 'worse'.
- The most commonly proposed 'next courses of action' were: put in a grievance or appeal in writing to the employer; contact/speak to a manager at work; *consider* submitting a claim to an Employment Tribunal; and put in a complaint to an Employment Tribunal.
- Only in three cases (just one per cent of the 257 clients perceived to have experienced a breach of their employment rights) was either the client or the adviser going to call the National Minimum Wage helpline, the Employment Agency Standards Inspectorate helpline, or the Gangmasters Licensing Authority helpline. However, this finding must be seen in light of the fact that only six clients were 'agency temping', and (as far as it is possible to tell from the recorded data) none were workers covered by the GLA scheme.
- Only a very small minority of clients had sought information from a trade union *prior* to approaching the CAB (two per cent), or were going to join a trade union and/or speak to a trade union representative *following* the approach to the CAB (four per cent).

Annex A: Bureaux taking part

Region	Name
South East	Aylesbury Citizens Advice Bureau
Midlands	Birmingham Citizens Advice Bureau Service Ltd
South East	Chiltern Citizens Advice Bureau Ltd
South West	Gloucester & District Citizens Advice Bureau
East	Great Yarmouth Citizens Advice Bureau
Wales	Gwynedd & De Ynys Mon Citizens Advice Bureau
East	Haverhill Citizens Advice Bureau
Midlands	Herefordshire Citizens Advice Bureau
East	Ipswich & District Citizens Advice Bureau
South East	Lewes Citizens Advice Bureau
South West	North Somerset Citizens Advice Bureau
South East	Rushmoor (Aldershot) Citizens Advice Bureau
Midlands	Solihull Citizens Advice Bureau
East	St Albans Citizens Advice Bureau
South West	Taunton Citizens Advice Bureau
South East	Tunbridge Wells Citizens Advice Bureau
Wales	Vale of Glamorgan Citizens Advice Bureau
Midlands	Wychavon (Evesham) Citizens Advice Bureau
Total	18

