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Convener
Social Justice and Social Security Committee
The Scottish Parliament
Edinburgh
EH99 1S

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Dear Collette,

I am writing further to my letter of 20 August 2025. As I stated on that occasion, I am grateful to the Committee for its work in undertaking the “Inquiry Into Financial Considerations When Leaving an Abusive Relationship.”

The information contained within the report covers many Ministerial portfolios. I therefore asked that the numerous policy officials and Ministers whose work is impacted consider the contents. The following outlines the Scottish Government’s approach across this wide-ranging and complex policy issue.

Part 1: Equally Safe and the role of government

As I stated in my earlier letter and at Committee, the Scottish Government is resolute in the belief that coercive control, including financial abuse, has no place in Scottish society. As your report and many respondents to the inquiry noted, our Equally Safe strategy explicitly addresses financial and economic abuse. It recognises perpetrators control finances and women’s access to employment and opportunities. It highlights women’s financial inequality with men enables that abuse. It acknowledges that structures and systems exacerbate that inequality and act as a barrier to women leaving. The recommendations from your report will be drawn on, along with other forms of data such as academic research and stakeholder views, when we develop our next Equally Safe Delivery Plan in 2026.

You welcomed the moves towards a new sustainable funding model and asked to be updated as work progresses, which we are happy to do.

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Part 2: Advice and information

The Scottish Government has allocated £16.9 million this year (2025-26) to support the provision of free income maximisation, welfare and debt advice services. The majority of this funding is allocated to organisations which have a national reach and provide holistic, generalist advice services. However, in recognition of the additional barriers faced by those experiencing financial abuse and coerced debt, we have provided additional funding this year to Financially Included and Scottish Women's Aid.

This additional funding will support the development of a new Scottish helpline for economic abuse as well as a range of additional resources targeting economic abuse and increasing awareness of sources of help and support on this issue. Scottish Women's Aid will pilot a debt advice project in two areas to provide regulated debt advice directly to women experiencing domestic abuse and who are currently receiving support from local Women's Aid groups.

In addition to the £21.6 million funds in 2025/26 granted to projects through the Delivering Equally Safe fund to address all forms of VAWG, the Scottish Government is also providing £608,559 in 2025/26 to Scottish Women's Aid to deliver the Scottish Domestic Abuse and Forced Marriage Helpline. This services provides information and support to survivors of financial abuse.

My policy officials have alerted COSLA to the recommendations appertaining to it.

Part 3: Social Security systems

Social Security Scotland is committed to adopting trauma-informed practice as a standard in line with Our Charter, actively working to embed trauma-informed practices across the organisation through training and induction. Client advisors within the Agency will signpost people to Scottish Women's Aid, Rape Crisis and Cedar where appropriate.

Social Security Scotland also has a dedicated Safeguarding Team, who are trained professionals who can support clients identified as at risk, including due to domestic abuse.

As the Committee notes, the Scottish Welfare Fund (SWF) is a vital lifeline for the most vulnerable people in Scotland. For 2025-26, we have maintained investment in the SWF at £41 million, providing support to those in crisis and to help people establish independent living. Following an extensive review of the Fund, we have delivered revised statutory guidance to ensure the effectiveness of the Fund to support people in need.

This updated guidance was published in April 2025 and states that decision makers can prioritise applications by need, and that staff delivering the fund should be able to recognise and respond appropriately to support people escaping domestic abuse. This includes understanding of what constitutes domestic abuse, including coercive control and financial abuse, and that they should have established relations and referral processes with specialist domestic abuse services.

Officials continue to work with practitioners delivering the fund to ensure that the needs of victims/survivors are met. This includes engagement with organisations such as Scottish Women's Aid and Engender at recent Practitioners' Forum meetings.

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Part 4: No Recourse to Public Funds (NRPF)

As your report highlights, people who are subject to NRPF conditions face additional barriers to leaving abusive relationships because of the highly limited support available to them as a result of their immigration status. NRPF is applied under reserved immigration legislation and rules. The Scottish Government cannot lift or amend NRPF.

The Scottish Government's Ending Destitution Together strategy was published in March 2021, following development in partnership with COSLA, and aims to improve support for people who are subject to NRPF within devolved powers. This partnership work with COSLA includes the publication of national guidance for local authorities. The guidance sets out the current legal framework and good practice to assist local authorities in meeting their statutory duties and the delivery of an effective response when working with people who are subject to NRPF conditions. Revised national guidance was launched on 4 October 2023, but we recognise that frequent changes in immigration legislation by the UK Government means that the guidance needs to be reviewed regularly. The Scottish Government is committed to ensuring that the guidance is kept up to date.

Our Ending Destitution Together Strategy urges the UK Government to immediately remove and cease to apply NRPF conditions to people in vulnerable circumstances, including women experiencing domestic abuse. The Migrant Victims of Domestic Abuse (MVDA) Concession enables people who are in the UK on a partner visa to claim public funds, whilst applying to settle in the UK, following breakdown of their relationship due to domestic abuse, however it does not extend to people whose partner has limited leave, including as a refugee. The Ending Destitution Together strategy presses the UK Government to extend the MVDA concession to make it available to anyone who is in the UK as a dependent on someone else's visa or protection status, regardless of the timescale of that status. This would not only enable more people to be supported by the concession, it would make it less complicated to access.

Scottish Ministers have repeatedly raised NRPF issues which impact people living in Scotland with the UK Government, particularly the Home Office, and will continue to do so.

Part 5: Public bodies and debt

We know that public sector debt can be a significant issue for those seeking to leave an abusive relationship and Council Tax debt, in particular, can pose a barrier to leaving. Following the success of two previous Council Tax debt pilot projects we have now allocated £2.22 million in 2025-26 to roll out this programme of work to enable increased debt advice provision across Scotland for those in Council Tax arrears as well as the development of national resources which can help support best practice principles in Council Tax collection.

Part 6: Legal Aid

The Scottish Government recognises that demands on the Legal Aid system and the needs of those who depend on it have changed significantly since the model was developed nearly 75 years ago and the current legislation was implemented nearly 40 years ago. Change is needed to ensure that we have an adaptable, flexible, affordable and sustainable Legal Aid system that supports people who are facing challenging issues and problems.

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Longer-term transformational change is needed to fully provide a modern and responsive Legal Aid system. We are committed to delivering that system and the significant primary legislation which it will require.

We will continue to work closely with our stakeholders to support women to get the right access they need, and listening to them is vitally important.

As part of the Legal Aid reform programme we will establish a robust framework for sustained credible user engagement in Legal Aid. This framework will provide regular opportunities for users and user representatives to reflect on their experiences, and on the extent to which Legal Aid funded services meet their needs. It will also provide opportunities to have an input into the continuous improvement of the system.

Our aim is to develop a system where feedback, evidence and research is gathered from a wide range of sources, including the legal profession and users of the Legal Aid system; and that feedback is considered in the context of a system where purpose, outcomes and activity are aligned in an accountable and transparent public service.

The Regulation of Legal Services (Scotland) Act received Royal Assent on 27 June 2025, after being passed by the Scottish Parliament on 20 May 2025. Once commenced this Act will increase access to justice by introducing provisions to widen access to legal services. It will enable innovative service delivery models, including liberalising alternative business structures enabling competition which will benefit the sector and clients. This change will help ensure that legal services are available in a way that meets the needs of a modern, diverse society. The Act also removes restrictions on third sector bodies, to allow them to employ solicitors, and represent some of the most vulnerable in society, including those fleeing domestic abuse.

The Scottish Government welcomes the Equalities, Human Rights and Civil Justice Committee's inquiry into what is and is not working within the current Civil Legal Aid system, and what changes could be made in the short and longer term to address access issues. The scope of this inquiry in many ways chimes with that of the Scottish Government's own Discussion Paper on Legal Aid which was published earlier this year and sets out our plans for short, medium and long term reform. We look forward to receiving the EHRCJ Committee's report and recommendations and will respond to the Parliament in due course.

Part 7: Housing and homelessness

The Cabinet Secretary for Housing has been clear that tackling the housing emergency is her top priority, this includes reducing the number of children in temporary accommodation and preventing homelessness for women experiencing domestic abuse

We are pleased to confirm that, as part of measures in the [Housing Emergency Action Plan](#), announced by the Cabinet Secretary for Housing on 2 September, we are investing £1m in a new national Fund to Leave in 2025/26. Women and their children across Scotland will be able to receive financial support to pay for essentials when leaving an abusive partner, this includes women with No Recourse to Public funds. Officials are working closely with Scottish Women's Aid on the logistics of setting the fund up and will confirm in due course when the fund is available for applications and referrals. We are committed to make this fund permanent and we will set out further detail at the forthcoming spending review.

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As you are aware, there are provisions in the Housing (Scotland) Bill, currently at Stage 3 of the parliamentary process, which build on the strong housing rights that already exist for people who are homeless by bringing a renewed focus on prevention so that households do not have to go through the trauma and disruption of homelessness. This includes a new legal duty on social landlords to develop and implement a domestic abuse policy which outlines how they support their tenants experiencing domestic abuse. The statutory guidance that will accompany this duty will be crucial in setting out more detail of how tenants can be supported, including keeping people in their homes safely and rehousing the perpetrator and due consideration of rent arrears as a result of domestic abuse. We will work closely with the housing and VAWG sector to develop the necessary guidance.

Part 8: Remote and Rural areas

The Scottish Government, through the Equally Safe strategy, recognises that women in small rural or island communities can face particular challenges in relation to all forms of VAWG, and that abuse can be even more hidden than in urban areas. We fund vital specialist support across all parts of Scotland, including rural and island communities, through our Delivering Equally Safe fund. However, the recommendations within the report will be considered in the work to develop the new funding model to try to mitigate the challenges noted, and those we are aware of due to other engagement with stakeholders.

In response to the point about food bank vouchers, the Scottish Government encourages a cash-first response, wherever possible and appropriate, to help ensure those in crisis or who need emergency income for food have dignity and choice. Our cash-first approach can include cash-equivalents, for example supermarket vouchers or gift cards, to help reduce stigma for those who are experiencing food insecurity and these are not identifiable by the service that issued them.

Part 9: Same-sex relationships

The Scottish Government is firmly committed to advancing equality for LGBTQI+ people and to promoting, protecting, and realising their rights across Scotland. Our Equally Safe strategy recognises the realities of abuse within same-sex relationships and the gender-based violence experienced by LGBTQI+ people. While there are important intersectional issues affecting both LGBTQI+ people, and women & girls, it remains essential that the strategy maintains its core focus on women and girls. This focus enables Scotland to meet its international human rights obligations, including those set out in the Istanbul Convention.

The Scottish Government are funding a wide range of initiatives aimed at tackling inequality and realising rights for LGBTQI+ people in all areas of Scottish life. In 2025–26, we are providing over £1.1 million in funding to organisations working to promote LGBTQI+ equality. We will continue to collaborate with third sector partners to ensure that the voices of those with lived experience inform and improve outcomes for LGBTQI+ communities across Scotland.

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Part 10: Matters related to policing

Colleagues from Police Scotland have stated that they aim to be trauma informed in all aspects of their engagement with victims of domestic abuse, including when encountering instances of financial abuse. They have a team examining their wider trauma-informed approach and specifically in relation to domestic abuse have an online CPD package that includes a module on domestic abuse and the effects of trauma.

Specifically in relation to financial abuse they continue to explore this area and have recently met with a financial abuse specialist from Scottish Women's Aid to develop their understanding of what more could be done. In terms of lived experience, they will keep that under consideration for future training/CPD and again, in general terms, they recognise the benefit of incorporating lived experience into their approach.

If the Committee has further questions of Police Scotland, members might wish to approach the organisation directly.

I hope this letter reassures the Committee of the work the Scottish Government continues to prioritise to address the issue of financial abuse – and also our commitment to developing our responses further, through the next phase of Scotland's Equally Safe strategy.

Yours sincerely

KAUKAB STEWART MSP, Minister for Equalities

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