

Signposting for customers who have language barriers

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Executive summary

Credit Services Association (CSA) research finds that language barriers are a recurring operational issue across debt advice organisations, but support capabilities can vary.

In practice, what matters is that firms - whether creditor, collector, or adviser - have a clear structure for identifying needs, recording them, and providing access to suitable support or referral routes.

- More than 1 million people in England and Wales have reported being unable to speak English either well or at all.
- Credit Services Association research finds that language barriers are a recurring operational issue across debt advice organisations, but support capabilities can vary.
- Research by the Institute of Money Advisers has shown that 50% of UK debt advisers worked with non-English speaking clients.
- In practice, what matters is that firms - whether creditor, collector, or adviser - have a clear structure for identifying needs, recording them, and providing access to suitable support or referral routes.

Although research into the impact of language barriers in financial services is limited, our engagement with stakeholders found that, for some, language barriers are a recurring operational issue and support can vary.



1 million +

More than 1 million people in England and Wales have reported being unable to speak English either well or at all.



50% work with non-English speaking clients

Research carried out by the **Institute of Money Advisers** stated that as of 2021, 50% of UK debt advisers were working with non English speaking clients.

Executive summary cont...

This can be a practical issue for both advice firms and financial services firms, but it is important to recognise that language needs are not binary; some customers may need only limited support, while others require a more tailored or sustained response. In practice, the issue is less about measuring prevalence and more about ensuring firms can recognise possible language barriers and act appropriately when they appear.

For CSA members, in many cases, original creditors, particularly financial services providers, will have already considered language barriers earlier in the customer journey, as part of their consumer understanding work. In other cases, creditors may be less aware of language barriers, for example, where the nature of the product means that the customer has accrued a debt with minimal interaction with the creditor e.g. utilities, public sector.

Language barriers can affect customer understanding and engagement, but the right response will vary by firm, portfolio and channel mix. The central issue is not to quantify every case, but to ensure firms can identify language needs early and respond in a structured, proportionate way when they arise. A light-touch process may be sufficient for some firms, while others, particularly where cases arise more often, may need more formal arrangements.

CSA members may wish to focus on three things: spotting potential language barriers early; making it easy for customers to disclose them; and having clear internal routes for support or referral. A practical, non-prescriptive approach is likely to work best. The aim is to improve communication in order to drive good outcomes for customers where a language barrier exists.

An effective approach should make it easy for customers to disclose language needs, give staff a clear route for recording and escalating them, and support relevant signposting or referral. Firms do not need a single standard model, but they do need a workable framework that improves understanding and supports fair outcomes.

There is no single model that will suit every firm, but our stakeholder engagement points to a range of practical options that firms could explore according to their needs and scale. For example:

- **Language Line Solutions** offers interpreter access and translation support across multiple languages.
- **Recite Me** provides website-based translation and accessibility support.
- **Association of Translation Companies** can help firms access reputable interpretation and translation providers.

Depending on the volume and type of cases they see, members may wish to consider:

- Clear internal escalation and recording routes for language-related cases.
- Simple prompts in customer communications to encourage disclosure of language needs.
- Periodic review of whether signposting and referral routes are working in practice.
- Access to interpretation support where justified by case volume or complexity.

Firms may not need a perfect or uniform solution, but they do need a structured and proportionate way to respond when language barriers arise. What that looks like will depend on the needs of the organisation and its customers, as well as the wider support capabilities available elsewhere.

We believe sharing this research will help organisations consider what is right for them. We will also be organising and facilitating a workshop involving debt advice charities and language support organisations, so that members can make informed choices about what approaches are best suited to them.

Introduction

As of 2021¹, 1.04 million people in England and Wales reported being unable to speak English either well or at all. For debt purchasing and debt collection firms, this statistic raises an important question: if a significant number of people face language barriers, how many may also be in debt, and how does language affect their ability to engage with the firms they owe money to?

Effective communication is critical in financial services. Without it, firms may face challenges in recovering money owed, while consumers may experience limits to accessing support. Where communication barriers are addressed, engagement can improve, repayment may be better supported, and fairer customer outcomes can be achieved.

This project explored how language affects engagement in the debt landscape, with a particular focus on how it influences a firm's ability to signpost customers to free debt advice, and a consumer's ability to access that support. We also examined the resources available to firms, with a view to developing best practice guidance for our members.

This report sets out the insights gained through our work, informed by engagement with debt advice charities, language support organisations, and Credit Services Association members.

Key considerations

The Financial Conduct Authority (FCA)² considers low capability, including poor English language skills, as a key driver of vulnerability.

Under the Consumer Understanding outcome of the Consumer Duty³, firms must ensure customers can understand the information they receive – this includes those with language needs.

Core objectives of this project:

The objectives of this project were to:

- 1** Understand whether, and how, language acts as a barrier to communication when people are in debt.
- 2** Explore how third party debt advice organisations identify and manage language needs.
- 3** Establish whether, and how, language presents challenges for CSA members.
- 4** Understand what support members would welcome to reduce language related issues.
- 5** Identify third party resources that could support firms.

1. Office for National Statistics – data on main languages and language proficiency – England & Wales 2021

2. Financial Conduct Authority – Financial Lives 2024 report

3. Financial Conduct Authority – Consumer Duty implementation 2024 report



...proficiency in everyday English is not the same as fluency in financial English. Financial communications are often complex, contain technical terminology, and require consumers to understand multiple concepts simultaneously.”

The scale of the problem

Research on language barriers in the UK is limited. The only national data is from the Office for National Statistics (ONS)⁴ and is only updated every 10 years. While the data reflects the UK population as a whole, **it does not indicate how many people in debt may also face language challenges.**

ONS data does, however, provide useful context. In 2021, in England and Wales:

- 880,000 people (1.5% of the population) could not speak English well.
- 161,000 people (0.3% of the population) could not speak it at all.

These figures are significant and will have likely risen since 2021.

The data also shows that 4.1 million people were recorded as proficient in English in 2021. **However, proficiency in everyday English is not the same as fluency in financial English.** Financial communications are often complex, contain technical terminology, and require consumers to understand multiple concepts simultaneously. **For consumers whose first language is not English, fluency in financial terminology cannot be assumed.**

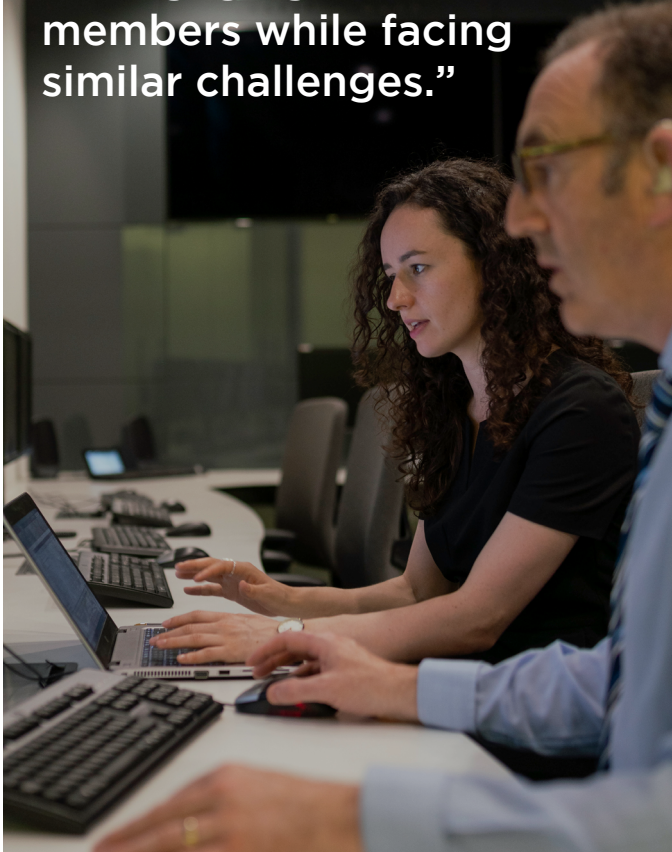
The **National Literacy Trust**⁵ provides further context, reporting that 14.9% (around one in seven) adults in England have literacy skills at or below Entry Level 3 (equivalent to a nine to eleven year old reading age). Adults at this level may struggle with everyday written information, including understanding household bills and reading labels on pre-packaged foods.

Taken together, this suggests that **headline figures on English proficiency should be treated with caution**, as they do not necessarily reflect the level of literacy required to engage confidently with financial communications.

4. Office for National Statistics – data on main languages and language proficiency – England & Wales 2021

5. The National Literacy Trust – what do adult literacy levels mean – report

“These findings demonstrate that language barriers are routinely encountered within the debt advice sector, raising important questions about how many customers may be engaging with CSA members while facing similar challenges.”



Insights from debt advice charities

A central aim of our project was to understand how language barriers can affect a firm’s ability to signpost customers to free debt advice, and whether this in turn influences a consumer’s ability to access that support.

To understand how signposting works in practice, we engaged with several third party debt advice providers to explore how they identify and manage language needs. These included:

- PayPlan
- StepChange
- Christians Against Poverty
- National Debtline
- Money & Pensions Service
- Citizens Advice Gateshead

What we found

1. **Money Advice & Pensions Service** has reported that in 2024, 7.3 million **people fell into the charity’s ‘needs debt advice’ category.**
2. **The Institute of Money Advisers⁶** (2021) research shows that **50% of UK debt advisers worked with non-English speaking clients**, with 11% doing so daily and 39% weekly.
3. **PayPlan** reported receiving on **average forty-three cases per month in 2025 where language was a barrier.** Since the launch of their digital intercom service in April 2025, they have conducted 609 conversations in different languages, alongside 540 calls that required translation support.
4. **Citizens Advice Gateshead** reported that approximately **10% of the customers** they supported each month between June 2025 to December 2025 **required** interpreter services or other **language support.**

These findings demonstrate that language barriers are routinely encountered within the debt advice sector, raising important questions about how many customers may be engaging with CSA members while facing similar challenges.

What charities do in practice

While we initially expected debt advice charities to offer broadly similar support for non English speaking customers, we found that **approaches vary considerably across the sector**. We also observed a lack of clarity about which organisations can offer what types of support.

Under the **Money & Pensions Service (MaPS)** funding framework, organisations holding national debt advice contracts receive funding that can be used to provide interpretation services. MaPS does not prescribe how this funding should be allocated, and instead allows each organisation to determine the level and type of provision based on the needs of its client base.

Christians Against Poverty (CAP) shared that, over the 30 years that they have been providing debt advice, they have explored various ways to support people for whom English is not their first language. This has included translating key documents into Welsh, Gaelic, Urdu, Punjabi, and Polish, as well as providing telephone translation services, ad-hoc bespoke arrangements, and face-to-face translation.

However, a key challenge they shared that they encounter, is around the complexity of providing a consistent enough translation service throughout the whole process to enable customers to achieve successful outcomes. This can be particularly difficult given how CAP works with its clients, including their focus on rapport building and regular client communication. For this reason, they can offer translation support for the initial stages of a customer's interactions with them, but not for the entire debt advice journey.

This aligns to a key insight we gained through our research, which is that language needs are not binary. For some customers – perhaps those that speak everyday English well – translation might only be needed when reading complex documents. For others, it might be helpful to have interpretation provisions on standby, whereas for some, support will be needed throughout their entire interaction with a firm. Members should consider each customer's needs before signposting, to ensure the organisation they are referring people to is able to meet their individual needs.

StepChange on the other hand do not currently provide in-house translation or interpretation services. However, they explained that they are committed to ensuring clients can access the support they need. Accordingly, where they identify concerns around language, they will seek to explore this and where appropriate, signpost clients to other organisations that specialise in translation support. They will also look to add an authorised third-party to an account, such as a client's friend or family member.

By contrast, **Citizens Advice** currently has funding to offer translation support. While this is not proactively advertised, advice appointments are booked in advance, and translation support can be arranged where required. **Arabic and Urdu** were identified as among the most common languages encountered, with **Kurdish** noted as particularly challenging due to limited interpreter availability.

PayPlan also offers language support through a combination of interpreters and translation technology. Additionally, National Debtline - including Business Debtline - are also able to offer support for customers who are experiencing language challenges.



Implications for signposting

Engaging with debt advice providers and members highlighted a lack of consistent understanding about which charities can support language needs.

This can create challenges for debt purchasing and debt collection firms if they are not clear on who they can refer to, or how each charity can help.

For instance, several members reported signposting customers to StepChange, despite the charity not currently offering translation facilities. This can create an additional barrier, as customers may be referred to services that are unable to meet their needs, limiting access to the right support. It could also result in charities receiving referrals that would be better placed with a different organisation.

Collectively, **this demonstrates a clear need for members to have access to a single, authoritative point of reference they can rely on when signposting customers.** As such, we encourage firms to utilise the insights from this research to, where necessary, update their signposting policies and procedures. This should support firms in ensuring that when they refer customers to free debt advice, it's to an organisation that can meet their individual needs.

“

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Insights from CSA members

As part of this project, we also engaged with members through our 2025 survey to understand how they encounter language barriers and whether they have processes in place to manage them.

What members told us

Of the forty-two firms who responded to our member survey, **sixteen** engaged with the questions relating to signposting. This told us that:

- 14 recognised languages as a barrier and reflected this in their policies.
- 2 recognised language challenges but did not reference them in policy documents.
- 12 reported having processes to signpost customers with language needs.

Of these 12 firms:

- 4 allow customers to use an authorised friend or family member to translate on their behalf.
- 2 utilise multilingual front line colleagues.
- 1 used Recite Me, a website based translation tool.
- “We request customers liaise via a family-member or English-speaking friend” (feedback from member)

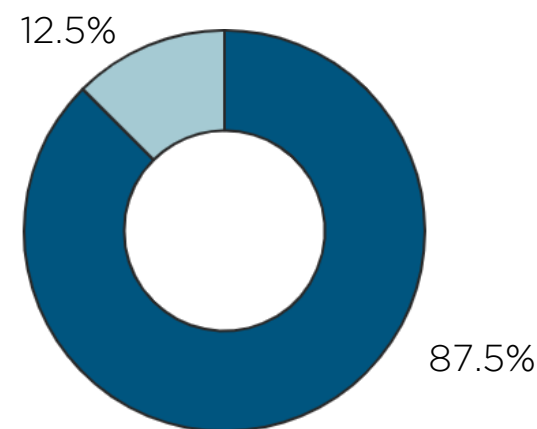
While it is positive that several members recognise language needs — particularly in light of Consumer Duty expectations and the FCA’s view of language as a potential vulnerability indicator - processes are often reactive and dependent on customers having a trusted friend or family member to communicate on their behalf.

This is understandable, given the inherent difficulties in identifying and being able to respond to different languages. However, overcoming these difficulties and having proactive processes to encourage language need disclosures could help firms to detect and address barriers more swiftly and to improve engagement.

Similarly, facilitating professional translators can also reduce the risks associated with using informal translation by friends or family members, including the risk of misunderstanding information, or even of potential economic abuse.

Without this, some customers may never engage with firms at all, meaning their debts remain unresolved.

Recognition of language barriers and signposting support



- Recognised languages as a barrier and reflected this in their policies.
- Recognised language challenges but did not reference them in policy documents.

Member appetite for further support

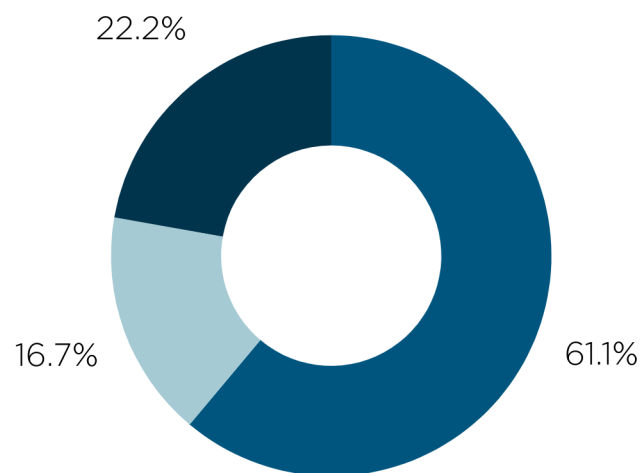
Feedback from a 2025 survey of CSA members and subsequent stakeholder engagement indicates **a clear appetite among some members for additional guidance** on supporting customers with language barriers.

Of the members who engaged with questions on signposting:

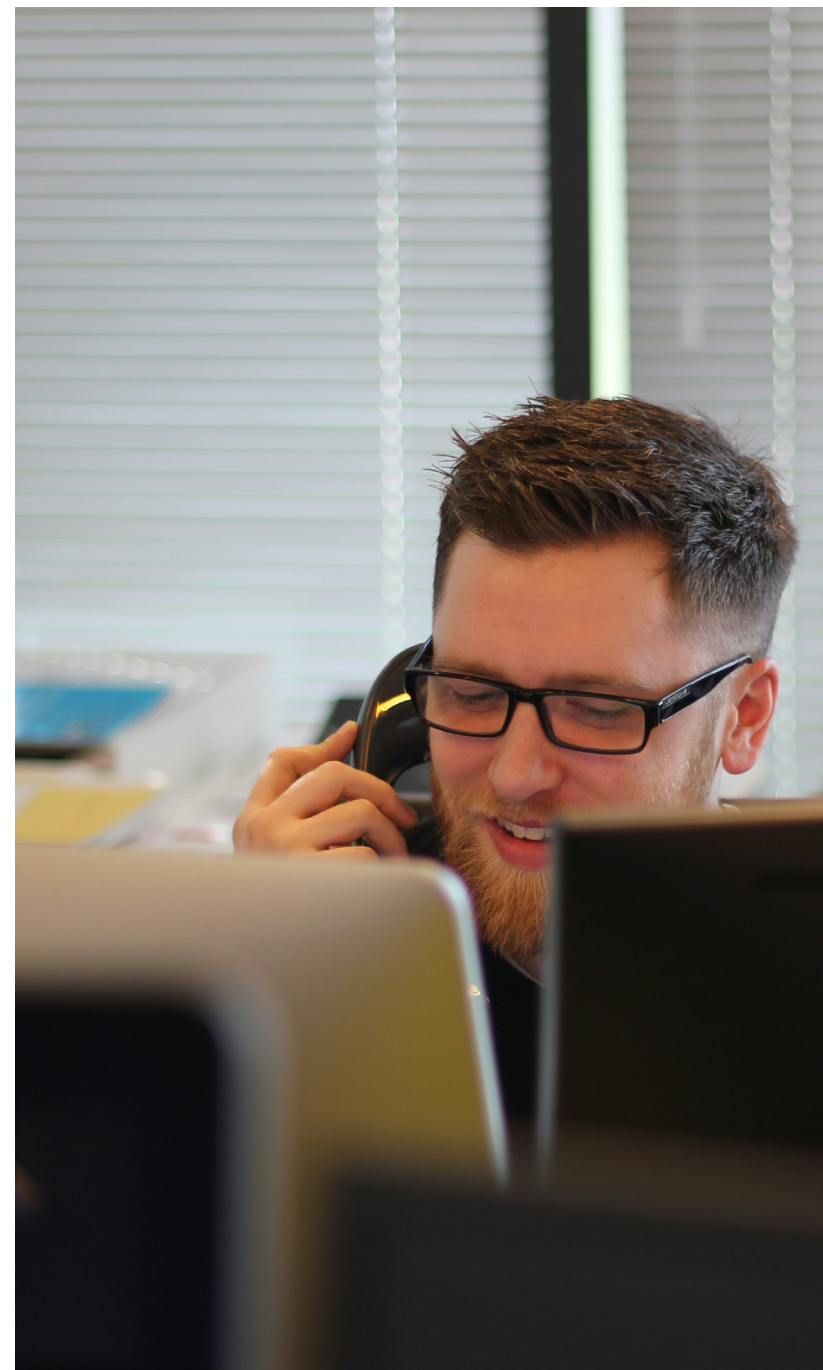
- 11 said they would welcome further guidance.
- 3 said they were open to support, although it was not a current priority.
- 4 said they did not anticipate needing additional support.

Members most likely to welcome guidance are those who recognise language as a challenge, but who experience the inherent difficulties in identifying and then responding to language needs. For others, language barriers were perceived as less prevalent, although this may itself reflect the reduced engagement of customers who are unable to understand or respond to firm communications.

Demand for additional guidance on language barriers



- would welcome further guidance.
- were open to support, although it was not a current priority.
- did not anticipate needing additional support.



Summary of support available to firms

In addition to engaging with debt advice charities, we spoke with organisations that provide translation and language support services. All expressed interest in supporting the CSA's work further. During the project, we spoke to, and gained more information about the following organisations:

Language Line Solutions are language support providers offering access to interpreters across multiple languages, as well as translation tools and applications. Services can be accessed on a case by case basis and Language Line appears to be the firm most frequently used by debt charities and other organisations.

Recite Me provides a translation service through a website plugin function. This allows content to be translated into 134 different languages. The plug-in website feature can also offer support for people who have disabilities and neurodiverse needs.

Association of Translation Companies (ATC) is the trade body for translation and interpretation providers. ATC can provide access to reputable interpreters and translators. They also shared that the most commonly spoken languages in the UK, other than English, include **Polish, Welsh, Romanian, Panjabi, Urdu, Portuguese, Spanish, Arabic, Bengali, Gujarati, and Italian.**

These firms represent potential solutions and resources for members looking to break down language barriers.

Throughout the stakeholder engagement sessions, Language Line Solutions, Recite Me, and the ATC all shared thoughts around what some of those solutions could look like in reality. In addition to the suggestion of firms individually subscribing to an **on-demand translation service**, it was also suggested that members could consider **proactive signposting within written communication.**

In reality, this could look like a brief statement included in correspondence - translated into the most commonly spoken languages - making customers aware of the debt advice available. However, it could also be wording incorporated into welcome letters or notices of assignment, again in the most typically spoken languages, telling customers what to do if they have a language need and how to get in touch.

Finally, members could also consider a one-off exercise of writing to customers they have not yet been able to establish contact with. This could involve issuing a letter or email with wording in commonly spoken languages, explaining that where language is a barrier, translation support can be explored. Notably, this would require members to then have the facility to record and respond to language preferences. However, it could go a long way to reaching those customers who up until now have not engaged with firms.



Next steps

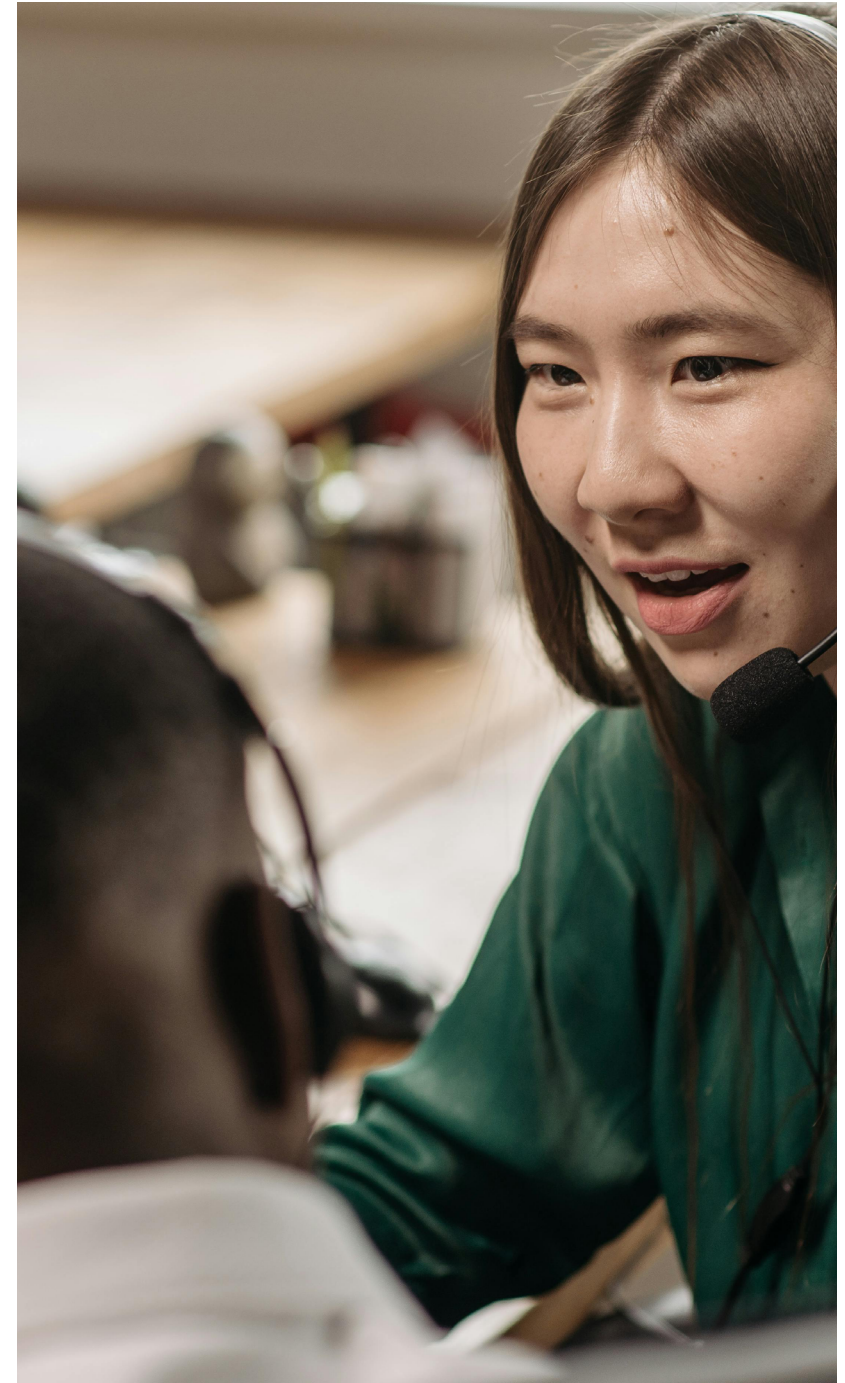
Overall, this work highlights that **there is a clear proportion of customers within the debt sector who experience language related barriers**. However, the true scale is not known. It is also important to acknowledge that language challenges are only one cause of consumer vulnerabilities or of accessibility barriers. Furthermore, language issues may differ from sector to sector. For instance, in financial services, the FCA's consumer understanding requirements under the Consumer Duty should mean that in most cases, regulated lenders have taken appropriate steps to ensure they are lending to consumers who either speak a certain level of English or whose language barriers were addressed as part of the borrowing. Whereas in utilities or with some government debts, less friction may initially arise, with accounts opened automatically when a person takes occupancy of a property and arrears able to build up without much prior interaction.

Nonetheless, evidence from debt advice charities suggests that language needs do arise regularly in practice, and therefore, in addition to publishing this report, **the CSA will be organising and facilitating a workshop involving debt advice charities and language support organisations**. This will give members the opportunity to:

- hear directly about the issue from different perspectives;
- explore practical and proportionate solutions on how to identify and support non-English speakers; and
- make informed choices about what approaches are appropriate for their own firms.

Following this, we will engage with members to answer any questions they may have about our findings, and to understand any actions they might choose to take based on this. It may be that in future, we explore additional steps to improve engagement and communication between firms and their customers. However, we believe it is important to begin by raising awareness of the challenges that language can introduce and to understand what impact this has for our members and their customers.

Overall, this project has identified that language barriers in the debt sector do exist, and perhaps most importantly, occur with some regularity; some customers may be able to discuss basic account details but struggle with more complex terms, while others might face issues with what is considered even the most basic English. Either way, better awareness of these challenges can only be a good thing if it helps increase understanding and lower barriers.



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