

## Money Advice Quality Model

### Citizens Advice response to the consultation

**February 2007**

## Summary

The Citizens Advice Service very much welcomes any initiative designed to raise standards in advice. In particular we are pleased that the paper proposes the use of the National Occupational Standards as the basis for the quality model as we have been actively involved in the development of the legal advice NOS. We also recognise the importance of NOS and recognise that this development offers considerable potential in terms of funding opportunities for the advice sector as well as in the area of quality. While we welcome this and the general principles underlying other aspects of the proposed MAQM we consider that the consultation document lacks detail in some critical areas. We have some concerns, for instance, as to the practicality of introducing a 'badging' system for money advice within a multidisciplinary advice setting; the practicalities and cost of introducing and auditing such a scheme and the potential impact of non-badging on less well resourced agencies.

There are a number of external developments, which we have outlined in the response below, which will impact on any QM scheme. We would urge further consideration to the timing of further work on this proposal.

We also have a number of questions in relation to the model, which we have highlighted in our response. We would welcome further opportunities to discuss the detail of any proposals going forward.

We would feel it is important for the role of the Money Advice Trust to be clarified in relation to the activities involved in the development and implementation of the Money Advice Quality Model scheme.

## Introduction

Citizens Advice welcomes this opportunity to respond to the Money Advice Quality Model consultation paper. The CAB service is the largest network of independent advice centres in Europe, providing high quality, free, independent and impartial advice from over 3,400 locations in England, Wales and Northern Ireland. These include 1,246 health locations, 483 schools and colleges, 218 prisons or courts and 206 community venues in addition to the extensive network of high street CAB offices. The CAB service also runs an advice website, [www.adviceguide.org.uk](http://www.adviceguide.org.uk) that received 4.3 million visits in 2005/06.

In 2005-6 Citizens Advice Bureaux dealt with 1.4 million queries relating to debt. The number of debt enquiries has continued to rise during 2006-7. In Q1 and Q2 CABx dealt with 824,000 enquiries related to debt, meaning that for the first time debt has become the biggest category of work for CABx (now comprising 29% of issues, compared to 27% in 2005-06)

Debt work is part of our 'core service' and all bureaux undertake work in this area. However, the volume of debt work, models of delivery and the level of specialism they are working to varies between bureaux depending on the individual resources of the bureaux, the availability of specialists and the demand for debt advice in the area.

There are over 17,000 advisers working in bureaux – all generalist advisers undertake debt advice as part of their advice role in the bureau. The most recent Bureau Information Survey [for 2005/2006] shows that there are some 842 paid advisers and 287 volunteer advisers categorised as money/debt 'specialists'

The CAB service is committed to the provision of quality advice services to the consumer. The CAB service Membership Scheme was launched in April 2000 and continues to be the quality assurance standard within the CAB service. The Membership Scheme is convergent with the Legal Services Commission Community Legal Service Quality Mark at both the General Help and Casework levels. Citizens Advice is an 'Accredited Agency' under the 'Access to Justice Act 1999.

We audit our members once every three years testing the quality of advice provided to consumers of the members services. In addition, we also audit the systems and processes deployed within bureaux as to their effectiveness and efficiency. We have developed an ongoing programme of effective auditing within the CAB service.

All staff within the Citizens Advice Audit Service are qualified 'Lead Auditors'. All staff having successfully completed the Institute for Quality Assurance training and written examination pertaining to 'Lead Auditor' skills in relation to ISO 9000 series.

- 1) **The proposed Money Advice Quality Model focuses on organisational ‘badging’ drawing on the advice-specific aspects of the Community Legal Service (CLS) Quality Mark (QM). This approach was adopted to minimise duplication of work for organisations, to enable effective passporting in for CLS Quality Mark holders, and to place the focus of the Money Advice Quality Model on high-quality advice delivery. Do you agree with the approach adopted?**

While we welcome the desire to minimise duplication of effort we are not convinced that the proposed model addresses quality assurance issues in sufficient detail

### **Quality Mark and other quality assurance frameworks**

The proposal to passport CLSQM holders is attractive at first sight, but if ‘passporting’ is taken to mean that the agency already meets standards over and above those contained in the MAQM then we are unsure how many non CAB advice agencies in the sector this may apply to. In practice the LSC has not been auditing non-CAB agencies for some time. The result of this is that although some agencies may possess the CLSQM, there is no assessment as to whether they would still meet the criteria. Therefore this ‘badge’ no longer gives real assurance of quality apart from those agencies where there is an internal audit function.

Section 3 of the consultation paper refers to the mapping of other audited quality standards [eg Investors in People] against MAQM but offers no comments as to how agencies might attain MAQM standards which they do not currently hold or what the evidential routes or audit requirements might be.

The ‘Accredited Agency’ status afforded Citizens Advice by the Legal Services Commission (LSC) means that we are able to audit to the CLSQM at both the General Help and Casework levels and make recommendations to the LSC concerning the award of the CLSQM. In addition to this we are the only advice agency that assesses the quality of advice delivered to consumers by our members.

We believe that this only currently applies to the CAB service in the money advice sector and this has considerable implications for the universal adoption of the MAQM as any kind of common quality assurance framework.

We are not convinced that the scope of the MAQM organisational standards 1 – 4 is sufficient to ‘ensure’ in any meaningful way that an agency meeting them would have the capacity to support and develop individual advisers. Whilst client care, case management, supervision and appraisal, signposting and referral and staff development are important there is no comment in the consultation paper about other equally important aspects which underpin an individual adviser’s performance and development – for instance assurance that the organisation is running effectively, governed effectively and has secure funding.

The CLSQM and also the Citizens Advice Membership Scheme recognise that these other elements are essential if a consumer is to have confidence in the organisation they are using. The focus of the MAQM is advice specific but we believe that the opportunity offered to make some comment about the fit between organisational and individual standards could have been taken. This is an important dimension, especially since (as the consultation paper notes) one of the drivers for the MAQM is the development of a framework to reassure consumers that they will receive high quality advice.

The lack of detail in this area is potentially counter-productive in that the MAQM could be seen as offering a ‘cheaper’ alternative simply because it lacks any associated audit processes – it is not at all clear from the consultation paper what non CLSQM agencies would need to do in order to meet

standards 1 – 4. We are concerned that the commercial sector could look to adopt the MAQM to gain competitive advantage in the market: as there is likely to be a resource cost involved with the adoption of the MAQM, commercial organisations may be in a stronger position to introduce the MAQM on the basis of wealth, whereas a poorly funded non CAB agency might struggle to do so even though they run a quality service

An audit/compliance system would need to be in place in order to ensure that the standards are complied with and this could be both costly and resource intensive. We would question whether the diversion of funds from front line delivery of money advice is sensible at this time whilst there continues to be a lack of sustainable long term funding for front line money advice. A clear business case would need to be made as to the need and additional benefits of such a scheme.

## **Other QA initiatives**

The discussion paper on accreditation issues [MAT July 2006] from which the current consultation arose identifies a considerable number of existing systems and initiatives in the money advice sector which have a direct impact on the standards and quality assurance debate. In addition the Debt Resolution Forum (facilitated by the IPA) has recently published draft standards for adoption by debt remedy companies. If the aim for the MAQM scheme is to assure quality and therefore promote consumer confidence, it would make sense for there to be engagement from all sections of the money advice sector and a common set of standards applicable. We feel that comments in the consultation paper that the MAQM project “where feasible and appropriate is liaising with representatives of the initiatives on issues of content and direction” lacks force and it would have been helpful at this point to indicate for consideration and comment what some of the issues are.

The consultation paper does not adequately take account of the recent developments within the advice and legal sectors regarding regulation and sector wide quality initiatives that will have an impact on the direction of the MAQM. The Legal Services Bill covers the regulation of the legal and advice sectors. This Bill envisages wholesale regulation under the Legal Services Board, which will be established by the Department for Constitutional Affairs. It is unclear as yet whether the not for profit sector will be dealt with under this bill, as there are conflicting opinions at this stage. Moreover, the advice membership networks have, through the Advice Services Alliance (ASA), put in a bid for the development of an advice sector wide quality scheme to the Big Lottery Fund the outcome of which will be known later this year.

The regulation of the advice sector, and the outcome of ASA in obtaining funding could have an impact on any quality assurance scheme is devised and it would be sensible to await outcomes before progressing this scheme further.

We would also welcome comment on the implications of the MAQM initiative for other MAT partner agencies like Citizens Advice Scotland and Money Advice Scotland – both in terms of their experience of the MATRICS scheme which audits money advisers undertaking the Debt Arrangement Scheme and in relation to the newly introduced National Standards which combine individual and organisational elements

**2) The working group recognised that while effective organisational standards provide a framework for good advice delivery, such standards do not guarantee individual adviser competence. The proposed model therefore places greater emphasis on the competence of individual advisers and how the skills, knowledge and understanding needed to deliver good quality money advice are developed and maintained within the organisation. Do you agree with the approach adopted?**

In principle we are in agreement with this approach since it mirrors that taken by Citizens Advice but we feel that the more rigorous approach to the acquiring and then maintaining of skills and knowledge which the MAQM model implies may be less attractive to agencies without the infrastructure to support such a system.

It is not possible based on the consultation paper to comment on how organisations receiving the badge would be able to assure quality of advice from their advisers.

At Citizens Advice we have an established and comprehensive competence-based training and assessment programme for new advisers which includes all the elements we would expect to see in a more fully developed and articulated MAQM. The programme

- identifies what a Generalist Adviser should be able to do (based on Membership Standards) and the underpinning knowledge, skills and attitudes needed to be able to do it
- provides a structured, but flexible programme of learning to enable new advisers to achieve the required level of competence
- provides a system of accreditation of prior experience and learning (APEL) for advisers who come to the service with some of the required skills and knowledge
- provides a structured system of assessment, using records of learning, to enable bureaux to be sure that advisers have satisfactorily completed each stage of the learning programme, and are able to do what is expected of them
- enables bureaux to identify training needs and development paths for their advisers throughout their time in the bureau including the opportunity to gain qualifications.

All the aspects of the more formal learning programme are complemented by a variety of activities in the bureau, including seeing clients within a structured framework of support and supervision.

The greater emphasis in the proposed MAQM model on competence of individual advisers implies that the agency will need to operate systems for support/supervision and assessment – the systems we have in place have developed over time to meet our specific needs. The absence of detail in the paper makes further comment on this aspect difficult in relation to the sector as a whole.

We are currently running a pilot exercise on the assessment of money advice cases and will have the results later in the year – we expect that the findings of this work will be of relevance to the issues of adviser support and learning raised by this aspect of MAQM

While in principle the proposed model appears to fit well enough with the Citizens Advice generalist adviser model we have some concerns about how it might apply for caseworkers and advisers operating at a more advanced level.

On the positive side we hope this initiative will offer an opportunity for a more detailed consideration of how an adviser [at whatever level] becomes and remains competent and more explicit statement of the variety of activities, which contribute to this, both organisational and individual

- 3) **The individual competence element in the proposed model is based on the use of current, applicable National Occupational Standards (NOS). NOS specify the standards of performance people are expected to achieve in their work and the knowledge and skills needed to perform their roles. NOS exist for legal advice and generic financial advice as well as for many other occupational areas such as management. They are owned by the sector to which they primarily apply. Do you agree that the individual adviser competence element of the model should be based on the sector's NOS?**

From the Citizens Advice perspective we agree that the legal advice NOS Standards should form the **basis** of competences for individual advisers but we feel that the consultation paper could do more to highlight the issues around NOS which the advice sector needs to address. These issues include the fit between generic and subject specific NOS (which is given little consideration in the paper); the relationship between the First Line and Casework within each subject specific standard and between the different subject areas.

For instance we would expect a money adviser to have a working knowledge of a number of other advice areas [not only Benefits or Housing ] if only for them to be able to identify “clusters” of problems and make appropriate referrals. The proposed MAQM as it stands incorporates a more restricted range of individual competences at a generalist level than the CLSQM framework within which bureaux now operate

At Citizens Advice we are in the process of considering the role of Generic Financial Advice and its relation to the more conventional debt/money advice and in this regard we have advocated an active co-ordinating role for the Money Advice Trust. Without more scrutiny and discussion on the ‘matching’ of the different NOS we feel that the example role profiles are not helpful, particularly in the mix of different sets of NOS in the examples used.

The Citizens Advice Service is predominantly a generalist advice service but many of our Generalist Advisers will not meet the outline role profile suggested as an example in the consultation paper. The tasks and activities undertaken by generalist advisers in bureaux will depend upon the model of delivery of advice and resources available in bureaux. For example not all generalist advisers in bureaux will meet LA12 (manage legal advice cases) and LA19 (manage personal caseload) but will meet other generic legal advice standards which are **not** included in the example role profile like LA1 on communication with clients or LA3 on interviews. It is not clear how the example role profiles have been arrived at or what criteria have been used to justify the inclusion of some generic standards while others have been omitted.

We would suggest that the example role profiles and their underlying standards be revisited to identify a ‘core’ set of standards that accurately reflect the differing types of work that is currently undertaken in advice agencies. The role profiles need to reflect the difference between paid, full time money advisers and volunteers who will usually be working part time and working under supervision. This would be particularly important in relation to any individual accreditation scheme that may be proposed in the future where the ability to practice money advice might be dependant on being accredited.

It may be that a piece of research needs to take place to examine the roles of a variety of different advisers in different agencies to inform the suggested role profiles.

A suggested alternative to this emphasis on individual competence to the exclusion of other factors is to recognise that our systems (Information, Training, Supervision, Case Checking, and Audit/QAA) provide the appropriate quality assurance system on a bureau wide basis, based on a set of ‘core’ individual competences.

We are uncertain about the comment in the consultation paper that the existence of the wiseradviser programme is the main rationale for introducing the MAQM to the **money advice sector only**, rather than attempting to introduce it as a template for **all areas of advice**. A more explicit statement of which agencies and organisations are seen as the main audience for this model might be helpful if it is not the money advice sector.

We wonder if the paper could say more about how NOS might be incorporated more fully in relation to the wiseradviser programme. While using NOS as a basis for role profiling is important we note that several elements of the Skills for Justice Legal Advice toolkit relate to learning and training and we would strongly advocate that these activities are given active consideration [for example in the design and development of learning programmes and in evaluation]

- 4) **The model proposes a new organisational standard – 5. Staff Development. This focuses on how organisations integrate the NOS into advice delivery roles; identify, manage and meet skills and knowledge gaps of individual advisers and ensure ongoing competence to meet current and developing money advice delivery needs. Do you agree with the principle of including section 5: Staff Development? If not, why not and what alternatives would you suggest for managing and supporting individual competence**

It is difficult to answer this question until the issues outlined above are resolved. We are already mapping the NOS for legal advice against our competences and learning programmes and could produce guidance for bureaux to turn this into role profiles. Citizens Advice has the skills to do this on a centralised basis, but would require resources to enable us to do so. Associated with this, we would need to give further thought to the implications of integration of standard 5 into training and adviser support roles

The new Staff Development standard in the model is couched in terms of agencies and organisations **being required** to undertake a variety of role profiling and associated tasks but without indication of what the benefits might be. Bureaux may see this as a lot of work for no particular reward.

Whilst bureaux would be passported for standards 1- 4 by virtue of our Membership Scheme, the consultation document makes it clear that agencies would need to provide evidence to demonstrate their support of ‘the identification, maintenance and development of individual advisers’ advice skills’

There would be significant amounts of work involved to establish and convince bureaux that there would be substantial benefits to them in investing scarce resources to obtain Standard 5. As yet there is not sufficient detail in the proposed model to identify such benefits readily.

This could be particularly problematic for small, poorly resourced bureaux and we would not like to see a situation whereby organisations with greater resources would be able to get the ‘badge’ purely because they have the resources to devote time to this initiative, particularly if that gave them a competitive advantage for funding purposes. It is conceivable that the commercial sector could meet the standards outlined and due to the centralised nature of their business, could at a lower cost map their adviser roles and assess much more easily. This does not assure the quality of the individual advice and we would be concerned if this was to happen.

The resourcing of this standard and how it might interact with any future individual accreditation scheme would need addressing.

The Legal Advice NOS project is currently moving into a new phase of considering issues around Workforce Development – we await the outcome of this initiative before offering further comment on this aspect of the proposed MAQM

- 5) **It is anticipated organisations would benefit from support to incorporate the NOS. It is envisaged support with role profiles and support and guidance on mapping current staff skills and experience against role profiles would be provided.**

**Is there any support you feel would be essential?**

**Who should provide that support?**

**What form should it take (e.g. electronic, seminars, case studies etc)**

**Are there any other factors we should consider?**

We are not in a position to answer these questions in any further detail that has been outlined above. We would be happy to contribute to the further consideration of the area of support but would require some further clarification of the scheme as highlighted in our above comments.

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