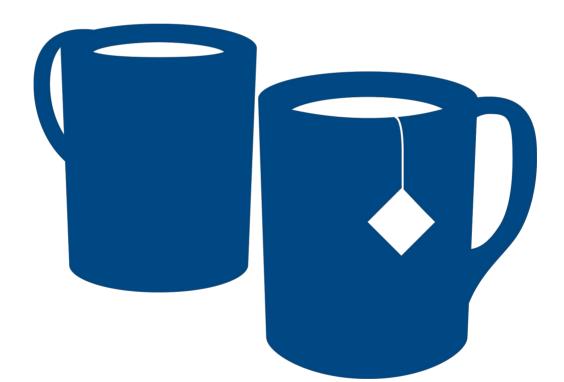
The free advice gap

Spreading the benefits of access to high-quality money advice





Executive Summary

Successive governments have attempted to improve financial capability, rates of saving among households and attitudes towards retirement planning. Those changes have become increasingly important to families' financial security as people are given more freedom and choice about how to manage their money. As the government carries out two major consultations on the advice sector, there is a crucial opportunity to reform the advice sector so that more people feel confident with their money and make the right decisions for a financially secure future.¹

We know that many have low financial capability and that this can be a factor in people struggling to budget, deal with financial shocks and plan for the future. Our recent polling found that:

- 13.4 million GB adults find managing money and making financial decisions challenging;
- 18.1 million GB adults say that they rarely or never save, and 11.7 million adults say they have not been able to save any money at all for the future in the past two years; and
- 22.1 million GB adults sometimes or constantly struggle to keep up with their bills or other financial commitments.

While good quality paid-for advice is an important part of improving financial outcomes for households, there is a limit to how affordable this can become, even if the current Financial Advice Market Review does suggest major changes to the paid-for advice sector that allow the price of advice to drop. Many cannot afford to pay for advice; 49 per cent of households have net financial wealth of less than £5,000.² Others will need to use free advice or guidance to appraise their basic options before paying for advice. Free money advice is therefore vital to help more households towards a more financially secure future.

However it is also clear that there is currently a 'Free Advice Gap'. The free services on offer can be confusing and sometimes don't work well together. Demand for help from local Citizens Advice often outstrips supply. While access to advice for those with problem debt is currently good and improving, more needs to be done

¹ These are the <u>Financial Advice Market Review</u>, which is considering "the current regulatory and legal framework governing the provision of financial advice and guidance to consumers and its effectiveness in ensuring that all consumers have access to the information, advice and guidance necessary to empower them to make effective decisions about their finances" and the <u>Public Financial Guidance</u> <u>Review</u>, which is considering "how the government should structure the public provision of free-to-client, impartial financial guidance [referred to in this consultation hereafter as "public financial guidance"] to give consumers the information they need, to make financial decisions directly or to seek

the right additional advice to help them do so."

² ONS, (2014), <u>Wealth and Assets Survey - Chapter 5: Financial Wealth, Wealth in Great Britain 2010-12</u>.

to expand and integrate other types of free money advice. Our research³ has found that:

- Up to 4.5 million people have had free money advice in the last two years, but
- Up to 5.3 million people who said they have needed advice in the last two years have not had it.
- Of those who said they have needed advice in the past two years but have not accessed it, 14 per cent said they had tried to get free advice but had been told the services were too busy. This suggests that up to 735,000 people may have been unable to access free advice when they sought it due to overstretched services.
- More than one in ten people or up to 500,000 who have taken free guidance in the past two years have seen symptoms of excessive demand including delays and inconvenient appointments.

The Government response to its current consultation on public financial guidance should adopt the following three principles to plug the free advice gap:

- Trust: Use familiar, trusted and convenient sources to provide advice.
- Tailored: Ensure that different types of advice are available through different channels to meet people's needs and build their capability in the long term.
- Timely: Ensure that this advice is available at the times in life when it would be of most benefit to individuals.

³ The original data in this report is based on a YouGov survey of 2,041 adults between 2nd - 5th October 2015. The survey was carried out online. The figures have been weighted and are representative of all GB adults (aged 18+). Any scaling up of figures was carried out by Citizens Advice and is based on the Great Britain adult population of 48,358,351, taken from the 2011 census.

Money, debt and pensions

Good financial health is important to living a secure life and avoiding money problems. However, managing a household's finances can be a complex task, and one that requires strong financial literacy, access to high-quality information and the ability to make the right choices in both the short and long-term. Sometimes guidance and advice are necessary to help individuals make the best decisions, and to build their financial capability.

Why do people need help with their money?

In the past 30 years there has been a shift in responsibility for long-term household financial health away from the government and employers and towards individuals. An illustrative example is pensions; previously the main model of private saving for retirement was the defined benefit pension provided by a lifelong employer. Now most save into defined contribution pensions and have also been given much more freedom over how they can take an income at retirement from those pension pots.

In addition, changes to consumer markets and the funding of certain public services mean that people need to take a large number of financial decisions as a matter of course; for example choosing an energy tariff or telephone and broadband provider, or deciding on whether it is a good investment to take out loans to finance higher education. This has led to an increase in the time and attention people need to devote to making these decisions.

Changes to employment practices have also placed new demands on individual households. Whereas previously most were paid weekly or biweekly, most are now paid monthly, which requires a particular set of budgeting skills. With the advent of Universal Credit, most key benefits will be paid monthly for almost all claimants by 2020, increasing the number of people who must start budgeting monthly.

Finally, financial products have also become increasingly sophisticated. While this means consumers are offered greater choice, it also means that greater financial capability is required to make optimal choices about whether or not to buy particular products and how to choose between different offers. Again, pensions offers an illustrative example. Under the changes introduced in 2015, those who would previously have been required to buy a relatively simple annuity product can now choose from a much wider range of more complex drawdown products.

In this context, there has also been a squeeze on household finances since the recession beginning in 2008. The overall extent of the household income squeeze depends on the measure used, but reasonable estimates suggest it has resulted in six to ten 'lost years' up to 2015 in which income didn't grow in real terms. On the other hand, the costs of many essential goods and services rose above inflation. For example, the price of electricity, gas and other fuels increased by 119 per cent

between 2008 and 2015, when overall Consumer Price Inflation for the period was 28%.⁴

In this context, it is ever more important that people have the level of financial capability necessary to navigate this more complex financial world.

Why is it important that people improve their financial capability?

Financial capability is not simply about financial literacy but means having the knowledge, understanding, skills, motivation and confidence to make financial decisions which are appropriate to one's personal circumstances. It has become an important concept in UK public policy since the Financial Services Authority started using the term in 2003. In 2010, the Money Advice Service was set up with the specific remit of trying to improve the nation's financial capability.

Ensuring that people have a good level of financial capability is important because high levels of financial capability:

- Help people to manage debts and avoid problem debt
- Help people move on in their lives and plan for the future
- Improve consumer markets by ensuring that more people make optimal decisions, thus driving increased competition
- Reduce arrears levels for for utility companies, mortgage lenders and landlords (including local authorities, housing associations and private landlords)
- Can improve people's psychological wellbeing⁵
- Increase the likelihood of people purchasing financial products thus providing benefits to the financial services industry.

Moving to Universal Credit

Over the next five years, around 8 million people will start a claim for Universal credit, or be moved onto the benefit from 'legacy' benefits (Tax Credits, Jobseeker's Allowance, Employment and Support Allowance, Income Support and Housing Benefit). This new benefit is paid monthly, as opposed to every two weeks for legacy benefits. This means that many claimants will have to adjust from budgeting weekly or two-weekly to monthly. Citizens Advice research estimated that 77% of our clients who would be moving to Universal Credit would need help in doing this. If Universal Claimants don't have the money management skills necessary to do this, there will be negative impacts not just for the individuals who struggle but also to landlords, local authorities, utility companies and creditors.

⁴ Citizens Advice, (2015), <u>Consumer Challenges 2015</u>.

⁵ A study by the Institute for Social and Economic Research (ISER) found that improving your financial capability has more of an impact on your mental health than a £1,000 per month increase in household income. ISER, (2011), <u>Financial capability, income and psychological well being</u>.

While the long-term impacts of financial capability levels remain understudied, analysis of the longitudinal British Household Panel survey found that increasing people's financial capability "can have long lasting effects on their mental health, living standards, savings behaviour and household income".⁶

Why do people struggle to manage their money?

The latest update of the UK Financial Capability Strategy identified three main types of financially capable behaviour.⁷ They are:

- Managing money well day-to-day: This includes being able to shop around, find the best deal, cut back when the going gets tough and budgeting on a regular basis. This includes building resilience to day-to-day financial shocks e.g. a household appliance breaking down.
- Managing money through significant planned or unplanned life events. This includes putting money aside in case something goes wrong, such as losing your job, or for a long-term goal like a car or a holiday, for the costs of bringing up a child, and for retirement.
- Being able to handle periods of financial difficulty. This includes being able to talk openly about money with family and friends, knowing where to turn for support and advice, and turning to it before it's too late. It also encompasses taking action to tackle debt problems.⁸

There is widespread evidence that many people have relatively low financial capability, and as a result struggle to manage their money. Our recent polling found that a significant minority (28%) find managing their money and making financial decisions challenging. Scaled up this would mean up to 13.4 million adults find managing money and making financial decisions challenging

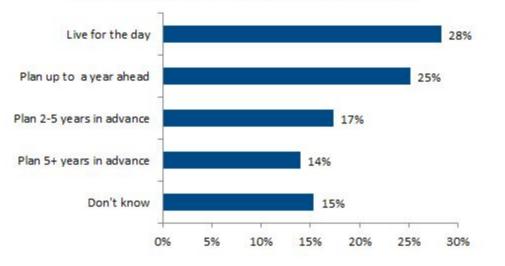
13.4 million adults in the GB population. Adults aged 25-44 are more likely to fall into this group (34%, compared with 23% of those aged over 55) as are those from black and minority ethnic backgrounds (40%, compared with 27% of white respondents).

When it comes to **managing money through significant planned or unplanned life events**, we found that just three in ten (31%) plan their money more than two years in advance. Roughly the same proportion (28%) say that they prefer to 'live for the day' when it comes to their finances.

⁶The Consumer Financial Education Body, (2011), <u>The long term impacts of financial capability:</u> <u>Evidence from the BHPS</u>.

⁷ Money Advice Service, (2015), <u>Financial Capability Strategy for the UK: The Consultation Response</u> and Next Steps.

Chart 1: Advance financial planning behaviour



Q. When it comes to money do you generally prefer to ...?

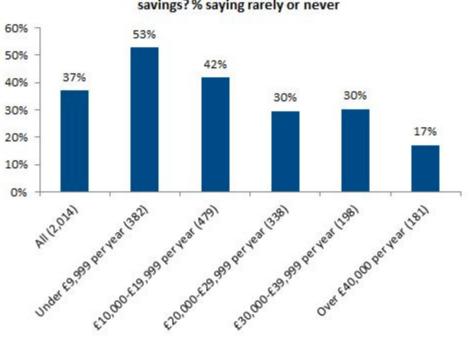
Indeed an even greater proportion (37%) said that they rarely or never save. This

would mean up to 18.1 million GB adults. Just under a quarter - or up to 11.6 million adults - say they have not been able to save any money at all for the future in the past two years. As illustrated in the chart below, saving behaviour is directly correlated with income levels, but even among

18.1 million GB adults say that they rarely or never save

those earning well above the UK average income there is a significant minority who say that they rarely or never save (17% of those earning more than £40,000).

Chart 2: Savings behaviour by gross personal income



How often, if at all, so you put aside any of your income into savings? % saying rarely or never

22.2 million GB adults sometimes or constantly struggle to keep up with their bills and other financial commitments

In terms of **managing money well day-to-day**, just under half (46%) are keeping up with all of their bills and commitments without any difficulties, while 43% - which would mean up to 15.5 million GB adults - say that keeping up with these commitments is a struggle from time to time. One in seven - or up to 6.7 million adults - find it a constant struggle, or are already behind on one or more of their bills and other financial commitments.

Just under one in three - or up to 13.7 million adults - have had to borrow from friends or family to cover day-to-day expenses in the last year.

Q. Thinking about the past 12 months (i.e. since October 2014), how often (if at

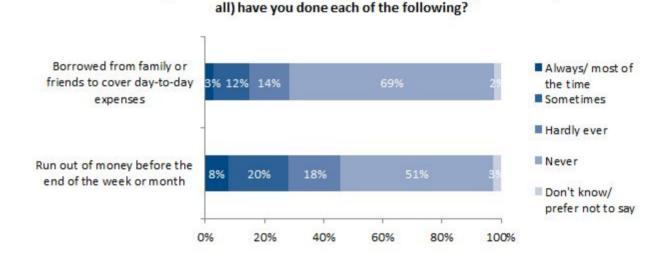


Chart 3: Day-to-day financial difficulties

Finding the best deal on essential household spending is another important element of managing money well day-to-day. Again, there is significant minority who haven't taken action that could limit their household spending on essential goods. Around a third haven't checked whether they are on the most appropriate energy (33%), mobile phone (32%) or broadband contract (34%) in the past two years. Scaled up, this indicates that up to 15.4 million people could be missing out on opportunities to limit costs in each of these three essential markets.

Budgeting too can cause challenges. In the last year, just under one in ten people say that they run out of money before the end of the month always or most of the time, which would indicate up to 3.8 million adults. Indeed only half (51%) have never run out of money

3.8 million GB adults run out of money before the end of the month always or most of the time before the end of the week or month in that period. Just over a third (34%) have relied on short term credit to pay for things that they didn't have enough money for at the time. This includes 5% who say that they do this always or most of the time, which scaled up would indicate up to 2.6 million adults in this position in the GB population.

Our polling shows that those aged 25-44, those from ethnic minorities, renters, those not in work or in part time work are all more likely to have run out of money before the end of the week or month, used short term credit or borrowed from friends or family. These tend to be the demographics with either lower incomes or high household costs. This echoes other research that suggest that younger people are more likely to have lower scores on various domains of financial capability.⁹

In this context of the increased demands of household financial management, coupled with strong evidence that a significant minority of people struggle to manage their money, it is vital that there is sufficient access to free money advice. The case for this is explored in the next chapter.

⁹ Office for National Statistics, (2015) *Financial capability in Great Britain 2010-2012*. Office for National Statistics.

Why should money advice be publicly funded?

As outlined in the previous chapter, there are millions of people who would benefit from free advice in order to help them improve their budgeting skills, control their costs and plan for the future.

For those with higher household incomes, financial advice is available to help them plan their pension saving and decumulation, as well as advice on the purchase of specific financial products and overall financial planning. However, this advice can be expensive, and is currently out of reach for the vast majority of individuals. Through its Financial Advice Market Review, the Treasury and the Financial Conduct Authority are currently looking at how paid-for advice can be made more accessible to more consumers. However, even if there were to be a proliferation of different levels of paid-for advice at a range of different price points, there would still be a limit to the demand for paid-for advice.¹⁰

In addition, paid-for advice, while useful in terms of helping people to make specific decisions, rarely has an explicitly educative or skill-building purpose. Therefore it can be of limited value in terms of improving individuals' own financial capability in the long term.

Why does money advice need to be free?

Therefore a sufficient supply of free advice will remain of vital importance whatever the outcome of the Financial Advice Market Review. There are two groups in particular who benefit from free advice: those for whom free advice is the 'only option' and those for whom free advice can act as a 'gateway' to paid-for advice.

Only option: This very large group of people (generally low and middle income earners) who would benefit from money advice that cannot afford it or are unlikely to ever pay for it. Analysis of the Wealth and Assets Survey found that 49 per cent of households have net financial wealth of less than £5,000, including 25% who have

28.3 million GB adults do not think they will pay for money advice at any point in the future

negative wealth.¹¹ These are the groups for whom financial advice is unlikely to ever be affordable or appropriate. This chimes with our polling, which indicates that just

¹⁰ Citizens Advice recent publication on the <u>Affordable Advice Gap</u> examines the affordability issue, specifically in relation to pensions advice.

¹¹ ONS, (2014), <u>Wealth and Assets Survey - Chapter 5: Financial Wealth, Wealth in Great Britain</u> <u>2010-12</u>.

under three in five people - up to 28.3 million GB adults - do not think they will pay for money advice at any point in the future.

Gateway: Many people who can pay for advice at particular key financial moments will also want clear and independent help understanding their basic options. The example of pensions is again illustrative: 44% of people who plan to go to an IFA for pension advice will also go to Pension Wise to engage with free guidance about their overall options.¹²

Given these large groups who would benefit from money advice, it is important that there is sufficient supply of free money advice at the times in people's lives when it would be most useful, which include but may not be limited to:

- Key life events, including going to university, starting a family and buying a home
- When choosing essential consumer goods and services
- When choosing financial products (if paid-for advice is not affordable)
- Saving for the future
- Deciding how to draw income from a pension
- When affected by loss or major changes to income
- When struggling to make ends meet or manage debt

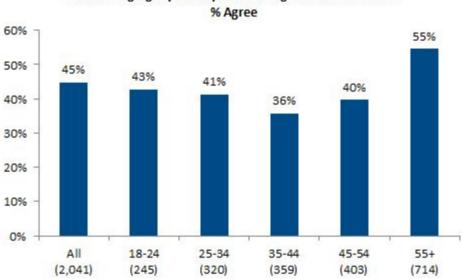
How many people would benefit from free money advice?

Our polling indicates that demand for free advice is high, with almost two thirds (64%) saying that they would consider using free guidance at some point and two in five (39%) saying that they would benefit from free access to money advice to help

19 million GB adults think that they would benefit from free money advice them with managing my money and making financial decisions. Scaled up, this suggests that there are up to 19 million people who think that they would benefit from free money advice. Young people - who are less likely to be able to afford paid-for advice - are more likely to agree with this statement, as illustrated in the chart below.

¹² Citizens Advice, (2015), <u>Affordable Advice Gap</u>, pg. 2.

Chart 4: Demand for free access to money advice



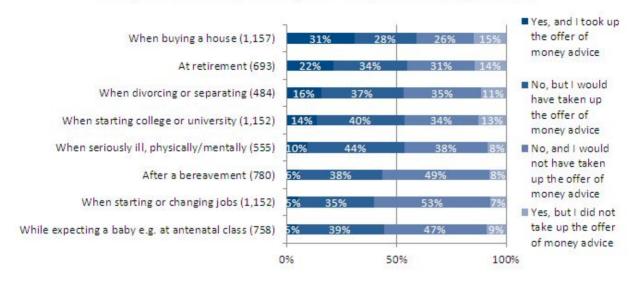
Q. I would benefit from free access to money advice to help me with managing my money and making financial decisions.

There is also a strong appetite for proactive advice at key life points that would help make these particular experiences easier to deal with financially and encourage people to think about the future and long-term financial management. For example, we found that only 27% of people have been offered advice when divorcing or separating, but that a further 37% of those surveyed who had experienced divorce or separation would have taken up money advice if offered at this time. This suggests up to 4.3 million people who have fallen into the free advice gap at this particular time in their life. Applying, there is a sizable advice gap for each of the following life events:

Table 1: Advice gap at key life events

Life event	Potential size of advice gap ¹³
When starting or changing jobs	Up to 9.5 million
When starting college or university	Up to 8.5 million
When buying a house	Up to 7.6 million
While expecting a baby e.g. at antenatal class	Up to 7.1 million
After a bereavement	Up to 7.0 million
When seriously ill (physically or mentally)	Up to 5.7 million
At retirement	Up to 5.5 million
When divorcing or separating	Up to 4.3 million

¹³ Number of people who have experienced this event, were not offered money advice at the time but say they would have take it up if they had been offered.



Have you ever been offered money advice in any of the following situations?

How big is the free advice gap?

Our research has found that a sizable proportion of the population - 9%, or up to 4.5 million people - have had free money advice in the last two years. However, it also indicates that there is an ongoing need for greater provision of free money advice. Just over one in ten (11%) - as many as 5.3 million people - who said they have needed advice in the last two years have not had it.

There is no one particular group of people who are more at risk of falling into this gap. However, those who find it a struggle to keep up with bills or are falling behind on them are more likely to say that they needed but have not accessed free advice (17%, compared with 6% of those who are keeping up with all of their bills and commitments).

5.3 million GB adults who have needed money advice in the last two years have not had access to it

The free advice sector is clearly under

pressure when it comes to money advice. More than one in ten people who have taken free guidance in the past two years have seen symptoms of excessive demand. Demand for help from local Citizens Advice often outstrips supply. Overall up to 500,000 people may have experienced a delay or had to take an appointment at an inconvenient time while taking free money advice in the past 2 years.¹⁴

There is a larger group of people who have sought free advice but have not been able to access it at all. Of those who said they have needed advice in the past two years but have not accessed it, 14 per cent said they had tried to get free advice but

¹⁴ The sample size is small due to the relatively low numbers of people who have had a bad experience of free money advice. We will be undertaking further research to better understand the experiences of this group.

had been told the services were too busy. This suggests that 735,000 people may have been unable to access free advice when they sought it due to overstretched services.

Why don't people get the money advice they need?

As outlined in the previous chapter, the free advice gap may affect a large number of people. The reasons for this gap are complex, and include issues related to the supply of free advice (undersupply and complexity of supply, as well as fit of supply with demand and user needs), awareness of free advice services and people's advice seeking behaviour when dealing with money.

What kind of advice can people get at the moment?

The current advice landscape is complex and fractured. The Money Advice Service has been since 2010 "tasked with promoting public awareness and understanding of financial services and enhancing consumers' ability to manage their financial affairs. In 2012, a new role supporting the provision of debt advice was added to its remit."¹⁵ The money advice remit is fulfilled through its public website, a face to face offer and funding for financial capability projects through charities. In the debt space it acts as a commissioner of services from charitable bodies and co-ordinates efforts across the sector. MAS funding for debt and money advice is just one element of the free advice picture. When we take a holistic approach at the broader money advice arena then the number of organisations / individuals playing a role grows significantly. Money advice may be their primary function or something they do to compliment their primary functions.

In addition to government and statutory bodies, the organisations and individuals providing financial education or advice of some kind are many and diverse. Although the list below is far from exhaustive, they fall into four broad groups:

- Consumer groups and charities;
 - O Faith groups
 - O Generalist advice providers such as Citizens Advice
 - O Credit Unions
- Commercial intermediaries;
- Financial services product providers; and
- The Media.

Not only is the list of advice bodies diverse but so too is the list of services that they may (or may not) provide in different areas. They may offer various services including: debt counselling; specialist debt relief solutions; generalist money advice;

¹⁵ Farnish, C, (2015), <u>Review of the Money Advice Service</u>.

money management courses and financial health checks. Even many national organisations offer different services in different locations. Within Citizens Advice alone, there is a very large range of services, reaching over 420,000 people over the last year.

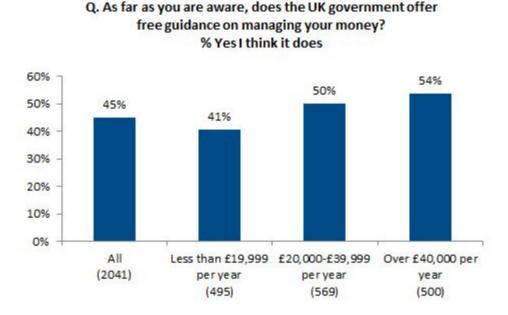
Type of service	Numbers reached
Training for the public	167,000
Integrated Money Advice	123,000
Financial Products and Services Advice	76,054
Integrated Digital Money Advice	19,973
Energy Best Deal	13,788
Training for frontline workers	8,500
Energy Best Deal Extra	5,050
Martin Lewis Integrated Money Advice Pilot	3,931
Universal Credit Advice	2,239
Better Financial Health	1,153

The question of who an individual might approach for advice becomes even more complicated when questions about eligibility for services or the strings that might be attached come into play (whether in reality or in perception only). For example, funding for services is sometimes tied to particular residential areas or has other access restrictions.

What do people know about the advice on offer?

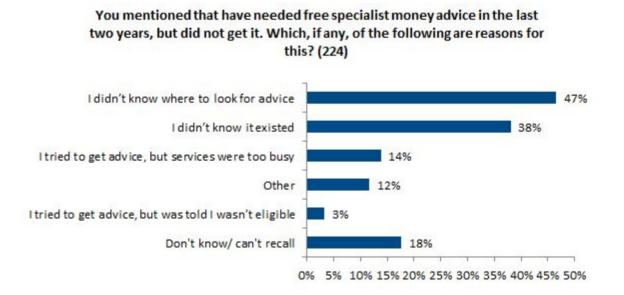
In order to access free advice people must first know it exists. Our polling indicates that fewer than half of people are aware that government-backed free guidance on money management exists. Indeed those with lower household incomes (who are therefore less likely to be able to afford paid-for advice) are less likely to be aware of this advice, with only 41% of those with a gross household income of less than £20,000 were aware, compared with 54% of those with a gross household income of over £40,000.

Chart 6: Awareness of government-backed free guidance, by gross household income



Even when people are aware that advice exists, they may not always be sure about who to approach with their specific query. With thousands of advice providers locally and nationally it isn't surprising that people don't know who to turn to. Indeed, lack of awareness of advice (38%) or where to look for it (47%) were the main reasons that those who said that they needed advice in the past few years did not get it.

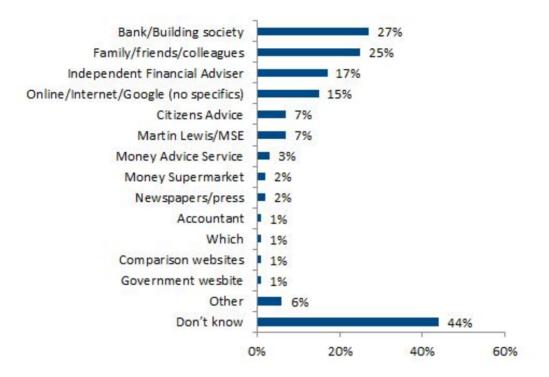
Chart 7: Reasons why people did not get money advice



When asked - unprompted - where they would turn to for money guidance, more than two in five (44%) people said that they don't know. As the chart overleaf shows, people tend to prioritise people or organisations with whom they already have relationships, those with expertise (IFA) or better known brands (e.g. Citizens Advice or Money Saving Expert). Many would simply search online.

Chart 8: Where people would go first for money advice

Q. Please imagine you needed guidance on how best to manage your money or plan for the future financially... Where would you go first? (Not prompted, up to three)



These findings suggest that more can be done to connect money advice provision to those who need or would benefit from money advice. However, this can only be done in pace with expansion of services; currently advice providers can be reluctant to advertise where they are concerned that there is insufficient supply available.

How and where do people look for advice?

Demand for money advice at local Citizens Advice offices indicates that people generally proactively seek money advice for one of two reasons:

- Crisis-point advice: Usually sought at a crisis point when income no longer meets expenditure e.g. dealing with problem debt or a benefit delay
- Product advice: When choosing or restructuring a financial product e.g. taking out a mortgage

Debt and product advice are currently well served by the free and paid-for advice sectors. Debt advice in particular is well-structured to help people at the right time, and through the right channels, with much progress being made to coordinate services across the advice sector and ensure that those who need advice and signposted or referred to the services they need as smoothly as possible.

However, as described above, as many as 5.3 million people think that they have missed out on free advice when they needed it in the past few years. This suggests

that more needs to be done to ensure that those who would benefit have easy access to advice when they need it. In particular, it is important to ensure that proactive money advice reaches people:

- Before financial difficulties turn into a crisis;
- At key life or financial transition points; and
- When choosing essential consumer products, such as energy tariffs.

The current Financial Capability strategy for the UK highlights the importance of ensuring that money advice is not just for those who are in financial difficulties.¹⁶ However, work to ensure that advice matches need requires in depth study of people's needs and behaviours, as well as painstaking work at a community level to build trust and regard for services. The evidence on what works in this space is still being developed. The next chapter outlines the high level principles that need to be followed in order to spread the benefits of access to money advice to more people who would benefit from it.

¹⁶ Money Advice Service (2015) <u>The Financial Capability Strategy for the UK</u>

Spreading the benefits of access to money advice

Helping people solve their financial problems and develop better financial capability is good for individuals and society. We have found that there may be as many as 5.3 million people falling into the free advice gap. In the future, and in conjunction with changes to the paid-for advice market, it will be important to develop the free advice landscape to offer better access to advice and guidance using the following principles:

- Provide advice through familiar, trusted and convenient sources.
- Ensure that different types of advice are available to fit people's needs and build their capability in the long term. This will include:
 - O Reactive advice for those facing financial difficulties (e.g. for debt)
 - O Product advice (two areas currently well served)
 - O Holistic general/debt advice that integrates money advice
 - O Proactive money advice/education at key life transition points.
- Ensure that this advice is available at the times when it would be of most benefit to individuals. The focus in the current financial capability strategy on young people's education and improving proactive advice at key life events is a welcome step in this direction.
- Provide advice through the most convenient and effective channel for the individual and their advice need. Improvements in telephone and digital advice services as well as increasingly sophisticated financial planning tools are helping people to access advice more easily and at a lower cost to advice providers. However it is imperative that face to face channels are preserved for those with complex cases or particular communication needs.

Annex

Advice and guidance

Throughout this report the term 'money advice' is used to describe everything from regulated independent financial advice to general money guidance.

In reality there are key differences, both between types of financial advice and between what constitutes 'advice' and what falls under the more general definition of 'guidance'.¹⁷

Broadly speaking, financial advice is is regulated by the FCA and are authorised to provide suggestions to consumers of the best financial decisions for them.

Within regulated advice, there is a further key distinction between 'independent' and 'restricted' advisers. Advisers, under the rule of the RDR must disclose whether they provide independent or restricted services and independent advisers can provide information on a full range of products and services whereas restricted advisers will only make suggestions from a limited range of financial products.¹⁸

By contrast, 'guidance' is used to refer to the general provision of financial information and does not involve the recommendation of particular products or services. Guidance services are sometimes referred to as 'information only' services to make that distinction clear. There is also a distinction between public financial guidance - which includes information and guidance funded directly by government or by a levy underwritten by statute - and other financial guidance provided by charities such as as Citizens Advice and other organisations.

¹⁷HM Treasury, (2015), <u>Public financial guidance: consultation</u>.

¹⁸ Some restricted advisers only offer recommendations on certain firms' products, whereas others only focus on certain areas of advice such as pensions.

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