

Investigation into Financial Capability Training Materials

30 August 2019



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Foreword

In August 2019, we were made aware that some training materials on our website contained unacceptable material relating to Black, Asian and minority ethnic (BAME) communities. I have apologised unreservedly for this.

To understand how this happened – and to stop anything similar happening again – I led an investigation, resulting in this final report.

To fix the failings outlined in the report, I'm working with my Executive Team to implement the report's recommendations in full, and as a matter of urgency.

But I won't stop there. This incident, and in particular the debate it led to, highlighted a wider issue. We've been too slow in our progress on diversity and inclusion. As an organisation – and as a sector – we've faltered when we should be leading the way.

In addition to enacting these recommendations, therefore, I'm accelerating wider plans to make national Citizens Advice a more diverse and inclusive organisation.

We'll acknowledge and confront inequality, including racial disparities. We'll invest more resources and time to address these issues. And we'll set bold targets to hold ourselves to account.

We've been too cautious on diversity and will now act to put this right.

A handwritten signature in black ink, appearing to read 'Gillian Guy', written in a cursive style.

Gillian Guy

Section 1.

Overview

As part of its work on financial capability Citizens Advice has produced training materials, including best practice guides, designed to support advisers since at least 2009.

In September 2015 an updated range of financial capability best practice guides were published on the Citizens Advice website. This included guides for working with BAME communities.

On the evening of Friday 9 August 2019 the communications team became aware via social media of the existence of these training materials and that they contained unacceptable content with regard to BAME communities.

On the morning of Wednesday 14 August 2019 the training materials were removed from the website and a member of the External Affairs team responded via social media.

The matter was then brought to the attention of the Chief Executive. A formal response from the organisation was given via social and traditional media, apologising unreservedly for the unacceptable material and committing to investigate.

Subsequently the organisation was made aware, by a journalist, of a statement from the BAME network group of staff regarding the materials. An hour later, the statement was emailed to the Executive Team and shared with staff in parallel via the organisation's internal communications channels.

Later that afternoon the Chief Executive confirmed in an email to all staff that there would be an internal investigation. This would look at the production of the materials and the way in which the organisation responded, with a tight timescale for completion.

On Friday 16 August the internal investigation began, led by the Chief Executive with the support of a senior manager.

Section 2.

Scope and process

Scope

The investigation, led by the Chief Executive, was commissioned to understand:

- The process by which materials were first developed and published, including any related review and approval process
- The way we responded after being made aware of the materials on 9 August 2019
- Recommendations as to how we make sure this does not happen again

The work did not attempt to evaluate the content or appropriateness of the training materials themselves, which we consider were unacceptable.

The work of the investigation did not focus on teams or individuals, but on lessons learnt and any improvements to the development, review, approval and publication process of training materials. The purpose of the investigation is to stop this happening again.

There may well be matters beyond the scope of this review which the Chief Executive will identify for appropriate action.

Process

In conducting this investigation the following activities have been undertaken:

- Interviews with members of staff involved in the production of the material and the response by the organisation
- Meetings with key stakeholders and other members of staff to gather background information

- A review of existing policies, procedures and guidance relevant to the scope of the investigation
- A review of documents provided by members of staff including emails, personal statements, timelines and communication materials

This wealth of information has been compiled into a detailed supporting dossier. To protect the confidentiality of individuals this material is not being published, but the findings and recommendations in this report are drawn from it.

Section 3.

Summary and recommendations

Headline findings

1. The content of the material had not been through an approval process
2. The material was not developed with the appropriate level of input from those with a specialist knowledge of equality issues
3. There are not adequate processes or controls in place around the publication of materials on the corporate section of the website
4. There is a lack of clarity around the role and remit of the network groups
5. There is not enough clarity and consistency on escalation protocols

Key findings with supporting commentary

1. The content of the material had not been through an approval process

The materials in question formed part of a financial capability resource library of training and other supporting materials aimed at trainers and advisers delivering financial capability. The resource library has existed in various forms since at least 2009. In 2015 an exercise to review, refresh and improve the resources it contained was undertaken by a member of the Financial Capability team.

As part of this exercise a new financial capability best practice guide for BAME communities was created. No approval was sought or given for the content of the guide prior to publication. The materials were reviewed by another member of the team for the purposes of proofreading and formatting, but that individual was not in a position to provide sign off.

2. The material was not developed with the appropriate level of input from those with a specialist knowledge of equality issues

The author of the material was brought into the organisation as a financial capability practitioner with the remit to create, maintain and develop high-quality training, support and resources.

The author has experience of working with a range of BAME client groups and, as a BAME individual, has personal experience of some particular communities. This experience, although valuable, does not equate to being a subject matter expert in matters of race equality or equality issues in general. Overall, too much reliance was placed on the lived and other experience of the individual as a proxy for specialist equality input.

It has been asserted that the materials were reviewed by a member or members of the network group for BAME employees prior to publication. As a number of key individuals have since left the organisation it has not been possible to evidence whether or not this occurred. However, while this would also have provided valuable input, there would have remained a similar challenge around specialist equality expertise.

In addition to the lack of input from a subject matter expert in equality issues, there was no structured user research or testing of the materials with either

advisers or clients prior to publication. This approach to content development was new to Citizens Advice at the time the materials were produced. However greater structural links, or integration of the work of the Financial Capability team with other teams producing advice or training content, could have provided additional checks and balances.

3. There are not adequate processes or controls in place around the publication of materials on the corporate section of the website

The materials in question were published on the corporate section of the public facing citizensadvice.org.uk website. This is distinct from the advice section of the website and is managed differently.

When publishing the training materials all relevant processes were followed in relation to gaining publishing rights and uploading the material. It is clear therefore, that there are not adequate controls in place on the way in which content on the corporate section of the website is governed, published and reviewed. Had such processes been in place, they could and should have acted as additional assurance on the appropriateness of the content prior to publication.

4. There is a lack of clarity around the role and remit of the network groups

Various aspects of this investigation have highlighted a lack of clarity around the role and remit of the staff network groups including the BAME network group.

There is a lack of clarity, in particular, in relation to whether there is a requirement on staff to check or seek input into materials that are being produced or issues that arise that may be relevant to the interests of the group.

There are no consistent processes or guidelines in place to support staff in understanding whether a network group should be consulted, what status such input would have and the practical mechanisms for requesting input if appropriate.

5. There is not enough clarity and consistency on escalation protocols

There was a lack of consistency between the escalation processes in place for traditional and social media, as well as a lack of clarity around lines of accountability. This contributed to a significant delay in the escalation of the issue to a level at which action could be taken to remove the materials and respond publicly. When the matter was escalated to appropriately senior decision makers, action was taken quickly.

A lack of specialist skills amongst the team on how to engage on a significant issue such as this on social media also contributed to the delay in responding. This was evident in the approach taken in the first response on Twitter.

Recommendations

1. There should be greater support for staff to understand what specialist equality expertise constitutes, how they can access it and the role it can play in their work
2. Specialist equality expertise should be sought as standard as part of the development of relevant content
3. The design and sign off of all training materials should be the responsibility of the Learning Team. This should include the responsibility to ensure input from subject matter experts, including on equality issues
4. All training materials should be produced in line with the internal best practice for content development that applies to advice content
5. Improved editorial and technical governance and control of the corporate website should be put in place, including a reassessment of existing content
6. Work should proceed with the network groups to clarify their role and remit and ensure staff have a clear understanding of what this is
7. There should be a greater investment in social media capability. This should include upskilling team members from all communications disciplines on engaging on social media
8. There should be a consistent approach to escalation across the various communications teams that is clear on roles and accountabilities



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Published August 2019

Citizens Advice is an operating name of

The National Association of Citizens Advice Bureaux.

Registered charity number 279057.