

Service Performance, Quality and Standards

Test and learn update

29/09/2022

Agenda

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Progress with test and learn

Sarah McNeice

Progress with Test and Learn

- In March we briefed delivery partners on the workstreams which would be the focus of the 10 month testing period:
 1. Embedding of the MaPS Standards at an operational and organisational level (Self-attestation and control self-assessment vs MaPS Standards and Control Testing)
 2. Compliance with the customer facing MaPS Standards identifying unsuitability and detriment (Customer facing sampling and Independent Sampling)
- Activities to test the implementation of the MaPS Standards commenced in April and are providing MaPS with helpful insight and data.
- The collaborative work between delivery partners, the Independent Quality Assessors (IQA) and MaPS has started to inform us how the MaPS Standards should be assessed.
- Early feedback from some delivery partners suggests that the previous level of pressure on front line workers is starting to reduce.
- The first round of calibration identified standards where assessors were seeking more evidence than necessary.
- The next round of testing and calibration will further help us determine the final process for assessing compliance of the MaPS Standards

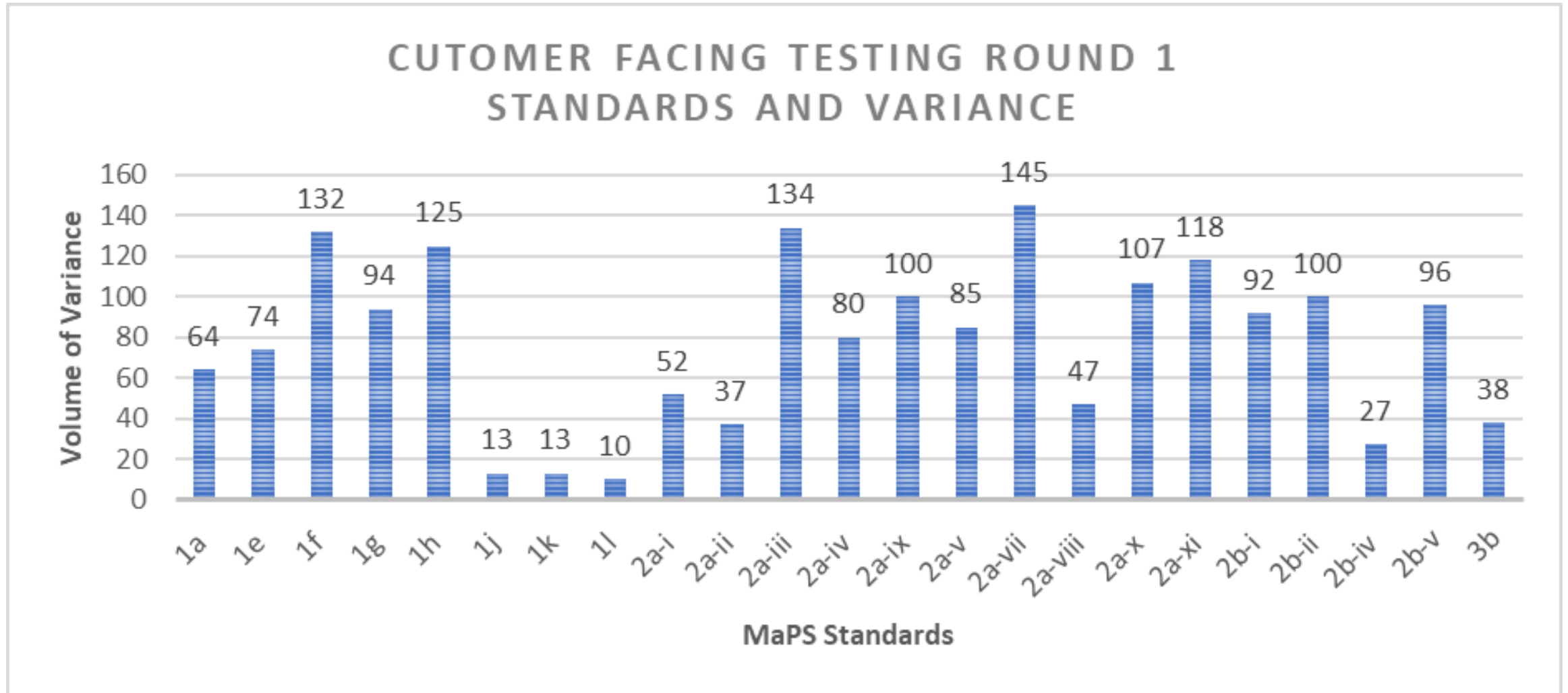
What have we learnt so far.....

Carol Marsh

Submission Data - April to Sept 2022

Submissions April to September 2022							
Overall Volumes and Compliance							
Delivery Partner Volumes		IQA Volumes		Delivery Partner overall indicated compliance		IQA overall indicated compliance	
828		788		81%		82%	
Submissions April to September 2022							
Breakdown of Assessment Outcomes							
Met		Not Met no impact		Not Met unsuitable		Not Met detriment Financial loss/harm	
DP	IQA	DP	IQA	DP	IQA	DP	IQA
81%	82%	12%	8%	7%	10%	0.02% (21 cases)	0.001% (1 Case)

Calibration Data – April / May 2022



What we have learnt so far.....

- Standards with the highest volume of ‘Met’
 - **1j** The information, guidance or advice provided must: not introduce or explicitly or implicitly recommend a specific product, provider of a financial service product, or financial adviser, unless to facilitate debt adjustment and resolution
 - **1k** The information, guidance or advice provided must: not sell, arrange, or facilitate the sale of a financial service or product
 - **1l** The information, guidance or advice provided must: (must not) Receive any inappropriate or improper payment or incentive as a result of the guidance or advice provided to a consumer
 - **2a i** All practitioners must ensure they: Inform consumers of the scope, purpose, and limitations of the session
 - **2a ii** All practitioners must ensure they: Inform consumers about the personal and financial information that the practitioner may request from them during the session
 - **2b iv** All practitioners must ensure they: Take a pre-emptive approach to identifying consumers in vulnerable circumstances and tailor sessions to meet their needs as far as possible
 - **2a viii** All practitioners must ensure they: Inform the consumer about managing their personal data
 - **3b** Services must: demonstrate that appropriate delivery channels have been identified by drawing on best available evidence about needs, consumer behaviours and preferences, to ensure advice and guidance is delivered in accessible and convenient ways.

What we have learnt so far.....

- Standards with the highest volume of '**Not Met**'
 - 2a iii All practitioners must ensure they: Request information about the consumer's financial and personal circumstances as appropriate to the presenting issue
 - 1f The information, guidance or advice provided must: Seek to drive informed decisions and actions. Where applicable, MaPS and its delivery partners must provide clear calls to action, next steps, or hand-offs to other organisations
 - 2a vii All practitioners must ensure they: Identify and provide for the consumer relevant information, options, and next steps for them to take, and explain by whom
- Data indicates a significant variance with these three standards between the assessment outcomes of:
 - Not Met – no impact
 - Not Met - unsuitable

Calibration

Carol Marsh

Insight from first round of Calibration

- There are clear trends emerging from the first round of testing which has assisted greatly in reviewing the guidance for providers.
- The revised guidance is unlikely to be the final iteration of guidance
- There are a further two rounds of calibration scheduled before we will be in a position to construct and roll out a final version of the guidance.
- There are several standards which reflected the most variance in assessment outcomes across all providers
- This provided a good opportunity for discussions around interpretation between MaPs, IQA and delivery partners.
- The revised guidance takes account of those discussions and internally decisions made around a common interpretation
- Across the cumulative assessment outcomes of all delivery partners, IQA assessed higher volumes of met standards than delivery partners collectively (this may not be reflected in the outcomes for all delivery partners when reviewed individually)
- The standards where not applicable has been an option, but should apply in all cases, will have that option removed from October 2022 – these changes will be reflected in the guidance and on the MS Forms

MaPS Standards - Guidance

Carol Marsh

Revised Guidance

- The revision of the guidance has been through a governance process which has ensured that the guidance remains limited to compliance with the standard and avoids overlap with regulation
- It is intended to ensure the focus of evidence remains within the scope of the standard and does not take the assessor beyond the requirements
- Language is consistent with the standard to maintain a focus on what is being sought to confirm compliance
- There are limited examples to avoid limiting potential evidence sources which could confirm compliance
- The not applicable option has been removed for standards which will apply in all cases
- The guidance has been written to apply across all MaPS service lines so there is a consistent use of terms such as practitioner as opposed to adviser
- Standard 1d *The practitioner must understand the difference between advice and guidance and comply with the boundary between regulated and non-regulated activities* is to be included for debt from October 2022
- Feedback will continue to be collected and used to inform further iterations of the guidance

Next Steps.....

Sarah McNeice

Testing – next steps

- A further two cycles of calibration will take place during testing
- The next cycle will focus on standards assessed as ‘not met’ by delivery partners
- During calibration, to help gain a greater understanding of the evidence considered to be lacking, up to three cases will be explored.
- Delivery partners will have the option of involving the assessor of those cases in the calibration sessions
- Feedback from those sessions will evolve collective thinking on the adequacy and acceptability of evidence.
- By the end of the testing period the full process for customer facing assessment will be defined:
 - Sampling Methodology
 - Scoring Methodology
 - Calibration process
 - Moderation and appeals process

Post test and learn activity

- Customer Facing Assessment will be rolled out from February 2023 with a quality KPI of 80% managed through monthly and quality performance meetings
- Calibration will be a quarterly activity to inform continuous improvement and development
- The assessment outcomes of the IQAS will assess compliance with the MaPS Standards and establish the KPI for compliance with these standards
- An appeals process will provide the opportunity to challenge the assessment outcome for providers not reaching the KPI compliance threshold
- To be defined:
 - The assessment guidance in its final form
 - The sampling methodology and the approach to delivery partner assessments
 - The defined evidence requirements for each standard
 - The IQAS provider from February 2022

Questions?

Sarah McNeice