

The Money and Pension Service Quality Assurance Customer Facing Assessment Guidance

DRO HUBS

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Money &
Pensions
Service

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16/02/23	V2.1	Quarterly	Lead Quality Manager	Head of Service Performance, Quality and Standards

Background

All service lines will be assessed for compliance with relevant customer facing MaPS Standards, by delivery partners and MaPS appointed independent assessors, who will be subject matter experts. They will review evidence provided in cases (files/recordings/transcripts) and assess compliance against the customer facing MaPS standards.

Delivery partners will work in collaboration with MaPS to analyse trends and use intelligence to continually improve the system, processes, and controls environment used to operate the service.

Guidance

While other monitoring processes cover all of the 11 MaPS Standards, for the purpose of customer facing testing we have established which standards can be measured through assessing the customer interaction and these have been listed in the guidance.

Standard 9b is integral to all customer facing standards as customer records must be complete, accurate and accessible.

The full version of the MaPS Standards can be accessed by following the [link](#). Within the standards document there are **MaPS Standards Terms and Definitions** to support understanding, across all MaPS service lines, of the terms used within the standards.

An overview of the options for assessment outcomes is outlined in the table below:

Assessment Outcomes	Guidance	Indicator
Met	Fully meets the expectations of the standard	There is evidence that all the requirements of the standard have been met
Not Met (No impact)	- Has not met the expectations of the standard. - There is no evidence of poor customer outcomes. - No evidence detriment (financial loss or harm)	There is not sufficient evidence to demonstrate that the standard has been met There is no evidence of impact on the customer.
Not Met (Unsuitable - Impact, No financial loss or harm)	- The standard is not met. - There is evidence of impact. - There is no evidence of financial loss or harm	There is not sufficient evidence to demonstrate that the standard is met. There is evidence that there has been an impact on the customer. There is no evidence of financial loss or harm.
Not met (Unsuitable with detriment - Impact, Financial loss or harm)	The standard has not been met and there is evidence of detriment (financial loss or harm)	There is not sufficient evidence to demonstrate that the standard is met There is evidence that there has been an impact on the customer There is evidence of actual financial loss or harm.

N/A	The standard does not apply to the customer's situation.	The standard is not applicable to the customer's situation

NOTE: The guidance column (column 3) lists the types of evidence that could be used to assess if a standard is met but relevant evidence is not limited to the bullet points listed. You may have further evidence that is not included as a bullet point, however if it relates to the customers circumstances and is key to the standard being met this should be included.

<u>Standard</u>	<u>Focus of the Standard</u>	<u>Guidance</u>	<u>Indicators</u>	<u>N/A Option</u>
2a-i - All practitioners must ensure they: Inform consumers of the scope, purpose, and limitations of the session	This standard focuses on allowing the customer to make an informed service choice.	Requirement that: customers will be provided with the relevant information about the scope, purpose and limitations of their advice provided by the DRO service based on their needs, either before or during the session	- Evidence through Control Self-Assessment i.e., IVR, Information Packs/Pre-Interview packs or - Evidence available on the case record	No
1d – The practitioner must understand the difference between advice and guidance and comply with the boundary between regulated and non-regulated activities.	This standard focuses on the need for the service to provide advice and guidance within its authority to do so.	Practitioners must not: Give regulated advice that the organisation is not authorised to provide.	There is no evidence to suggest the advice provided is outside the organisations authority to provide.	No
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.	This standard focuses on ensuring reasonable steps have been taken to identify the appropriate delivery channel.	Is there evidence on the case record that either: - a process has taken place to ensure that the delivery channel is appropriate for the customer's needs and preference or - The customer need is understood, acknowledged and practitioner, where appropriate, identifies indicators that an	- Evidence that a process has taken place to determine channel suitability. - If relevant, practitioner has identified indicators suggesting an alternative channel is more suitable and therefore refers on to an intermediary via an alternative channel	No

<u>Standard</u>	<u>Focus of the Standard</u>	<u>Guidance</u>	<u>Indicators</u>	<u>N/A Option</u>
		alternative channel is more appropriate		
2b-iii – Create and maintain a detailed consumer record	This standard focuses on ensuring a record has been created and is also maintained for customers in detail	Is the customer record sufficiently detailed and accurate?	- The record is required to have the level of detail to enable compliance with the customer facing standards. - The record must meet the case submission criteria.	No
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	This standard focuses on ensuring sufficient information is requested and the customer is fully prepared for the session. This will help us to ensure the customer receives the most appropriate advice or guidance on their DRO application, based on their circumstances.	Is there evidence on the case record that the Practitioner: Has INFORMED the customer what personal/financial info may be requested in order to provide suitable advice?	- The customer has been advised on the personal and financial information that will be required. - The request for information could take place at any point prior to session commencement i.e., may be prior to a booked appointment or at the start of an advice session irrespective of channel	No
2a-viii - All practitioners must ensure they: Inform the consumer about managing their personal data	This standard focuses on data protection, consent, and withdrawal of consent, having been explained to the customer	Is there evidence that: The customer has been informed about relevant data protection policies or where appropriate, consent processes	Evidence on the case record that customer has been informed about relevant data protection policies or where appropriate, consent processes	No

<u>Standard</u>	<u>Focus of the Standard</u>	<u>Guidance</u>	<u>Indicators</u>	<u>N/A Option</u>
2b-i - Debt advice practitioners must ensure they: Identify any emergency or urgent issues related to the consumer's debts	This standard focuses on ensuring that emergency and urgent issues are <u>identified</u> .	Is there evidence on the case record that the Practitioner: Has taken steps to explore if there are any emergency or urgent issues	Emergencies/urgent issues identified and considered.	No
2a-iii - All practitioners must ensure they: Request information about the consumer's financial and personal circumstances as appropriate to the presenting issue	This standard focuses on ensuring sufficient information is requested from the customer in order to provide the most appropriate advice or guidance on their DRO application based on their circumstances.	Is there evidence that: - Information HAS BEEN REQUESTED about the customer personal and financial circumstances in line with regulatory guidance appropriate to their DRO application. - Relevant questions will depend on the customer circumstances and query.	- The Practitioner has requested the relevant personal and financial information from the customer. - Examples may include, (this list is not exhaustive) - key dates/deadlines - Income, Expenditure, and assets - Details of their debts and questioning of liability? (Where liability issues occur, please see standard 2a-vii) - What action has been taken so far by either the customer or creditor? - Any known or foreseeable changes	No

<u>Standard</u>	<u>Focus of the Standard</u>	<u>Guidance</u>	<u>Indicators</u>	<u>N/A Option</u>
			to the customers circumstances.	
2a-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	This standard focuses on ensuring vulnerability is identified and appropriate adjustments made to the delivery of the session to take account of vulnerability	Is there evidence on the case record that the Practitioner: - Has taken the appropriate steps to identify vulnerability. - Has adapted the delivery of the session to meet the needs of the customer	- sufficient exploration has taken place to identify any vulnerability the customer may have. - if a vulnerability is identified then the advice and guidance has been adapted in line with the vulnerability	No
1a - The information, guidance or advice provided must: Be impartial and accurate	This standard focuses on ensuring the advice given to the customer is impartial and accurate.	Is there evidence that the advice or guidance is - based on customer need without bias. - advice/guidance has been driven by customer best interest - accurate and in line with the most recent legislation and regulatory obligations	- Guidance and/or advice is solely based on customer need, individual circumstances and in line with regulatory obligations. - Accurate advice with the customer circumstances considered fully.	No
1e - The information, guidance or advice provided must: Be timely and relevant to the consumer	This standard focuses on the need to ensure the guidance and advice is relevant and takes account of customers circumstances and key dates	Is there evidence on the case record that the Practitioner has: - Identified key dates that impact the customer. - Considered key dates when agreeing next steps with the customer.	- Key dates identified and considered by the Practitioner. - Information, guidance, or advice is relevant to the customers circumstances and takes account of any time constraints to allow	No

<u>Standard</u>	<u>Focus of the Standard</u>	<u>Guidance</u>	<u>Indicators</u>	<u>N/A Option</u>
		Has provided suitable information, guidance, or advice relevant to the customer's needs and circumstances in relation to their DRO application	customers to meet deadlines.	
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	This standard focuses on advice/guidance to be sufficient to ensure it drives informed decisions and actions in relation to their DRO application. This includes clear call to actions, next steps, and referrals.	Is there evidence on the case record that: - Sufficient information, guidance, or advice has been provided to allow the customer to make informed decisions. - The Practitioner has agreed next steps with the customer and where appropriate signposted to other organisations relevant to customer need	- Communicated sufficient information, clear actions, and next steps to the customer. - Signposted/referred the customer to other organisations where applicable	No
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	This standard focuses on ensuring Practitioners DO NOT recommend/introduce specific products or financial services.	Is it evident that the Practitioner: Has not introduced or explicitly or implicitly recommended a specific product, provider of a financial service product, or financial Adviser, unless to facilitate debt adjustment and resolution	No evidence on the case that the practitioner has introduced or explicitly or implicitly recommended a specific product, provider of a financial service product, or financial Adviser, unless to facilitate debt adjustment and resolution.	No

<u>Standard</u>	<u>Focus of the Standard</u>	<u>Guidance</u>	<u>Indicators</u>	<u>N/A Option</u>
11 - 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	This standard focuses on ensuring practitioners DO NOT receive inappropriate or improper payment as a result of the advice given.	Is there evidence on the case record that the adviser: Has received any inappropriate or improper payment or incentive as a result of the guidance or advice provided to a customer [if no, it is met]	No evidence that the practitioner has received any inappropriate or improper payment or incentive as a result of the guidance or advice provided to a customer.	No
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	This standard focuses on identifying and providing the customer with relevant information, advice or guidance and their options in relation to their DRO application, including next steps for the customer and the practitioner.	Is there evidence on the case record that the Practitioner: - Has sufficiently explored the customers circumstances to identify what is needed to be able to give relevant advice/guidance on the DRO application. - The customer has been given relevant information and options and has been made aware of relevant next steps to be performed by the practitioner and the customer.	- Has provided information and options based on the customers circumstances and what has been identified - Has established liability issues and provided relevant information and next steps - Has clearly explained what actions they (the Practitioner) would take - Has clearly explained what actions the customer would need to take	No
2a-ix - All practitioners must ensure they: Provide them with information about particular types of financial products or services that may be	This standard focuses on where solutions or services have been identified as appropriate the advantages and disadvantages of those options have been	Is there evidence on the case record that the Practitioner: Has provided the customer with information about DRO application.	The case record evidences that the customer has been provided with information about the DRO application with the	No

<u>Standard</u>	<u>Focus of the Standard</u>	<u>Guidance</u>	<u>Indicators</u>	<u>N/A Option</u>
relevant and the potential advantages and disadvantages of these, as required	clearly explained to the customer.	Has explained the advantages and disadvantages of these	advantages and disadvantages of these.	
2a-v - Signpost, refer or warm-transfer consumers in vulnerable circumstances to specialist services as required, with, particular reference to people in acute emotional or financial crisis	This standard focuses on ensuring customers in vulnerable circumstances have been signposted, referred and or warm transferred to the appropriate specialist team e.g., Vulnerable Team.	Is there evidence on the case record that, where required, the Practitioner: Has Signposted, referred or warm-transferred customers in vulnerable circumstances particularly those with acute emotional needs, or are in financial crisis, to specialist services	Where necessary, signposted, referred, or warm-transferred customers in vulnerable circumstances to specialist services	Yes
2a-xi - All practitioners must ensure they: Refer them to their existing product provider where the consumer needs further information that the provider can provide, or where that provider is required to take action to implement one of their options.	This standard focuses on the customer being referred back to an existing product provider.	Is there evidence on the case record that the Practitioner, where appropriate: has referred the customer back to an existing product provider?	- Where appropriate the customer has been referred back to an existing product provider - An existing product provider in this context (debt) may be a creditor (e.g., they have a credit product with) or a debt solution provider (e.g., DMP provider they have a DMP with). This is not an exhaustive list. - Action required may be alerting them to a change of circumstances.	Yes

<u>Standard</u>	<u>Focus of the Standard</u>	<u>Guidance</u>	<u>Indicators</u>	<u>N/A Option</u>
2b-ii - Debt advice practitioners must ensure they: Alert consumers to other sources of information, guidance, and advice as appropriate and at relevant points during, or following the intervention	This standard focuses on ensuring customers are made aware of other potential sources of information and/ or guidance and advice at relevant points.	Is there evidence on the case record that the Practitioner: Is there evidence on the case record that the practitioner: · Has been made aware of the appropriate sources of information according to the customers' needs?	• Made the customer aware of appropriate sources of information according to the customers' needs. • This may include factsheets.	No
1k - The information, guidance or advice provided must: not sell, arrange, or facilitate the sale of a financial service or product	This standard focuses on ensuring Practitioners DO NOT sell, arrange, or facilitate the sale of a specific product or financial service.	Is it evident that the Practitioner has not: • sold, arranged, or facilitated the sale of a financial service or product	• Has not sold, arranged, or facilitated the sale of a financial service or product.	No

Supplementary Guidance

Impacted Standards

MaPS recognises wherever possible the standards should be assessed in isolation. However, there are certain circumstances where one standard not being met will have a direct impact on another. MaPS have determined the following standards are likely to have a direct impact.

STANDARD	IMPACTED STANDARD
Under 2a vii - if a practitioner has not identified and provided the customer with relevant information, options, and next steps	This has a direct impact on 2a ix as the practitioner cannot provide advantages and disadvantages of the advice provided.
Under 1g - if the practitioner has not made the customer aware of digital tools on the MaPS website and that of delivery partners	This has a direct impact on 1h as the practitioner cannot provide the customer support in completing the digital tools as required.
Under 2a iv - if the practitioner does not take a pre-emptive approach to identify customers in vulnerable circumstances and tailor sessions to their needs	This has a direct impact on 2a v as the practitioner cannot signpost, refer, or warm-transfer customers in vulnerable circumstances to specialist services.
Under 1f – if the practitioner does not provide comprehensive advice the customer is unable to make informed decisions and actions	This has a direct impact on 2a vii as the practitioner cannot identify and provide full advice on options and actions without comprehensive advice being given.

There may be other standards that when assessed an impact with another standard is identified but this is likely to be case specific. Wherever possible standards should be assessed in isolation.

Relevance of N/A

This section covers where N/A is an assessment option. This has been laid out below:

- 2a – v - Signpost, refer or warm-transfer consumers in vulnerable circumstances to specialist services as required – MaPS recognises that if there are no vulnerabilities this will not apply.
- 2a – xi – Refer to their existing product provider where further information or action is required by the provider - MaPS recognises this will not always apply.
- 2b – ii - Alerting customers to other sources of information and advice as appropriate - N/A only applies to Webchat.

Assessing Vulnerability Guide

The evidence required is as follows:

Scenario	Outcome
There is evidence that the practitioner has asked about vulnerability, and none was identified	MET
There is evidence that the practitioner has asked relevant questions linked to vulnerability and vulnerability is identified	MET
There is evidence that the practitioner has not asked about vulnerability and there was none	NOT MET – (UNSUITABLE NO IMPACT)
There is evidence that the practitioner has not asked about vulnerability and vulnerability is evident with no impact of the questioning	NOT MET (UNSUITABLE – No impact)
There is evidence that the customer has been impacted by the vulnerability not being identified and or no alternative was offered, no change in approach was identified and no signposting was undertaken	NOT MET (Unsuitable – IMPACT, NO FINANCIAL LOSS OR HARM)

MaPS still expects that if the question is asked and there is no evidence from the response provided, and it becomes clear throughout the session that there is vulnerability, to meet the standard there needs to be evidence that this was explored, and appropriate adjustments made if required.

Standards Placements

MaPS has determined where standards should be placed in reference to key areas as mentioned below.

- Income Maximisation
- Breathing Space
- Tailoring
- Comprehensive

The table below highlights this and is accompanied by examples, although not an exhaustive list, as it will vary due to individual case circumstances.

Income Maximisation	This would be placed under 2a-vii – as the standard asks whether the practitioner has sufficiently explored the customers circumstances to identify what is needed to be able to give relevant advice/guidance on options. In order to sufficiently explore the customer’s options, any financial capability advice would need to have been provided/taken into account before advising on options. For example, if the financial capability advice was for a customer to apply for council tax reduction, or cancel a subscription package then this would affect the clients SFS which in turn could present more/different available options to the client
Breathing Space	This would be placed under 2a-vii – as breathing space is an interim debt solution (such as a moratorium which would also be placed within the debt options section of a case). The standards cover advice, guidance and next steps. Therefore, if breathing space is to be applied for a customer, this would form part of the next steps.
Tailoring	This would be placed under 1e – the standard expects that the guidance and advice is relevant and takes into account the customer’s circumstances. This standard would also look for timely advice as well as tailoring. This could also be marked under standard 1f as it looks at whether the advice given would allow a customer to make informed decisions. If incorrect advice has been given rather than irrelevant advice, this would be marked under 1a . For example, if a customer has been advised that a DRO is a suitable option, but they have a property, this would be marked under 1f as the advice is unsuitable. Whereas, if a customer had been advised to check their tax code and they are

	unemployed then this would fall under 1e as the advice isn't tailored, but it would not have an impact on the customer.
Comprehensive advice	This would be placed under 1f and applies to 2a vii – 1f the standard focuses on the advice and guidance being sufficient to drive informed decisions and actions, this would require comprehensive advice to be given to the customer. If there is missed advice, then the customer may not know all of the relevant details and therefore would impact the customers next steps and actions. 2a vii focuses on the practitioner identifying and providing relevant information, options and next steps, this would require comprehensive advice to be given to the customer to provide options and next steps.