

The Money and Pension Service Quality Assurance Customer Facing Assessment Guidance

Debt Advice

March 2024



Money &
Pensions
Service

Date	Version Control	Review Frequency	Responsible	Approver
28/03/2024	V3.3	Annually	Lead Quality Manager	Head of Service Performance, Quality and Standards (approved by Service Performance)

Background

All service lines will be assessed for compliance with relevant consumer 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 consumer 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 consumer facing testing we have established which standards can be measured through assessing the consumer interaction and these have been listed in the guidance.

Standard 9b is integral to all consumer facing standards as consumer 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	<ul style="list-style-type: none"> Fully meets the expectations of the standard 	There is evidence that all the requirements of the standard have been met
Not Met (Unsuitable No impact)	<ul style="list-style-type: none"> Has not met the expectations of the standard. There is no evidence of poor consumer outcomes. No evidence detriment (financial loss or harm) 	<p>There is not sufficient evidence to demonstrate that the standard has been met.</p> <p>There is no evidence of impact on the consumer.</p>
Not Met (Unsuitable - Impact, No financial loss or harm)	<ul style="list-style-type: none"> The standard is not met. There is evidence of impact. There is no evidence of financial loss or harm 	<p>There is not sufficient evidence to demonstrate that the standard is met.</p> <p>There is evidence that there has been an impact on the consumer.</p> <p>There is no evidence of financial loss or harm.</p>

Assessment Outcomes	Guidance	Indicator
Not met (Unsuitable with detriment - Impact, Financial loss or harm)	<ul style="list-style-type: none"> The standard has not been met and there is evidence of detriment (financial loss or harm) 	<p>There is not sufficient evidence to demonstrate that the standard is met.</p> <p>There is evidence that there has been an impact on the consumer.</p> <p>There is evidence of actual financial loss or harm.</p>
N/A	<ul style="list-style-type: none"> The standard does not apply to the consumer's situation. 	The standard is not applicable to the consumer'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 consumers 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 consumer to make an informed service choice.	Requirement that: <ul style="list-style-type: none"> consumers will be provided with the relevant information about the scope, purpose and limitations of their advice session based on their needs, either before or during the session 	<ul style="list-style-type: none"> Evidence through Control Self-Assessment i.e., IVR, Information Packs/Pre-Interview packs or Evidence available on the case record 	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 consumer is fully prepared for the session. This will help us to ensure the consumer receives the most appropriate advice or guidance on their presenting issue, based on their circumstances.	Is there evidence on the case record that the practitioner: <ul style="list-style-type: none"> Has INFORMED the consumer what personal/financial info may be requested in order to provide suitable advice? 	<ul style="list-style-type: none"> The consumer has been advised on the personal and financial information that will be required. Informing the consumer could take place at any point prior to session commencement i.e., may be prior to a booked appointment FOR WEBCHAT – it would be expected at a minimum that the pre-amble or the practitioner would indicate that information may be requested. 	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 consumer	Is there evidence that: <ul style="list-style-type: none"> The consumer has been INFORMED about relevant data protection policies or where appropriate, consent processes 	<ul style="list-style-type: none"> Evidence on the case record that consumer 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>
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: <ul style="list-style-type: none"> • Has taken the appropriate steps to identify vulnerability. • Has adapted the delivery of the session to meet the needs of the consumer 	<ul style="list-style-type: none"> • Sufficient exploration has taken place to identify any vulnerability the consumer may have. • If a vulnerability is identified then the advice and guidance has been adapted in line with the vulnerability • FOR WEBCHAT – it is expected that some questioning and probing, which is the pre-emptive approach, to take place. E.g., are there any health issues we should be aware of? 	No
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: <ul style="list-style-type: none"> • Has taken steps to explore if there are any emergency or urgent issues 	<ul style="list-style-type: none"> • Emergencies/urgent issues identified and considered. 	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: <ul style="list-style-type: none"> • A process has taken place to ensure that the delivery channel is appropriate for the consumer's needs and preference (may be by the practitioner or prior e.g., triage, assessment), or • The consumer need is understood, acknowledged and practitioner, where appropriate, identifies indicators that an alternative channel is more appropriate. 	<ul style="list-style-type: none"> • Evidence that a process has taken place to determine channel suitability. • If relevant, practitioner has identified indicators suggesting an alternative channel is more suitable 	No

<u>Standard</u>	<u>Focus of the Standard</u>	<u>Guidance</u>	<u>Indicators</u>	<u>N/A Option</u>
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 consumer in order to provide the most appropriate advice or guidance on their presenting issue, based on their circumstances.	<p>Is there evidence that:</p> <ul style="list-style-type: none"> Information HAS BEEN REQUESTED about the consumer's personal and financial circumstances in line with regulatory guidance appropriate to their presenting issue. Relevant questions will depend on the consumer's circumstances and query. 	<ul style="list-style-type: none"> The practitioner has requested the relevant personal and financial information from the consumer. Examples may include, (this list is not exhaustive) <ul style="list-style-type: none"> Key Dates/deadlines e.g., for response to court action? 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 consumer or creditor? Any known or foreseeable changes to the consumers circumstances. 	No
2b-iii – Create and maintain a detailed consumer record	This standard focuses on ensuring a record has been created and is also maintained for consumers in detail	Is the consumer record sufficiently detailed and accurate?	<ul style="list-style-type: none"> The record is required to have the level of detail to enable compliance with the consumer facing standards. The record must meet the case submission criteria and reflect the guidance in the Advice Assessor Toolkit. 	No

<u>Standard</u>	<u>Focus of the Standard</u>	<u>Guidance</u>	<u>Indicators</u>	<u>N/A Option</u>
1a - The information, guidance or advice provided must: Be impartial and accurate	This standard focuses on ensuring the advice given to the consumer is impartial and accurate.	Is there evidence that the advice or guidance is: <ul style="list-style-type: none"> Based on consumer need without bias. Advice/guidance has been driven by consumer's best interest. Accurate and in line with the most recent legislation and regulatory obligations. 	<ul style="list-style-type: none"> Guidance and/or advice is solely based on consumer need, individual circumstances and in line with regulatory obligations. Accurate advice with the consumers circumstances considered fully. 	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: <ul style="list-style-type: none"> Give regulated advice that the organisation is not authorised to provide. 	<ul style="list-style-type: none"> There is no evidence to suggest the advice provided is outside the organisations authority to provide. 	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 consumers circumstances and key dates	Is there evidence on the case record that the practitioner has: <ul style="list-style-type: none"> Considered key dates when agreeing next steps with the consumer. Has provided suitable information, guidance, or advice relevant to the consumer's needs and circumstances. 	<ul style="list-style-type: none"> Key dates considered by the practitioner. Information, guidance, or advice is relevant to the consumers circumstances and takes account of any time constraints to allow consumers to meet deadlines. 	No

<u>Standard</u>	<u>Focus of the Standard</u>	<u>Guidance</u>	<u>Indicators</u>	<u>N/A Option</u>
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. This includes clear call to actions, next steps, and referrals.	Is there evidence on the case record that: <ul style="list-style-type: none"> • Sufficient information, guidance, or advice has been provided to allow the consumer to make informed decisions. • The practitioner has agreed next steps with the consumer and where appropriate signposted to other organisations relevant to consumer need. 	<ul style="list-style-type: none"> • Communicated sufficient information, clear actions, and next steps to the consumer. • Signposted/referred the consumer to other organisations in relation to their next steps. 	No
1g - The information, guidance or advice provided must: Make the consumer aware of digital tools on MaPS' website and that of delivery partners	This standard focuses on making the consumer aware of digital tools on the MaPS website and that of delivery partners.	When appropriate Is there evidence on the case record that the practitioner: <ul style="list-style-type: none"> • Has made the consumer aware of digital tools available to them according to their needs on the MaPS' consumer facing website (Money Helper) and funded delivery partner tools as per glossary of terms. • N/A can only be used in circumstances of digital exclusion. 	<ul style="list-style-type: none"> • Consumer is made aware of digital tools available to them according to their needs. 	Yes

<u>Standard</u>	<u>Focus of the Standard</u>	<u>Guidance</u>	<u>Indicators</u>	<u>N/A Option</u>
1h - The information, guidance or advice provided must: Support consumers to complete the digital tools, as required	<p>This standard focuses on supporting the:</p> <ul style="list-style-type: none"> Consumer (by guiding them or using the tools on their behalf) <p>Or helping the:</p> <ul style="list-style-type: none"> Consumer to complete the digital tools on the MaPS website and that of the delivery partners as required. 	<p>Is there evidence on the case record that the practitioner:</p> <ul style="list-style-type: none"> Supported the consumer to complete digital tools as required on the MaPS' consumer facing website (Money Helper) and delivery partner tools as per glossary of terms. N/A can only be used where: <ul style="list-style-type: none"> The consumer is digitally excluded or Where support has not been provided but the consumer is capable of completing the digital tools independently 	<ul style="list-style-type: none"> 'Support' can include guiding the consumer to complete the digital tools themselves or completing them on behalf of the consumer. Relevant digital tools on MaPS delivery partner websites. 	Yes
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	<p>This standard focuses on ensuring practitioners DO NOT recommend/introduce specific products or financial services.</p>	<p>Is there evidence on the case record that the practitioner:</p> <ul style="list-style-type: none"> 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 [if no, it is met]. 	<ul style="list-style-type: none"> 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>
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 there evidence on the case record that the practitioner: <ul style="list-style-type: none"> Has sold, arranged, or facilitated the sale of a financial service or product [if no, it is met].. 	<ul style="list-style-type: none"> Has not sold, arranged, or facilitated the sale of a financial service or product. 	No
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	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 practitioner: <ul style="list-style-type: none"> Has received any inappropriate or improper payment or incentive as a result of the guidance or advice provided to a consumer [if no, it is met]. 	<ul style="list-style-type: none"> 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 consumer. 	No
2b-v - Debt advice practitioners must ensure they: Practitioners may also deliver interventions which are outside of the session structure which may include self-help support	This standard is focusing on signposting to services/organisations where the outcome of the signposting is not associated with the debt solution and does not fall into the category of emergency or acute emotional or financial crisis but focuses on emerging needs. Also includes advising and signposting to available and relevant self-help tools for consumers to access.	Is there evidence on the case record that the practitioner: <ul style="list-style-type: none"> Appropriately signposted to the relevant services as required. Advised and signposted to self-help tools available to the consumer if needed. If not applicable assess as met. 	<ul style="list-style-type: none"> Signposted appropriately to the relevant services as required. Advised consumers of self-help tools and signposted to them for broader debt related issues or other non-debt related matters. 	No

<u>Standard</u>	<u>Focus of the Standard</u>	<u>Guidance</u>	<u>Indicators</u>	<u>N/A Option</u>
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 consumers 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: <ul style="list-style-type: none"> Has Signposted, referred or warm-transferred consumers in vulnerable circumstances particularly those with acute emotional needs, or are in financial crisis, to specialist services. 	<ul style="list-style-type: none"> Where necessary, signposted, referred, or warm-transferred consumers in vulnerable circumstances to specialist services. 	Yes
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 consumers 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: <ul style="list-style-type: none"> Has made the consumer aware of appropriate sources of information according to the consumers' needs? 	<ul style="list-style-type: none"> Make the consumer aware of appropriate sources of information according to the consumers' needs. This may include factsheets. 	No
2a-x - All practitioners must ensure they: Refer them to a directory or other list of financial advisers or providers of financial services or products, as required	This standard focuses on referrals, if appropriate, to a directory of other financial advisers, providers of financial services and or products.	If required, Is there evidence on the case record that the practitioner. <ul style="list-style-type: none"> Has referred/signposted as required, the consumer to a directory or list of other financial advisers or providers of financial services or products? 	<ul style="list-style-type: none"> Has referred, as required, the consumer to a DIRECTORY OR LIST of other financial Advisers or providers of financial services or products. This may include referrals to basic bank account providers, pensions providers, mortgage, or re-financing etc. 	Yes

<u>Standard</u>	<u>Focus of the Standard</u>	<u>Guidance</u>	<u>Indicators</u>	<u>N/A Option</u>
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 consumer with relevant information, advice or guidance and their options, including next steps for the consumer and the practitioner.	Is there evidence on the case record that the practitioner: <ul style="list-style-type: none"> Has identified all available options based on the consumer's circumstances. The consumer has been fully advised on all suitable options and next steps to be performed by the practitioner and the consumer. 	<ul style="list-style-type: none"> Has provided information and options based on the consumers circumstances. Has advised on 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 consumer 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 relevant and the potential advantages and disadvantages of these, as required	This standard focuses on where <ul style="list-style-type: none"> Available solutions or services have been identified as appropriate, and The advantages and disadvantages of suitable options have been clearly explained to the consumer. Available options not considered suitable are supported by reasoning. 	Is there evidence on the case record that the practitioner: <ul style="list-style-type: none"> Has provided the consumer with information about relevant debt solutions or services. Has explained the advantages and disadvantages of these. 	<ul style="list-style-type: none"> The case record evidences that the consumer has been provided with information about relevant debt solutions or services with the advantages and disadvantages of these. 	No

<u>Standard</u>	<u>Focus of the Standard</u>	<u>Guidance</u>	<u>Indicators</u>	<u>N/A Option</u>
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 consumer being referred back to an existing product provider.	Is there evidence on the case record that the practitioner, where appropriate: <ul style="list-style-type: none"> Has referred the consumer back to an existing product provider? 	<ul style="list-style-type: none"> Where appropriate the consumer 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 providers to a change of circumstances. 	Yes
2b-iv - Debt advice practitioners must ensure they: Provide consumers with a record of their advice intervention and agreed actions	This standard focuses on ensuring the consumer is provided with a record of their advice intervention/agreed actions.	Is there evidence on the case record that the practitioner: <ul style="list-style-type: none"> Has provided the consumer with a record of the advice intervention and agreed actions. 	<ul style="list-style-type: none"> Provided the consumer with a copy of the advice interventions given and any agreed actions. 	No