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Consultation Response

# A Strategic Approach to Debt Advice Commissioning 2018-23

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# Introduction

The Improvement Service welcomes the opportunity to respond to the Money Advice Service's [consultation](#) on the future approach to debt advice commissioning.

Along with other organisations, the Improvement Service has produced compelling evidence that improving financial capability and increasing levels of resilience, and the provision of debt advice are inextricably linked. As a result, most advice providers adopt a person-centred approach and seek to offer a holistic service to individuals at a time of need- which often occurs when people experience life changes either as a result of personal circumstances (e.g. unemployment) or alterations in state policies (e.g. welfare reform). From 2018, the responsibility for commissioning services that deliver advice relating to financial capability and debt will rest with different bodies, a new financial guidance body and the Scottish Government respectively. In these circumstances, it is critical that a collaborative approach is taken by public service providers which is in line with the Christie Commission's recommendations to provide effective and efficient services.

# Identify and target priority groups within the over-indebted population

## **1.1: Do you think that it is right for MAS to focus on identifying and targeting priority groups? Please explain your response.**

In line with any strategy to address inequality it is logical to target resources at those who are most excluded and disadvantaged and who are, accordingly, most likely to experience barriers in accessing services. There is a risk that by identifying priority groups on a UK wide basis the unique situation in many local areas in Scotland will not be adequately considered.

There must be a clear rationale for the inclusion of certain groups as priorities. The Improvement Service, in our report on [money advice services across Scotland's local authorities](#), have identified that decisions taken on how and where to target resources should be evidence based and the effectiveness of the approach adopted properly evaluated. Satisfying these requirements should underpin any commissioning strategy.

## **1.2: The four priority groups are based on evidence gathered from internal and external research. Do you think a significant group has been missed? If so, which one(s) and what is the rationale and evidence base to support this thinking?**

The target groups identified are very specific and it is likely to be challenging to identify and engage with them. This may require a disproportionate amount of resource and effort for the numbers of potential recipients involved and may lead to services to other vulnerable groups being reduced. It may be better to have a wider range of target groups, e.g. older people.

One option might be to state that proportion of any resources awarded must be allocated to meeting the needs of any specific subsets that have been identified within the wider service user group. For example, a service could be commissioned to support families with children living in social housing and within that there could be a requirement to develop an initiative that targets families with more than 3 children. Alongside ensuring evidenced based services are delivered which target priority groups, attention should be focussed on approaches that include prevention and early intervention.

The location in which a service is provided can greatly improve accessibility by removing barriers and significantly increasing uptake by the most vulnerable, and socially and economically disadvantaged individuals. Various studies support this including a recent Improvement Service report, [Forecast Social Return on Investment on Co-locating Advice Workers in Medical Centres](#).

## **1.3: Is there a specific role that you would like to see MAS undertake to deliver this commissioning intention? Please explain your response.**

Given that debt advice is being devolved and will be the responsibility of the Scottish Government it will be vital to continue to maintain close links with Scottish Government, public sector bodies and other funders. This will ensure that a strategic approach to funding all the constituent parts of money advice is adopted. Some form of joint reporting system which seeks to measure and assess the performance and impact of activities should be considered.

# Deliver debt advice and money guidance services in a blended fashion, in line with need

**2.1: Do you think it is right for MAS to try to integrate financial capability into debt advice to better meet client needs? Please explain your response and share any examples of good practice you are aware of.**

Financial capability and money advice are inextricably linked and most publicly funded services are provided on this basis as this is the best way to meet service user needs. There are several examples of good practice in this regard on the improvement service website at [Publications](#).

**2.2: Is there a specific role that you would like to see MAS undertake to deliver this commissioning intention? Please explain your response.**

See response to 1.3

# Develop a clear view of the client from access through to outcome

## **3.1: Do you think that MAS is right to have a focus on an effective end-to-end client journey evidenced through clearly defined outcomes? Please explain your response.**

Greater consideration of the service user journey and resultant outcomes is essential. Ensuring that the perspective of the service user is sought and reflected in this process is critical. Data provided to the Improvement Service for the [money advice performance management framework](#) (MAPMF) suggests that the accessibility and availability of debt services on a Scotland wide basis is very variable and greater attention should be given to achieving a consistent approach whilst still allowing a degree of flexibility which takes account of differing local needs. Having a set of shared overarching outcomes and establishing a consistent approach to measuring and reporting on them will assist with understanding the effectiveness of individual services and enable investment to be made in those creating the greatest impact.

## **3.2: Do you agree with the principle of payment on the basis of outcomes? Please explain your response.**

Payment on the basis of actually achieving outcomes may be problematic. Services should be commissioned on the basis that they provide activities that will deliver defined outcomes. Performance should be reviewed at set intervals and if adequate reasons for failing to achieve the desired results are not provided then disinvestment should be considered.

## **3.3: Would single points of entry for telephone and web based provision make it easier for potential clients to access advice? Please explain your response.**

A single point of entry that meets clients' needs with onward referral to the most appropriate source of advice is in line with adopting a person centred approach. A balance must be struck between maximising service user choice and at the same time reducing duplication of services.

The Improvement service has recently published a report on [money advice customer journey mapping](#) which found that not all clients require the high degree one-to-one support entails and transferal of those who can self-serve to other channels would allow advisors to assist more vulnerable clients who need direct, in-person, support.

## **3.4: How could a proportionate risk based approach to performance management be best achieved?**

A common reporting framework that collects defined data on a consistent basis could be used as the basis for assessing performance. This would require to be completed on a regular basis and any improvement areas quickly identified and actioned within a set timescale.

# Establish a comprehensive workforce strategy for MAS funded advisers

## **4.1: Do you think that MAS is right to have a focus on establishing a comprehensive workforce strategy for MAS funded advisers? Please explain your response.**

Increasingly money advice is being provided by staff on a generic basis -recent, as yet unpublished, data returns for the MAPMF suggest that the number of specialist money advisors is reducing. This poses two main challenges: ensuring that generic staff have the requisite skills to offer basic advice and make appropriate referrals to specialist staff, and ensuring that the specialist staff to whom referrals are made are able to maintain the skills at a sufficiently high level. Quality measures that apply in both situations should be reflected in the framework. Any funding awarded needs to include resources for staff time, training costs and the introduction of new technologies.

## **4.2: Is there a specific role that you would like to see MAS undertake in delivering this commissioning intention? Please explain your response.**

See response to 1.3

# Embed crisis debt advice within a network of holistic support

## **5.1: Do you think that the MAS is right to have a focus on co-commissioning services? Please explain your response.**

The public sector reform agenda positively encourages greater collaboration between and across sectors. As well as offering best value, this way of working results in more positive outcomes for service users. Partnership working in relation to money advice can take many forms which range from improved referral pathways to joint service delivery in which individual partners provide their own technical and professional areas of expertise.

There are several examples of good practice in this regard on the improvement service website at [Publications](#).

## **5.2: Is there a specific role that you would like to see the MAS undertake in delivering this commissioning intention? Please explain your response.**

See response to 1.3

## **5.3: How else might you see a response to more complex problem solving in debt advice?**

A holistic approach involving multiple agencies that can be accessed from a single point of contact would appear to offer the best approach to delivering positive outcomes for service users. If this is not possible or desirable, then mechanisms that identify and facilitate the referral process as quickly and efficiently from a service user perspective should be considered.

# Build services that make the best possible use of existing and emerging technologies

## **6.1: Do you think that MAS is right to have a focus on making the best use of existing and emerging technologies? Please explain your response.**

The Improvement service's report on [money advice customer journey mapping](#) identified a lack of available data in relation to the use of online platforms to access advice. This should be explored further and any barriers identified and addressed. More research is required to identify how different channels are used by people seeking money advice. Organisations offering money advice should be supported to improve their monitoring procedures for tracking channel use, particularly in relation to web based platforms, in order to gain the evidence that is required to drive service improvements.

Greater use should be made of new technology and existing approaches shared and tailored to meet local needs. MAS are well positioned to encourage greater co-operation and to share learning between financial institutions and the advice sectors.

## **6.2: Is there a specific role that you would like to see MAS undertake to deliver this commissioning intention? Please explain your response.**

MAS could provide insight and knowledge from a UK perspective which would ensure that all the devolved nations were well placed to access existing and emerging technologies.

# Future commissioning

## **7.1: Do you think MAS is right to adopt a prioritised and phased implementation? Please explain your response.**

A prioritised and phased implementation period is the most appropriate way to proceed provided it offers adequate time for consultation and incorporates the views of both service providers and users. It would be helpful to start dialogue in this regard as soon as practicable.

## **7.2: Are the outcomes we want to achieve through our commissioning intentions the right ones?**

It will be important that the outcomes from MAS and the Scottish Government are closely aligned.

## **7.3: Do you feel the size and geographical reach of our face to face agreements would benefit from being more evenly distributed – for example, by adopting an approach using the nine English regions? Please explain your response.**

As funding is being devolved this is not relevant at this stage. It may be the Scottish Government would wish to consider allocating resources on a regional basis.

## **7.4: Most of our current agreements are for three years. Do you think this is an appropriate duration and what do you consider to be an optimum funding period Please explain your response.**

Increasingly major trusts and funder (e.g. Big Lottery Fund) are moving towards a 3- 5-year funding period. This reflect the time it takes to establish projects and to deliver outcomes for service users. It also means that there is greater chance of securing continuity of staff support and to prepare an adequate sustainability strategy. Whilst a minimum of three year's funding should be awarded, depending on the type of project a 5-year period might be more appropriate.

## **7.5: What approach should MAS take to measuring client outcomes, particularly for the increasing number of clients on insufficient incomes to cover their living costs?**

A core set of client outcomes should be agreed that are measured in all cases with others being included, if and when required, depending on the project type. Ideally outcomes should be measured and reported on consistently. The Improvement Service is currently testing this approach with a small number of local authorities in Scotland.

**For further information, please contact the author of this consultation response:  
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