

# REPORT BY THE FINANCIAL CONDUCT AUTHORITY

To

The Secretary of State for Work and Pensions

and to

The Money and Pensions Service

Findings and Recommendations from a Review into the appropriateness of the Standards set by the Money and Pension Service for the delivery of Debt Advice, Money Guidance and Pension Guidance and how the Money and Pension Service is monitoring and enforcing those Standards.

07 June 2024

1. Executive Summary of Findings
  - 1.1. This **report sets out the FCA's** findings and recommendations from its first three yearly statutory review ("**the Review**") into whether the Standards set by **the Money and Pensions Service ("MaPS")** relating to the provision of Debt Advice, Money Guidance and Pension Guidance (collectively, "**the Relevant Functions**"):
    - (a) continue to be appropriate; and
    - (b) how MaPS monitors and enforces the Standards.
  - 1.2. MaPS delivers the Relevant Functions through its own internal teams or through external **parties (collectively, the "Delivery Partners")**. The **FCA's** Review has focused on the framework that MaPS has put in place to enable it to monitor and assess whether the Delivery Partners comply with the Standards when delivering the Relevant Functions. This 'Monitoring Framework' (as described and defined in the main body of the Report) is comprised of processes that involve:
    - (a) Delivery Partners submitting evidence and attestations to MaPS on their ability to meet the Standards;
    - (b) a process for MaPS to test those submissions; and,
    - (c) a process for MaPS to monitor the interactions that its Delivery Partners have with customers.
  - 1.3. This report sets out the factual findings from the **FCA's** review followed by 20 findings and 22 recommendations. Those findings and recommendations are summarised below.

#### Appropriateness of the Standards

- 1.4. **The FCA's** findings in relation to the appropriateness of the Standards are that:
  - (a) The Standards remain appropriate in terms of whether they achieve **a connection between MaPS' purpose, its functions and the Corporate Objectives and success measures that it has set for itself.**
  - (b) In terms of whether they are operationally effective in enabling MaPS to link the Standards to its Monitoring Framework and assurance processes (as more fully described in the Report) there are a number of observations. In particular:

- (i) The Standards are drafted as principles and, as a result, MaPS has found that some of the Standards are difficult to monitor in practice due to being broadly expressed and open to interpretation when directly assessed through the Monitoring Framework. This is also evident to the FCA from work carried out during the Review.
- (ii) MaPS has had to make a number of workarounds, compromises, and pragmatic decisions in order to ensure that the Standards can be effectively monitored. This arises because in some cases it is not straightforward to link a Standard with a monitoring mechanism to then inform Key Performance Indicator scores and provide assurance;
- (c) The FCA has therefore made a number of recommendations to MaPS to amend the Standards, to create a clearer link between them, the Monitoring Framework and ultimately the assurance they provide. The FCA has also made recommendations for MaPS to address issues with the clarity and interpretation of certain Standards.

## Framework for Monitoring the Standards

### Development of a Framework for Monitoring the Standards

- 1.5. MaPS developed a new Monitoring Framework shortly after the Standards **were approved by the FCA in January 2021. The FCA's Review found that MaPS' approach to developing the Monitoring Framework was** overarchingly appropriate in that:
  - (a) MaPS went through a '**Development Phase' which lasted** from January 2021 to February 2023, involving an iterative process to design, test, develop and refine the framework which likely served to make it more robust.
  - (b) In the Development Phase MaPS collaboratively engaged with relevant Delivery Partners which also likely served to make the Monitoring Framework more robust as well as enabling better embedding of the framework with those Delivery Partners when it was fully operationalised.
- 1.6. **In the FCA's view,** the Development Phase was, however, lengthy and the Monitoring Framework did not reach full maturity until around February 2023. From that point and over the following months it was operationally embedded in priority **across MaPS' various functions** (starting with Debt Advice (February 2023), then Money Guidance (May 2023) whilst Pension Guidance remains in Development Phase. While

MaPS did carry out monitoring during the Development Phase, including calibrating Key Performance Indicators, it was more focused on testing and refining the framework than on producing outputs that assessed compliance with the Standards. During this time, MaPS tracked the quality Key Performance Indicators but could not contractually enforce against them. The introduction of the contracts and the use of Key Performance Indicators should enable MaPS to hold delivery partners to greater account.

- 1.7. As such, during the Development Phase the Monitoring Framework provided MaPS with a limited ability to monitor and enforce the Standards. MaPS mitigated the risks related to this issue by maintaining certain other quality assurance processes. The FCA has made recommendations to MaPS to accelerate implementation and scaling of the Monitoring Framework across its functions. The FCA also makes a recommendation for MaPS to develop and link other existing sources of assurance outside of the Monitoring Framework to monitor the Standards.

#### Monitoring Framework Activities

- 1.8. **The FCA's Review found that the Monitoring Framework** is capable of providing an effective means to monitor the Standards and to enable MaPS to either gain assurance that functions are being carried out in compliance with the Standards or (where that assurance cannot be given) to enable MaPS to make Interventions to ensure that the Standards are met in future.
- 1.9. **However, the FCA's Review** identified a number of aspects of how the Monitoring Framework operates in practice that can be improved to enhance the quality of the assurance MaPS receives. These include that:
  - (a) A theoretically beneficial monitoring process called 'Controls Testing' was designed, but not rolled out. This has the capability to enable MaPS to challenge self-assessments made by Delivery Partners after their original submissions are initially discussed and baselined with MaPS. Without operationally embedding the Controls Testing process, MaPS is reliant on the Control Self-Assessments submitted by Delivery Partners and is limited in its ability to challenge those self-assessments or conduct thematic reviews.
  - (b) The sampling methodology (related to assessments of customer interactions) that MaPS has implemented allows Delivery Partners to self-select customer interactions for monitoring. This is not a robust sampling methodology and can be open to improper use.

- (c) The selection of files by the Delivery Partners is required to be from advice or guidance completed in the previous month. This results in MaPS not receiving data or interactions to monitor incomplete advice or guidance, despite that also being capable of causing consumer harm. It also results in consumer harms potentially being missed where they crystallise some months after the advice or guidance is given.
  - (d) **MaPS'** sampling of funded interactions is conducted at around, but under, 1% for Debt Advice and a fraction of 1% for other functions. This provides limited assurance and limited or no effective ability for MaPS to thematically assess monitoring outputs from the customer interaction part of its monitoring framework.
  - (e) **The employed definition of 'detriment' was found to be very** narrow relying on financial loss or harm being present. This potentially underplays or misses other types of consumer harms in the relation to the provision of debt advice, including non-financial harms, and means outputs provide limited assurance.
  - (f) Monitoring of the Standards does not involve a scoring system that takes into account any sort of prioritisation or weighting system. This means that breaches of the Standards are of equal measure, rather than prioritised according to the extent of consumer harm that can result when a Standard is not met.
  - (g) MaPS is reliant on Delivery Partners and a third-party quality assurance assessor to conduct the customer interaction monitoring against the Standards, with limited ability for MaPS itself to challenge and interrogate findings and with limited access to underlying documents.
- 1.10. The FCA therefore makes a number of recommendations for MaPS to improve sampling methodology, the effectiveness of the methodology used to assess whether customer interactions adhere to the Standards (including the operation of its scorecard) and the definition of wider harms and detriment. The FCA also makes recommendations for MaPS to make changes so that it is better able to oversee and challenge these elements of the Monitoring Framework.

#### Enforcement of the Standards

- 1.11. MaPS has no statutory powers to enforce against the Standards in relation to Delivery Partners. In addition to being able to challenge Delivery Partners and set, or re-set expectations; potential enforcement actions against external Delivery Partners are limited to taking action under contractual arrangements. This includes the ability to leverage

service credits (i.e., claw back funding payments) and ultimately terminate contracts with external Delivery Partners (as set out at section 12 of this report). These potential enforcement steps have not been commonly employed beyond the lower levels of challenge meetings and expectation setting, and an example of a root cause analysis. This is in part because MaPS has not had identified instances that would otherwise necessitate the use of enforcement tools since the contracts have come into effect.

- 1.12. Also, MaPS has not set out a policy for or documented its approach to enforcing the Standards outside of detailing the process for leveraging service credits in the Debt Advice contracts.
  - 1.13. The FCA has therefore made recommendations for MaPS to develop an approach to enforcement and to document a policy to employ these and other enforcement activities in appropriate circumstances. It also has recommendations for MaPS to recalibrate the Key Performance Indicators that could result in intervention and/or enforcement action.
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2. Background
    - 2.1. **The Money and Pensions Service ("MaPS") is an arm's-length** body of the Department of Work and Pensions. Its purpose is to provide advice, information, **and guidance to improve the UK public's ability to manage** their financial affairs.
    - 2.2. MaPS aims to fulfil this purpose by providing certain functions to the public which include (but are not limited to) a Debt Advice Function, a Pension Guidance Function (comprised of Pension Guidance and Pension Wise), and a Money Guidance Function (together '**the Relevant Functions**').
    - 2.3. **The Relevant Functions are carried out by internal MaPS' teams** involved in **the delivery of the Relevant Functions or external 'Delivery Partners'** (third parties appointed by MaPS under grants or contracts to carry out the delivery of the Relevant Functions).
    - 2.4. **The Financial Guidance and Claims Act 2018 ('the Act')** requires MaPS to set Standards to be complied with in carrying out the Relevant Functions. MaPS set those Standards and they comprise 11 Standards with 69 sub-standards.
    - 2.5. **The Act requires the Financial Conduct Authority ('FCA')** to approve those Standards, which it did in January 2021.

- 2.6. The Act requires MaPS to monitor its own and its Delivery Partners' compliance with the Standards.
- 2.7. Under section 10, the Act further requires the FCA to review, at least once every three years:
  - (a) whether the Standards continue to be appropriate; and
  - (b) how MaPS is monitoring and enforcing the Standards.
- 2.8. The FCA completed its first review under section 10 of the Act on 18 January 2024 (**the "Review"**).
- 2.9. The Act further requires the FCA to provide a report on the Review to MaPS and the Secretary of State for Work and Pensions, as soon as practicable after the Review is complete (**the "Report"**).
- 2.10. Under the Act, the Report may also include recommendations to MaPS.
- 2.11. Given the requirements set out in the Act, the scope of the **FCA's Review** has not included analysis of:
  - (a) the underlying quality of the debt advice, money guidance or pension guidance that MaPS has funded;
  - (b) the underlying policies and procedures that MaPS and its Delivery Partners have submitted to evidence adherence to the Standards;
  - (c) how MaPS commissioned or awarded the underlying contracts or grants with Delivery Partners;
  - (d) how MaPS has funded or resourced its work to monitor compliance with the Standards.

### 3. MaPS' **Purpose and Role**

- 3.1. **Three of MaPS' five core functions are in scope for the purpose of the FCA's Review:**
  - (a) **The Debt Advice Function:** MaPS offers individuals in England information and advice on debt-related matters, serving as the largest funder of free debt advice services. MaPS engages Delivery Partners to help customers access reliable and cost-free advice. MaPS also provides training and support to front-line advisers, ensuring they are equipped with the necessary tools to deliver effective assistance to those in need.

- (b) The Pension Guidance Function: MaPS offers information and guidance to individuals regarding workplace and personal pensions. MaPS has a team of trained pension experts that helps people who are seeking answers to their pension questions. MaPS operates consumer websites which serve as a source of information and guidance on pensions. Additionally, through the MaPS Pension Wise service, support is provided to individuals aged 50 and above in making decisions regarding their defined contributions pension pots. **MaPS' aim is to empower individuals to navigate the complexities of the options related to pensions and make choices that align with their financial goals and retirement plans.**
  - (c) The Money Guidance Function: MaPS provides information aimed at improving individuals' understanding of and expertise in financial matters, as well as improving their day-to-day money management skills. MaPS provides people with free and impartial money guidance through its consumer websites, call centre and webchat service. MaPS' aim is to empower individuals by providing them with the tools and knowledge they need to make informed financial decisions and effectively manage their finances.
- 3.2. **The other two of MaPS' five core functions that are not in scope for the purpose of the review relate to Consumer Protection and a Financial Wellbeing Strategy.**

#### Corporate Objectives

- 3.3. In its Corporate Plan for 2023-24 MaPS identifies its objectives as including:
- (a) helping people in financial crisis;
  - (b) helping people in need to manage their money today;
  - (c) helping people with their pension and financial future;
  - (d) collaborating with partners to improve financial wellbeing; and
  - (e) building on strong foundations.
- 3.4. Also in its Corporate Plan, MaPS sets out certain measures of success which include (non-exhaustively):
- (a) improved accessibility including prioritising customers facing vulnerable circumstances;
  - (b) consumer protection against financial scams; and,

(c) improving outcomes and experience for customers.

#### 4. How MaPS Delivers the Relevant Functions

##### The Debt Advice Function

- 4.1. MaPS outsources the provision of debt advice through 11 contracts or grants delivered by seven Delivery Partners. MaPS assigns a Contract Manager to each contract or grant **to manage the Delivery Partner's** performance. Nine contracts or grants are for the provision of Debt Advice and two contracts are for the provision of Debt Relief Orders (which is a form of personal insolvency).
- 4.2. In relation to the Debt Advice Function, Delivery Partners provide debt advice sessions by telephone, in face-to-face meetings and through digital means (email or webchat). A MaPS Quality Manager works with each Delivery Partner to ensure ongoing performance against the Standards.
- 4.3. MaPS commissioned new contracts and awarded new grants for the Debt Advice Function in 2022 which commenced in February 2023. This was a move away from a grant-based model in all but regional Debt Advice delivery where new grants were awarded instead. Under the revised commercial terms in the grants and contracts, MaPS switched from funding and tracking the separate advice sessions provided by the Delivery Partners to instead funding and tracking the number of individual customers served.
- 4.4. In 2022/23 MaPS funded debt services supported around 494,000 individuals. Under the new contracts and grants, MaPS expects to support around 776,000 individuals per year in the future. This is made up of the following targets set by MaPS for its Delivery Partners:
  - (a) The delivery of advice to 420,000 customers under debt advice contracts;
  - (b) The delivery of advice to 19,000 small business debt advice customers;
  - (c) The delivery of advice to 240,000 customers for Debt Relief Orders
  - (d) The delivery of advice to 97,000 customers under legacy grants.

## The Pension Guidance Function

- 4.5. The Pension Guidance Function currently comprises two services – Pension Guidance and Pension Wise.
- 4.6. Pension Guidance is delivered by an internal MaPS team through three channels (telephone, webchat, or written correspondence). In 2022/23, pensions guidance sessions delivered 227,996 customer interactions.
- 4.7. Pension Wise provides dedicated guidance for consumers aged 50 and above about their defined contribution pension pots. MaPS delivers Pension Wise appointments through two external Delivery Partners on a grant basis as well as through an internal MaPS team.
- 4.8. The two Delivery Partners provide Pension Wise guidance through telephone and face-to-face appointments. MaPS' internal Pension Wise team provides a telephone service only. In 2022/23, MaPS facilitated 243,069 Pension Wise telephone, face-to-face, and **'Explore your options'** self-service online journeys.
- 4.9. As with the Debt Advice Function, each Delivery Partner has an assigned MaPS Contract Manager.

## The Money Guidance Function

- 4.10. MaPS delivers the Money Guidance Function by contracting with one external Delivery Partner to operate a contact centre on a white labelled basis, presenting to the public as MaPS under the MoneyHelper brand. This Delivery Partner is the sole provider of money guidance for MaPS with around 56,000 guidance interactions in 2022/23.
- 4.11. The Delivery Partner provides money guidance by telephone, WhatsApp, email sessions and webchat. The provided information and guidance are limited to content held on **MaPS' MoneyHelper website**.
- 4.12. Agents, also **known as 'Guiders'**, assist customers by identifying information from the MoneyHelper website relevant to the customer query. Guiders undergo training developed by MaPS to ensure they do not stray into making recommendations that would constitute giving advice (which would be a regulated activity requiring FCA approval, whereas providing money guidance is not an FCA regulated activity). The Guiders also signpost or perform warm referrals directly to MaPS' debt Delivery Partners.

## 5. The Standards

- 5.1. The Act requires MaPS to establish and publish a set of Standards that should be followed by MaPS and its Delivery Partners when they are providing information, advice, or guidance in pursuance of the Relevant Functions. MaPS developed the Standards and the FCA approved them in January 2021. As set out in **MaPS'** Introduction to the Standards (see Annex One):

"The Standards set out, at a high-level, the quality and performance requirement for services MaPS delivers directly or commissions through partners. The aim of the Standards is to support the delivery of services **that improve consumers' financial knowledge and in so doing, to enable them to make informed decisions** . . .

These standards are intended to set out clearly, and in one place, the principles for delivering the MaPS advice and guidance functions. They do not replace or supersede any existing grant agreements or contracts held with MaPS.

The standards . . . provide a framework for developing best practices and continually improving services that can be used as a reference point for collaboration with partner organisations, stakeholders and the devolved governments of Wales, Northern Ireland, and Scotland."

- 5.2. There are 11 Standards supported by 69 separate sub-standards. The Standards set out the quality and performance expectations on MaPS and Delivery Partners when carrying out the delivery of the Relevant Functions. The Standards can broadly be divided into those that relate to the provision of information, advice, and guidance to consumers ('the Customer Facing Standards'), and those that MaPS' **internal and external** Delivery Partners need to abide by when delivering the Relevant Functions ('the Non-Customer Facing Standards'). The Standards themselves are set out in full at Annex One.
- 5.3. **As above, MaPS' relationship with** external Delivery Partners is governed either by grants (mostly historically, although some grants remain in place) or contracts. Both the grants and the contracts include, among other things:
- (a) volume Key Performance Indicators; and
  - (b) quality Key Performance Indicators.
- 5.4. These Key Performance Indicators help to determine performance under the contracts and grants that were active from February 2023. The contracts for Debt Advice (but not the grants for the Pension Guidance

and Money Guidance Functions) provide a mechanism for MaPS to clawback funding where Key Performance Indicators are not met.

6. The Monitoring Framework
  - 6.1. **The FCA's Review covers the period from January 2021 to December 2023 ('the Relevant Period').**
  - 6.2. The Relevant Period progressed across two distinct phases. First, a **'Development Phase' which lasted from January 2021** after the FCA approved the Standards to February 2023, and then an **'Implementation Phase'** from February 2023.
  - 6.3. **In the 'Development Phase,'** MaPS proposed, designed, tested, developed, and refined new processes and procedures in order to **establish a 'Monitoring Framework,'** to monitor and enforce the Standards across the Relevant Functions.
  - 6.4. As this was necessarily an iterative process, during the **'Development Phase':**
    - (a) Some, if not many, elements of the Monitoring Framework were active and in place at various stages throughout the Relevant Period.
    - (b) Documents were submitted by Delivery Partners to evidence compliance with the Standards at an organisational level.
    - (c) MaPS engaged Delivery Partners to educate them on the new Standards and set expectations as to how they should be met.
    - (d) MaPS maintained quality assurance processes (in addition to certain quality assurance processes carried out by the Delivery Partners themselves) which were reviewed for compatibility with the Standards.
    - (e) Some monitoring of customer interactions was taking place whilst the process to design, test and calibrate a system to score those interactions was being put in place.
  - 6.5. Because of the iterative nature of the development of the Monitoring Framework, it was not fully operationally embedded during this Development Phase. In particular:
    - (a) Many elements of the Monitoring Framework were subject to periodic refinement during the Development Phase, as a result of

adjustments made through testing. The Monitoring Framework as a whole did not settle into an established set of processes that could be embedded operationally until early 2023 for Debt Advice, and later for Money Guidance; with Pension Guidance remaining in Development Phase.

- (b) The active monitoring taking place of customer interactions during the Development Phase was both relatively low in number and focused primarily on testing and refining the Monitoring Framework to ensure there was an effective and practical way to score and track the customer interactions as opposed to producing outputs to assess compliance with the Standards.
  - (c) Key Performance Indicators in the contracts and grants for the Debt Advice Function, although in place in the Development Phase were not enforceable until February 2023;
  - (d) The introduction of contracts for the Debt Advice Function (replacing the historical grants) in February 2023 created a clearer link between the Monitoring Framework, an assessment of the Standards, and performance under the contracts. Indeed, the 2023 contracts represented the first time that the MaPS Standards became a contractual obligation for Delivery Partners.
- 6.6. By February 2023, the Monitoring Framework reached a sufficient level of maturity and a point of stability in its evolution to enable MaPS to start the process of moving it from testing and start to operationally embed it. This point marks the start of the 'Implementation **Phase.**'
- 6.7. From that point and over the following months MaPS operationally embedded the Monitoring Framework **in priority across MaPS' various** functions starting with the Debt Advice Function (February 2023), then the Money Guidance Function (May 2023). The Pension Guidance Function remains in Development Phase.

## Chronology

### Development Phase: January to May 2021 – design

- 6.8. MaPS did not have a process in place to monitor and enforce against the Standards when the FCA approved them in 2021. However, it did have pre-existing quality assurance processes (some inherited from its predecessor organisation, the Money Advice Service).
- 6.9. From January 2021 **to May 2021 MaPS' second line** of assurance commenced work to design the Monitoring Framework. This included a

discovery phase to identify gaps in existing quality assurance and define new processes.

#### June to September 2021 – testing

- 6.10. In June 2021, field trials to monitor the funded customer interactions began, including case file reviews of customer interactions across the Relevant Functions. This first phase of testing concluded in September **2021 with approval of “Minimum Viable Products” (templates** derived from the best examples of submissions from testing) to allow for continued monitoring and obtaining attestations of compliance with the Standards from the existing Delivery Partners and internal MaPS teams.

#### October 2021 – Quality Assurance Framework

- 6.11. In October 2021, MaPS approved and published a Quality Assurance Framework. The Quality Assurance Framework is described in more detail below. In essence it is a framework to oversee quality assurance using a combination of three measures. One of these measures relates to MaPS’ monitoring of the Standards (through Control Self Assessments, Controls Testing and Customer Facing Assessments). The other two relate to measuring Customer Outcomes and Customer Satisfaction through **‘Voice of Customer’ surveys** (Customer Surveys). These surveys do not measure compliance with the Standards, but they do offer indicators as to whether specific Delivery Partners are adhering to some of the Standards.
- 6.12. In September 2021 MaPS created a new team to further develop and embed the process for the monitoring of the Standards - the Service Performance, Quality and Standards Team (**‘the SPQS Team’**).

#### February 2022 to January 2023 – development and testing

- 6.13. **Development work continued and, from April 2022 it entered a ‘test and learn’ phase. The** grants for existing Delivery Partners for the Debt Advice Function were renewed with new terms that obligated **participation in the ‘test and learn’ work. Delivery Partners** with new grants awarded during the Covid-19 pandemic were excluded from this obligation. However, some participated voluntarily. This enabled further development of the Quality Assurance Framework and the development of a process for monitoring the customer facing aspects of the Standards. This phase involved testing customer files, calibrating outsourcers and Delivery Partners, engagement sessions with Delivery Partners to strengthen policies and controls, and multiple revisions of guidance documents and tools. The Quality Assurance Framework was also revised by the Head of the SPQS Team during this period.

- 6.14. During this period MaPS also undertook a procurement exercise for new Delivery Partners for the Debt Advice Function. New contracts were effective from February 2023.
- 6.15. **MaPS monitored Money Guidance customer interactions in the 'test and learn' phase** by having the white-label Delivery Partner perform 94 assessments against the Standards in 2022, of which the SPQS Team checked approximately a quarter.
- 6.16. MaPS also re-procured the existing Independent Quality Assurance Service ('the IQAS') to perform the role of a third-party monitor of the customer interactions across all Relevant Functions.

February 2023 to December 2023 – Operationally Embedding the Monitoring Framework

- 6.17. In February 2023, the new grants and contracts with Delivery Partners for the Debt Advice Function commenced.
- 6.18. Also in February 2023, the IQAS began formal monitoring of customer transactions under the Debt Advice Function. Testing continued for the monitoring of customer transactions for the Pension Guidance Function and the Money Guidance Function.
- 6.19. In May 2023, the IQAS began formal monitoring of customer transactions under the Money Guidance Function.
- 6.20. In August 2023, the IQAS was due to begin monitoring of the Pension Guidance Function under test and learn conditions. However, this was delayed due to a lack of technical expertise within the IQAS. The SPQS Team took on that role in August 2023 instead.
- 6.21. Also in August 2023, the SPQS Team published a revised Quality Assurance Framework.
- 6.22. In October 2023, the SPQS Team published an Advice Assessor Toolkit (**the 'Toolkit'**) to provide further clarity for debt advice assessors at the IQAS and in Delivery Partners on how to monitor and score adherence to the Standards. A further revision to the Toolkit was made in November 2023 to take account of analysis of the lowest performing Standards.

Other Observations on the Development of the Monitoring Framework

- 6.23. In addition to the Toolkit, MaPS also facilitated webinars and workshops for Delivery Partners and the IQAS to help embed the Monitoring Framework throughout the development and implementation phases.

- 6.24. Alongside the development of its Monitoring Framework, MaPS concurrently maintained pre-existing quality assurance processes across the Relevant Functions. This included, for example, a **'Debt Advice Peer Assessment Scheme' (DAPA)** to assess quality in the MaPS funded Debt Advice Function until March 2022. This was followed by monitoring of the **Standards under 'test and learn' conditions from April 2022 before the** formal monitoring of the Standards began in February 2023.
- 6.25. The Pension Guidance Function and Money Guidance Function also had separate quality assurance processes. MaPS continued to use these pre-existing quality assurance processes in each function while the Monitoring Framework was being designed and tested. Although MaPS mapped these legacy processes to the Standards in 2021 to ensure compatibility, they are outside the scope of **the FCA's Review** as they did not directly monitor adherence to the Standards. However, they are relevant to the extent that they may have provided some mitigation to the absence of an operationally embedded Monitoring Framework by ensuring that some quality assurance measures were being maintained during the Development Phase.
- 6.26. MaPS prioritised rolling out a Monitoring Framework for the Debt Advice Function because:
- (a) The SPQS Team and the IQAS had debt advice expertise but did not have sufficient Pension and Money Guidance expertise from the outset;
  - (b) the provision of advice (as opposed to guidance) represents a more significant risk;
  - (c) consumers in need of debt advice are at greater risk of more immediate harm;
  - (d) **MaPS' approach to providing Money Guidance and Pension Guidance** is more scripted than is the case for Debt Advice, and is based on the provision of information and / or options to narrow down consumers' choices, without making an explicit recommendation as in the case of the Debt Advice Function;
  - (e) In the Debt Advice Function, customer demand is more significant in terms of customer numbers than the Money Guidance Function and Pension Guidance Function.
- 6.27. MaPS' ability to design, test, implement and operationally embed the Monitoring Framework was impacted by a number of competing priorities **(which are outside the scope of the FCA's Review)**. These include the ongoing work, following the creation of MaPS in January 2019, to bring

together three predecessor organisations (Money Advice Service, The Pensions Advisory Service and Pension Wise) as well as the resource and operational impacts of the Pandemic.

## 7. **Relationship between MaPS' Quality Assurance Framework and the Monitoring Framework**

- 7.1. MaPS developed a Quality Assurance Framework which incorporates three elements to measure quality assurance including:
- (a) Compliance with the Standards: a set of monitoring processes and procedures (the development of which is described in the previous section) to assess the delivery of the Relevant Functions and to assess compliance with the Standards (the Monitoring Framework);
  - (b) Customer Outcomes: measuring resolution, understanding and customer well-being through "Voice of Customer" surveys (Customer Surveys);
  - (c) Customer Satisfaction: which MaPS also evaluates through the "Voice of Customer" surveys (Customer Surveys).
- 7.2. **The FCA's Review is limited in scope, in line with the review requirements** under the Act. Accordingly, for the purposes of this Review, the FCA has distinguished between those elements of the Quality Assurance Framework that enable MaPS to monitor compliance with the Standards (which are within the scope of the Review) and those elements that provide additional management information, performance indicators and **other outputs relevant to MaPS' operational activities (which are outside the scope of the Review)**.
- 7.3. This includes the Customer Survey process. The purpose of the Customer Survey is to measure Customer Outcomes and Customer Satisfaction during and after the provision of the service. It predates the Standards and the Monitoring Framework, and shortly after the Standards were approved in 2021, MaPS mapped parts of the Customer Survey to a limited number of the customer facing aspects of the Standards. The Customer Survey is now mapped to 14 sub-Standards. However, the Customer Survey itself does not provide a quantitative source of data or metrics to monitor compliance with the Standards. Instead, it provides an additional source of qualitative information which helps to indicate when Delivery Partners may not be performing to the expectations of the Standards.

7.4. **The FCA's Review also does not include the other frameworks outside of the Quality Assurance Framework which MaPS' compliance and assurance teams have operated since its inception in 2019; for example, a separate 'Compliance Framework' and 'Assurance Framework', as these do not monitor the Standards. This also includes the Customer Complaints process which is distinct from and is not linked to the Standards in any way.**

## 8. Monitoring Framework Activities

8.1. The Monitoring Framework comprises three processes for measuring compliance to the Standards which are considered below and in the following three sections:

- (a) Control Self-Assessments;
- (b) Controls Testing; and
- (c) Customer Facing Assessments.

8.2. As stated above, the Customer Surveys provide additional insights and indicators of compliance with the Standards. However, the Customer Survey does not quantitatively measure compliance with the Standards.

## 9. Control Self-Assessments

9.1. Control Self-Assessments are an assurance process whereby **MaPS'** Delivery Partners (external and internal) share their operational processes, procedures, and policies along with a self-assessment and attestation which (if appropriate) demonstrates that their controls are adequate to ensure compliance with the Standards.

9.2. MaPS developed the Control Self-Assessments process by creating a web-based portal that allows its Delivery Partners to upload attestations and evidence of adherence to the Standards on a live and ongoing basis. **This enables MaPS' Contract and Quality Managers to regularly meet and** work with Delivery Partners, using data from the customer facing assessments, and to feedback expectations under the Standards.

9.3. MaPS splits the Control-Self Assessment into three parts:

- (a) **The Controls Library:** This is a catalogue of each Delivery **Partner's** controls to show how the Delivery Partner evidences compliance with the Standards.

- (b) Standards Assessments: the Standards Assessments link the **Delivery Partner's controls (from the Controls Library)** to specific aspects of the Standards to which they relate. A confidence assessment is then made as to whether the particular control is adequate in terms of being able to evidence how non-compliance to the related Standard is avoided, detected, and corrected when identified.
  - (c) Self-Attestations: each Delivery Partner completes and submits attestations to MaPS annually, or after it makes significant changes to its controls, to assure MaPS that the controls it has put in place are adequate to monitor compliance with the Standards.
- 9.4. As well as self-attesting compliance with the Standards, Delivery Partners also explain how they identify and act on non-compliance. MaPS Quality Managers regularly meet Delivery Partners to discuss and to challenge, if necessary, the submissions.

#### December 2021 - First Round of Submissions – All Functions

- 9.5. In December 2021, all active Delivery Partners submitted a first round of Control Self-Assessments to MaPS for each of the Relevant Functions. However, as there was no standardised format for submissions or guidance for Delivery Partners to use, the results varied in quality and detail.

#### Improvements to the Control Self-Assessment Process

- 9.6. MaPS' SPQS Team reviewed the process in April 2022. MaPS worked with Delivery Partners to develop and refine a Control Self-Assessment template by adopting best examples from the first round of submissions, as well as from feedback received in one-to-one sessions. MaPS then standardised a template for the Delivery Partners to use to ensure that the controls they submitted better demonstrated how the Delivery Partners complied with the Standards.
- 9.7. As part of **this, MaPS classified the controls into 'preventative,' 'detective,' and 'corrective' categories. MaPS developed and** produced guidance documents available to Delivery Partners to help them complete the Control Self-Assessments. These guidance documents provide examples of what may be a preventative, detective, and corrective control for every Standard (including all sub-standards), accompanied by a video demonstration.
- 9.8. Also following the first round of submissions, MaPS created a Microsoft Forms web-based system that allows Delivery Partners to upload their controls and self-assessments in a standard format. By adopting this

process, MaPS is able to receive Delivery Partners' annual attestations as well as in-year submissions if a Delivery Partner makes a change to their controls.

#### July 2022 – Second Round of Submissions

- 9.9. MaPS completed a second round of Control Self-Assessments in July 2022. These reviews provided a “baseline” view of the controls that each Delivery Partner had in place at that point in time across all the Relevant Functions. MaPS' Quality Managers use this to assess Delivery Partners on an ongoing basis.
- 9.10. MaPS issued guidance to Delivery Partners in November 2022 which provided examples of what documents it might expect to receive in submissions. This included: copies or excerpts of a policy; procedures, forms, or process maps; guidance notes, briefings, or publications; and extracts from or screen shots of relevant training material.
- 9.11. In making submissions, Delivery Partners provide confidence levels for their controls in the final part of the Control Self-Assessment using a Red, Amber, Green Ratings System (**'a RAG Rating'**). MaPS reviews and challenges these RAG Ratings in the regular meetings it has with Delivery Partners and, where necessary, Delivery Partners amend and re-submit their evidence of the effectiveness of their controls to MaPS to justify the self-attestation.
- 9.12. Once submissions are made, MaPS' Contract and Quality Managers are able to assess submissions provided and can combine this with data from the Customer Facing Assessments (see below).
- 9.13. Contract and Quality Managers are then able to give feedback on how Delivery Partners have met, or can improve when seeking to meet, the expectations under the Standards. Where Delivery Partners are not able to attest to being compliant with the Standards, action plans are put in place to address any shortcomings.

#### Money Guidance Function

- 9.14. For Money Guidance, MaPS contracts an external Delivery Partner on a white-label basis. MaPS provides the majority of the operational controls itself i.e., training materials and call scripts. The guidance material is limited to the MoneyHelper website. The Delivery Partner, nonetheless, submits the full Control Self-Assessment to MaPS. This presents some unique challenges for monitoring and enforcing the Standards against the white-labelled Delivery Partner for this service as the Delivery Partner maintains that it cannot be held responsible for the controls that MaPS itself has designed and implemented. Consequently, it is unclear

how MaPS will be able to enforce against the Delivery Partner or will otherwise be able to engage with the Delivery Partner in relation to ineffective controls it designed itself.

- 9.15. In practice it is likely that any challenges would materialise either in the form of the control not working because it has not been adhered to properly or at all (in which case the external Delivery Partner will likely need to take action to resolve the issue) or because the control is not effective as drafted (in which the MaPS itself would likely need to resolve the issue).

## 10. Controls Testing

- 10.1. Controls Testing, as originally designed, would have enabled MaPS to undertake a more detailed examination - beyond self-assessment by a Delivery Partner - of the controls that a Delivery Partner has put in place to ensure compliance with the Standards. Ultimately, the designed approach has not been implemented. However, the approach as designed has been considered as part of the **FCA's Review**.

- 10.2. Through the Control Self-Assessments; as above, Delivery Partners attest to having controls in place to comply with the full range of customer facing and non-customer facing aspects of the Standards. The controls relating to customer facing Standards receive further scrutiny through monitoring of the customer interactions (the Customer Facing Assessments – as covered below). However, the controls relating to non-customer facing Standards are not scrutinised outside of the Control Self-Assessment process.

- 10.3. MaPS designed an approach to Controls Testing which it shared with Delivery Partners in November 2022. As part of that approach, MaPS, or a third party on MaPS' behalf, would conduct a detailed review of the controls that the Delivery Partner had submitted as part of the Control Self-Assessment.

- 10.4. This Controls Testing process would enable MaPS to identify shortcomings and opportunities for improvement that might otherwise not be picked up by Control Self-Assessments. MaPS planned to perform the Controls Testing either remotely or during on-site meetings with Delivery Partners.

- 10.5. Controls testing could either be:

- (a) thematic (with pre-determined areas of focus and involving some or all of the Delivery Partners); or

- (b) risk based (prompted by risk triggers identified in various ways and more likely relevant to the individual Delivery Partner for whom a risk had been triggered).
- 10.6. In January 2023, after piloting a proposed thematic test with one Delivery Partner, MaPS concluded that when it had previously baselined the Control Self-Assessment with Delivery Partners, it had achieved many of the intended benefits of Controls Testing. Ultimately MaPS considered that the thematic control testing did not add to or enhance its **view of the Delivery Partner's ability to** comply with the Standards except to confirm that the controls were as the Delivery Partner had described in the Control Self-Assessment. As such there was no clear value added from the thematic Controls Testing process.
- 10.7. MaPS also concluded that the proposed risk-based Controls Testing required more resource than was available. As a result, MaPS did not introduce Controls Testing and is in the process of redesigning a process that is achievable within its level of available resource. **MaPS' approach** to assessing controls is therefore reliant upon Control Self-Assessment as described in the previous section.
- 11. Customer Facing Assessments
  - Background
  - 11.1. Customer Facing Assessments involve the examination of customer interactions with a view to determining whether they operate as expected and meet the relevant Standards.
  - 11.2. MaPS outsources the monitoring of Customer Facing Assessments for the Debt Advice Function and Money Guidance Function to a contracted third party, independent, quality assurance service provider; the IQAS. MaPS outsourced the monitoring of customer interactions within its Debt Advice Function through the IQAS since its inception in 2019 (an approach inherited from its predecessor, the Money Advice Service).
  - 11.3. The IQAS was involved in supporting the testing of the customer interaction aspect of the Monitoring Framework during the Development Phase.
  - 11.4. Although it was intended that the IQAS would monitor customer interactions for the Pension Guidance Function; due to it having **insufficient qualified assessors with technical expertise, MaPS' SPQS** Team has performed this role from August 2023.

## Approach

- 11.5. The Customer Facing Assessment process involves the Delivery Partners initially assessing customer interactions and self-scoring compliance with the customer facing aspects of the Standards. For this they use a Customer Facing Assessment Scorecard (**'the Scorecard'**) and Toolkit developed and provided by MaPS.
- 11.6. The Delivery Partners then submit the underlying records, recordings, and case files to the IQAS. The IQAS then performs the same assessment, for independent moderation, using the same Scorecard. The final Scorecard is used to monitor the performance of the Delivery Partner against the quality Key Performance Indicators.
- 11.7. By issuing Scorecards to Delivery Partners and the IQAS to assess their customer interactions, MaPS has the ability to track the performance of customer facing aspects of the Standards across the Relevant Functions. As the data becomes richer over time, MaPS plans to use this data to enable it to provide feedback to Delivery Partners and drive continuous improvement. For example, to identify emerging issues or systemic practices used among Delivery Partners that drive harm or poor outcomes.
- 11.8. This outsourced, dual assessment approach to monitoring the customer facing aspects of the Standards that MaPS has adopted enables MaPS to demonstrate independence from the process.
- 11.9. However, the dual assessment approach also means that MaPS is dependent on IQAS to perform the monitoring role. MaPS also has limited oversight of the underlying customer files that Delivery Partners submit for monitoring, and MaPS only becomes sighted on these in the moderation sessions it facilitates between the IQAS and Delivery Partner and any subsequent appeal.

## Sampling Methodology

- 11.10. On a monthly basis, each Delivery Partner performs their assessments by self-selecting customer files and carrying out local (Delivery Partner led) quality assurance using the processes that it has developed for itself (and performs separately to the Standards assurance processes). For all Relevant Functions, samples are required to be taken from customer interactions where the provided advice or guidance reached a conclusion in the previous month.
- 11.11. Unlike the Money Guidance Function and the Pension Guidance Function, files for the Debt Advice Function are often comprised of multiple

customer interactions. This is because, in the current funding model, MaPS funds the whole customer journey.

- 11.12. From these self-assessed cases, Delivery Partners select a further sample of files to assess against the Standards. The size of this sample is set out in the contracts or grants and is dependent on the relative size of the Delivery Partner and the volume of interactions that MaPS funds.
- 11.13. Below is a table setting out the required sample sizes for customer interaction monitoring for all Relevant Functions. **This shows that MaPS' requirements for sample sizes are limited to less than 1% of completed cases for the Debt Advice Function. Sample sizes for the Money Guidance Function and Pension Guidance Function are substantially smaller than 1%.**

**Table 1 – Sampling dependant of size of Delivery Partner.**

Delivery Partner category	Interactions per year	(Cat 1) Minimum sampling pcm	(Cat 3) Maximum sampling pcm
Category A	25,000 or less	10	20
Category B	25,000 - 50,000	12	25
Category C	50,000 - 100,000	15	30
Category D	over 100,000	20	50

- 11.14. From the start of the Implementation Phase:
- (a) For the Debt Advice Function: from February 2023 (when formal monitoring began) to September 2023, Delivery Partners submitted 977 files to the IQAS for monitoring. The IQAS assessed an average of 164 debt advice cases per month.
  - (b) For the Money Guidance Function: from May (when formal monitoring began) to August 2023, Delivery Partners submitted an average of 10 cases per month.
  - (c) The IQAS assessment for Pensions was meant to begin in August 2023. Instead, **MaPS' SPQS** Team reviewed 12 cases in August 2023 and 11 cases in September 2023.
- 11.15. For Debt Advice and Money Guidance, this level of sampling is loosely in line with the **'category 1' minimum sample sizes that MaPS has proposed** in the Monitoring Framework (albeit representing 0.25% of all conducted sessions in Debt Advice, while Money Guidance and Pension Guidance reviews represent 0.019% and 0.039%, respectively).

## Development of the Scorecard

- 11.16. As described in section 9 above, Control Self-Assessments monitor compliance with all of the Standards (customer facing and non-customer facing). The purpose of the Scorecard is to measure compliance with the Standards during customer interactions, therefore it does not monitor compliance with the non-customer facing Standards, most of which are overarching organisational principles that Delivery Partners should abide by when delivering the Relevant Functions.
- 11.17. The Standards were developed as a set of high-level principles before and independently from the later development of the Scorecard to monitor compliance to the customer-facing elements of it. As a result, when it went through the iterative process of designing, testing, revising, and operationalising the Scorecard, MaPS found that a number of challenges arose including:
- (a) Some of the Standards are not characterised as being customer-facing. However, when developing the Scorecard, it became apparent that those Standards could be monitored through customer facing assessments. As a result, these Standards were included in the Scorecard;
  - (b) Conversely, some of the Standards that are characterised as being customer-facing could not be appropriately monitored through customer facing assessments. As a result, these Standards are not included in the Scorecard;
  - (c) Where Standards could be monitored by the customer facing assessments it became apparent that a single monitoring assessment element could relate to more than one Standard. This can cause one error, picked up by the single monitoring assessment element, to result in two or more Standards being assessed as not met. This could give an exaggerated outcome, indicating multiple failures, when there had been just one error. As a result, some of the Standards are not included in the Scorecard assessment to avoid this double-failure effect.
- 11.18. The Scorecard is used to assess the interaction against a number of the customer-facing sub-Standards:
- (a) 25 are assessed and scored for the Debt Advice Function;
  - (b) 20 are assessed and scored for Debt Relief Orders within the Debt Advice Function;
  - (c) 23 are assessed and scored for the Money Guidance Function; and

- (d) 24 are assessed and scored for the Pension Guidance Function (25 for Pension Wise).
- 11.19. For every sampled interaction, the assessor reviews and determines whether each Standard has either been:
- (a) Met (because compliance to all elements of the Standard is evident)
  - (b) Not Met – Without Impact (because the advice or guidance was unsuitable, but had no impact on the customer)
  - (c) Not Met – With Impact (because the advice or guidance was unsuitable, and this had an impact on the customer but did not cause financial loss or harm)
  - (d) Not Met – With Detriment (because the advice or guidance was unsuitable, and this caused detriment to the customer in the form of financial harm or loss)
  - (e) N/A (because the channel may be excluded; or not relevant to the interaction; and if the client did not present an issue such as vulnerability)
- 11.20. There is no separately identifiable assessment of whether there is an insufficient record on the customer file to be able to make a determination as to whether a Standard has been met or not. Insufficient evidence is **scored as 'Not Met'**, however, this means that poor record keeping is not separately identified and therefore **results in 'Not Met'** outcomes conflating both failures to adhere to Standards and failures to keep adequate records (which may or may not mask a failure to meet a Standard). This approach means that MaPS is also unable to identify instances where record keeping may be lacking within Delivery Partners, which is a requirement under Standard 9.
- 11.21. The Scorecard creates a score for the entire interaction by calculating the proportion of met Standards as a percentage of all the applicable customer facing Standards that the interaction could be assessed against. The average percentage across all of the assessed interactions for each individual Delivery Partner is then used to measure and track the quality Key Performance Indicator for each Delivery Partner. The process for this is detailed below.
- Advice Assessor Toolkit
- 11.22. MaPS produces an Advice Assessor Toolkit for the Debt Advice Function. This provides guidance for assessing debt advice customer journeys against the Standards (except for Debt Relief Order processing). In the

latest Advice Assessor Toolkit, dated November 2023, MaPS provides guidance that if there is remedial action expected, assessors should mark **this as 'Not Met - With Impact'**. If no remedial action is required, the **assessor should mark this as 'Not Met - No Impact' or 'Met,'** depending on the evidence available. Remedial action is needed if detriment materialises in the future. In these circumstances it is unclear if and how MaPS track instances of impact to ensure the detriment has been prevented. We have not seen evidence of MaPS centrally tracking whether the remedial action employed by the Delivery Partner was effective.

### Scoring the Standards

- 11.23. For the purpose of the scoring, each individual assessment of each Standard is treated the same. MaPS treats all the Standards with parity in its scoring system. MaPS therefore does not attach weightings within its scoring system to areas such as:
- (a) Standards that, if not met, would be more likely to result in consumer harm (financial or non-financial) and/or poor consumer outcomes;
  - (b) Standards that are more likely to focus on consumers in vulnerable circumstances; and
  - (c) Standards that, if not met, prohibit a consumer from making an informed decision to achieve their financial goals.
- 11.24. **MaPS also does not add weight to or differentiate between "Not Met – Without Impact," "Not Met – With Impact" and "Not Met – With Detriment" for the purpose of scoring the interactions.**
- 11.25. Conversely, it could also be the case that, in not proportionately weighting a Standard that less materially impacts the quality of the advice or guidance, the resulting score can disproportionately impact a **Delivery Partner's quality** Key Performance Indicator. For example, this could happen if a Delivery Partner fails to gather one piece of information assessed under Standard 2a(iii):
- "all practitioners must ensure they: request information about the consumer's financial and personal circumstances as appropriate to the presenting issue."**
- 11.26. Of the potential pieces of missing information, some may be critical, some important, and some of lesser consequence. However, any failure to gather one element of information would **result in a 'Not Met'** outcome; without any specific weighting attached to the importance of

the missing information. These more technical breaches may not impact the outcome for the customer but would impact the score for the Delivery Partner.

- 11.27. There are also elements of the customer journey that could be tracked, but which are not assessed in the Scorecards. For example, Standard 6a and Standard 6b on Communication, which provides that:

**"... Services must:**(a) Consider the information needs of consumers using the service, and communicate information to them in an appropriate, clear, impartial manner, suitable for the target audience. (b) Ensure that all written or telephone communication is dealt with within agreed service levels and for those with protected characteristics **or in vulnerable circumstances."**

#### Identification of Detriment

- 11.28. In the Quality Assurance Framework, MaPS defines detriment for the purpose of monitoring against the Standards as:

"Actual financial harm or loss, experienced by a customer" as a direct result of MaPS or its service Delivery Partner's information, advice, or guidance.

- 11.29. In the Toolkit for debt advice, through the following guidance provided **on how to use the 'with Impact' score during assessments, 'Impact' can** include detriment that is expected to occur but has not yet crystallised at the point of assessment:

**"If there is remedial action expected, this would be marked as 'not met - with impact.'**

- 11.30. Detriment can be identified and reported in a number of ways, including:

- (a) By Delivery Partners in the course of performing local quality assurance on interactions funded by MaPS (but outside of the Standards monitoring process);
- (b) By Delivery Partners in the course of monitoring the Standards in the sample they have selected for the monthly Customer Facing Assessments;
- (c) By the IQAS during its review of the files submitted by the Delivery Partners as part of the monthly Customer Facing Assessments; and
- (d) By either Delivery Partners, the IQAS or MaPS during the calibration sessions.

- 11.31. Since formal monitoring of the Debt Advice Function began in February 2023 and up to September 2023, the IQAS identified two cases of detriment through the Customer Facing Assessments. Delivery Partners have reported an additional four instances of detriment outside of the Customer Facing Assessment process. This is from a total of 977 case files submitted for IQAS assessment plus an unknown quantity of **Delivery Partners' internal (non-Standards)** quality assurance assessments. No instances of detriment have been identified in the Money Guidance Function or the Pension Guidance Functions.
- 11.32. This appears to be low, given the number of funded interactions in the period. To put that into context, 25 Standards are assessed on the regular Debt Advice Scorecard; therefore making a total of 23,600 Standards assessed for 944 Debt Advice cases – with detriment being identified in 0.004% of assessments and impact being identified in 3.89% of assessments).
- 11.33. For Debt Relief Order processing, 20 Standards are assessed; therefore making a total of 660 Standards assessed for 33 Debt Relief Order cases with detriment being identified in 0.151% of assessments and impact being identified in 4.39% of assessments). 944 of the 977 debt cases were for regular debt advice, the remaining 33 were for Debt Relief Orders.
- 11.34. This low occurrence may be the result of the combined effect of the self-selection sampling methodology as well as due to **MaPS' adoption of a narrow definition of detriment**, limited to actual financial loss or harm. This may not capture other harms arising including (but not limited to):
- (a) Prospective potential financial harm or loss;
  - (b) Loss of opportunity;
  - (c) Inconvenience;
  - (d) Reputational harm;
  - (e) Impact on wellbeing;
  - (f) Unnecessarily prolonged indebtedness;
  - (g) Impact on vulnerability;
  - (h) Identification of Impact with no financial harm or loss.
- 11.35. Impact is not clearly defined in the Quality Assurance Framework, guidance documents or the Advice Assessor Toolkit. In theory, assessors

could use the “Not Met – With Impact” score to capture some elements of the harms described in 11.34. However, given that MaPS has not **provided a clear definition of “Impact”**, these non-financial harms will not be consistently captured. Instances of **detriment are reported to MaPS’** Compliance Steering Group. Instances of detriment and Impact are logged and the remedial action discussed with Delivery Partners during feedback sessions to drive improvement in services. **MaPS’ Compliance** Steering Group is informed where emerging or systemic risks are identified.

#### Production of Scorecards – Role of the IQAS

- 11.36. After the Delivery Partner performs its assessment of each of the sampled customer interactions, it uploads the completed Scorecard to a web-based system. The IQAS is notified of the submission and separately receives the underlying case file from the Delivery Partner. The IQAS does not see (and is not sent) the Delivery Partner’s completed Scorecard. The IQAS then assesses the same interaction and completes the Scorecard again, independently, not knowing the scoring already assessed by the Delivery Partner.
- 11.37. Once the IQAS has completed its assessment, both the Delivery Partner and the IQAS then become sighted on the score that each has given on the sampled interactions. Where there are discrepancies on files that do not meet the Standards, MaPS facilitates calibration sessions between MaPS, the IQAS and Delivery Partners. The purpose of the calibration sessions is to resolve thematic variances between Delivery Partners and the IQAS that creates scoring misalignment, as opposed to decisions made in the scoring of individual cases. MaPS documents the discussions and retains the record to inform continuous improvement.
- 11.38. When the IQAS has completed its independent assessment, MaPS becomes sighted on the two completed Scorecards, but does not receive the underlying customer files. These are retained by IQAS, and although the contractual requirement between MaPS and IQAS is for IQAS to dispose of the case files within 12 months, if no appeals have been lodged by a Delivery Partner, the IQAS fulfils its data protection obligations under GDPR to dispose of that file in an accelerated 2-month timeframe. This constrains MaPS’ ability to review the underlying customer files and therefore **has an impact on MaPS’ ability to effectively oversee the IQAS**. It also had an impact on the **FCA’s ability to conduct the Review** due to the lack of availability of relevant documents.

## Scorecard Appeals

- 11.39. If a Delivery Partner remains dissatisfied with the decision and score awarded by the IQAS in individual cases, it can appeal that score to MaPS. MaPS then either rejects or upholds the appeal.
- 11.40. In the period from February 2023 to September 2023 977 customer interactions were assessed by the IQAS. This involved 24,260 assessments against the Standards against which Delivery Partners lodged 474 appeals (1.95%).
- 11.41. Of those appeals, at the time of **the FCA's** review, MaPS had decided on 375. Of these, MaPS:
- rejected 305 Appeals (81.3%);
  - upheld 58 Appeals (15.5%); and,
  - partially upheld 12 Appeals (3.2%).

## Assurance and Key Performance Indicators

- 11.42. The outcome from the Monitoring Framework process is that MaPS receives an insight into how the Standards are being met (or not met) by Delivery Partners. It receives or develops a number of items of management information to provide these insights. These include the following which shows what the highest and lowest performing Standards are:



- **Standard 1l** - MaPS or its delivery partners must not: Receive any inappropriate or improper payment or incentive as a result of the guidance or advice provided to a consumer.
- **Standard 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.
- **Standard 1j** - MaPS or its delivery partners 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.
- **Standard 1d** - Understand the difference between advice and guidance and comply with the boundary between regulated and non-regulated activities.

- **Standard 2a-iii** - All practitioners must ensure they: request information about the consumer's financial and personal circumstances as appropriate to the presenting issue.
- **Standard 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.
- **Standard 2a-v** - All practitioners must ensure they: 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.
- **Standard 1a** - The information, guidance or advice provided must: be impartial and accurate.



- 11.43. It also receives information to show the trajectory of compliance with the Standards. The following infographic shows the trajectory within the **Debt Advice Function as reported to Delivery Partners in MaPS' SPQS Team's quarterly update** for September 2023:

Standard	August	September	Trajectory	Standard	August	September	Trajectory
1a	41%	69%	▲	2a-v	89%	90%	▲
1d	100%	100%	▲	2a-vii	46%	64%	▲
1e	79%	85%	▲	2a-viii	99%	100%	▲
1f	68%	72%	▲	2a-ix	70%	80%	▲
1g	100%	98%	▼	2a-x	91%	94%	▲
1h	100%	99%	▼	2a-xi	86%	87%	▲
1j	100%	100%	▬	2b-i	99%	98%	▼
1k	99%	100%	▲	2b-ii	99%	91%	▼
1l	100%	100%	▬	2b-iii	68%	48%	▼
2a-i	100%	100%	▬	2b-iv	62%	98%	▲
2a-ii	100%	99%	▼	2b-v	86%	92%	▲
2a-iii	36%	37%	▲	3b	99%	99%	▬
2a-iv	98%	97%	▼	<b>Overall</b>	<b>86%</b>	<b>89%</b>	▲

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- 11.44. Following the conclusion of any appeal process, a final score for the assessed interaction is determined. The overall score for the case file is calculated as a percentage of all the Standards met.
- 11.45. The average score of all case files submitted by a Delivery Partner for that month is then aggregated to create its quality Key Performance Indicator score for that month (i.e., an average score of the customer interaction for that month). This means that single instances of non-compliance with the Standards, where one customer interaction fails the 80% quality Key Performance Indicator, does not result in that Delivery Partner being disproportionately penalised and held to account if the rest of the sample scored more positively. Instead, instances where a customer facing interaction falls below 80% are discussed at the regular performance meetings between MaPS and the Delivery Partners; to understand what drove the score, and what the Delivery Partner plans to do to address it.
- 11.46. MaPS has a Key Performance Indicator that requires each Delivery Partner's aggregated score to be above 80% for that month. For the Debt Advice contracts, this increased to 83% in February 2024 and will increase again to 85% in February 2025. The Key Performance Indicators in the grants can be raised when they are renewed.
- 11.47. From February 2023 to September 2023, the average scores achieved were:

- (a) For the Debt Advice Function: the average score was around 82%;
- (b) For the Money Guidance Function: the average score was around 91%;
- (c) For the Pension Guidance Function (including Pension Wise) the average score was around 95%.

11.48. These Key Performance Indicators, when triggered above the scores set in the contracts and grants, provide MaPS with assurance as to whether expectations are being met, in line with the Standards, in the delivery of the Relevant Functions. Failure to meet that Key Performance Indicator may lead to intervention and/or enforcement action (as detailed in the next section).

## 12. Enforcement of the Standards

### Enforcement Powers

12.1. Although the Act references MaPS' enforcement of the Standards in its Delivery Partners, the Act does not provide MaPS with any specific statutory investigation or statutory enforcement powers or tools in a traditional regulatory or law enforcement sense. For the purposes of its **Review, the FCA adopts a broader definition of 'investigation,' 'interventions' and 'enforcement'** as follows:

- (a) Investigation: MaPS can conduct investigations using tools such as its Quality Assurance Framework, which incorporates its Monitoring Framework to assess compliance with the Standards. As above, MaPS achieves this through its customer facing assessments and monitoring against key performance indicators.
- (b) Interventions: MaPS can intervene where it identifies failures by Delivery Partners to meet the Standards through various mechanisms including:
  - (i) Challenge and Expectation setting: as described above, the outputs of the various elements of the Monitoring Framework are received by both the Delivery Partners and **by MaPS' Contract Managers and Quality Managers. This** enables Contract Managers and Quality Managers to both challenge Delivery Partners and, where appropriate, to set expectations for future improvements. This can be done at the regular meetings MaPS has with its Delivery Partners.

- (ii) Conducting a Root Cause Analysis: this would take place in circumstances **where a Delivery Partner's key** performance indicators indicate that it is failing to meet the Standards as expected. In one case during the Relevant Period, a Delivery Partner did not meet the 80% Quality Key Performance Indicator (in July 2023) because less than 80% of the assessed Standards were met. In this case the MaPS Quality Manager worked with the Delivery Partner to improve telephone scripts, case recording, and fact sheets. This led to an improvement in the KPI achieved in September and the subsequent months.
    - (iii) Implementing a Continuous Improvement plan: this is where MaPS request the submission of an action plan to ensure that a Delivery Partner takes corrective or preventative action to avoid failing to meet the Standards as expected.
  - (c) Enforcement: MaPS can take enforcement action under its commercial terms with Delivery Partners through the following mechanisms:
    - (i) **Leveraging 'service credits'**: this enforcement option is available to MaPS under its contracts with Delivery Partners (but not the grants, some of which are still in place nor in the Pension Guidance or Money Guidance Functions). This option entitles MaPS to claw back funding where Delivery Partners have failed to meet the Standards to the level expected. To date, MaPS has not leveraged any service credits.
    - (ii) Terminating contracts and grants with Delivery Partners: this is also available to MaPS under its commercial terms with Delivery Partners and can be initiated where there is continued failure to meet the Standards. To date, MaPS has not terminated any contracts.
- 12.2. Although these enforcement mechanisms do not appear to have been used by MaPS during the Relevant Period (save for challenge and expectation setting and an example of conducting a root cause analysis seen as part of the Review), that may be partly because Key Performance Indicators were not enforceable during the Development Phase period between March 2022 and February 2023 when the new contracts for the Debt Advice Function went live. In addition, although the Key Performance Indicators have been in place and monitored since February 2023, under the terms of the contracts, service credits could not be enforced in the first six months.

- 12.3. MaPS has written performance management processes into the contracts and commercial agreements with external Delivery Partners. Where services are provided internally, MaPS anticipates putting in place a period of intervention while remedial activity is undertaken. For the Money Guidance Function and the Pension Guidance Function, as MaPS has had limited oversight or monitoring of the Standards, MaPS has not identified any interactions to enforce against.
- 12.4. There are other enforcement mechanisms that MaPS has not adopted. These include:
- (a) Mandatory Training or Re-Training requirements;
  - (b) Enhanced Monitoring (either within the Delivery Partner or at IOAS);
  - (c) Warning Letters; and
  - (d) Mandatory reviews of past business

### 13. Appropriateness of the Standards

#### **Relationship between the Standards and MaPS' Role**

- 13.1. During the course of its Review the FCA has had regard to whether the Standards continue to be appropriate in the sense that they are relevant **to MaPS' overall** purpose, that they support the delivery of its Relevant Functions in an appropriate manner, and that they are expressed in a **way that is consistent with MaPS' Corporate Objectives**.
- 13.2. As set out in the above:
- (a) **MaPS' purpose is to provide advice, information, and guidance to improve the UK public's ability to manage their financial affairs.**
  - (b) It seeks to fulfil this purpose by providing certain functions which include (but are not limited to) debt advice, pension guidance and **money guidance ('the Relevant Functions') to the public.**
- 13.3. Also as set out above, MaPS Corporate Plan for 2023-24 identifies its objectives as including:
- (a) helping people in financial crisis;
  - (b) helping people in need to manage their money today;
  - (c) helping people with their pensions and financial future;

- (d) collaborating with partners to improve financial wellbeing; and
- (e) building on strong foundations.

13.4. Also, in its Corporate Plan MaPS sets out certain measures of success which include (non-exhaustively):

- (a) improved accessibility including prioritising customers facing vulnerable circumstances;
- (b) consumer protection against financial scams; and,
- (c) improving outcomes and experience for customers.

13.5. The Standards (Annex One) as originally designed by MaPS and approved by the FCA remain **relevant to MaPS'** purpose, its delivery of the Relevant Functions, its then Corporate Objectives and its measures of success.

#### Relationship between the Standards and the Monitoring Framework

13.6. During its Review, the FCA has also considered whether the Standards continue to be appropriate in the sense that they enable MaPS to make an assessment, through the Monitoring Framework, of how well it is fulfilling its role in delivering the Relevant Functions and meeting the Standards in doing so.

13.7. In this respect, a number of observations have been made above relating **to the challenges and tensions between the Standards and MaPS'** Monitoring Framework. These include that the Standards were prepared independently of and before the Monitoring Framework was developed. This means that MaPS has faced challenges and tensions in developing clear and clean links between the Standards and elements of the Monitoring Framework. Similarly, MaPS has faced challenges and tensions in developing clearly aligned elements between the Monitoring Framework and the Scorecard.

13.8. As a result, MaPS has used a degree of interpretation, adjustment, and pragmatism to ensure that the Monitoring Framework enables it to measure compliance with the Standards. For this reason, MaPS worked with third parties to test the Monitoring Framework before implementing it formally.

13.9. Additionally, the FCA has observed that, when the new Monitoring Framework was developed, MaPS found that certain Standards were difficult for Delivery Partners, the IQAS and MaPS to consistently interpret and assess compliance with due to the high-level, principle

focussed language used in drafting. This also creates difficulties in consistent reporting on the customer facing aspects of the Standards. Some of the challenges that MaPS has had to address include:

- (a) Interpretation challenges: For example, Standards 1a and 1e which respectively provide that:

“The information, guidance or advice provided must: Be impartial and accurate;”

and

“The information, guidance or advice provided must: Be timely and relevant to the consumer.”

  - (i) These are both customer facing Standards and by using words such as ‘**impartial,**’ ‘**accurate,**’ ‘**timely,**’ and ‘**relevant**’ they are open to different interpretations being applied, depending on the customer interaction. A lack of clarity around interpreting these Standards has meant that they perform amongst the worst during assessments and are frequently found to be ‘Not Met’ (albeit without impact or detriment).
  - (ii) Consequently, MaPS has made efforts to mitigate against this by publishing guidance documents and, in the case of the Debt Advice Function, an Advice Assessor Toolkit to remove ambiguity and address interpretation variances.
  - (iii) The latest version of the Toolkit was issued in November 2023 and is a product of the testing, learning, and two-way feedback that has taken place between MaPS and Delivery Partners since 2021. It aims to remove ambiguity around the customer facing Standards with clarification on how to interpret them.
- (b) Double-measure challenges: For example, Standards 1a and 1e contain two parts within each Standard. This leads to ambiguity around which part of the Standard is being ‘Not **Met.**’ In practice, if one part of the Standard is ‘Met’ and another **is** ‘Not **Met,**’ MaPS will score the Standard as ‘Not **Met.**’ This approach contributed to Standards 1a and 1e being among the worst performing Standards across all functions.
- (c) Multiple-occurrence challenges: For example, Standard 2a-iii which provides that:

“All practitioners must ensure they: request information about the consumer’s financial and personal circumstances as appropriate to the presenting issue.”

- (i) There are numerous pieces of information that need to be collected in most cases of advice. For example, the advisor will be expected to collect information relating to the customer’s: age, residential status, marital status, number of child dependants, number of adult dependants, partner’s income, disability income, value of car, value of other assets, regular expenditure, irregular expenditure, priority debts, non-priority debts, pending court action etc.
  - (ii) A single instance of not collecting information will result in this Standard being **‘Not Met.’** Consequently, in practice this Standard is not met in 64% of cases. This Standard performed worse in the face-to-face channel whereby it was **‘Not Met’ in 68% of cases**, compared to telephone (62%) and Digital (61%).
- (d) Clarity challenges: For example, Standard 2b-v which provides that:
- “Debt advice practitioners: may also deliver interventions that are outside of the session structure which may include self-help support.”
- (i) Through its permissive language, it is not clear that this is a requirement, yet it is assessed as part of the Monitoring Framework. This Standard had a high appeal uphold rate of 45% (for 20 Appeals made between February and September 2023).
  - (ii) A further example is Standard 3d which provides that:

“Services must: Be flexible in terms of service delivery approach, with consumers using the service able to change to a different delivery channel. Where consumers change delivery channels, duplication of the information or guidance delivered is minimal.”
  - (iii) MaPS received feedback through monitoring activities for the Money Guidance Function and the Pension Guidance Function that in some circumstances, depending on the interaction, it might be better to repeat the guidance to customers to ensure messaging is well received. It is not entirely clear from the language, but the desired outcome of

this Standard is that the customer should not have to repeat themselves or duplicate providing information as they move between delivery channels. Therefore, the wording does not clearly speak to the behaviour MaPS wants to change.

- (e) Duplication challenges: For example: Standard 1f, which provides that:

“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.”

And Standard 2a-vii which provides that:

“All practitioners must: identify and provide for the consumer relevant information, options, and next steps for them to take, and explain by whom.”

- (f) Both these Standards relate to action being taken following the advice or guidance process. This repetition leads to Delivery Partners and the IQAS assessing the same thing twice and has led to appeals for unduly duplicating ‘Not Met’ outcomes and bringing down overall scores in the Customer Facing Assessments. Standards 1f and 2a-vii were the two most appealed against Standards of the 474 appeals between February and September 2023. Standard 1f was appealed 93 times and Standard 2a-vii was appealed 74 times.
- (g) These challenges raise a question, **addressed in the FCA’s** findings and recommendations, as to whether the Standards remain appropriate in terms of them working and being clearly aligned with the Monitoring Framework and the Scorecard and whether MaPS is able to produce reliable and informative Key Performance Indicators so that it either has assurance or the opportunity to Intervene in relation to the operational activities of Delivery Partners.

## 14. Findings

- 14.1. The **FCA’s Findings (numbered F#) for the Secretary of State for Work and Pensions and the Money and Pensions Service, along with FCA’s Recommendations (numbered R#) for the Money and Pensions Service** are provided in the table below.

F#	Finding	R#	Recommendation	MaPS' Response
Appropriateness of the Standards - <b>Relationship with MaPS' Purpose, Functions and Objectives</b>				
F1	Based on the facts set out in section 5 (The Standards) and paragraphs 13.1 to 13.5 (Appropriateness of the Standards – Relationship between the <b>Standards and MaPS' Role</b> ); the <b>FCA's</b> finding is that the Standards remain appropriate in that they do set out a reasonable range of expectations for the delivery of the Relevant Functions. The Standards are expressed in a way that relates to MaPS' purpose, and are in line with its corporate objectives and its measures of success.			
Appropriateness of the Standards - Relationship with the Monitoring Framework and Scorecard				
F2	Based on the facts set out in section 5 (The Standards), paragraphs 11.16 to 11.21 (Development of the Scorecard) and paragraphs 13.6 to 13.9 (Appropriateness of the Standards – Relationship between the Standards and the Monitoring Framework); <b>the FCA's</b> finding is that	R1	Relationship: The FCA recommends that MaPS review the Standards and consider amendments to make a clearer and more aligned link between a Standard, the element of the Monitoring Framework that monitors that Standard, and the score in the Scorecard that assesses	

<p>the Standards present challenges in practice that impacts the effectiveness of MaPS' ability to monitor them. MaPS has had to engage in making a number of workarounds, compromises, and pragmatic decisions in order to ensure that the Standards can be monitored through the Monitoring Framework and scored through the Scorecard using the Advice Assessment Toolkit. While these workarounds mitigate the risks arising from the challenges, they also create or do not fully resolve the unclear relationship between the Standards, the Monitoring Framework, and the Scorecard. This raises the risk that the outcomes of the monitoring process might not adequately provide the intended assurance.</p>		whether that Standard has been met.	
	R2	Clarity: The FCA recommends that MaPS should consider proposing amendments to the Standards to address the lack of clarity and scope for misinterpretation that the monitoring work has identified in some of the Standards.	
	R3	Rationalisation: The FCA recommends that MaPS undertake a rationalisation process to remove duplication in the Standards and to address other similar issues identified in the Report at paragraph 13.9, including the double-measure and multiple-occurrence challenges.	
	R4	The Advice Assessor Toolkit (review): FCA recommends that MaPS continues to review the Toolkit to ensure it is effective in creating greater consistency in the application of the Scorecards to monitor the Standards.	

		R5	The Advice Assessor Toolkit (application across the Relevant Functions): The FCA recommends that MaPS develop an Assessor Toolkit for the Money Guidance Function and the Pension Guidance Function.	
Monitoring Framework – Development Phase and Chronology				
F3	Based on the facts set out in section 6 (The Monitoring Framework); the <b>FCA's</b> finding is that MaPS adopted a suitable and appropriate approach to developing the Monitoring Framework. In particular:			
F3(a)	<b>MaPS' approach to the</b> iterative design, testing, development, and refinement <b>of the</b> Monitoring Framework likely contributed to the development of a more robust Monitoring Framework than would have been the case without such an iterative development process involving a degree of practical testing.			
F3(b)	By developing the Monitoring Framework in collaboration with Delivery Partners and the IQAS, MaPS ensured that the Monitoring Framework benefitted from input from all interested parties. This likely aided both the quality of the Monitoring			

	Framework and its acceptance and use <b>by Delivery Partners.</b>			
F3(c)	By maintaining pre-existing quality assurance processes, MaPS mitigated the risks of not having an operationally embedded Monitoring Framework during the <b>Development Phase.</b>			
F4	Based on the facts set out at section 6 (The Monitoring Framework; the <b>FCA's</b> finding is that the period of time spent in the Development Phase, and the decision to prioritise operationally embedding the Monitoring Framework for the Debt Advice Function (and therefore deprioritise embedding it for the Money Guidance Function and the Pension Guidance Function), has meant that <b>MaPS' ability to adequately</b> monitor the Standards was constrained during the Development Phase. It continues to be constrained for the Pension Guidance Function which remains in the <b>'test and learn' element</b> of the Development Phase. The risks associated with this constraint for the Relevant Functions and ongoing constraint for the Pension Guidance Function principally relate to the fact that limited assurance can be provided about compliance with the Standards while in the Development Phase.	R6	Dual Assessment Approach (Pensions Function): The FCA recommends that MaPS achieves implementation for the Pension Guidance function as soon as possible and, if MaPS is to continue to adopt the dual approach to monitor customer interactions, that MaPS takes steps to expedite the appointment of the IQAS or another appropriate third party to monitor compliance with the Standards in the Pension Guidance Function.	MaPS approach to developing the monitoring framework was also driven by the introduction of contracts for the provision of our National debt delivery. These contracts went live in February 2023 and a robust monitoring approach needed to be in place. As a result, it made sense to complete the development and testing with our debt partners during 2022 and into 2023. Money Guidance and Pensions Guidance were not de-prioritised, but were impacted by available resource however work did continue in these areas. Both were required to submit control self assessments, the same as our debt partners, and customer facing testing was taking place across Money during this time.

	However, those risks may be mitigated to some extent by the continuance of pre-existing quality assurance processes.			
<b>Monitoring Framework – Other Observations on the Evolution of MaPS’ Monitoring Framework</b>				
F5	Based on the facts set out at paragraphs 6.23 to 6.27 (The Monitoring Framework – Other Observations on the Development of the Monitoring Framework); the <b>FCA’s Finding is that MaPS’ risk-based decision to prioritise the monitoring of the Standards in relation to the Debt Advice Function is based on an informed decision-making criteria and appears appropriate in terms of identifying the Function that represents the likely biggest risks.</b>			
<b>Relationship between MaPS’ Quality Assurance Framework and the Monitoring Framework</b>				
F6	Based on the facts set out at section 7 ( <b>Relationship between MaPS’ Quality Assurance Framework and the Monitoring Framework</b> ); the <b>FCA’s Finding is that the customer outcomes and customer satisfaction elements of the Quality Assurance</b>	R7	Utilising the Quality Assurance Framework: The FCA recommends that MaPS enhances its customer outcomes and customer satisfaction measures to better support monitoring of compliance with the Standards for each of the Relevant	MaPS has linked a number of questions within the existing surveying process to the standards in order to utilise our customer voice monitoring as an additional source of data and insight to monitor compliance with

	<p>Framework could be developed further <b>to better support MaPS' ability to</b> monitor compliance with the Standards.</p>		<p>Functions. In particular, MaPS could develop the existing links in the customer survey to the Standards, and map the customer complaints process to the Standards, as part of its overall process to monitor the Standards. This could be achieved alongside any revision of the Standards to ensure that data obtained for the customer outcomes and customer satisfaction functions is aligned with, linked to, and provides insights into the revised Standards. In doing so, MaPS will be able to benefit from another source of assurance to monitor the Standards that directly relates to the customer experience across all parts of the customer journey.</p>	<p>the MaPS Standards. However, we do agree that further work and development could enhance this approach and complaints data would provide valuable insight to indicate standards compliance.</p>
<p>Control Self-Assessments</p>				
<p>F7</p>	<p>Based on the facts set out at section 9 (Monitoring Framework Activities – Control Self-Assessments); the <b>FCA's</b> finding is that the Controls Self-Assessment process represents an effective way to work with Delivery Partners and to assess the extent to <b>which Delivery Partners' controls are</b></p>			

	adequate to ensure compliance with the Standards.			
Controls Testing				
F8	Based on the facts set out in section 10 (Monitoring Framework Activities – Controls Testing); <b>FCA’s</b> finding is that MaPS has not yet introduced the Controls Testing part of the Monitoring Framework. This would have introduced (a) an opportunity for independent challenge and enabled MaPS to gain independent assurance <b>about a Delivery’s Partner’s self-</b> assessment and / or (b) an ability for MaPS to identify outlier Delivery Partners through thematic work. This would lead to negative outliers being challenged and positive outliers potentially providing an opportunity for collective improvement (if commercial sensitivities permit). By not introducing Controls Testing, MaPS has not deployed one of the key components for monitoring against the Standards in its Quality Assurance Framework. <b>MaPS’ reliance on Controls Self-</b> Assessment is unlikely to identify all shortcomings within a particular	R8	The FCA recommends that MaPS continues to refine, develop and operationally embed Controls Testing, either in the format originally designed or redesigned to ensure it is effective in both providing the dual advantages of (a) independent challenge and assurance and (b) using thematic testing to assess controls across a group of or across all Delivery Partners with a view to identifying and addressing outliers.	

	Delivery Partner and could be subject to misuse by Delivery Partners.			
Customer Facing Assessments – Approach				
F9	Based on the facts set out in paragraphs 11.5 to 11.9 (Customer Facing Assessments – Approach); <b>the FCA’s</b> finding is that the dual assessment process promotes objectivity and opportunities for collective learning for Delivery Partners, the IQAS and MaPS. However, being heavily reliant on the IQAS to perform the Customer Facing Assessments and to monitor the quality Key Performance Indicators constrains <b>MaPS’ ability to assure itself that the</b> customer facing aspects Standards are being met.	R9	The FCA recommends that MaPS consider using other sources of assurance to monitor the customer facing aspects of the Standards. MaPS could gain further assurance, for example, by more routinely and systematically reviewing customer files itself to ensure that Delivery Partners and the IQAS are taking a consistent approach. MaPS could also further develop and link the information available from other compliance processes already in place that do not monitor the Standards, such as the Customer Satisfaction surveys and complaints elements of the Quality Assurance Framework (per R7)	
Customer Facing Assessments – Sampling Methodology				
F10	Based on the facts set out in paragraphs 11.10 to 11.15 (Customer Facing Assessments – Sampling Methodology); <b>the FCA’s</b> finding is			

	that the Sampling Methodology is inadequate and it creates marked risks that may impact the quality and value of the assurance gained from Customer Facing Assessments. In particular:			
F10(a)	By permitting Delivery Partners to select their own files, MaPS creates a selection risk whereby Delivery Partners may submit files for moderation that they believe will meet the Standards. Delivery Partners may be able to mislead MaPS, and in doing so provide misleading assurance and / or prevent MaPS from imposing Improvement requirements (through <b>Standards enforcement</b> ).	R10	The FCA recommends that MaPS introduces random or MaPS-initiated targeted sampling and discontinues Delivery Partner led self-select <b>sampling</b> .	
F10(b)	<b>MaPS' sampling methodology for the Debt Advice Function</b> is designed to capture only debt advice interactions that reached a completed conclusion in the previous month. This means that <b>MaPS' monitoring will fail to capture</b> sessions that are partial, discontinued or where the consumer disengages. Such cases may end for various reasons, some of which could relate to instances of poor-quality advice or engagement.	R11	The FCA recommends that MaPS broadens the sampling parameters to include discontinued as well as completed debt advice.	MaPS agree and work was completed in 23/24 to review our "Incomplete Journeys" and to identify other journeys whereby end to end Advice or Guidance may have not been achieved. This work was not included in the review due to it still being in working draft but this will be included in the next phase of our sampling approach.
F10(c)	<b>Similarly, because MaPS' sampling methodology</b> examines customer interactions within a short period after	R12	The FCA recommends that MaPS broadens the sampling parameters beyond an assessment of the facts	In most cases MaPS and its delivery partners are delivering a service that may not result in a

	<p>they reach a completed conclusion, it may also fail to capture cases where harm arises in the future, where that harm could not be anticipated at the time of review but arises from poor-quality advice or guidance.</p>		<p>at the time or very shortly after the advice or guidance was concluded, to also include cases of historic advice or guidance. This will enable MaPS identify whether harms arise after the customer interaction, for reasons that may not have been apparent at or around the time the advice concludes.</p>	<p>longer-term relationship with the customer and our funding arrangements are typically until the completion of the advice being delivered. This limits our ability to assess cases post advice delivery to determine if future harm has arisen. We do however conduct both customer satisfaction and customer outcome surveys post advice and guidance delivery that provides us with insight as to whether harm may have materialised.</p>
F11	<p>In monitoring compliance with the Standards for the Debt Advice Function, MaPS maintains a sample size of less than 1% of the completed advice sessions. Sample sizes are considerably smaller as a small fraction of 1% for the Money Guidance Function and the Pension Guidance Function. Such a low sample size (and particularly one based on self-selection) provides MaPS with assurance of very limited value. It also does not enable MaPS to conduct robust, reliable, and insightful trend analysis due to the lack of statistical significance in the number of customer interactions assessed.</p>	R13	<p>The FCA recommends that MaPS increase sample sizes to a level that would enable it to gain more reliable assurance and enable it to conduct robust, reliable, and insightful trend analysis based on statistically significant numbers of customer interactions.</p>	

Customer Facing Assessments – Development of the Scorecard				
<p>F12</p>	<p>Based on the facts set out in paragraphs 11.16 to 11.21 (Customer Facing Assessments – Development of the Scorecard); the <b>FCA’s</b> finding is that the categorisation of each sub-Standard as being ‘Met’, ‘Not Met – Without Impact’, ‘Not Met – With Impact’, ‘Not Met – With Detriment’ and ‘N/A’ does not include cases where there is an insufficient record on the customer file to reach a view. MaPS currently records such <b>cases as “Not Met”</b>. This means that MaPS is not fully sighted on poor record keeping and is therefore unable to identify trends related to poor record keeping or take corrective action (including to identify whether poor records mask the existence of consumer harm).</p>	<p>R14</p>	<p>The FCA recommends that MaPS amend the Scorecards to make assessments of cases where the records on the customer files are inadequate to reach a conclusion. This will enable it to identify and address trends and cases of poor record keeping which might otherwise hide consumer harms.</p>	
<p>F13</p>	<p>Based on the facts set out in paragraphs 11.19 to 11.21, and paragraphs 11.22 to 11.27; <b>the FCA’s</b> finding is that MaPS requires Delivery Partners and the IQAS to score all the Standards with parity. By not weighting the scoring of some of Standards that, if not met, might result in</p>	<p>R15</p>	<p>The FCA recommends that MaPS attribute weightings to the scoring of the Standards to identify relative degrees of importance for Standards that relate to matters that might result in a greater likelihood of consumer harm arising (financial or non-financial) or which relate to</p>	<p>MaPS has developed the monitoring framework on the basis that all standards are equal when assessing compliance. However, we do agree that some standards have a higher propensity than others to cause customer harm if they are not</p>

	comparatively more significant customer detriment or harm, MaPS may not be identifying practices or trends in Delivery <b>Partner's'</b> application of the Standards that drive more acute customer harm.		elevated risk issues such as consumer vulnerability.	met. MaPS proposes to review the approach to weighting and degree of importance when reviewing the standards as a whole to ensure they are worded with clarity and the important of the standards is included.
Customer Facing Assessments: Identification of Detriment				
F14	Based on the facts set out at paragraphs 11.28 to 11.35 (Identification of Detriment); the <b>FCA's finding is that MaPS' definition of detriment is so narrow that there is a risk of a significant under-assessment of consumer harm. In particular:</b>			
F14(a)	The narrow definition of detriment, limited to financial loss or harm, fails to capture other types of consumer harm that can arise as more fully described at paragraph 11.34. The definition of impact also does not have sufficient clarity to capture those harms.	R16	The FCA recommends that MaPS revise its approach to defining and scoring detriment by adopting a more appropriate definition of detriment that takes into account financial and non-financial harm, the potential for future crystallisation of financial or non-financial harm and the types of harm that can arise for consumers in vulnerable circumstances (who commonly present for debt advice support). The FCA also recommends	MaPS does agree that our definition of detriment could be broadened to encompass a wider view of customer harm. However, the adoption of additional categories in our scoring methodology such as "Not met - with Impact," have been capturing some of these instances to date and subsequently mitigating the risk of these issues being missed.

			that MaPS clarifies the distinction between detriment and impact.	
F14(b)	When a Delivery Partner or the IQAS assesses a customer interaction and identifies that a Standard is not met, there is no differentiation between 'Not Met - with <b>Detriment,</b> ' 'Not Met - with Impact' or 'Not Met - No Impact' for the purpose of the Performance Indicators. This means that cases where there is detriment and cases where this is no material impact are considered with parity.	R17	The FCA recommends that MaPS modify the Scorecard to attribute appropriate weighting to instances of detriment or impact.	
F14(c)	The assessment of detriment takes place shortly after the completion of the advice process and therefore potentially before financial harm or loss may crystallise because of any poor advice or guidance. This increases the risk that instances of detriment may not be identified.	R18	The FCA repeats recommendations R12 and R13 above recommending that MaPS increase sample sizes and consider broadening the sampling parameters to include cases of historic advice or guidance to determine whether harms may arise sometime after the customer interaction for reasons that may not have been apparent at or around the time the advice concludes.	In most cases MaPS and its delivery partners are delivering a service that may not result in a longer-term relationship with the customer and our funding arrangements are typically until the completion of the advice being delivered. This limits our ability to assess cases post advice delivery to determine if future harm has arisen. We do however conduct both customer satisfaction and customer outcome surveys post advice and guidance delivery that provides us with insight as to whether harm may have materialised.

<p>F14(d)</p>	<p>In conducting the Review and based on the facts set out in paragraph 11.27, FCA identified that the Customer Facing Assessment scorecard has limited assessment of the quality of customer communications as outlined in Standard 6. Poor consumer communications can lead to a variety of harms including disengagement, poorly understood or mis-understood advice or inappropriate decision-making.</p>	<p>R19</p>	<p>The FCA recommends that consumer communications are incorporated into the Customer Facing Assessments to monitor Delivery <b>Partner’s compliance with Standard 6.</b></p>	
<p>Customer Facing Assessment Scorecards: the IQAS</p>				
<p>F15</p>	<p>Based on the facts set out in paragraphs 11.36 to 11.38 (Production of Scorecards – the Role of IQAS); <b>the FCA’s</b> finding is that MaPS has limited oversight over how the IQAS performs its monitoring role because it cannot access the customer files and advice sessions that Delivery Partners submit to the IQAS for assessment. MaPS is unable to access customer files submitted to IQAS that are older than two months due to constraints relating to access to personal data in the contracts with <b>Delivery Partners, thus limiting MaPS’</b> ability to oversee the decisions made</p>	<p>R20</p>	<p>The FCA recommends that MaPS should ensure that its contracts with Delivery Partners enable customer file reviews to take place so that MaPS can oversee the decisions made by the IQAS and so that FCA can conduct its statutory review function.</p>	

	<p>by the IQAS. This has a corresponding <b>impact on FCA’s ability to</b> conduct its Review.</p>			
<p>Customer Facing Assessments – Assurance and Key Performance Indicators</p>				
<p>F16</p>	<p>Based on the facts set out in paragraphs 11.42 to 11.48 (Assurance and Key Performance Indicators); <b>the FCA’s Finding is that</b> (setting aside the sampling, detriment definition and the IQAS findings identified above) the outputs from the scoring process are capable (once those findings and recommendations have been resolved) of providing MaPS with an assessment of compliance with the Standards across all Relevant Functions upon which it can either take assurance or make interventions. This means that with a more appropriate approach to sampling, a clearer and more appropriate approach to defining detriment and the incorporation of a weighting system in the scoring process, the outputs should provide MaPS with the assurance it needs or the ability to make intervention decisions.</p>			

Enforcement of the Standards				
F17	Based on the facts set out in section 12 (Enforcement of the Standards); <b>the FCA’s</b> finding is that MaPS has the ability to take a range of actions to enforce its expectations under the Standards. That is notwithstanding the fact that it does not have formal (statutory) enforcement powers. Notably, through its contracts with Delivery Partners, MaPS has the ability to effect a variety of enforcement actions of progressive levels of seriousness (ultimately leveraging service credits and terminating contracts).			
F18	Beyond an example identified during the course of the Review where a Root Cause Analysis was carried out, MaPS has not used the enforcement tools available to it (although this may also be an indicator of the short period of time that the contracts and KPIs have been in place and the KPIs have been met).			
F19	Based on the facts set out in paragraphs 11.42 to 11.48, the contracts and grants in the Relevant Functions have a universal trigger set	R21	The FCA recommends that MaPS revisit and baseline the Key Performance Indicators trigger to assure itself that the 80% has been	

	at 80% of the quality Key Performance Indicator (albeit increasing annually in the Debt Advice contracts). This trigger has not been recalibrated and is the same across all the Relevant Functions. It does not differentiate between advice and guidance despite the risk of harm being more acute in the Debt Advice Function.		set correctly, leads to good consumer outcomes, and is adequate to hold delivery partners to account. MaPS should consider adjusting the trigger to take into account the greater risks that exist in the Debt Advice Function.	
F20	MaPS does not have a policy for intervening where instances of non-compliance with the Quality Standards are identified.	R22	The FCA recommends that MaPS develops a formal written policy to give clarity to Delivery Partners, by setting out its contractual ability to investigate and enforce compliance with the Standards and setting out the circumstances in which it would take increasing degrees of intervention and enforcement action where the Standards are either not met or are at risk of not being met.	MaPS does have clear written processes for Delivery Partners included in contractual documentation that set out our contractual ability to enforce compliance with the MaPS Standards including processes for appeals and service credit implementation. We do however acknowledge that our Quality Assurance Framework could include information at an organisational level as to what action we can and will take in the event of non-compliance with the standards and this will be reviewed.

## ANNEX ONE – The Standards

### Introduction

The Money and Pensions Service (MaPS) is an arms-length body of the Department for Work and Pensions (DWP) with a responsibility to provide advice, information, and guidance to enhance **people’s understanding and knowledge** of financial matters and their ability to manage their own financial affairs. This is done directly through free and impartial services designed to help people make the most of their money and pensions.

The Financial Guidance and Claims Act 2018 (The Act) sets out a requirement for the Single Financial Guidance Body (renamed as MaPS) to set standards in relation to persons providing information, advice, or guidance in pursuance of the bodies:

- Pension guidance function

- Debt advice function

- Money guidance function

The Act also sets out the MaPS objectives, which these standards contribute to by ensuring quality service delivery and compliance, underpinned by good systems and procedures.

The standards set out, at a high-level, the quality and performance requirement for services MaPS delivers directly or commissions through partners. The aim of the standards is to deliver services **that improve consumers’ financial** knowledge and in so doing to enable them to make informed decisions.

**MaPS is required to publish standards which apply to its own and partners’ delivery of services.** The FCA is responsible for reviewing how MaPS is monitoring and enforcing the Standards.

These standards are intended to set out clearly, and in one place, the principles for delivering the MaPS advice and guidance functions. They do not replace or supersede any existing grant agreements or contracts held with MaPS.

The standards will provide a framework for developing best practices and continually improving services that can be used as a reference point for collaboration with partner organisations, stakeholders and the devolved governments of Wales, Northern Ireland, and Scotland.

These standards will apply to MaPS work in relation to education for children and young people (except the provisions relating to individual guidance and advice sessions, which are not applicable).

MaPS does not have any statutory powers of enforcement. The requirement to adhere to all current or future UK legislation, regulatory requirements or taxation rules are not set out in these standards, as it is expected that these are applicable to organisations as intended by the specific measures.

Furthermore, in case of conflict, those will take precedence over the provisions set out in these standards.

Our [MaPS'] service standards will be designed to ensure that we [MaPS] comply with our obligations under the Public Sector Equality Duty (Section 75 Northern Ireland) in relation to all our activities, and with the requirement in the Act target our information and guidance to consumers who are most in need, especially those consumers in vulnerable circumstances.

Exceptional events may lead to circumstances where a service is temporarily unable to meet an element of the **standards. MaPS, subject to its Board's approval, can allow the service to continue** where this would be in the interests of consumers. A remediation programme approved by MaPS will be put in place and the FCA will be notified.

These standards will be reviewed annually by MaPS and updated from time to time, to reflect any substantive changes to MaPS service delivery. In such circumstances, approval will be sought from the FCA as required.

## Standard 1 - Service delivery

1. The information, guidance and advice offered by MaPS or a delivery partner must ensure it helps and enables a consumer to make informed decisions. The services provided must be independent and free at the point of delivery and reach those consumers who are most in need of them. The information, guidance or advice provided must:
  - a. Be impartial and accurate.
  - b. Be available to all consumers utilising services delivered in a range of channels and formats, allowing meaningful access dependent upon their personal circumstances.
  - c. Take account of the needs of consumers in vulnerable circumstances and tailor our approach as required in relation to service design, commissioning, delivery, staff training, quality assurance and evaluation.
  - d. Understand the difference between advice and guidance and comply with the boundary between regulated and non-regulated activities.
  - e. Be timely and relevant to the consumer.
  - f. 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.
  - g. Make the consumer aware of digital tools on the MaPS website and that of delivery partners.
  - h. Support consumers to complete the digital tools, as required.
  - i. Ensure, for services provided in Wales, the provider is also able to deliver the service equally in Welsh and in accordance with the MaPS Welsh Language Scheme.

MaPS or its delivery partners must not:

- j. 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.
- k. Sell, arrange, or facilitate the sale of a financial service or product.
- l. Receive any inappropriate or improper payment or incentive as a result of the guidance or advice provided to a consumer.

## Standard 2 - Practitioner-led advice and guidance

2. An important element of MaPS service to consumers is individual guidance or advice sessions, and set out below are standards that apply to all practitioners delivering a service for or on behalf of MaPS:

- a. All practitioners must ensure they:
  - i. Inform consumers of the scope, purpose, and limitations of the session.
  - ii. Inform consumers about the personal and financial information that the practitioner may request from them during the session.
  - iii. Request information about the consumers financial and personal circumstances as appropriate to the presenting issue.
  - iv. Take a pre-emptive approach to identify consumers in vulnerable circumstances and tailor sessions to meet their needs as far as possible.

- 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.
- vi. Alert the consumer to other sources of information, guidance, or advice, as appropriate and at relevant points during the session.
- vii. Identify and provide for the consumer relevant information, options, and next steps for them to take, and explain by whom.
- viii. Inform the consumer about managing their personal data.
- ix. Provide consumers with information about particular types of financial products or services that may be relevant and the potential advantages and disadvantages of these, as required.
- x. Refer consumers to a directory or other list of financial advisers or providers of financial services or products, as required and
- xi. Refer consumers 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.

Any practitioner providing non-regulated guidance should deliver the service to the relevant level of competence set out in MaPS Money Guidance Foundation Competency Framework for practitioners.

b. Debt advice practitioners must ensure they:

**i. Identify any emergency or urgent issues related to the consumer's debts.**

ii. Alert consumers to other sources of information, guidance, and advice as appropriate and at relevant points during or following the intervention.

- iii. Create and maintain a detailed consumer record.
  - iv. Provide consumers with a record of their advice intervention and agreed actions.
  - v. Practitioners may also deliver interventions that are outside of the session structure which may include self-help support.
- c. Money guidance practitioners must ensure they:
- i. Make the consumer aware of financial scams and how to deal with them, when appropriate.
  - ii. Adapt their guidance sessions to meet consumers' specific circumstances, and where necessary, refer to organisations that can offer specialist guidance or advice.**
- d. All pensions guidance practitioners must ensure they:
- i. Make sufficient enquiries to establish the type of pension the consumer is enquiring about.
  - ii. Make consumers aware of the benefits of shopping around, highlighting and explaining costs and charging, where appropriate.
  - iii. Ensure, where appropriate, the consumer is made aware of pension scams and how to deal with them.
- e. In addition to the requirements of 2d, Pension Freedoms practitioners must additionally ensure they:
- i. Draw the consumer's attention to the potential tax implications and/or debt obligations and refer them to support services, as appropriate.**

## Standard 3 - Delivery channels

3. Consumers engage with MaPS and its delivery partners in a number of ways, and this is continuing to expand with technological advances. The MaPS aim is to ensure that available delivery channels are not a barrier to consumers engaging with services. Therefore, services must:

- a. Deliver guidance and advice through suitable and appropriate delivery channels (for example, face-to-face, telephone, webchat, written, and online).
- b. Demonstrate that appropriate delivery channels have been identified by drawing on the best available evidence about needs, consumer behaviours and preferences, to ensure advice and guidance is delivered in accessible and convenient ways.
- c. Ensure delivery of the information is consistent across the different delivery channels unless there is a good reason for it not to be.**
- d. Be flexible in terms of service delivery approach, with consumers using the service able to change to a different delivery channel. Where consumers change delivery channels, duplication of the information or guidance delivered is minimal.

In addition, MaPS must:

- e. Ensure that the service is accessible to consumers in line with the requirements of the Public Sector Equality Duty (Section 75 Northern Ireland). To meet this requirement, MaPS must undertake an Equality and Vulnerability Impact Assessment (EVIA), with support from service delivery partners to complete the assessment. The EVIA needs to be undertaken for any new or substantively changed service or proposition being developed, and for commissioned services at the point of renewal.

f. Ensure that the outcome of the EVIA determines what is required for vulnerable groups, the need for any extra support, or a **hand-off process for those whose needs can't be simply addressed.**

#### Standard 4 - Professional standards

4. MaPS or its delivery partners must ensure services are provided to the highest professional standards, and must have or adhere to:

- a. Membership of the **appropriate regulatory or professional bodies and associations, where applicable.**
- b. A programme for initial training and then continued professional development for its practitioners.
- c. A process to manage, review and maintain the professional standards for practitioners working on their behalf.
- d. A performance management and reporting system for services provided and its practitioner.
- e. A high-level organisational governance structure setting out key areas of responsibility.
- f. The Money Guidance Competency Framework for practitioners providing non-regulated guidance.

#### Standard 5 - Specialist delivery

5. A specialist delivering services must ensure they have or adhere to:

- a. Relevant training or qualifications to carry out the specific guidance or advice work being provided to consumers.
- b. Membership of appropriate professional bodies and associations, where applicable.

- c. A programme of continued professional development, to keep up to date and enhance their knowledge base.

## Standard 6 - Communication

6. Good communication is imperative in ensuring that information, guidance, or advice provided, is well received and understood by consumers. Therefore, services must:
  - a. Consider the information needs of consumers using the service, and communicate information to them in an appropriate, clear, impartial manner, suitable for the target audience.
  - b. Ensure that all written or telephone communication is dealt with within agreed service levels and for those with protected characteristics or in vulnerable circumstances.
  - c. Raise consumer awareness of the information and guidance in ways that are focused, timely and relevant. This includes, but is not limited to, targeting specific audiences of consumers most in need.
  - d. Ensure that all information, guidance, advice, and tools that are provided or made available to consumers are periodically assessed to ensure they are up to date and of a good quality.

## Standard 7 - Complaints management

7. Occasionally issues may arise with service delivery, or a consumer may feel that the service they have received could have been delivered better. Having a good complaints management process aids the improvement in service delivery and provides confidence to service users. Therefore, services must:

- a. Have in place a complaints policy and documented processes to ensure consumer complaints in connection with service delivery are investigated fairly, consistently, and promptly. In addition, the process and outcome must be clearly communicated to consumers.
- b. Prepare reports on the number of complaints and their resolution, annually or as required by specific contracts or agreements.

### Standard 8 - Assurance and monitoring

8. Assurance and monitoring are key parts of ensuring that the standards are being delivered and any issues or problems are being identified and addressed. Therefore, MaPS and its delivery partners must:
  - a. Monitor the application of the standards, and where required, cooperate with and support MaPS Quality Assurance, Internal Audit, and Compliance functions.
  - b. Be able to provide information about value for money, efficiency and effectiveness of its policies, operations, and the status of its compliance with statutory obligations.
  - c. Ensure a risk management policy, controls, and reporting are in place and operated as part of its regular service management activities.

### Standard 9 - Managing records / data

9. Requirements for managing records and personal data are set out in the relevant legislation and MaPS or delivery partners must:

- a. Have a system and process in place for individuals to access their records and for individuals to exercise their data rights.
- b. Arrange for orderly records to be kept for specific guidance or advice given. This must be sufficient to enable monitoring or review of compliance with these standards. Records must be kept for a period as documented in the data retention policies.
- c. Report all data or system breaches through the appropriate channels.

## Standard 10 - Performance management

10. Performance management is another key part of ensuring that the standards are being delivered and any issues or problems are being identified and addressed. Therefore, MaPS must:

- a. Ensure regular reporting processes are in place. These may be in the form of internal organisational management information reporting or external reporting to funding or supervising bodies.

MaPS will monitor the performance of delivery partners in line with their commercial agreements.

Therefore, delivery partners must:

- b. Adhere to the reporting and monitoring conditions as stated in their agreement or contract.
- c. Engage with MaPS via regular monitoring meetings and proactively escalate instances of non-conformity or underperformance.

## Standard 11 - Lessons learned

11. Lessons learned from existing service delivery is key to improving the standards and the impact and outcomes **for consumers using MaPS services. Therefore, MaPS and its delivery partners must:**

- a. Ensure there is a shared process in place to annually review the impact of the standards and identify lessons learned informing future improvements.
- b. Work cooperatively to share intelligence, best practice, and insight in relation to the standards to identify service gaps.
- c. Collaborate through co-design and innovation initiatives to test new service models that could develop the standards to meet the changing needs of consumers.
- d. Ensure information gained from consumer complaints and their outcomes informs the lessons learned process to improve future services.
- e. Share information gained from wider consumer insight that may assist the improvement of the standards.



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