

MaPS Standards Update

Customer Experience & Quality

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MaPS Standards - Update

- We are pleased to confirm that the FCA Board reviewed and **formally approved** the updated MaPS Standards on the 2nd of October 2025.
- The updated MaPS Standards are now available on our website.
- We will be continuing to use the existing Standards between now and the 1st of April 2026, while we support internal delivery teams and external Delivery Partners to implement and embed the updated Standards.
- Supporting toolkits and documentation is now in development and will be developed in collaboration with Delivery Partners. Once finalised, they will be available at www.debtquality.org.uk in the latest updates section.



What did we change?

MaPS updated the standards to reflect how we operate, we separated them into three key sections:

- **Designing Services and Creating Capability**
- **Delivering Services to Consumers**
- **Managing the Service**

Within these sections are 11 core standards broken down into sub standards to reflect the expectations that we have of ourselves and our partners.

These standards were updated to reflect our new strategic direction and included standards that ensure we are helping those most in need, are delivering accessible services and are going where people are



How we consulted

- We **consulted** with our delivery partners and the wider sectors that we operate in
- We **consulted** directly with the FCA
- We completed an **internal consultation** with MaPS colleagues
- We held engagement sessions both internally and externally to gather verbal feedback and questions

Engagement



How did we engage?

- We promoted the consultation via MaPS' website, internal intranet and LinkedIn
- We **engaged** regularly with an FCA Working Group
- Individuals and organisations were invited to respond within 30 days

• Individuals responded by attending drop-in sessions, submitting emails and completing MS forms

• We held 2 external drop-in sessions – **69 people attended**

• **15 organisations** responded to the external consultation

• **6 individuals and 2 collective teams** submitted responses to the internal consultation

In addition to MaPS colleagues and the FCA, below is an example of the organisations that responded to the consultation.



Financial Conduct Authority (FCA)

FCA Review

The Financial Conduct Authority (FCA) considered the statutory obligations and a wide range of other elements in its evaluation of the 2025 MaPS Standards, focusing on whether they effectively support MaPS in helping the public make informed financial decisions. Their assessment was structured around eight key areas, to ensure the proposed Standards were:

- ↻ **Outcomes Focused**
- ↻ **Achievable and Measurable**
- ↻ **Ensuring Trust and Confidence**
- ↻ **Providing Clarity**
- ↻ **Avoiding Duplication**
- ↻ **Supporting Consumers in Vulnerable Circumstances**
- ↻ **Proportionate (for different sized organisations)**
- ↻ **Encouraging Collaboration**



In summary, the FCA feedback on the 2025 MaPS Standards was constructive and broadly supportive of the proposed Standards. It recognised that the Standards are largely **outcomes-focused**, aiming to improve financial decision-making for consumers, especially those most in need. It appreciated the emphasis on **flexibility and innovation** and acknowledged that the standards promote **collaboration** across delivery partners and stakeholders. They identified areas where the Standards could be more **achievable and measurable**, particularly where language was overly prescriptive or lacking clarity. They encouraged refinement of qualifiers to ensure expectations are realistic and proportionate to the capabilities of delivery partners.

The FCA welcomed the Standards' commitment to impartiality and independence, as ways of **ensuring trust and confidence**. They suggested clearer communication of these principles to consumers. They also highlighted the importance of **providing clarity**, noting that some Standards contained ambiguous language or overlapping content, which could lead to inconsistencies. The FCA recommended reducing **duplication** and improving structural coherence to enhance comprehension. They were particularly attentive to how the Standards support **consumers in vulnerable circumstances**. The proposed Standards were regarded as well-intentioned and largely effective.

Consultation Responses

General feedback received

Key Themes from Feedback

- **Structural Changes:** Respondents generally support the structural changes, noting improved clarity, logical grouping, and reduced duplication. Some suggest further testing for intelligibility and clarity, especially for smaller or less experienced providers.
- **Definitions:** There were requests for specific definitions, for terms such as 'vulnerability,' 'detriment,' and 'outcomes.' Many recommend aligning with FCA definitions and providing practical examples.
- **Other Comments and Suggestions:** Include phased implementation of any changes, consideration of resource impact, and inclusion of timeliness and action-taking within the Standards. Concerns were raised about duplication with FCA regulation with encouragement given for a risk-based, outcome-focused approach.

“There appears to be an attempt to distinguish consumers in ‘vulnerable circumstances’ from those ‘most in need,’ but this distinction is unhelpful.”

“The changes specific to service design are clearer in setting out what is expected from MaPS funded services.”

“These are structurally more condensed and make a lot of sense in terms of areas and will encourage practitioners to understand with less areas open to interpretation.”

“The repositioning of the Standards presents Standards in a more logical manner. The structure loosely mirrors a process of ‘preventive’ ‘detective’ and ‘corrective’ viewpoint.”

Proposed Standard 1 – Designing and Developing Services

Key Themes from Feedback:

- **Accessibility and Inclusivity:** Strong support for the inclusive nature of this proposed standard. However, practitioners had questions about the term ‘fully accessible,’ and have asked for practical examples.
- **User Involvement:** Support for co-design with consumers, but requests made for clearer guidance on what constitutes ‘meaningful involvement.’
- **Service Availability:** Questions about what ‘readily available and timely’ means; clarification requested on expectations during and outside operating hours.
- **Evaluation and Testing:** Smaller organisations in particular have asked how they will demonstrate they have ‘sufficiently tested and evaluated’ aspects.

“The standard is clear in its direction and easy to understand. Access to service and developing those services is as important as the advice and consumer engagement.”

“While we fully support the ambition for services to be accessible to all, we would welcome further clarity from MaPS on what ‘fully accessible’ entails in practical terms.”

This proposed Standard received the most feedback.

“Availability of services: We would appreciate clarification on what ‘readily available and timely’ means in practice.”

Proposed Standard 2 – Engaging with Consumers

Key Themes from Feedback

- **Proactive Engagement:** Broad support for reaching under-served groups and using evidence-based delivery channels.
- **Terminology Clarity:** Terms like ‘appropriate consumer demographics’ and ‘most in need’ may need clearer definitions.
- **Delivery Channels:** Support for flexibility in engagement methods, including digital, but concerns about how ‘face-to-face’ is defined.
- **Consistency Across Channels:** Encouragement for consistent service quality across all delivery methods.

“The requirement for a strategy is not problematic. However, the wording ‘appropriate consumer demographics’ and ‘those most in need’ are open to interpretation.”

“Initial advice delivery may be through one channel (e.g. F2F), but subsequent support may be through a mixture of telephone and online. This needs to be absolutely transparent when the consumer first engages, so they are aware of any service delivery limitations, including capacity.”

“The additional focus on clear and documented engagement strategies is positive from both a customer perspective and for audit and governance purposes.”

Proposed Standard 3 – Training, Competency and Capability

Proposed Standards 3 and 9 received the most positive comments

Key Themes from Feedback

- **Clarity and Structure:** Generally seen as clear and well-structured. Inclusion of practitioner wellbeing is widely welcomed.
- **Qualifications:** Concerns about removal of references to qualifications. Strong support for mandatory debt advice qualifications and a national training framework.
- **Wellbeing Support:** Requests for more guidance on what constitutes an effective support model.
- **Training Consistency:** Calls for a centralised training academy and protected time for Continuing Professional Development (CPD).

“In relation to the newly added standard on practitioner wellbeing needs, will there be any further guidance on what MaPS would wish to see though this support model?”

“Inclusion of standard that acknowledges wellbeing and complexity of cases is welcome.”

“Standard is really clear on what is required for Training and competency and set out in a manner that limits misinterpretation.”

“We welcome the suggestion that organisations should ensure that their employees have appropriate professional memberships, but question how well this is currently monitored.”

Proposed Standard 4 – Providing Information, Advice and Guidance

Key Themes from Feedback

- **Impartiality and Accuracy:** Support for separating these concepts, but requests for clearer definitions and examples.
- **Suitability and Relevance:** Concerns about overlapping or ambiguous language. Suggestions to align with Consumer Duty by focusing on ‘positive outcomes.’
- **Digital Tools:** Support for promoting digital tools, but recognition that not all consumers or advisers are comfortable with them.
- **Complexity of Advice:** Acknowledgement that advice sessions can be complex and emotionally demanding; recommendations for better communication tools and summaries.

“In relation to 4a (Be impartial and not used to drive a poor consumer outcome) we would suggest that it may be beneficial to change language to driving good customer outcomes rather than avoiding poor outcomes, in line with the Consumer Duty.”

“Here the focus is on advice accuracy. This is such a small section of the MAPS standards which feels contradictory because there can be many areas that a debt advisor needs to give advice about.”

“Much clearer around impartial and accurate, great to see this has been split and is no longer the same standard as these are 2 very different things.”

Proposed Standard 5 – Delivering Services to Consumers

Key Themes from Feedback

- **Operational Clarity:** Support for detailed standards but concerns about over-prescription and ambiguity in terms like “sufficiently probed” and “urgent.”
- **Business Context:** Requests to include business-related financial circumstances in assessments, where relevant.
- **Terminology Consistency:** Inconsistencies in terms like “relevant options” vs. “available options” could be removed where possible.
- **Confirmation of Advice:** Strong feedback on the need for clearer, more concise advice summaries aligned with Consumer Duty.
- **Signposting:** Support for proactive signposting but calls for MaPS to engage with external providers to ensure continuity of support.

“5k and 5l are good additions.”

“Standard details are overall clear, concise.”

“While Standard 5 is operationally thorough and well-intentioned, its level of prescriptiveness may create difficulties in practice, especially where flexibility, proportionality, or sensitivity is required.”

“Standard 5f: Including the term ‘proactive signposting’ is subjective and leaves the provider and assessor to determine what will be considered compliant... It would be preferable for this specific expectation to be clarified and for the term ‘where appropriate’ to be included.”

Proposed Standard 6 – Communicating with Consumers

Key Themes from Feedback

- **Clarity:** Strong support for clearer communication. Suggestions to explicitly reference Consumer Duty.
- **Duplication of Information:** It was felt that some duplication may be beneficial—should not always be viewed negatively.
- **Consistency:** Support for consistency across channels, but flexibility is needed to accommodate consumer needs.
- **Scoring and Assessment:** Requests for ‘N/A’ scoring options and adjustments to KPI calculations when criteria are not applicable.

“We agree with this Standard.”

“Standard 6b and Standard 6c – will these be customer facing standards? Or are they more to do with Designing and Developing Services or Engaging with Consumers?”

“The Standard currently frames “duplication of information, guidance or advice delivered” as something to be avoided. However, this may not always be a negative outcome, some duplication across channels can benefit consumers, ...allowing consumers to access support in a different format or at a different time.”

Proposed Standard 7 – Supporting those most in need

At least 50% of respondents provided feedback on Proposed Standards 1 - 7

Key Themes from Feedback

- **Positive Reception:** Broad support for a standalone standard focused on vulnerability and accessibility.
- **Terminology Concerns:** The phrase “most in need” is seen as vague; suggestions to use clearer, more actionable language.
- **Consent & Data Protection:** Multiple concerns about the requirement for “explicit consent” to record accessibility or health needs—many suggest this may be unnecessary or legally problematic under GDPR.
- **Referral Clarity:** Requests for a centralised list or guidance on trusted specialist services for referrals.
- **Proactive Support:** Encouragement for inclusive design, data sharing, and use of tools like speech analytics and vulnerability databases.

“It is beneficial to have the focus on identifying vulnerability and additional accessibility needs within a single standard and we welcome the inclusion of the new requirements.”

“Standard 7c: we don’t understand why explicit consent is needed to record accessibility or health needs, this will most likely be covered by organisational privacy policies and be considered a legitimate interest in most circumstances.”

“We support the standard calling out the need to identify vulnerability, and where it is identified, to tailor sessions and the information provided to the individual. This should include supporting their understanding outcomes, in line with Consumer Duty.”

Proposed Standard 8 – Managing Service Performance

Key Themes from Feedback

- **Scope Clarity:** Concerns that the standard blurs the line between quality assurance and contract enforcement. Calls to keep it focused on service quality and improvement.
- **Terminology:** Terms like ‘non-conformity’ and ‘underperformance’ can be subjective; suggestions for clearer definitions and tiered severity levels.
- **Dispute Resolution:** Requests for clearer guidance on how disagreements between MaPS and providers will be handled, especially where FCA and MaPS standards may conflict.
- **Data Sharing:** Questions about expectations for sharing insights and with whom. Suggestions to encourage sector-wide transparency without overburdening providers.

“Standard 8b: Clarity is needed on what the expectation is from MaPS. In particular, who are providers expected to share intelligence with, and to what extent.”

“8a and 8b could be clearer in who is involved in and implementing the sharing and improvement process.”

“These points seem fair and adaptable across a range of services. However, to ensure consistency, there should be a clearly defined and uniform cadence for implementation, supported by up-to-date and accessible documentation where required.”

Proposed Standard 9 – Monitoring and Assuring the Service

Proposed Standards 3 and 9 received the most positive comments

Key Themes from Feedback

- **Positive Views:** This proposed Standard is received as clear, proactive, and aligned with good governance.
- **Risk Reporting:** Some concerns about the breadth of risk reporting expectations—suggestions to align with FCA’s ‘foreseeable harm’ threshold.
- **Record-Keeping:** Suggestions to ensure records support intelligibility reviews and iterative improvement.
- **Outcome Focus:** Encouragement to include more outcome-based metrics and risk-based case selection in quality assurance.

“We find Standard 9 to be clear in both intent and structure...The standard encourages proactive risk communication.”

“We support this and proportionate alignment with core obligations under the FCA rules.”

“We have processes in place to raise new or emerging risks with MaPS and to evidence our ongoing compliance with statutory and regulatory objectives, we welcome the opportunity to review processes against the amended standards.”

Proposed Standard 10 – Managing Complaints

Key Themes from Feedback

Supportive Tone: A well-received proposed Standard, identified as promoting a learning culture and systemic improvement.

Clarity Required: Ambiguity around what constitutes a ‘legitimate or qualifying complaint’ rather than general feedback; requests for clearer definitions.

Regulatory Alignment: Questions about potential overlap with FCA DISP rules; clarification needed on whether FCA compliance suffices for MaPS standards.

Adviser Role: Recognition that advisers may need to assist with complaints related to broader financial issues (e.g. motor finance commissions).

“Support the alignment with DISP requirements... Could include whether any redress would go to the consumer or set-off against a debt.”

“Standard 10 appears to replicate many of the rules in the FCA’s Handbook – Dispute Resolution: Complaints, for those providers regulated by the FCA.”

“We find Standard 10 to be clear in intent and supportive of a robust, accountable complaints process. It moves beyond simply resolving individual complaints... The emphasis on root cause analysis and systemic improvement is a significant step forward.”

Proposed Standard 11 – Handling Consumer Data

Key Themes from Feedback

- **Aligned with Best Practice:** Seen as comprehensive and in line with GDPR and other data protection legislation.
- **Terminology Improvements:** Suggestions to use standard data protection language and broaden breach definitions to include integrity and availability.
- **Operational Clarity:** Requests to clarify the relationship between this standard and internal policies/procedures (e.g. DPIAs, DSARs).
- **Cybersecurity and AI:** Calls to address cyber resilience, AI usage, and sub-processor risks; especially relevant for cloud-based services.
- **Oversight:** Concerns about enforceability in joint controller arrangements where local offices manage their own data practices.

“We support the clarity and comprehensiveness of Standard 11, which appropriately reinforces the importance of data governance, consumer rights, and breach management. The standard is well-aligned with existing data protection legislation.”

“Standard 11 provides a high-level summary of key data protection requirements i.e. alignment with legal requirement, data protection legislation, but it might work better if it uses the appropriate language like ‘Data Subjects Rights’ etc.”

“It probably needs to look at the impact of cyber-resilience and the relevance of Cyber Essentials and ISO 27001. Whether data is held on the premises or ‘in the cloud’ is becoming increasingly relevant.”

New MaPS Standards

Designing Services and Creating Capability

- **Standard 1 - Designing and developing services** – ensuring that the needs of consumers and the people delivering the service are established.
- **Standard 2 - Engaging with consumers** – ensuring that our services reach people where they are.
- **Standard 3 - Training and competency** – ensuring MaPS its delivery partners have adequate training, continued professional development and technical competency to deliver the service.

Delivering Services to Consumers

- **Standard 4 - Delivering information, advice or guidance to consumers** – ensuring our services help and enable consumers to make informed decisions.
- **Standard 5 - Communicating with consumers** – ensuring our information, advice and guidance is well received and understood by consumers.
- **Standard 6 - Supporting those most in need** – ensuring our services are available to those most in need of it, and keeping the needs of consumers in vulnerable circumstances in mind.

Managing the Service

- **Standard 7 - Managing service performance** – using performance management to ensure any issues or problems with meeting standards are being identified and addressed.
- **Standard 8 - Monitoring and assuring the service** – monitoring compliance with the standards and providing information about the status of our compliance.
- **Standard 9 - Managing complaints** – ensuring we have a good complaints management process to aid in improving service delivery and provide confidence to service users.
- **Standard 10 - Handling consumer data** – ensuring we meet relevant legislation around managing records and personal data.

Next Steps



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Change Activity

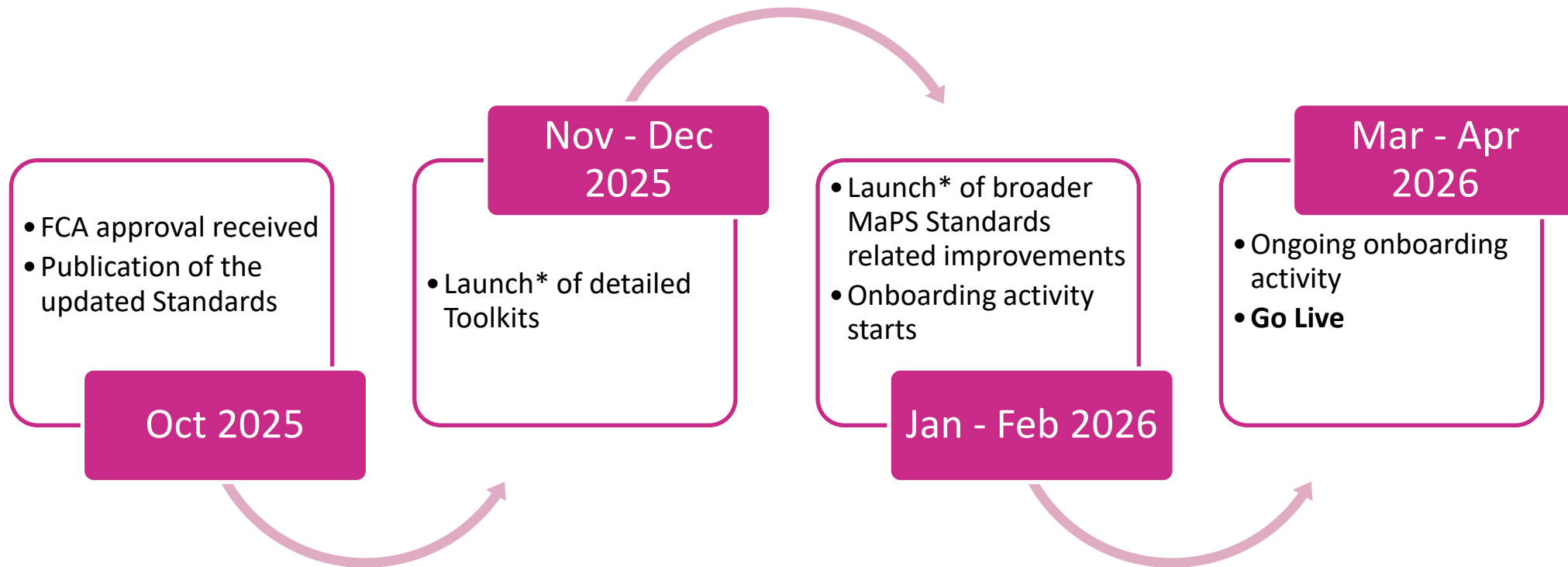
Broader MaPS Standards related improvement workstreams:

- Review of detriment definition
- Review of the Customer Facing Assessment (CFA) sampling approach
- Review of the compliance scoring approaches including CFA
- Inclusion of broader customer journeys in assurance methodologies
- Explore how can we better utilise insights from 1st line quality assurance activity

Continuous Improvement of existing assurance approaches such as:

- Evidence requirements to support assessment including 'pre-approval' where possible
- Calibration and appeals processes

Phased Approach to Implementation



*Launch activity will include socialisation, feedback and refinement activity. This may include minor iterative refinement post 'go live' to ensure MaPS, assessors and impacted delivery partners can influence how the updated standards are operationalised into BAU activity.

Appendix – Sentiment Analysis



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Sentiment Analysis for Feedback Against Each Proposed Standard

1 Standard 1 – Designing and Developing Services

The overall sentiment is strongly positive, with most respondents expressing support for the direction and intent of Standard 1. Many highlighted its emphasis on inclusivity, accessibility, and consumer engagement as key strengths. A few comments were constructive, often requesting clarification on terms like “fully accessible” or expectations for user involvement, but none expressed overtly negative sentiment.

2 Standard 2 – Engaging with Customers

The sentiment is largely positive, with respondents appreciating the focus on proactive engagement and accessibility. Several comments praised the emphasis on reaching underserved groups and using evidence-based delivery channels. Constructive comments typically sought clarity on terms like “appropriate consumer demographics” and “most in need.”

3 Standard 3 – Training and Capability

Feedback was generally positive, with strong support for the inclusion of staff wellbeing and clear training expectations. However, a notable number of constructive comments reflected requests for more guidance on what constitutes adequate training, CPD, and qualifications, especially in the absence of a centralised framework.

4 Standard 4 – Providing information, Advice or Guidance

The sentiment is strongly positive, with many respondents welcoming the alignment with Consumer Duty principles and the focus on impartiality and informed decision-making. Constructive comments often asked for clearer definitions of terms like “suitable,” “relevant,” and “poor consumer outcome.”

Sentiment Analysis for Feedback Against Each Proposed Standard

5 Standard 5 – Delivering Services to Customers

Sentiment was evenly split between positive and constructive. Respondents appreciated the clarity and operational detail, especially around case recording and advice delivery. Constructive feedback often raised concerns about terminology consistency (e.g., “relevant” vs. “available” options) and the need for clearer expectations on next steps and follow-through.

6 Standard 6 – Communicating with Customers

The sentiment was mostly positive, with strong support for the emphasis on clear, consistent, and accessible communication. Constructive comments focused on practical challenges, such as system limitations, duplication of information, and the need for flexibility across channels.

7 Standard 7 – Supporting those Most in Need

Feedback was largely positive, with respondents welcoming the creation of a dedicated standard for vulnerability. Constructive comments often questioned the use of terms like “explicit consent” and suggested merging overlapping criteria for clarity and ease of implementation.

8 Standard 8 – Managing Service Performance

Sentiment was more constructive, with some positive recognition of the importance of performance oversight. However, many comments sought clarity on the boundary between quality assurance and contract management, and how non-compliance and underperformance would be defined and addressed.

Sentiment Analysis for Feedback Against Each Proposed Standard

9 Standard 9 – Monitoring and Assuring the Service

The sentiment was positive overall, with respondents appreciating the focus on internal assurance and proactive risk identification. Constructive comments requested clearer definitions of risk thresholds and how compliance would be monitored without overburdening providers.

10 Standard 10 – Managing Complaints

Feedback was moderately positive, with support for the emphasis on learning from complaints and systemic improvement. Constructive comments highlighted the need for clearer definitions of what constitutes a “legitimate complaint” versus general feedback.

11 Standard 11 – Handling Consumer Data

The sentiment was positive, with respondents acknowledging the standard’s alignment with GDPR and data protection best practices. Constructive comments suggested refinements to terminology and clarification on breach definitions, especially in relation to cybersecurity and AI usage.