MaPS Standards Toolkit: debt advice services

Minimum threshold of compliance guidance
v1.2

Money & Pensions Service

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Detailed guidance

Additional detailed guidance has been reframed to ensure it can be used:

- at all stages of the service lifecycle (from service design to delivery)
- for all relevant assurance methodologies (from Control Self-Assessment to Consumer Facing Assessment)
- across service lines and delivery channels (with any nuances in minimum expectations clearly drawn out).

The focus of this guidance is to clearly articulate **what** it is we are looking for as a minimum, not where we might find evidence of it or how this might be assessed.

This document sets out the minimum threshold for compliance for each MaPS Standard. Where required, we have refocused content to make this clearer, with the aim of reducing the risks of varying interpretation.

This guidance within this toolkit should be read alongside:

1. **the MaPS Standards**
2. **the overlay key (Appendix 1)**
3. **the definitions table included with the MaPS Standards (copied in Appendix 2)**
4. **the supporting mapping clarifying how the MaPS Standards apply to relevant services (Appendix 3).**

Where certain standards might be impacted by compliance with other standards, this has been explicitly stated in this guidance. Additionally, it has been highlighted where certain standards are only mandatory based on individual consumer circumstances or presenting issues ('not applicable'). If these are not explicitly stated, consider the standard to apply in full in all circumstances.

This document highlights additional specific guidance ('overlays') for individual service lines or delivery channels. The 'overlay' key (Appendix 1) should be used to ensure you are considering the appropriate minimum threshold of compliance where this differs.

You may need to consider multiple overlays for certain services. For example a digital tool delivering full debt advice would need to consider the content in the following overlays: Debt Advice Services, Full Debt Advice, Full Debt Advice – Digital and Digital Services. These have been created to be read together.

This version of the toolkit is intended to be used from November 2026 and replaces v1. Future iterations will be developed if required, taking into account ongoing feedback from a range of sources including clarification hub questions, calibration and appeals. We will continue to review options to improve the way these toolkits are formatted, following your feedback.

MaPS Standard 1: Designing and developing services

1. When designing and subsequently delivering a service, it is crucial that the needs of the consumers and the people delivering the service are established.

As a result, when designing the services, MaPS and delivery partners must:

Standard wording	Minimum threshold for compliance – additional detail
1a. Ensure products and services are accessible and inclusive. Services should be designed in line with existing industry standards, guidelines and best practice in relation to the delivery of accessible services specific to the type of service being delivered.	Services must be designed and remain compliant with accessibility legislation (such as the Equality Act) and regulatory expectations. At the earliest stage of design and beyond, industry best practice (such as ISO 22458) that supports the design and delivery of accessible and inclusive services must also be considered where appropriate to the scope of the service. Services must evidence how the service has considered accessibility and inclusion during design. This includes: • service design processes clearly establishing how accessibility, inclusion and the Equality Act are considered and embedded • evidence of research and reference materials considered during design • clear accessibility statements/policies available to the public, outlining how services accommodate different needs • a defined schedule of regular reviews of accessibility and inclusion to ensure it adapts to evolving regulations, technological advancements and emerging best practices • documented evidence of updates in response to new regulations or best practice. **Debt advice services only** Consideration must also be given to FCA Consumer Duty. **Digital services only** It may also be appropriate to consider the Service Standards set by the Government Digital Service (GDS). Web content must comply with the latest version of the Web Content Accessibility Guidelines (WCAG).

1b. Have involved the intended consumers and those with a range of accessibility needs in the design and ongoing development and improvement of the service.	Service design and development must evidence the inclusion of those with accessibility needs to ensure that services are usable and accessible across a range of impairment types (for example visual or hearing impairments). This includes: • demonstrating an awareness and understanding of consumers with accessibility needs • targeted activity focused on the experiences and challenges of consumers with accessibility needs • ensuring feedback mechanisms and complaints processes allow consumers to report accessibility challenges for improvement • targeted user testing with individuals or focus groups who have diverse accessibility needs to evaluate the usability of services and identify potential barriers. Impacted Standard: 2c
1c. Take account of the needs of consumers in vulnerable circumstances and tailor the approach as required in relation to service design, commissioning, delivery, staff training, quality assurance and evaluation.	Services must demonstrate in a clear way that explicit consideration has been given to identify and appropriately tailor for consumers in vulnerable circumstances as is proportionate to the service scope. Policies and processes must enable adaptations when delivering information, advice and/or guidance to consumers in vulnerable circumstances (such as policies allowing extended session times for consumers with limited understanding or engagement difficulties) In addition to the requirements set out in Standard 3, specific training covering the below areas must be included: • recognising drivers of vulnerability and access needs • understanding legal duties under the Equality Act 2010, including making reasonable adjustments to provide equitable service for consumers with different needs • best practices to ensure they can provide inclusive services and tailor support for consumers with different needs. Systems must be in place that capture consumer accessibility needs and preferences, and tools available that help practitioners identify and respond to vulnerability during service delivery (for example, BRUCE or TEXAS). The service must evidence that QA processes include consideration of consumers in vulnerable circumstances (for example, a percentage of checks towards files where vulnerabilities have been identified). Consumer feedback and data must be used to assess whether services meet the needs of vulnerable consumers and drive improvements to address gaps or barriers.

	The policy must have an accompanying schedule for review which is adhered to and evidenced, including version control and governance. Impacted Standards: 3c
1d. Ensure the service is available to all consumers utilising services delivered in a range of channels and formats, to optimise understanding and allow meaningful access dependent upon their personal circumstances.	Services must demonstrate that explicit consideration has been given to the range of formats and channels that enable optimal utilisation of the service. This may include evidence of consideration given to how consumers' capability, access needs or personal circumstances affect their ability to engage with different channels or formats, and ensuring that alternative approaches are available where needed to support with meaningful access and understanding. This should be applied proportionately to the scope of the service.
1e. Ensure the service is timely, to allow consumers to access services when needed.	Services must demonstrate that the service enables optimal access and reduces any unnecessary barriers that would impact ability for consumers to receive timely information, advice and/or guidance.
1f. Ensure the service is designed with a mechanism to actively seek and documenting consumer feedback including consumer satisfaction and /or dissatisfaction.	A formal process exists for collecting consumer feedback covering satisfaction and dissatisfaction and is embedded in service design documentation. The approach, frequency and intensity of feedback collection prior to engagement must be proportionate to the service scope, and in any case provide a clear route for the consumer to engage in that process.
1g. Incorporate consumer feedback and insight into evidence-based decision making and use this to support ongoing service improvements, ensuring the service evolves with changing consumer needs.	An upfront, structured methodology for consumer feedback and insights that covers both development of the service and ongoing delivery should be clearly documented. This must include how direct and indirect consumer insights will be used to inform service design, and continuous improvement based on the needs of consumers.
1h. Conduct sufficient testing and evaluation prior to direct engagement with consumers including robust user acceptance testing.	An upfront strategy of structured testing and evaluation must be developed and documented early in service design. This must demonstrate how key design and development milestones, and risk, have been appropriately considered. The approach, frequency and intensity of testing and evaluation prior to engagement with live consumers must be proportionate to the service scope. It must also consider relevant variables such as format, channel and user groups. This must take place prior to the service, or any substantive change to the service that warrants further testing, goes live.
1i. Ensure, for services provided in Wales, that the service is provided equally in Welsh and in accordance with the MaPS Welsh Language Scheme.	*Refer to the latest version of the MaPS Welsh Language Scheme.*

MaPS Standard 2: Engaging with consumers

2. Consumers engage with MaPS and delivery partners in a number of ways, and this is continuing to expand with technological advances. MaPS aim is to ensure that available delivery channels are not a barrier to consumers engaging with services and that most importantly, our services go to where people are.

Therefore, MaPS and delivery partners must:

Standard wording	Minimum threshold for compliance – additional detail
2a. Ensure the service is designed to engage consumers and deliver information, advice or guidance through suitable and appropriate delivery channels (including but not limited to; community-based services, face-to-face or video, telephone, webchat, written, online including the use of digital tools).	Demonstrate that explicit consideration has been given to the range of formats and channels that enable optimal utilisation of the service which is proportionate to the service scope.
2b. Considers the needs of consumers 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.	The service must be designed with universal design principles applied and supported by varied insights (such as demographic data) to make evidence-based decisions on service design. This should be focused on ensuring it is accessible and convenient for the widest possible audience of its intended scope, while also providing tailored adaptations for consumers with specific accessibility or complex needs. Services must demonstrate how they have researched and sought out evidence of needs, consumer behaviours and preferences, and built this into the design for their different methods of communication. Services should use a range of insights to ensure a comprehensive understanding of their audience.
2c. Have a clear and documented consumer engagement plan and approach to ensure the services are designed to reach the intended consumer demographics and those most in need.	A strategy of structured and regular engagement of intended service users throughout the development cycle of a service should be clearly documented. This must include a wide range of consumers and how direct consumer insights will be used to inform service design - inclusive of guidance set out in 1b. The approach, frequency and intensity of engagement must be proportionate to the service scope. In addition, consider guidance set out in 1b.

2d. Have signposting pathways to other organisations whereby those other organisations may be better able to meet the consumer engagement need and preference.	Services must identify other organisations who may be better able to meet consumers' needs and preferences. They must develop and embed a signposting approach that supports consumer engagement with such organisations where appropriate. This must be structured, documented and regularly reviewed to ensure it remains fit for purpose.

MaPS Standard 3: Training and competency

3. MaPS and delivery partners must ensure the services provided are compliant, suitable and meet the needs of consumers. In order to do this, they must have adequate training, continued professional development and technical competency to deliver the service. It is therefore an expectation that organisations and practitioners delivering a service will have:

Standard wording	Minimum threshold for compliance – additional detail
3a. Membership of the appropriate regulatory or professional bodies and associations, where applicable.	**Debt advice services only** Delivery partners delivering regulated debt advice must hold the relevant FCA authorisations. As a minimum this must include authorisations for debt counselling (limited or full permissions).
3b. A high-level organisational structure setting out key areas of responsibility, competency and service ownership. Including ownership of key legislative or regulatory requirements.	Delivery partners must have a documented organisational structure and/or partnership structure in place. This can be a visual or written document. As a minimum this must include details of all key personnel and outline key areas of responsibility and service ownership (including compliance with all relevant legislative and regulatory requirements). It must demonstrate at a high level that key personnel have appropriate competency to deliver the required areas of responsibility.
3c. A programme of initial training aligned to the responsibility, competency and service ownership plan. Supported by a continued professional development plan for practitioners. This training should include all key areas relevant to delivering the service including supporting those most in need, relevant regulatory training and/or statutory training needs and effective communication skills.	Delivery partners must identify the training needs for all key personnel, including its practitioners, with this mapped to the areas of the service responsibility. This must form the basis of a programme of initial training, and then an ongoing continued professional development (CPD) plan (as defined by the Standards). As a minimum, initial and ongoing plans must: • include route to competency with reference to any relevant competency frameworks • highlight how practitioners are managed and supported from induction to sign-off • include training on effectively supporting consumers most in need (in relation to both vulnerability and accessibility – Standards 1 and 6) and complying with the boundary between regulated and non-regulated activities (Standard 4a-(i) as relevant to the service being delivered)

	• highlight CPD expectations, including what counts as structured/unstructured CPD, required hours, and how this will be managed and recorded • reflect how plans will be reviewed and updated regularly, including how relevant statutory, legislative, or regulatory changes will be identified and reflected in the plan or training where necessary. Where training delivery is outsourced/external, the delivery partner must review and regularly check the ongoing suitability of relevant training. **Debt advice services only** Practitioners delivering the service must have completed training accredited against the MaPS Debt Advice Quality Framework (Individual) to the activity set they will deliver before any delivery takes place.
3d. A process to manage, review and maintain the professional standards for practitioners working on their behalf.	As a minimum this must be a written document which includes: • how training and professional membership needs will be identified • how training will be recorded • how professional membership will be recorded • the approach/system to track training and professional membership records, and schedule for auditing of records • continued professional development (CPD) templates and how CPD plans will be evaluated • (where training delivery is outsourced/external) how third-party providers will be monitored/managed including quality assurance criteria that will be applied.
3e. A performance management and reporting system or the capability to document training and CPD delivered and to identify areas of improvement for practitioners.	The system (manual or digital) must be able to monitor initial training and continued professional development (CPD) plan progress and completion. It must have the capability to produce regular and ad hoc reports relating to participation (such as attendee lists) and experience (such as sentiment insights and feedback surveys). The system must include a process to support identification of gaps or areas for improvement to support staff development. If applicable, the system must be able to facilitate any further reporting requirements set out in the grant or contract you hold with MaPS, or its reporting templates.
3f. An approach to support the wellbeing needs of practitioners delivering front line services, recognising the complexity of the services being delivered and the impact this may have on their wellbeing.	As a minimum this must be a written document which includes: • access to and active promotion of wellbeing support, resources and tools • standard operating procedures (SOPs) that support practitioner wellbeing • how the complexity of service being delivered has been considered in this approach

	• what wellbeing insights and data will be collected (including practitioner feedback), and how this will be analysed and used to drive decision making and continuous improvements as required.
3g. The Money Guidance Competency Framework for practitioners providing non-regulated guidance.	**This standard does not apply to debt advice services.**

MaPS Standard 4: Delivering to consumers

4. The information, advice or guidance offered by MaPS and delivery partners 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. Delivering individually tailored advice or guidance to consumers is key to MaPS service delivery function. These sessions can be delivered via a range of channels, so it is important that the standards are applicable regardless of the method of delivery.

Standard wording	Minimum threshold for compliance – additional detail
4a. The information, advice or guidance provided must:	
4a-i. Comply with the boundary between regulated and non-regulated activities.	Delivery partners must ensure that the service is provided within the scope of which it is authorised and must observe any limitations stipulated within those authorisations. **Debt advice services only** For regulated services, this means they may only deliver advice for which they are authorised. Boundary breaches for a debt practitioner could include where they have provided: • financial advice • pensions advice • legal advice. This is not an exhaustive list. **Mental Health Crisis Breathing Space (MHCBS) only** Boundary breaches for a practitioner could include where they have provided legal advice (except if authorised by the service and in relation to MHCBS – the advice must have come from an appropriate legal practitioner). **MHCBS - Initial contact only** Practitioners who are not authorised to give regulated debt advice should not do so, and should recognise when their consumer needs to be referred to a regulated service.
4a-ii. Be impartial and in the best interest of the consumer.	Delivery partners must ensure service delivery, including the provision of information, advice and/or guidance, remains impartial (as per the MaPS Standards definition) at all times. They must ensure while providing information, advice and/or guidance, that views and opinions are not expressed that could steer the consumer towards a particular course of action, unless

	it's delivered within the context of regulated advice and is deemed suitable (as per the MaPS Standards definition).
	
	Examples of non-compliance with this standard include:
	
	• sharing a personal preference for a specific product or product provider, potentially influencing consumer choice
	• sharing an organisational preference for a specific product or product provider, either:
	  ○ when alternatives are available, but the consumer has not been made aware of these
	  ○ where that preference does not support the consumer's best interest
	• expressing a view or an opinion which could bring the reputation of a particular organisation/individual into disrepute - this could include commenting on the quality of service delivered by that organisation/individual or commentary on a political policy.
	
	Debt advice services only
	
	For regulated services, a professional recommendation as to the appropriate course of action is expected. This should be in line with the service's FCA authorisations (in particular PERG 17).
	
	Where the provider also provides debt solutions, they must ensure the consumer is made aware that other suppliers may also provide same/similar debt solutions. The practitioner must confirm with the consumer that they are happy to proceed with the delivery partner's own product as opposed to seeking alternatives. The practitioner can be clear to the consumer that they are not able to provide advice on the products of other product providers, but they can signpost if required.
	
	Signposting or referrals to select financial services/advice or banking should be assessed under 4a-(ii) if there is not a financial incentive for the practitioner, as it may not be considered to have been impartial advice.
	
	If the service has recommended a specific solution/product provider and there is a financial incentive to the service to do so, then this would be assessed under 4b-(ii) instead.

4b. MaPS and delivery partners must not:	
4b-i. Sell, arrange, introduce, explicitly recommend or facilitate the sale of a financial service or product, unless to facilitate debt adjustment.	This standard requires that delivery partners do not engage in selling, arranging or facilitating the sale of a financial service or product. **Debt advice services only** It may be suitable to introduce or recommend a service or product if the activity is to facilitate debt adjustment. The delivery partner must also have the correct FCA authorisations to do so.

	It is considered relevant to recommend a solution when presenting available options based on the facts of the individual case, even where there is a standardised application fee (such as a bankruptcy fee). This is not considered a sale. Delivery partners may also introduce consumers to other organisations for a specific solution if: • that organisation has the correct FCA authorisations to do so and • it is the most suitable option for the consumer. For example, introducing the consumer to another provider of a debt management plan (DMP) as they meet the secondary organisation's qualifying criteria.
4b-ii. Receive any inappropriate or improper payment or incentive as a result of the guidance or advice provided to a consumer.	Signposting/referring to select financial services, banking or financial advice should be assessed under this standard if there is a financial incentive for the service (or any individual within the service) to do so. Direct referrals will be considered under this standard where there is a financial incentive for the practitioner. Personal benefits to the practitioner are not acceptable, whether the practitioner is open about this or not. **Debt advice services only** If the delivery partner and/or practitioner has recommended a service/provider and there is no financial incentive, then this would be assessed under 4a-(ii) as it may not be considered to be impartial advice. Where relevant, for payments to facilitate debt adjustment (sometimes categorised as charitable donations) to be considered appropriate, the service must inform the consumer in line with the minimum expectations set out in CONC 8.7.4.
4c. Prior to the commencement of the interaction, inform the consumer about:	
4c-i. The scope, purpose and limitations of the session, including, where relevant, ensuring the consumer understands the boundary between advice and guidance.	As a minimum this must include what the advice/guidance boundary means for the service being provided, and any specific information regarding limitations of the service and delivery channel. This must be communicated prior to the start of the interaction or, if this is not possible, before the service requests details about the consumer's presenting issue. The service must consider the best format and sequencing for delivering this. Positive indication of understanding does not need to be sought directly from the consumer via confirmation questions, summary prompt or offering clarification. Where triage has been conducted by a referring organisation, colleague and/or team, this would comply with the timing element of this standard.

	Digital services only This must include any constraints on the accuracy, completeness or applicability of the information, advice and/or guidance, or outputs provided. Where this depends on the accuracy of the information the consumer provides, this must be made clear to them. **Mental Health Crisis Breathing Space (MHCBS) only** As a minimum this must include ensuring the MHCBS application form is on record as confirmation that the adult mental health practitioner (AMHP) has explained the scope, purpose and limitation of the service to the consumer, and the service has informed the consumer what they will do on their behalf (this could be by letter informing them of entry into the moratorium). **MHCBS – Initial contact only** Where a consumer is ineligible for MHCBS or it's deemed an inappropriate solution, the scope, purpose and limitations of the service have been explained within that context.
4c-ii. The personal and financial information that may be requested from them during the session.	The service must inform the consumer of the personal and financial information required to enable the consumer to get the most out of their interaction(s). As a minimum, this must include explaining that they will need to provide certain information such as personal details, personal circumstances and financial circumstances. The specific information needed may vary depending on the service and informing them of the types of questions they will be asked is the minimum expectation. This must be communicated prior to the start of the interaction or, if this is not possible, before the service requests personal or financial information. Where triage has been conducted by a referring organisation, colleague and/or team, this would comply with the timing element of this standard. It is not necessary to evidence that the specific information has been requested at this stage or has been provided, just that the consumer has been informed of what the delivery partner will need to request. **Digital services only** **Not applicable (N/A) - clarification** This is only inapplicable to services where the interaction with the consumer is one way (for example, MoneyHelper content, blogs, use of template letters and printed guides).

	Mental Health Crisis Breathing Space (MHCBS) only
	
	This standard focuses on informing the consumer and/or their AMHP/NPOC about the information needed in order to process their application.
	
	As a minimum this must include ensuring:
	
	• the MHCBS application form is on record as confirmation that
	  ○ the AMHP has informed the consumer about the information that will be requested (typically if an application form is present, it can be presumed the AMHP has informed the consumer adequately) and
	  ○ the consumer (or someone with the appropriate decision making authority, such as someone with a Lasting Power of Attorney) has been informed of what information (including financial) will be gathered to support their application
	• the consumer has been informed that additional information may be gathered from other sources (such as credit reference checks or direct contact with creditors etc).
	
	MHCBS - Initial contact only
	
	<u>Not applicable (N/A) clarification</u>
	
	Not applicable where an application form hasn't been received and it wouldn't be appropriate to outline what information will need to be requested. Examples may include where it is clear from the outset that the consumer does not meet one or more of the eligibility criteria and no further probing is required.

4c-iii. The way in which their personal data will be managed.	As a minimum this must include a verbal or written explanation of how the consumer can find out about the way in which their data is managed (this includes recording of the consumer interaction via any method). This can be by referring the consumer to the service's privacy notice. This must be communicated prior to commencement of the interaction or, if this is not possible, before the service collects any personal data. For outbound calls (or inbound where there is no interactive voice response), it is accepted the consumer's voice will be recorded before there is an opportunity to deliver this information. In these situations, the consumer must be informed as early as possible in the interaction, and before confirming or receiving any other personal data from the consumer. This standard is about informing the consumer of their data rights. Consumer consent is not being assessed under this

	standard, nor is the compliance of the data protection policies/notices of the delivery partner (see Standard 10a). **Mental Health Crisis Breathing Space (MHCBS) only** If the service intends on keeping any consumer information (including processed or rejected application forms) for any period of time, even though the consumer may not enter MHCBS, they still need to be informed of the above. If a consumer contacts the service by any means other than via the application form, it is expected that they are informed about the recording of information (including telephone call recording or similar) before connecting with a practitioner.
4d. MaPS and delivery partners are required to request and explore the following areas sufficiently to enable the delivery of the service:	
4d-i. The consumer's personal circumstances.	The service must request sufficient (as defined by the Standards) personal information from the consumer. This should enable (in conjunction with requesting financial information – 4d-ii) delivery partners to provide sufficient and accurate information, advice and/or guidance relevant to the consumer's presenting issue and/or their circumstances. The sufficiency of exploration should be assessed within the context of the service. This standard is assessing that the information has been requested and explored, not the actual provision of advice and/or guidance. Any errors in how this has been recorded will be considered in Standard 4f. **Debt advice services only** **Full debt advice only** Personal circumstances requiring exploration (non-financial related matters) may include: • personal details • health • housing status • immigration status • household composition • caring responsibilities • employment status • known or foreseeable future changes. This is not a minimum or exhaustive list. **Limited debt advice only** It is only necessary to request personal information that is relevant to the consumer's presenting issue and/or their circumstances that will support the delivery of accurate and sufficient advice.

	Debt Relief Order (DRO) only The Approved Intermediary is responsible for ensuring that adequate exploration of the consumer's personal circumstances has taken place. Adequate exploration includes seeking to ensure that relevant information has been requested from the consumer so the Approved Intermediary can provide appropriate advice and guidance on the DRO application. This is necessary at every point the consumer presents new information. The Approved Intermediary may meet this standard by checking with the consumer that the existing exploration in the referral is correct, or where this hasn't been evidenced by the referral partner, that full exploration is carried out. This standard is not assessing the quality of the referral, but the exploration completed/confirmed by the Approved Intermediary. This includes identifying errors within the referral where the referral information is being relied upon, and exploring whether the referral information remains up-to-date. **Digital services only** Where applicable, efforts to verify the accuracy of the consumer's input must take place before any information, advice and/or guidance output is generated. Digital services are expected to: • identify gaps, inconsistencies or unusual entries within the consumer's information • use probing questions or targeted prompts to help the consumer correct or clarify their inputs • avoid reliance on a generic confirmation prompt alone, especially where input data appears incorrect or incomplete. Where reasonable efforts have been made to ensure accuracy and the consumer chooses not to amend their information, the input may then be accepted as provided.
4d-ii. The consumer's financial circumstances.	The service must request sufficient (as defined by the Standards) financial information from the consumer. This should enable (in conjunction with requesting personal information – 4d-i) delivery partners to provide sufficient and accurate information, advice and/or guidance relevant to the consumer's presenting issue and/or their circumstances. The sufficiency of exploration should be assessed within the context of the service. This standard is assessing that the information has been requested and explored, not the actual provision of advice and/or guidance. Any errors in how this has been recorded will be considered in Standard 4f.

Debt advice services only

Full debt advice only

FCA CONC 8 requires advice to be based on a sufficiently full assessment of the consumer's financial circumstances before recommendations are made.

When exploring debt-related matters, consideration should extend to the type and status of the debt, creditor action taken including any enforcement action to date, and any liability challenge that may apply.

The financial information gathered will inform the creation of a Standard Financial Statement (SFS) or equivalent. Delivery partners are expected to explore any unusual or unexpected (high or low) expenditure, missing essential expenditure, or income (including benefits) to enable an accurate SFS to be prepared.

Illustrative examples to highlight the level of exploration that would be considered sufficient include:

- where the consumer is receiving disability benefits, financial exploration must include how this is to be used
- in circumstances where the consumer presents with a deficit budget, services should establish how the consumer is managing the deficit to ensure they are not accruing further debt
- in circumstances where the consumer presents with affordability issues, but the budget surplus contradicts this, further exploration would be expected.

Completion of an accurate SFS is covered under Standard 4g.

Full debt advice - digital only

There is no expectation that the digital debt advice tool determines which 'square peg' debts should be prioritised.

However, the advice provided must acknowledge the possibility that square peg debts may be priority debts, and reflect this appropriately within the recommendations or advice.

A digital debt advice tool must identify any unusual or unexpected expenditure, missing essential expenditure or income to enable an accurate SFS to be prepared by the consumer. Where reasonable efforts have been made to ensure accuracy and the consumer chooses not to amend their information, the input may then be accepted as provided.

Limited debt advice only

It is only necessary to request financial information that is relevant to the consumer's presenting issue and/or their circumstances that will support the delivery of accurate and sufficient advice and/or guidance.

Depending upon the consumer's presenting issue, it may not be appropriate to complete a full SFS.

Debt Relief Orders (DRO) only

The Approved Intermediary is responsible for ensuring that adequate exploration of the consumer's financial circumstances has taken place in line with expectations in 4d-(i).

This may include:

- details of all debts (including debt type, prioritisation and status/action taken)
- any possible missed debts where there is evidence of this (such as debts with friends and family)
- liability of debts
- any savings or assets
- at least one credit report
- relevant paperwork to verify the consumer's details for the DRO application.

This is not a minimum or exhaustive list.

Mental Health Crisis Breathing Space (MHCBS) only

This standard focuses on ensuring sufficient information is requested from the AMHP, NPOC, consumer, creditor or any other appropriate persons in order to protect the consumer as fully as possible.

It is recognised that the service may have limited information with regard to consumer's circumstances right away. Consumers should be entered into MHCBS as soon as they meet the minimum eligibility criteria, but it is noted further exploration may take place after entry where appropriate.

The minimum expectation is that the service understands, as fully as possible, the eligible debts to be put onto MHCBS, any emergencies (as per 4e) and any non-eligible debts that won't have MHCBS protection.

Given there may be limited direct contact with the consumer, reasonable attempts to establish eligible debts and creditors should be a priority of the service both before and after entry into MHCBS. For example, if Council Tax is listed on the referral form as a debt, but it's not clear to which council this is owed to or if indeed it is an eligible debt, the service should investigate the likelihood of which council it is and contact them to enquire further.

MHCBS - Initial contact only

Where applicable, sufficient questioning should be conducted in order to help establish the consumer's eligibility for MHCBS. This includes but is not limited to whether the consumer has at least one debt that qualifies, whether they are currently in breathing space and if they are receiving mental health crisis treatment. Further questioning on the presenting issue may be appropriate to establish possible next steps for the consumer

	(but should stay within the boundaries of the practitioner's regulatory authorisation).
4d-iii. The consumer's presenting issue and advice or guidance need.	Delivery partners need to establish an understanding of the consumer's issues and presenting needs to enable accurate delivery of sufficient information, advice and/or guidance. The sufficiency of exploration should be assessed within the context of the service. This standard is assessing that the information has been requested and explored, not the actual provision of advice and/or guidance. Any errors in how this has been recorded will be considered in Standard 4f. This information may be obtained through closed, open and probing questions. To differentiate the assessment of this standard from 4d-(i) and 4d-(ii), exploration here should look at questioning around the consumer's specific circumstances which may alter the final advice and/or guidance. Questions that are asked here may not be normally expected during a typical fact-find for the service involved. Examples may include: • questioning around attitude to risk (for money and pensions guidance) • questioning around preference for self-managed vs supported options • questioning around what the consumer is seeking to achieve through engaging with the service and their motivation • questioning around attitude to disposal or realisation of assets. This is not an exhaustive list. **Debt advice services only** **Debt Relief Orders (DRO) only** **<u>Not applicable (N/A) Clarification</u>** May not be applicable where the consumer has no additional presenting issues. **Digital services only** Digital services must verify that the service meets the consumers' needs. This must take place before any information, advice and/or guidance output is generated.

4e. Debt advice services must take steps to identify any emergency or urgent issues related to the consumer's debts.	**Debt advice services only** The service must proactively identify whether the consumer's situation constitutes an emergency or urgent issue. This must include further exploration if this is not clear from initial information provided by the consumer. This must take place as early as possible in the interaction, but probing throughout the interaction or engagement with the service may also be relevant as more information is shared. It does not extend to providing information, advice or guidance on resolving these issues (as this is covered by subsequent Standards). An emergency is a situation that will have an adverse effect on the consumer if it is not dealt with immediately. In relation to debt, this is a threat to the consumer's home, essential goods and services or their liberty. When considering whether goods or services are essential, you should always take the consumer's personal circumstances into account (examples of what may constitute an emergency can be found in the CPAG handbook Chapter 3, Section 2). It should not be automatically assumed that the consumer is in an emergency situation purely as the result of a deficit budget. If the interaction shows signs of an emergency (as defined above) but the service does not explore or confirm it, Standard 4e will not be met. **Full debt advice - digital only** A digital debt advice tool must proactively support and enable a consumer to easily identify an emergency or urgent issue for themselves. **Limited debt advice only** If a consumer chooses not to engage in discussions around the identification of emergencies, it is expected that the practitioner explains the consequences of not engaging in these discussions and that this is recorded within the case file. Where there is evidence the practitioner has attempted to take steps to identify emergencies and the consumer does not engage, this standard would still be considered met. **Mental Health Crisis Breathing Space (MHCBS) only** For MHCBS the identification of an emergency can be via a variety of means including (but not limited to) engagement with the consumer/NPOC, the application form, the credit check or other investigations. **MHCBS - Initial contact only** It is still expected that the service will identify emergencies/urgent issues and highlight them as such based on the information presented to them. If based on that

information an emergency has not been identified, this standard can be marked as met.

Emergencies may be identified as early as first contact with the service. Bearing in mind the service may have limited, if any, direct contact with the consumer at this point, every reasonable effort should be made to alert the consumer to the importance of addressing emergency issues (this could be via the NPOC or other appropriate person).

4f. MaPS and delivery partners must create and maintain an accurate record of the data provided by the consumer, including the information, advice or guidance provided. This must be sufficient to enable monitoring or review of compliance with these standards.

As a minimum this must include an accurate record of:

- the personal details, personal circumstances and financial circumstances collected from the consumer
- the information, advice and/or guidance provided to the consumer
- any other communication between the service and consumer that directly links to the information, advice and/or guidance/service being provided.

If the case record accurately reflects the information, advice and/or guidance provided during the interaction, this standard will be met even if the information, advice and/or guidance itself is deemed inaccurate (assessed under Standard 4h-i).

Debt advice services only

Full debt advice only

In addition to what is expected as the minimum threshold, for debt advice services this must also include:

- any activity undertaken by the service to support the advice journey
- the Confirmation of Advice (unless consumer has specifically declined and this has been recorded)
- a Standard Financial Statement (SFS) or equivalent (Completion of an accurate SFS is covered under Standard 4g)
- where relevant, any applications or casework completed (such as DRO, Breathing Space, Trust Funds, Credit Reports, Benefit Checks etc).

If a tool has been used which concludes that no changes for the consumer are suggested, supporting evidence is not required. However, the practitioner should provide case evidence to confirm this.

For example:

- where a benefit entitlement calculation has been completed and the case record states that there is no change to the consumer's benefit entitlement
- a check for charitable grants that results in no available options
- checks to the Individual Insolvency Register (if this is added to the case, any third party details must be redacted)

Completion of an accurate SFS is covered under Standard 4g.

Limited debt advice only

Depending upon the consumer's presenting issue, it may not be appropriate to complete a full SFS and therefore one may not be evident. However, if a partial budget or a full SFS is completed, it is expected that is evident on the consumer record.

Debt Relief Orders (DRO) only

As a minimum requirement to ensure accuracy of the case record, the following documents would need to be evidenced:

- incoming referral document (where relevant)
- any step-by-step guides used (where relevant) - this can be submitted as pre-assessment information
- written or verbal confirmation of the consumers personal and financial information
- written or verbal confirmation of the advice given and/or next steps
- at least one credit report (this can be obtained by the referral agency if within the past three months)
- asset valuations (where relevant)
- documents that directly link to the advice being given and the DRO application being submitted (for example, Individual Insolvency Register checks, or paperwork the consumer has provided to evidence their debt or to verify their financial statement)
- any subsequent correspondence between the Approved Intermediary and the consumer
- the DRO application and any adaptations or variations to this (marked according to status, i.e. draft or final)
- the signed DRO declaration.

Any documents received through the referral must be evidenced as having been checked by the Approved Intermediary before being relied upon.

If the referral form confirms the Individual Insolvency Register has been checked by referral agency, a screenshot should be attached to the case record so the Approved Intermediary can ensure this has been completed accurately. If the Approved Intermediary has personally completed the Individual Insolvency Register check the notes should confirm this.

If the Approved Intermediary agrees to send a document to the consumer and this document has been attached to the case record, it will be viewed that this has been sent to the consumer unless there is evidence proving otherwise.

Digital services only

It is expected that any digital service that stores consumer data, and provides tailored information, advice and/or guidance

maintains an accurate record of an interaction to enable a review of compliance with these standards.

Not applicable (N/A) clarification

Inapplicable for digital services that do not store consumer data in order to provide tailored information, advice and/or guidance.

Mental Health Crisis Breathing Space (MHCBS) only

For the MHCBS service a detailed consumer record may include:

- the MHCBS application form
- when a debt is entered onto the Insolvency Service Portal, evidence of where that information has come from (for example application form, credit reference check or other communication with consumer/NPOC)
- evidence that a credit check has been carried out before entry into MHCBS
- screenshots of the Insolvency Service Portal entries which include identification of the consumer to whom the entry relates to
- any creditor communication (including challenges and reminder of responsibilities)
- any relevant communication (including interval checks, factsheets, letters, consumer/NPOC queries) with the AMHP/NPOC/consumer
- confirmation of entry into and exit out of MHCBS.

This is not a minimum or exhaustive list.

MHCBS - Initial contact only

For consumers who have been rejected for entry into MHCBS it is expected a copy of the application form (if there is one) and evidence of the reason for rejection (where relevant) is on the case record.

For these consumers only the following might be applicable:

- the MHCBS application form (if an application was made but rejected)
- evidence that a credit check has been carried out before entry into MHCBS (and the result is that there are no eligible debts evident)
- any relevant communication (as per above including phone calls, letters and emails)
- confirmation of rejection of entry into MHCBS and associated evidence (where possible)
- a record of the next steps (if any) given to the consumer.

4g. Debt advice services must ensure that the consumers financial circumstances (4d-ii.) are captured within an accurate income and expenditure, using the Standard Financial Statement (SFS) or equivalent, where a budget is required to achieve a suitable debt advice outcome.

Debt advice services only

A suitable debt advice outcome is where the consumer has received debt advice on options and/or a course of action, and is able (and eligible) to enact that action by themselves or with the support of a service.

The Standards define accurate as "correct, precise and truthful". Therefore, the SFS (or equivalent) must be wholly accurate, including with financial amounts, as could be reasonably known at the time of input. For factual amounts this must not include input errors or rounding.

If the SFS contains inaccurate information, regardless of whether it affects the resulting advice, this standard will not be met.

It should match what the consumer has told the service, or what has been agreed as an appropriate budget adjustment with the consumer (for example, short term changes to flexible expenditure), what has been discovered via other means (such as a credit reference report) or what is widely known to be a standard figure (such as child benefit).

For instance, if a debt is discovered later but was missed off the original SFS as it wasn't known about at the time, this standard will still be met if the SFS is updated to reflect this.

When stored electronically, the SFS must be easily updated to reflect changes. Where multiple versions exist, the current version must be clearly identified, including whether it is a draft or final version. Previous versions should be made available to evidence its state at a particular point in time where meaningful updates have been made that affect the advice and/or recommendations.

This standard is about assessing accuracy, not impact. Any impact inaccuracies have on the resulting advice should be considered under 4h-(i) or 4i-(ii).

Not applicable (N/A) clarification

For limited debt advice only, this may not apply where a budget is not required to assess eligibility as above.

Examples of when a budget may not be required include:

- requesting a hold
- entering a consumer into breathing space
- disputing liability of a debt.

Full debt advice - digital only

It is expected that a digital debt advice tool is able to prompt a consumer to complete an accurate and complete standard financial statement or equivalent.

Debt Relief Order (DRO)

For DROs, an SFS or equivalent is required. The equivalent can be defined as the income and expenditure from the DRO application itself.

4h. MaPS and delivery partners must ensure that throughout the course of the interaction (but outside of the options being provided) that the information, advice or guidance is:

4h-i. Accurate, based on true and factual information.

All information, advice and/or guidance provided to the consumer must be accurate (as defined by these Standards) and up to date based on known facts.

If the service delivers inaccurate information, advice and/or guidance this standard will not be met, regardless of whether it affects the consumer's circumstances or next steps.

Where something is referenced as an estimate, changeable or based on professional judgement (such as the average income needed for a comfortable retirement, or the costs of professional services), as long as it has not been presented as definitive and the service is able to identify where that position originates from, this would be considered as met.

Accuracy of the case record is considered separately under Standard 4f.

Debt advice services only

Accuracy of the financial statement is considered separately under Standard 4g.

This standard assesses the accuracy of the advice given (outside of the options being provided) based on the consumer's personal and financial circumstances. Practitioners should ensure that they provide accurate information, guidance and/or advice which is in date at the time of the interaction.

This may include:

- emergencies
- safe banking
- consequences of non-payment
- next steps in the debt process
- what actions creditors can take
- what actions the consumer can take.

This is not a minimum or exhaustive list.

When delivering accurate advice, delivery partners and/or practitioners should take into account foreseeable changes in the consumer's circumstances, and within legislation and regulatory obligations, advice, financial support and grants available will change over time, and it is expected that the advice is accurate at the time it is delivered to the consumer.

Inaccuracies within the case record due to a recording error, such as within the SFS (4g) or advice letter (4f), will not be considered under this standard. However, if inaccurate advice

has been delivered and is reflected within the case record, the case record will be considered to have been maintained in accordance with the advice provided, and therefore will not impact 4f.

Where the delivery partner and/or practitioner has provided inaccurate advice or completed an inaccurate application due to an incorrectly completed SFS (for example, incorrectly advising that the consumer has a disposable income/deficit budget), Standard 4h-(i) will be not met.

Debt Relief Order (DRO) only

This standard is not assessing the quality of the information contained within the referral, but the information and advice provided by the Approved Intermediary. This includes identifying errors and exploring whether the referral information remains up-to-date where this is being relied upon to progress the DRO.

Digital services only

For digital tools the accuracy of the information, advice and/or guidance provided will be based on the information the consumer has disclosed within the digital journey.

Where the information, advice and/or guidance populated at the end of the tool does not align to consumer input, then this will be assessed under this standard.

If consumer input appears to be inaccurate and this has not been sufficiently explored, then this will be considered under standards within 4d for exploration and prompting accurate input.

Mental Health Crisis Breathing Space (MHCBS) only

The service must be delivered in line with legislative and statutory obligations. The current appropriate piece of legislation for MHCBS is the Debt Respite Scheme Regulations 2020.

Legislation can be subject to amendments and these should also be taken into consideration as and when made. The service should also consider relevant court cases which may give interpretations on the Regulations.

This may include that:

- information given to the consumer/NPOC/AMHP about debts is accurate
- creditor challenges have been dealt with in line with legislative and statutory obligations, and information given to them about MHCBS is accurate.

The service must ensure they provide accurate information, advice or guidance which is in date at the time of the interaction. This may include:

- the scope and purpose of MHCBS

	• the MHCBS regulations • ineligible debts (including the consequences of non-payment) • emergencies • options/solutions/standard breathing space • next steps. This is not a minimum or exhaustive list. Where a consumer has not been entered into MHCBS, it must be done in line with legislative and regulatory obligations.
4h-ii. Sufficient, to enable the consumer to make an informed decision.	'Sufficient' is defined by the Standards and requires "the provision of enough information for the consumer to understand the implications, make a decision and take action." Information, advice and/or guidance delivered would be considered insufficient if information is not provided to the consumer that, had it been provided, may affect the consumer's decision making. For advice or guidance to be considered 'provided', the consumer must be actively informed about, or signposted to the relevant sections of, the information, advice and/or guidance. Generic materials that contain information not discussed or referenced, during the interaction would not be considered 'provided' for the purposes of this standard. This standard only covers enabling a decision to be made. Recommendation is covered by Standard 4i-(ii) and more detail on the next steps to be taken and agreed actions is covered by Standard 4i-(iv). **Debt advice services only** Sufficient advice may include: • emergencies • safe banking • consequences of non-payment • next steps in the debt process • what actions creditors can take • what actions the consumer can take. This is not a minimum or exhaustive list. It is expected that the advice needed to drive informed decisions is presented to the consumer up front. Where the consumer needs to click through a chain of multiple weblinks to access the advice, this would not be viewed as being drawn to the consumer's attention, and so would not meet the requirements under this standard.

	Mental Health Crisis Breathing Space (MHCBS) Indicators for the MHCBS service include: • evidence the service has been clear about how and when they will contact the NPOC and the consumer in the future • evidence that it's been made clear to the NPOC that they should inform the service as soon as the consumer has exited crisis treatment. **Digital services only** **<u>Not applicable (N/A) clarification</u>** Inapplicable for digital services that do not deliver information, advice and/or guidance such as template letters.
4h-iii. Relevant to the consumers circumstances.	'Relevant' is defined by the Standards and requires the information, advice and/or guidance provided to be "directly related and applicable to the consumer's issue or the context in which the service is provided." Generic information, advice and/or guidance (such as factsheets) can be used as a supplement, or as relevant supporting materials, but must not be used in the absence of tailored advice or guidance. Where tailored advice and/or guidance has not been 'provided', this would only be considered relevant where the consumer's attention has been drawn to specific sections. **Digital services only** For digital services that do not gather personal and/or financial information from the consumer (such as those providing content through articles, blogs, printed guides or other static mediums), the information or guidance presented must be inherently relevant to the topic or scenario it addresses. For digital services that do gather personal and/or financial information from the consumer, all relevant information, advice and/or guidance must be: • tailored • clearly highlighted or • explicitly signposted. This is so that the consumer can easily identify information that applies to their circumstances. **Mental Health Crisis Breathing Space (MHCBS) only** This should include: • key dates that impact the consumer • a plan for future contact with the consumer and/or NPOC

- no evidence on the record of unnecessary delays to the process of submitting the application to the Insolvency Service.

If there is evidence of an unnecessary delay in a required response that would have an effect on the consumer (and that is not covered by the specifics here or legislation), then this would be deemed not met

In addition to identifying key dates with regards to the consumer's debts, the service should also be able to evidence that:

- where relevant, updates to the consumer record and/or the MHCBS portal are made within two business days (with day one being the next business day after the information is received)
- the next contact date has been diarised which must be within 20 to 30 days of the beginning of the moratorium
- where applicable, there is a further diary entry for the next contact date which must be within 20 to 30 days of the previous request for information (for clarity the previous request for information date does not include any chasers or follow ups)
- the consumer has been removed from the MHCBS portal by the end of the business day following notification that they are no longer in crisis treatment, or if the NPOC has not responded to a request for information for 30 days, the consumer is removed from the MHCBS portal within 24 hours of the request expiring
- where a consumer has not been entered into MHCBS because they are already in a standard Breathing Space, they (and the AMHP/NPOC) are informed as to when they could reapply.

Due to the potentially limited contact the service will have with the consumer, use of generic factsheets are permissible when it is not possible to give more tailored and relevant information.

There is no requirement for consumers in MHCBS to elect to receive debt advice. However, where emergencies have been identified the service should proactively give timely and relevant information about those emergencies and how to deal with them, including any deadlines the consumer should be aware of. This may include a call to action to engage in full debt advice.

MHCBS - Initial contact only

Indicators that this standard is met for these consumers could include:

	• giving information about key times and dates regarding the MHCBS service (such as when they can apply if in a standard breathing space) • no unreasonable delays in rejecting an application • information given regarding the MHCBS service that is relevant to the consumer's circumstances (as can be reasonably determined with an 'initial contact') • next steps including references to any relevant deadlines (as reasonably identified through the limited exploration that may have taken place).
4i. Following the completion of exploration of the consumers circumstances, MaPS and delivery partners must ensure that they:	
4i-i. Identify and inform the consumer as to what option/s are available and suitable.	The service must identify all options available to the consumer (including those which are suitable or not). This standard is about ensuring options are presented to the consumer, not the information, advice and/or guidance provided on those identified. The service does not need to inform the consumer of unavailable options or solutions, but where an unavailable option has been presented as available, this would not meet this standard. Where an available option has been missed, or an unavailable option has been presented as available, this may impact compliance with 4i-(ii) and 4i-(iii). **Debt advice services only** From the available options, the service must identify and inform the consumer of those which are suitable. Where an available option is identified as unsuitable, it must be confirmed to the consumer that the option is available and the reasons that it is deemed unsuitable. Reasons for unsuitable options must be clearly captured within the case record. If a consumer does not meet the delivery partner's criteria but the option could be available elsewhere, this option should be considered available. In this context, 'options' refer to solutions that directly address the consumers debts. This would include formal, informal, temporary and/or individual debt solutions. 'Doing Nothing' does not need to be presented as an option in all cases, but should be considered where it would be within the consumers best interest. For example, doing nothing could be applicable where: • the consumer's debts could become statute barred, • a council tax reminder notice has been issued and allowing the relevant period (14 days) to pass would enable the full liability outstanding for the year to be scheduled into a DRO, or

- where a consumer has been served with a statutory demand and would benefit from the creditor covering the petition costs, as bankruptcy is the most suitable option for them.

This is not an exhaustive list.

Options that address income maximisation and financial capability are considered in 4k-(ii) and 4k-(iii).

Limited debt advice only

For these interactions this standard focuses on identifying the available options and informing the consumer of those which are suitable to address their immediate issue(s)

Consumers must receive full advice on all suitable options in relation to their presenting issue(s).

Where applicable, practitioners should evidence in the case record the reasons why they consider available options, specific to the presenting issue, to be unsuitable.

The practitioner is expected to make the consumer aware that there are other options available to address their overall debt issue(s) and there is evidence to confirm that the consumer has been advised to return for further advice to address any remaining debt.

Debt Relief Order (DRO) only

As the available option of a DRO has already been identified, this standard is assessing the identification of other available solutions outside of the DRO (such as Breathing Space and/or options for dealing with non-qualifying debts).

Breathing Space should be assessed as a short-term option and advised upon where relevant to the consumer's circumstances. It is important that, where the consumer is potentially eligible for Breathing Space but it is not considered appropriate, the case record reflects the reasons why. The appropriateness of Breathing Space may depend on the DRO Hub's own policies in relation to Breathing Space. The expectation of the Approved Intermediary's obligations in relation to Breathing Space are:

- if the consumer has been advised on Breathing Space and the circumstances now indicate this is an eligible and appropriate short term option, it is the Approved Intermediary's responsibility to ensure the consumer is entered into Breathing Space
- if the consumer has already been entered into Breathing Space and has been referred to the DRO Hub, it is the Approved Intermediary's responsibility to ensure the midway review, and any other associated actions or administration, are carried out
- where a consumer is no longer eligible for a DRO and would benefit from Breathing Space, it is the Approved Intermediary's responsibility to take the necessary

	action to progress this directly or with the original referral organisation where appropriate. If an available option for dealing with the non-qualifying debts has been missed, it is not possible for the Approved Intermediary to assess its suitability and therefore as a consequence, this standard would not be met. **Not applicable (N/A) clarification** Not applicable only where the consumer is not eligible for Breathing Space and does not have any non-qualifying debts. **Digital services only** This standard is applicable to full debt advice digital only. **Mental Health Crisis Breathing Space (MHCBS) only** The service must show evidence that: • it has proactively attempted to engage with the consumer about receiving debt advice (and other appropriate services that are within scope) as deemed appropriate when considering the other standards (particularly around vulnerability) • it has also informed the consumer of the benefits of engaging with debt advice • where there are debts that are ineligible for MHCBS or where there are emergency debt situations, the consumer (or their NPOC) has been informed of possible appropriate next steps (this includes where an ineligible debt has been erroneously added to the MHCBS portal) • next steps to take up debt advice, or deal with ineligible debts/emergency situations are clearly explained. **MHCBS - Initial contact only** The service is still expected to help the consumer (within their authority) by providing next steps for them even if a MHCBS application is rejected. **Not applicable (N/A) clarification** Not applicable where the information about the consumer's circumstances is not sufficient to identify relevant products or services, or where no relevant products or services were offered.
4i-ii. Provide sufficient and accurate information, advice or guidance about the key features of the option/s available, how the option/s will work as well as the advantages and disadvantages where applicable.	The service must provide sufficient and accurate information on all options that are available to the consumer. Where appropriate this must include full details such as any eligibility criteria, how each option works, any costs involved, and outlining the advantages and disadvantages to enable informed decision-making.

Information must be accurate enough to enable the consumer to make an informed decision. Therefore, if something is not set in stone (such as the average cost of an IVA or approximate pension management fees), as long as the information is reasonably accurate and, if required, the service is able to identify where that information originates from, this would be considered as met.

Please consider compliance with 4i-i when considering this standard.

Not applicable (N/A) clarification

Not applicable only where the service or type of interaction is not normally expected or required to present the consumer with options as relevant to their presenting needs (such as when a simple informative answer to a question is required).

Debt advice services only

There is no requirement to provide full details (as above) on options that are available but unsuitable for the consumer.

For unsuitable options, sufficient information must include confirming the available option exists and explain why it is deemed unsuitable based on the consumer's preferences and/or circumstances. Where the reasoning for the option being unsuitable is factually incorrect this would be considered not met.

Debt Relief Order (DRO) only

There should be evidence that the Approved Intermediary has checked the consumer is aware of:

- all the qualifying conditions
- the effects of the DRO
- what the consumer has to do under a DRO
- any restrictions on the consumer
- the DRO period
- what happens to qualifying debts at the end of the DRO period
- consequences of sending false information or leaving out information from a DRO application
- the advantages and disadvantages of a DRO.

This is not a minimum or exhaustive list.

Advice letters from referral agencies can be used to help evidence the advice that has been provided to the consumer, however the Approved Intermediary is expected to evidence in the case record that they have checked the consumer is aware of this. Any missing advice relevant to the DRO will need to be supplemented by the Approved Intermediary.

The Approved Intermediary will need to ensure the consumer is eligible for a DRO and that this is a suitable option. The Approved Intermediary is responsible for checking the

	consumer's circumstances before submitting the application form. In addition to providing sufficient and accurate information and/or advice in regards to the DRO, where Breathing Space and/or options for dealing with non-qualifying debts have been identified as a suitable, the minimum threshold of compliance outlined above applies. **Digital services only** This standard is applicable to **full debt advice digital only**. For these services it is expected that relevant guidance or advice on options are presented to the consumer up front without the need to click through a chain of weblinks to access them. This is to enable the consumer to make comparisons with other options at a high level. **Mental Health Crisis Breathing Space (MHCBS) only** This standard focuses on where solutions or services have been identified as appropriate, and that the advantages and disadvantages of those options have been clearly explained to the consumer. Where there is engagement with the consumer/NPOC and it is appropriate to do so, indicators for the MHCBS service include: • evidence that the consumer has been provided with information about relevant debt advice services and/or other financial products or services • evidence that the advantages and disadvantages of these have been explained. When first entering the moratorium consumers may not be in a position to engage in debt advice. However, if one of the debts owed is to their current bank account provider they should be informed about safe banking options and the advantages/disadvantages of this. **<u>Not applicable (N/A) clarification</u>** Not applicable where the information about the consumer's circumstances is not sufficient enough to identify relevant products or services, or where no relevant products or services were offered.
4i-iii. Seek to drive informed decisions and confirm consumer understanding of the options available.	Positive indication of understanding of options must be sought directly from the consumer via confirmation questions, summary prompt or offering clarification. It is not necessary to test or check detailed understanding, but where a consumer has clearly misunderstood an option, the service must re-cover the relevant information and then reconfirm their understanding. An informed decision is not limited to the choice of a specific option, product or service, but will depend on the personal and financial circumstances of the consumer and their presenting

issue. This should be considered broadly and could be to 'do nothing'.

Where a summary is auto-generated and/or digitally displayed, prompts for consumer confirmation of understanding is required before proceeding to a conclusion of interaction.

This standard is focused on checking that the consumer understands the options available to them to facilitate informed decision-making. This does not extend to the information, advice and/or guidance itself.

Please consider compliance with 4i-i and 4i-ii when considering this standard.

Not applicable (N/A) clarification

Not applicable only where the service or type of interaction is not normally expected or required to present the consumer with options as relevant to their presenting needs (for example, when a simple informative answer to a question is required).

Debt advice services only

Debt Relief Order (DRO) only

In addition to confirming consumer understanding in regards to the DRO, where Breathing Space and/or options for dealing with non-qualifying debts have been identified as suitable, the minimum threshold of compliance outlined above applies.

Where the consumer has non-qualifying debt(s) and has been presented with an unavailable option, or irrelevant advice has been highlighted in a factsheet on those options, this would be assessed under this standard as not relevant to the consumer.

Digital services only

This standard is applicable to **full debt advice digital** only. Where a summary is auto-generated and/or digitally displayed, prompts for consumer confirmation of understanding is required before proceeding to the conclusion of the interaction.

This standard is focused on checking that the consumer understands the options available to them to facilitate informed decision-making. This does not extend to the information, advice and/or guidance or advice itself.

Mental Health Crisis Breathing Space (MHCBS) only

The service must show evidence that:

- it has been clear about how and when they will contact the NPOC and the consumer in the future
- it's been made clear to the NPOC that they should inform the service as soon as the consumer has exited crisis treatment
- it has communicated sufficient information, clear actions and next steps (including dates) to the NPOC and/or consumer

- where it has been identified that there are debts ineligible for MHCBS or emergency issues, the consumer (or their NPOC) has been informed of possible appropriate next steps.

4i-iv. Confirm the next steps and actions as well as who needs to take them and by when. Implementing these actions where appropriate.

As a minimum the service must:

- clearly outline the next steps required to progress the consumer's situation
- specify who is responsible for each action (consumer, delivery partner or otherwise)
- indicate when these actions will be taken or need to be completed by.

This can be completed either during the interaction or after, where they are provided with written confirmation of the information, advice and/or guidance given.

Where a delivery partner is not required to implement actions, if confirmation of next steps and consumer actions are provided, this standard would be met. Where it is appropriate, the delivery partners must also complete actions assigned to the service. Where a delivery partner has an action to send the consumer information (other than something covered by 4m) and this has not been done, it may also be considered under 4f.

This standard only covers whether the confirmation (or implementation of actions where appropriate) has taken place. The suitability and whether these are the correct next steps based on the consumer circumstances and presenting issue are not to be assessed here.

Not applicable (N/A) clarification

Not applicable only where the service or type of interaction does not require further action from either the consumer or the delivery partner.

Debt advice services only

Limited debt advice only

Where next steps and agreed actions are referenced, these should be related to the presenting issue.

Debt Relief Order (DRO) only

Consumers should be provided with clear agreed actions to enable them to progress their DRO application. This should include all the next steps relating to the DRO application, who needs to complete them and by when.

For example, next steps may include:

- the consumer needing to check their tenancy agreement, employment, bank account, pensions, additional debts, etc

	• the Approved Intermediary needing to carry out additional checks or outstanding administrative tasks before submitting the DRO application • where the DRO application has been submitted, the consumer should be notified. In addition to confirming next steps in regards to the DRO, where Breathing Space and/or options for dealing with non-qualifying debts have been identified as suitable, the minimum threshold of compliance outlined above applies. **Digital services only** This standard is applicable to **full debt advice digital** only. It is not expected that the digital service supports the consumer to fully implement their chosen option, however the consumer should be informed as to how they can proceed with their chosen option. **Mental Health Crisis Breathing Space (MHCBS) only** The service has communicated sufficient information, clear actions and next steps (including dates) to the NPOC and/or consumer. Where it has been identified that there are debts ineligible for MHCBS or there are emergency issues, the consumer (or their NPOC) must be informed of possible appropriate next steps. **MHCBS - Initial contact only** Where a consumer is not entered into MHCBS but there is a need for support elsewhere (such as ineligible debts or standard breathing space), next steps and hand-offs are still expected in line with the above.
4i-v. Proactively signpost consumers to other sources of information, advice or guidance as appropriate and at relevant points during or following the intervention.	Delivery partners must ensure consumers are signposted (as defined by the Standards) to other appropriate sources of information relevant to their query. This can be completed either during the interaction, or after the interaction when they are provided with written confirmation of the information, advice and/or guidance given. Consideration should also be given to any signposting needs the consumer may have, taking into account any relevant deadlines. For example, if a consumer presented with enforcement action but a debt advice appointment was not available for two weeks, they should be signposted to receive emergency advice to address this. To protect the consumer from scams and to help them get to the right place, signposting activity must be accompanied with further information, or an offer of further information, on how to get to the correct place (such as a phone number or website link). Signposting activities can include:

- up-to-date links to reputable websites (where a link is out of date but the consumer is automatically redirected to the correct place, this will still be met)
- current telephone numbers for relevant services
- MoneyHelper pages and tools
- other trusted resources deemed suitable and appropriate by the delivery partner.

This standard covers all relevant signposting except that covered by 4j-i, 4j-ii and 6d.

Not applicable (N/A) clarification

Not applicable only where there are no other sources of information, advice or guidance required relevant to the consumer's query or circumstances.

Digital services only

Not applicable (N/A) clarification

Not applicable only for digital services that do not deliver information, advice and/or guidance such as template letters.

Mental Health Crisis Breathing Space (MHCBS)

The standard also assesses whether the consumer has been signposted/referred to an organisation for further advice/support where this is needed as part of their next steps, such as to housing specialists, legal advice or other specialist services. This is in reference to consumers who are engaging with the service and/or where this information is necessary to support the consumer in an emergency situation.

MHCBS - Initial contact only

Where a consumer is not entered into MHCBS but there is a need for support elsewhere (such as ineligible debts or standard breathing space), next steps and hand-offs are still expected in line with the above.

4j. MaPS and delivery partners must ensure that they refer consumers to:

4j-i. Their existing product provider or creditor 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.

Where it is evident that the consumer needs to clarify or obtain information, the consumer must be informed to contact their existing product provider or, where it is in the scope of the service, the delivery partner must contact on behalf of the consumer to obtain the information.

For the purposes of this standard, a product provider does not include the consumer's employer. If a consumer requires further information from their employer, this should be considered under 4i-iv.

Not applicable (N/A) clarification

Not applicable only where there is no existing product provider or creditor, where no further information or action is required.

Debt advice services only

A service may advise a consumer to not contact their existing provider or creditor if it is suitable advice (for example, where the debt may be statute barred).

Where a consumer is advised to:

- clarify information
- obtain information
- stop paying a debt
- reduce payments to a debt or
- cancel a direct debit/standing order payment towards a debt,

the delivery partner must make the consumer aware that the creditor must be informed. This can be via direct contact between consumer and creditor, or where it is within the scope of the service, the delivery partner contacting on behalf of the consumer.

Where a delivery partner offers to contact on the consumer's behalf and this is not actioned and/or evidenced on file, this will also impact Standards 4i-iv and 4f.

Debt Relief Order (DRO) only

An existing product provider in the context of DRO advice may include:

- a creditor (for example, a provider who the consumer has a credit product with)
- a utility provider
- a pension provider
- a benefit agency
- a court
- an enforcement agent or
- a debt solution provider (such as an IVA/DMP provider who the consumer has an existing IVA/DMP with).

Action may be required to submit the DRO or to alert the product provider to a change of circumstances.

Examples include:

- The Approved Intermediary contacted/consumer advised to contact their existing provider to:
    - obtain balances
    - request debt status
    - request a hold on the account where more time is needed (informal moratorium)
    - let them know they are engaging with debt advice (this includes contacting the courts, contacting existing IVA/DMP providers and creditors in general).
- The consumer is provided with a template letter to send to their creditors to notify them:

	○ about a change in circumstances ○ to request a hold ○ to request further information. • The consumer is advised to inform LA/DWP/HMRC/pension provider regarding a change of circumstance that would affect them if not notified. • The Approved Intermediary may need to refer the consumer back to their debt provider/utility provider to check the accuracy of their bills/statements. • The Approved Intermediary may need to refer the consumer back to their debt provider to gather any other further details of their debt for the DRO or Breathing Space application. This is not an exhaustive list. **Digital services only** **<u>Not applicable (N/A) clarification</u>** Not applicable only for digital services that do not deliver information, advice and/or guidance such as template letters. **Mental Health Crisis Breathing Space (MHCBS) only** It may be necessary to remind the creditor of their responsibilities under the Debt Respite Scheme regulations. Where the service has been informed of creditor contact with the consumer that is not allowable under the regulations, evidence should show that the service has reminded the creditor of their responsibilities, and that the Insolvency Service has been informed. There may also be situations where the consumer gives consent for the service to contact creditors or services on their behalf to deal with things such as emergency situations. Again, there should be evidence that this has happened where appropriate and should be assessed under this standard. **MHCBS - Initial contact consumers** It may be appropriate to refer the consumer to an existing provider in limited circumstances considering the non-specialist nature of that interaction (for example, referring them back to a debt advice provider they already have an engagement with). This should not include referring the consumer back to their creditors until they have sought regulated debt advice.
4j-ii. A directory or other list of financial advisers or providers of financial services or products, as required.	Signposting (as defined by the Standards) must be to reputable and unbiased directories or lists. Examples of lists that might be referred to include: • safe bank account providers • pension annuity providers • regulated financial advisers.

	Not applicable (N/A) clarification Not applicable only where there is no directory or list of financial practitioners or providers relevant to the consumer's query or circumstances. **Debt advice services only** Examples may include: • signposting to a weblink or list to find pension advice/mortgage advisers/financial advisers when it was identified that financial advice was required - this includes signposting to MoneyHelper for a list of financial services/products • signposting to a weblink or list to find a provider of a DMP or insolvency where required (such as where the service does not offer that solution) • signposting to a weblink or list to find all basic bank account providers where needed, rather than signposted to a select few which offer basic bank accounts. Where the consumer has an underlying issue and requires financial advice, the practitioner should provide the consumer with a list of relevant services which may be able to assist, such as regulated financial advisers. Where the consumer has a safe bank account, providing general banking advice and/or information which may be relevant to the consumers future circumstances would be seen as exceeding the minimum expectations. Providing there is a clear rationale for the inclusion of this information, this standard would be met. General banking information provided to consumers when not required would be considered not applicable for this standard, but may result in non-compliance with standard 4h-iii in terms of the relevancy of the information.
4k. MaPS and delivery partners must ensure they make consumers aware of:	
4k-i. Financial scams and how to deal with them, when appropriate.	Relevant information about scams, and how to deal with them, must be delivered where relevant to the consumer's circumstances (for example, there are signs the consumer has been scammed and/or there are strong indicators of risk of being scammed). This can be limited to identifying the risk and directing the consumer to trusted sources of advice and/or support. **Not applicable (N/A) clarification** Not applicable only where this information is not required based on the consumer's query or circumstances.

4k-ii. The benefits of shopping around, highlighting and explaining costs and charging, where appropriate.	Where relevant the service must make consumers aware that there may be benefits to shopping around for a particular financial product or service. It may be appropriate for this to include: • making the consumer aware that different financial products and/or services may incur a fee, and stipulating specific conditions which may vary according to the provider • encouraging consumers to compare costs and/or charges - they should also compare any conditions or special features of both existing and new agreements. It is important this is discussed but care must be taken not to cross regulated advice boundaries. The above should be delivered within the context of the consumer circumstances and the information, advice and/or guidance being delivered. For example, comparison of special features is likely to apply more to pensions guidance than debt advice. **Not applicable (N/A) clarification** Not applicable only where this information is not required based on the consumer's query or circumstances. **Debt advice services only** Where general advice and/or information is provided which may be relevant to the consumer's future circumstances, this would be seen as exceeding the minimum expectations. Providing there is a clear rationale for the inclusion of this information, this standard would be met.
4k-iii. Ways of maximising their income and opportunities to reduce expenditure, highlighting and explaining costs and charging, where appropriate.	Where appropriate consumers must be made aware of ways to increase their income and reduce their expenditure (where not covered by 4k-(ii)). Where it is evident that a consumer might be overpaying for products or services, it is important this is discussed but care must be taken not to cross regulated advice boundaries. Similarly, if a consumer is not maximising their income, it is important this is discussed. But again, care must be taken not to cross regulated advice boundaries. Examples of income maximisation could include: • explaining the tax benefits of paying into a pension • explaining the difference between saving into a non-interest-bearing account versus an interest-bearing account (note this is different to 4k-ii where the consumer should be told to shop around) • use of reputable comparison sites • budgeting tools and resources • benefit check, charitable grants and social tariff incentives.

	This list is not exhaustive. Discussions around income maximisation are still expected to be held within the context of the consumer's interaction. For example, it wouldn't normally be expected for a practitioner to go into detail about the tax treatment of pension contributions. **<u>Not applicable (N/A) clarification</u>** Not applicable only where this information is not required based on the consumer's query or circumstances. **Debt advice services only** Where general advice and/or information is provided which may be relevant to the consumers future circumstances, this would be seen as exceeding the minimum expectations. Providing there is a clear rationale for the inclusion of this information, this standard would be met.
4l. Pension services must ensure they:	
4l-i. If applicable, draw the consumer's attention to the potential tax implications of the proposed options available and refer them to support services, as appropriate.	**This standard does not apply to debt advice services.**
4l-ii. If applicable, draw the consumer's attention to the potential debt obligations of the proposed options available and refer them to support services, as appropriate.	**This standard does not apply to debt advice services.**
4m. Where a confirmation of information, advice or guidance is required in line with statutory or regulatory expectations, MaPS and delivery partners must:	
4m-i. Provide consumers with a concise summary record of their advice or guidance intervention and agreed next steps and actions.	A tailored written confirmation of advice or guidance must include: • a summary of the interaction • the agreed actions including responsibilities for all relevant parties • next steps for all relevant parties. The confirmation must be sent in consideration of consumer's preferred format, ensuring that there is a record that a written summary has been provided or shared with the consumer. Where a summary is auto-generated and/or displayed on-screen, a way to allow a consumer to reference back to the summary should be provided. In instances where the case record confirms a record of the interaction has been sent to the consumer, and this is not included within the case file, this omission will also be considered under Standard 4f. If the service delivers inaccurate information during the interaction and this is reflected as such in the written confirmation, this standard will still be met.

If the written confirmation corrects any inaccuracies that were delivered during the interaction, the consumer should be made aware of those corrections. If that happens, this standard will still be met.

Not applicable (N/A) clarification

Not applicable only where the consumer has declined to receive a confirmation of the advice or guidance provided and this is clearly recorded in the case record.

Debt advice services only

Must also include recommended debt options/solutions, advantages and disadvantages as required by statutory rules and regulation.

Debt Relief Order (DRO) only

This standard is not assessing the confirmation of advice provided by the referring agency. DRO hubs do not need to repeat the original advice, but must provide a tailored written summary of their own interaction(s) with the consumer.

Examples of this could be:

- what the DRO hub has checked or discussed
- any changes, corrections or additional advice provided
- agreed actions and who is responsible for them
- next steps for the consumer.

From the examples above, this could be over several communications. Singular interactions should not be considered in isolation.

Digital services only

This standard is applicable to **full debt advice digital** only. It is expected that any digital service that stores consumer data and provides tailored information, advice and/or guidance can reproduce an unaltered copy of the information, advice and/or guidance initially provided to the consumer.

Mental Health Crisis Breathing Space (MHCBS) application only

This could include:

• offering the consumer a record of any engagement during moratorium that has resulted in options/actions

• offering the consumer a record of their moratorium and any agreed follow up actions

• evidence of notification of entry into and exit out of MHCBS.

It may be appropriate to send records of engagement to other authorised people (such as family members with authorisation to receive information on the consumer's behalf, NPOCs and AMHPs).

	MHCBS - Initial contact only Where a consumer has not been entered into MHCBS, they have received confirmation of such and the reason(s) why. **Not applicable (N/A) Clarification** May not be applicable where it would be unreasonable to expect a record of the interaction to be sent to the consumer.
4m-ii. Ensure the language used is clear and concise, avoiding jargon where possible.	All written confirmation of advice or guidance must be in plain language to enable consumers to clearly understand the information, advice and guidance provided. Consideration must be given to a wide range of factors that may influence consumer comprehension, but as a minimum this must include: • the use of simple, everyday language • avoiding technical or legal jargon • acronyms to be explained before being used • ensuring that where technical terms are unavoidable, clear definitions or examples are used to provide clarity • keeping sentences short and easy to follow. In addition, consideration must extend to any accessibility needs or vulnerabilities declared by the consumer throughout the interaction, which may affect their ability to absorb the communication. **Not applicable (N/A) clarification** Not applicable either where the consumer has declined to receive a confirmation of the advice or guidance provided and this is clearly recorded in the case record, or where a confirmation of advice or guidance is missing (4m-i). **Digital services only** This standard is applicable to **full debt advice digital** only.
4m-iii. Be structured to allow easy navigation and comprehension taking into consideration the consumers preferences.	All written confirmation of advice or guidance must be structured to present content with simple formatting so key points stand out, and sequenced in a way that guides the consumer to key information most relevant to their circumstances and/or the information, advice or guidance received. Where a summary is auto-generated and/or displayed on-screen, navigation should be intuitive and have the ability for accessibility customisation. Where hand-offs to other written references are used, including links to more detailed information, advice and/or guidance (such as factsheets), or other sources (such as articles available on MoneyHelper), it is expected that these are easily accessible without the need to click through a chain of weblinks to access them.

	Not applicable (N/A) clarification Not applicable either where the consumer has declined to receive a confirmation of the advice or guidance provided and this is clearly recorded in the case record, or where a confirmation of advice or guidance is missing (4m-i). **Digital services only** This standard is applicable to **full debt advice digital** only.
4m-iv. Take proactive steps to confirm consumer understanding of what will be included and signpost or direct the consumer to key pieces of information, advice or guidance relevant to their situation.	Consumers must be made aware of the written confirmation of advice or guidance they will receive. Positive indication of understanding must be sought directly from the consumer via confirmation questions, summary prompt or offering clarification. It is not necessary to test or check detailed understanding of the contents of the confirmation of advice or guidance, only that the consumer is aware of what they will receive. A summary of what the consumer will receive is sufficient. Where a summary is auto-generated and/or digitally displayed, prompts for consumer confirmation of understanding is required before proceeding to conclusion of interaction. **Not applicable (N/A) clarification** Not applicable where the consumer has declined to receive a confirmation of the advice or guidance provided and this is clearly recorded in the case record. **Digital services only** This standard is applicable to **full debt advice digital** only. **Mental Health Crisis Breathing Space (MHCBS)** For the purpose of this standard, it is accepted there may be no or limited communication with the consumer. Positive indication may be sought from the NPOC, AMPH or the friend/family member supporting consumer. **Not applicable (N/A) clarification** Not applicable where the interaction with the consumer may be one way or there is no direct consumer interaction.

MaPS Standard 5: Communicating with consumers

5. Good communication is imperative in ensuring that information, advice or guidance provided, is well received and understood by consumers. Therefore, MaPS and delivery partners must:

Standard wording	Minimum threshold for compliance – additional detail
5a. Consider the information needs of consumers using the service and communicate information to them in an appropriate manner, suitable for the target audience, where this is reasonable and proportionate to the type of service or channel being delivered.	Communication must reflect the consumer's circumstances, adapting tone, pace and detail to their literacy level along with the complexity of the information, advice and/or guidance. Adaptation should be reasonable and proportionate to the service type, journey and channel. Where digital mechanisms or channels are used: • navigation must be intuitive and easy to follow, and content should cater to the lowest literacy need • accessibility features must be available (e.g. text size, screen reader compatibility). **Debt advice services only** Services must consider regulatory disclosures and ensure clarity on debt solutions.
5b. Ensure provision of the information, advice or guidance is consistent across the different delivery channels unless there is a good reason for it not to be.	Content and quality of experience within interactions must be consistent where multi-channel access to information, advice and/or guidance is available. For example, if a consumer receives information on a specific topic via webchat, then decides to call on a separate occasion about the same topic, they will receive the same information and experience. In addition, any content used within defined multi-stage information, advice and/or guidance journeys must be consistent where omni-channel delivery is available. For example, where a consumer engages via a digital channel, then moves to a traditional channel to continue their information, advice and/or guidance journey, there must be no conflict between information, advice and/or guidance already received or relied upon.

	Where appropriate, guidance and frameworks should be available to ensure clarity and consistency in both content and experience. Where relevant, if digital mechanisms and/or automated content are used to provide information, advice and/or guidance as an alternative to practitioner-led delivery, it must be to the equivalent accuracy, quality and completeness as practitioner-led delivery via traditional channels. Any content is regularly reviewed for accuracy, and any differences must be documented with clear rationale (for example, legislative changes meant content changes were required to remain accurate and up to date).
5c. 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, advice or guidance delivered is minimal, unless intended to improve the consumer outcome or seek to confirm consumer understanding.	Where appropriate, mechanisms must be available to easily allow a change of channels as an alternative way to receive information, advice and/or guidance based on consumer preference and needs (such as from webchat to a telephone call). Systems, tools and processes facilitate checks on any relevant consumer information already disclosed and what information, advice and/or guidance has already been covered prior to the transition into an alternative channel. Unnecessary repetition is avoided unless to support context, the next level of detail or confirm understanding. Reasonable steps must be taken to ensure continuity and avoid conflicting information, advice and/or guidance when switching channels. This includes maintaining any accessibility adjustments during transitions. Where digital mechanisms are used, systems and tools should minimise consumer burden to input repeated information to support the transition across channels and maintain continuity.
5d. Ensure any pre interaction, follow up or supporting materials provided outside of statutory or regulatory requirements, are clear, concise and free from jargon and structured to aid understanding and comprehension.	Refer to the minimum expectations set out in 4m-ii and 4m-iii for confirmations of advice and guidance. This standard applies these minimum expectations to all other written communications with the consumer, excluding the confirmation of advice which is assessed under Standard 4m-i. Examples of such materials include (but not limited to): • appointment booking confirmations • generic factsheets that do not form part of the confirmation of advice as assessed in 4m • emails with further information and/or links. **Not applicable (N/A) clarification** Not applicable only where no additional communication has been sent to the consumer.

MaPS Standard 6: Supporting those most in need

6. MaPS is required to ensure that information, advice or guidance is available to those most in need of it (and to allocate its resources accordingly), bearing in mind in particular the needs of consumers in vulnerable circumstances. Providing information, advice or guidance to consumers in vulnerable circumstances and those with accessibility needs is a key part of the work that MaPS and delivery partners deliver.

As such we expect MaPS and delivery partners to:

Standard wording	Minimum threshold for compliance – additional detail
6a. Take a pro-active approach to identifying consumers in vulnerable circumstances or those with accessibility needs.	The service must proactively identify whether the consumer is in vulnerable circumstances or has accessibility needs (as defined by the Standards). This must be considered as early on in the interaction as possible. The service must consider the best format and sequencing for delivering this. This must include further exploration if this is not clear from initial information provided by the consumer. If vulnerable circumstances or accessibility needs are not initially disclosed, but evidence later in the interaction indicates they may exist, this should be revisited. Delivery partners must attempt to understand the impact of vulnerable circumstances or accessibility needs when exploring the consumer's circumstances. This is with the aim of ensuring information, advice and/or guidance is relevant and tailored to the consumer's needs. This standard is about demonstrating that steps have been taken to identify vulnerable circumstances and accessibility needs. **Digital services only** It is expected that digital services assist the consumer to self-identify vulnerable circumstances or accessibility needs and provide opportunities for disclosure/channel shifting early during the digital journey. Evidence of the tool's accommodation for vulnerabilities may be found in the service design as opposed to a case record (for

	example, ensuring accessibility is met via the Web Content Accessibility Guidelines). **Mental Health Crisis Breathing Space (MHCBS) only** If there is a reasonable amount of direct consumer contact, and it is appropriate to do so, it is expected that the service explores any additional vulnerabilities, not just those disclosed. With that in mind, consumers who are receiving treatment which would make them eligible to enter a MHCBS on health grounds should automatically be deemed as having a mental health related vulnerability, and the service should adapt accordingly. The following list shows examples of how the service could adapt: • Try and liaise with appropriate people supporting the consumer where the consumer is unable to engage with the service. • Be mindful that consumers who are engaged may wish to take things more at their own pace whilst in treatment. • Be conscious of language and the need for empathy in any form of communication with the consumer. This is not an exhaustive list. **MHCBS - Initial contact only** If consumers are not entered into MHCBS but a vulnerability is still identified, this should still be addressed in the same way as above. However, the level of exploration required should be proportionate to the interaction if the consumer is not being entered into MHCBS.
6b. Where vulnerability or an accessibility need is identified, take steps to adapt sessions and supporting documentation, including information, advice or guidance, to meet the consumer's needs as far as possible.	Where vulnerability or accessibility needs are identified, delivery partners must adapt their approach, prioritising clarity, empathy and meaningful access. This must include (where appropriate and within the scope of the service): • adjustment made to the service or interaction, for example in length, structure or delivery style • adjustment made to supporting documentation, for example in length, structure or communication style • support to facilitate communication needs such as from a communication professional or aids/tools • providing additional information, advice and/or guidance relating to vulnerability or accessibility needs • providing resources for post-service support. Signposting to support services is covered under 6d.

	Not applicable (N/A) clarification Not applicable only where either: • no vulnerable circumstances or accessibility needs (as defined by the Standards) have been identified • where vulnerable circumstances have been identified, but it has been determined no adaptation or further support is required.
6c. Make the adjustments the consumer requires and where progressing through an onward journey, record the needs and adjustments to ensure they are provided for in every subsequent contact.	For services where it is possible that the consumer will recontact the service (as part of an onward journey, or as a separate need), as a minimum this must include needs and preferences relating to: • delivery channel • communication method • communication format/style • service duration and • any other relevant adjustments required. Once disclosed, adjustments should be accommodated in subsequent contact with the service where possible. This information must only be stored for as long as is necessary and as stated in the service's privacy notice. Records must be regularly updated to ensure subsequent information, advice and/or guidance remains relevant to the consumer's evolving needs, avoiding unnecessary repeat disclosure. As this standard is focusing on the recording of needs and/or adjustments, non-compliance here should not impact compliance with 4f. When making warm referrals, services must seek the consumer's explicit consent for information on their adjustment needs to be shared. This is so their ongoing needs can be met throughout the onward journey. This does not include warm referrals within the same organisation (such as from one MaPS-delivered guidance service to another). **Not applicable (N/A) clarification** Not applicable only where either: • no vulnerable circumstances or accessibility needs (as defined by the Standards) have been identified • vulnerable circumstances or accessibility needs have been identified, but it has been determined no adaptation or further support is required. **Digital services only** **Full debt advice digital only** Recording the needs and adjustments is only necessary for services where consumer data is stored to enable a more informed and tailored onward journey.

6d. Signpost, refer or warm-transfer consumers in vulnerable circumstances to specialist services where additional support is required.	Where vulnerable circumstances have been identified and additional support is required, the consumer must be signposted (as defined by the Standards) to appropriate specialist services for additional support. The service must record signposting or referrals made. **Not applicable (N/A) clarification** Not applicable only where either: • no vulnerable circumstances or accessibility needs (as defined by the Standards) have been identified, or • vulnerable circumstances or accessibility needs have been identified, but additional support is not required (therefore there is no need to signpost to specialist services). **Debt advice services only** Examples include, but are not limited to, signposting to: • MIND • Mental Health Crisis teams • Gingerbread • Samaritans • specialist housing advice for crisis housing issues • specialist advice for asylum seekers/refugees • Addiction Support (e.g., AA) • creditor welfare/vulnerability teams • priority services register (where there are appropriate indicators suggesting signposting is needed such as deficit budget and PPM, or if the consumer is vulnerable and has energy/water arrears).

MaPS Standard 7: Managing service performance

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

Standard wording	Minimum threshold for compliance – additional detail
7a. Work cooperatively between each other to share intelligence, best practice, and insight in relation to the standards to identify service gaps.	Delivery partners must take a proactive approach to identifying and actioning opportunities for sharing. As a minimum, this must include participation in MaPS-facilitated activity where appropriate. If applicable, this must also be in line with any further requirements set out in the grant or contract held with MaPS.
7b. Engage in a shared process, led by MaPS, to annually review the impact of the standards and to identify lessons learned informing future improvements.	Delivery partners must work collaboratively with MaPS to agree, implement and engage with relevant shared processes.
7c. Ensure regular performance 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.	Delivery partners must implement a structured and recurring performance reporting process. This process must provide clear, accurate and timely information on compliance with the Standards. The process must: • monitor adherence to the Standards • identify and address risks or issues promptly • inform corrective actions and drive continuous improvement in service delivery • be produced within agreed timescales, and • contain accurate, relevant data to support effective governance.
7d. MaPS will monitor the performance of delivery partners in line with their commercial agreements. As such we require delivery partners to:	
7d-i. Adhere to the reporting and monitoring conditions as stated in their grant agreement or contract.	**This standard applies to outsourced or externally delivered services only.** This must be in line with any requirements set out in the grant or contract held with MaPS.

7d-ii. Engage with MaPS via regular monitoring meetings and proactively escalate instances of non-conformity or underperformance.	**This standard applies to outsourced or externally delivered services only.** This must be in line with any requirements set out in the grant or contract held with MaPS.
7d-iii. Where non-compliance or under performance is identified, comply with the action planning and remediation plan requirements of the relevant grant or contract.	**This standard applies to outsourced or externally delivered services only.** This must be in line with any requirements set out in the grant or contract held with MaPS.

MaPS Standard 8: Monitoring and assuring the service

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 delivery partners must:

Standard wording	Minimum threshold for compliance – additional detail
8a. Monitor compliance with the standards and where required deliver detailed action plans to improve compliance where non-compliance is identified.	Delivery partners must ensure internal/first-line monitoring of MaPS Standards compliance takes place regularly. This must ensure processes and systems are in place to track compliance with all applicable standards. Where non-compliance is identified delivery partners must: • identify and analyse root causes • document comprehensive action plans (that address root causes and include relevant timelines) • track actions to completion • assess if actions have resulted in the required improvements.
8b. Be able to provide information about the status of their compliance with statutory and regulatory obligations specific to the service being delivered.	Delivery partners must ensure internal/first-line monitoring and processes/systems are in place to track compliance with statutory and regulatory obligations relevant to the service being delivered. This must include how compliance statuses are reviewed and updated regularly to reflect any relevant statutory, legislative or regulatory changes.
8c. Ensure a risk management policy, controls, and reporting are in place and operated as part of their regular service management activities.	As a minimum the risk management policy must include: • a description of risk management processes • how risks are identified • how the delivery partners ensure risk assessments are objective and data driven • how quantitative risk scoring models, statistical analysis and/or benchmarking is used in risk evaluation • how risks are recorded and risk registers are managed • how risks are mitigated • how risks are reported and escalated • how risks and issues will be distinguished and monitored separately

	• how lessons learnt will be used to future-proof services. The policy must have an accompanying schedule for review which is adhered to and evidenced, including version control and governance. Delivery partners must hold ISO 31000 or have an equivalent internal framework in place and be able to demonstrate how the policy and processes align with ISO 31000 principles. If applicable, this must also be in line with any further requirements set out in the grant or contract held with MaPS.
8d. To make MaPS aware of any new or emerging risks whereby impact or potential detriment to consumers or service delivery may occur.	With consideration of detriment (as defined by the Standards), delivery partners must inform relevant MaPS contacts and teams of any new or emerging risks where there is a risk of detriment to the consumer or impact to service delivery. Relevant training, processes and guidance for individuals to identify detriment risks and take appropriate steps should be included. Risk registers and systems must be able to track communication and escalation of new or emerging risks (including timestamps) to relevant MaPS contacts and teams. Risks and issues must be distinguished, logged and communicated separately. Any additional complementary internal or MaPS processes relating to identification and remediation of detriment issues must also be followed. If applicable, this must also be in line with any further requirements set out in the grant or contract held with MaPS.

MaPS Standard 9: Managing complaints

9. 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, MaPS and delivery partners must:

Standard wording	Minimum threshold for compliance – additional detail
9a. Have in place a complaints policy and documented processes to ensure consumer complaints in connection with service delivery are investigated fairly, consistently, and promptly.	Services must maintain a written complaints policy that is kept up to date and aligned with any regulated obligations or best practice relevant to the service. The policy must have an accompanying schedule for review which is adhered to and evidenced, including version control and governance. The policy must include at a minimum: • a description of the complaints process, including how complaints will be logged, investigated and resolved • clear Service Level Agreements (SLAs) which must include the response and communication timescales for new or open complaints • details of how to escalate a complaint if dissatisfied with the outcome • details of the relevant ombudsman.
9b. Ensure the process and outcome is clearly communicated to consumers.	Services must provide sufficient signposting and access to an up-to-date complaints process at key points within a consumer's journey. Complaints must be acknowledged and an outcome of the complaint issued to consumers in line with any Service Level Agreements (SLAs) provided in the complaints policy. The outcome of a consumer's complaint must be provided to complainants in a clear, structured and timely manner, with the outcome, any remedial action(s) and escalation routes outlined.
9c. Ensure information gained from consumer complaints and their outcomes informs the lessons learned process to improve future services.	Services must show evidence that complaints data and outcomes are analysed for trends and themes on a regular basis. The lessons learned should drive tangible actions for improvement that are documented, linked to any associated improvement actions and tracked to completion.

9d. Conduct root cause analysis to ensure complaint trends and themes are analysed and utilised to improve service delivery and compliance with the MaPS Standards.	Services must take reasonable steps to categorise and understand complaints data with the purpose of identifying recurring issues or emerging themes. The lessons learned should drive tangible actions that proactively address complaint causes or processes that are tracked and implemented with evidence of impact.
9e. Prepare reports on complaints received including number of complaints, outcomes and their resolutions, annually or as required by specific contracts or agreements.	Complaints-reporting must be established to ensure appropriate oversight of the complaints policy. Services must adhere to MaPS' complaints data reporting requirements, including: • the production of complaints reporting in line with any Service Level Agreement(s) • the accuracy of data • a full and complete data set reflecting complaints volumes, outcome and any remedial actions for each reporting period. Services must not breach any complaint-reporting obligations set by applicable regulatory bodies. If applicable, this must also be in line with any further requirements set out in the grant or contract held with MaPS.
9f. Where feedback is received, this is captured and included in wider service improvement activity.	Services must ensure that feedback received, but not managed under complaints handling processes, is captured and analysed for trends and themes with the purpose of identifying recurring issues or emerging themes on a regular basis. The lessons learned should drive tangible actions for improvement that are tracked and implemented with evidence of impact.

MaPS Standard 10: Handling consumer data

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

Standard wording	Minimum threshold for compliance – additional detail
10a. Have a clearly documented policy detailing but not limited to; how data is stored and classified, managed and reported.	The service must have a written policy in place which includes as a minimum: • how data is processed (including but not limited to how it is collected, stored, classified, managed, used, reported and destroyed) • how the service ensures its privacy notice remains fit for purpose and appropriately enables consumers to understand how their data will be processed and their data rights. This must cover all consumer data processed including recordings of the consumer (such as consumer voice) and complaints. The policy must have an accompanying schedule for review which is adhered to and evidenced, including version control and governance.
10b. Ensure records are organised, secure, and retained or erased per retention policies.	This must be in line with the latest version of MaPS' data retention policy, or as outlined within the grant or contract held with MaPS (if applicable).
10c. Have effective and tested validation processes in place to ensure the quality and integrity of the data being processed.	The service must have validation processes in place to ensure the quality and integrity of the data being processed which, as a minimum, must consider the following areas: • accuracy • completeness • timeliness • consistency. This process must have undergone testing upfront, and be subject to regular review to ensure it is fit for purpose.
10d. Have processes or systems that enable data subjects to access, modify, erase, or port their data, and respond within legal timeframes.	The service must have documented processes in place that ensures data subjects are able to access, modify, erase or port their data, and respond within legal timeframes in line with relevant legislation.

	If applicable, this must also be in line with any further requirements set out in the grant or contract held with MaPS.
10e. Set procedures for identifying, reporting, and notifying data subjects about data breaches.	The service must have documented processes in place for identifying, reporting and notifying data subjects about data breaches within legal timeframes in line with relevant legislation. If applicable, this must also be in line with any further requirements set out in the grant or contract held with MaPS.
10f. Report breaches internally, and where applicable, to regulators, and document responses.	The service must have documented processes in place for reporting data breaches internally and, where applicable, to relevant regulators. This should include how the service will ensure this takes place within legal timeframes, in line with relevant legislation, and how responses are documented. If applicable, this must also be in line with any further requirements set out in the grant or contract held with MaPS.
10g. Conduct post-breach reviews to prevent recurrence.	The service must have a documented process in place for conducting post-breach reviews. As a minimum, this should include how the service will seek to identify the causes of the breach, how corrective actions will be identified and tracked, and how lessons learnt will be used to prevent recurrence.

Appendix 1: Overlay Key

Digital services	Digital refers to services, tools, or content accessed independently by a consumer through digital technology (with or without practical support from a friend, family member, or support worker to help the consumer access or navigate the service). For the purposes of these standards, digital excludes practitioner-led digital communication or interaction, including webchat, video calls, emails, messaging, or any other digital channel where a practitioner communicates or interacts with a consumer.	
	Full debt advice, digital	Where the full debt advice journey (as defined below) is completed via a digital/online platform with no practitioner interaction.
Debt advice services	Debt advice services refers to regulated services that provide individuals with tailored advice (as defined in the MaPS Standards), information and/or guidance to help them understand their financial situation and manage their debts.	
	Limited debt advice (LDA)	Where due to consumer preference or circumstances it is not feasible to provide full debt advice (through to solution recommendation), however some tailored advice can be provided.
	Full debt advice (FDA)	Advice where a solution and/or options recommendation has been provided.
	Debt Relief Order (DRO)	Where the main purpose of the service is to progress the consumer into a DRO. This reflects that broader advice or guidance will have already taken place prior to this service.
Mental Health Crisis Breathing Space (MHCBS)	**MHCBS - Initial contact**	Where the main purpose of the interaction is to seek a better understanding of the consumer's circumstances and query to direct them to the best substantive service, or get them to the next stage of a service.
	MHCBS - Application only	Similar to initial contact, but this includes specific steps to enable/prepare specifically for debt advice or to meet other legislative requirements.

Appendix 2: Copy of the MaPS Standards Definitions

For ease of reference please find below a copy of the definition table contained within the MaPS Standards.

Term	Definition
Accurate	Accuracy will be assessed in two ways. 1. The input of information gathered from the consumer, for the purpose of the standards it is defined as the capturing or gathering of correct, precise and truthful information that fully reflects the consumers situation. 2. The output of information back to the consumer, for the purpose of the standards it is defined as the provision of factual and correct information, advice or guidance to the consumer to enable them to make an informed decision.
Advice	Advice in this context is the giving of an opinion or recommendation as a guide to action to be taken, in this case the liquidation of debts that is tailored to the consumer's circumstances and objectives. It either explicitly or implicitly steers the consumer to a particular course of action. Any element of evaluation, value judgment or persuasion is likely to mean that advice is being given. Advice in this context is regulated and delivered by an organisation authorised and regulated by the Financial Conduct Authority (FCA.) Providers of advice are responsible and liable for the accuracy, quality and suitability of the recommendation they make. Where incorrect advice is provided, remediation activity would be expected.
Compliance	Meeting and evidencing the requirements within the standards.
Consumer	Members of the public using MaPS services, benefitting from MaPS delivered services or those who may use MaPS services in the future. This may be used interchangeably with consumer or client within internal process documentation.
Consumers in vulnerable circumstances	Aligned to the FCA's definition. MaPS defines consumers in vulnerable circumstances as "someone who, due to their personal circumstances, is especially susceptible to detriment, particularly if MaPS or delivery partners do not act with the appropriate levels of care." These circumstances may be temporary or permanent. Including but not limited to; physical or mental health problems, specific characteristics such as age or literacy skills, or changes in personal

	circumstances such as bereavement, job loss or changes in household income.
Consumers with accessibility needs	Individuals with any condition that affects their ability to access, use or benefit from products, services or information that require reasonable adjustments to ensure fair and equitable access, use or to facilitate understanding.
Continued professional development (CPD)	Learning activities that professionals engage in to develop and enhance their abilities, knowledge, and skills. Ensuring that qualifications and knowledge do not become out-dated or obsolete, CPD activity should allow individuals to continually 'up skill' or 're-skill' themselves. MaPS refers to CPD as both accredited and non-accredited continued professional development activity suitable to competency needs of the organisation.
Complaint	MaPS has aligned their definition of a complaint to the FCA definition. MaPS defines a complaint as an expression of dissatisfaction (either oral or written) regarding the provision of, or failure to provide a service. Where a consumer alleges to have been impacted by financial loss, material distress, or material inconvenience. This definition includes any dissatisfaction, whether justified or not.
Data / System breaches	A security incident in which sensitive, protected or confidential data is copied, transmitted, viewed, stolen or used without authorisation.
Debt Adjusting	Definition taken from the Financial Services and Markets Act 2000 (Regulated Activities) Order 2001: 1. When carried on in relation to debts due under a credit agreement — a). negotiating with the lender, on behalf of the borrower, terms for the discharge of a debt, b). taking over, in return for payments by the borrower, that person's obligation to discharge a debt, or c). any similar activity concerned with the liquidation of a debt, is a specified kind of activity. 2. When carried on in relation to debts due under a consumer hire agreement: a). negotiating with the owner, on behalf of the hirer, terms for the discharge of a debt, b). taking over, in return for payments by the hirer, that person's obligation to discharge a debt, or c). any similar activity concerned with the liquidation of a debt, is a specified kind of activity.
Delivery channel	A consumer's access point to a service provider, advice, guidance, or information. This can include traditional points of access (e.g., telephone, face to face, letter, etc.) or digital points of access (e.g., email, mobile apps, websites, webchat etc.). This may also include multiple points of access throughout their consumer journey where services are provided by multi or omni channel interactions.

Delivery Partners	Organisations or internal delivery teams that provide consumer facing services either on behalf of MaPS or commissioned services via a grant agreement or a commercial contract. Throughout the standards this will be referred to as MaPS and delivery partners where the requirement applies to both. Where MaPS have a responsibility to provide a service alone, this will be referred to as MaPS.
Detriment	Detriment at MaPS is defined as 'financial harm or loss, distress and/or inconvenience experienced by a consumer' as a direct result of a failing of MaPS or service delivery partners, in provision of information, advice, or guidance. When assessing compliance with the MaPS Standards, 'detriment' will form a sub-measure of non-compliance.'
Directory of financial advisers	A list of FCA accredited financial advisers.
Enforcement	Act of ensuring observance and compliance with guidance or rules. Within MaPS enforcement falls within our performance management framework and any enforcement action will be listed within commercial documentation.
Equality	Equality in service delivery, observed through PSED for public bodies (including MaPS,) also observed through a general duty, including aspects relating to considerations on reasonable adjustments applicable to all service providers.
FCA Regulatory Requirements	Requirements for practice as determined by the Financial Conduct Authority.
Financial services or products	Financial services refer to a range of professional services provided by financial institutions to manage money and assets. These services support individuals and businesses in making, saving, investing, borrowing, or protecting money decisions. Financial products are the products or tools offered through financial services that help individuals and businesses meet their financial needs or goals.
Free at the point of access	No charge to the consumer for using the service.
Grant agreement	An agreement between MaPS and external organisations to provides services to consumers that are grant-funded.
Guidance	Guidance is an impartial service that will help a consumer to identify their options and narrow down your choices but will not tell the consumer what to do or which product to buy; the decision is theirs.

Impartial	Is in the context of providing guidance or advice based on objective criteria, rather than on the basis of bias, prejudice, or preferring the benefit to one person (or organisation) over another for improper reasons. Accepting the differences in advice and guidance, whereby for guidance there may be only one appropriate course of action that is in the consumers best interest.
Money and Pensions Service	Organisation created under the Financial Guidance and Claims Act 2018 whose vision is 'Everyone making the most of their money and pensions'.
Money Guidance Competency Framework	The money guidance competency framework sets out the skills, knowledge and behaviours required to deliver impartial guidance on money management and financial wellbeing in the non-regulated space.
Most In Need	MaPS is required to ensure that information, advice or guidance is available to those most in need of it (and to allocate its resources accordingly), bearing in mind particularly the needs of consumers in vulnerable circumstances. MaPS strategic intent is to deliver information, advice or guidance to those most in needs. MaPS defines those most in need as "People struggling with financial wellbeing, particularly at moments that matter."
Non-regulated	Not being subject to regulation.
Performance management	A method used to monitor, assess, control and deal with how well something is functioning against a desired standard.
Practitioner	A debt adviser providing regulated information and advice, or guider providing non-regulated information and guidance directly to a consumer.
Professional standards	Required standards for a given profession.
Regulated	Controlled by rules or regulations.
Relevant	Directly related and applicable to the consumer's issue or the context in which the service is provided.
Service	Information, advice or guidance delivered directly in-house or externally through a delivery partner.
Signposting	Proactively directing or referring a consumer to a place, organisation, individual, source of information, or service that they need to achieve a positive outcome.
Single Financial Guidance Body	Previous name of the Money and Pensions Service, the body that came into being as a result of the Financial Guidance and Claims Act 2018.

Specialist	Practitioners with subject matter expertise for specific circumstances, or financial service and products, or services that can support consumers non-financial needs (e.g. wellbeing, housing, employability).
Suitable	Well-matched or tailored to the consumer's individual needs, circumstances, and financial situation. Information, advice or guidance based on the information provided by the consumer taking into consideration their preferences.
Sufficient	Adequate in quantity and quality to meet the requirements for informed decision-making and standards compliance. MaPS requires the provision of enough information for the consumer to understand the implications, make a decision and take action.
Supply Chain	A supply chain is a network of organisations and individuals that are involved in creating a product or service and delivering it to the consumer. Supply chains will typically exist in our commercial agreement and work under a prime contractor.
Underperformance	Not performing at a level in line with expectations set out within commercial agreements or internal key performance indicators.

Appendix 3: MaPS Standards service line mapping

			Debt Advice Services					
Standard	Sub-Standard	Covered by CFA process:	Full debt advice	Limited debt advice	DRO	Full debt advice, digital	MHCBS - Initial contact	MHCBS - Application only
1	1a		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	1b		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	1c		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	1d		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	1e		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	1f		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	1g		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	1h		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	1i		Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Does Not Apply	Standard Does Not Apply	Standard Does Not Apply
2	2a		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	2b		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	2c		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	2d		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
3	3a		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies

	3b		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	3c		Standard Applies	Standard Applies	Standard Applies	Standard Does Not Apply	Standard Applies	Standard Applies
	3d		Standard Applies	Standard Applies	Standard Applies	Standard Does Not Apply	Standard Applies	Standard Applies
	3e		Standard Applies	Standard Applies	Standard Applies	Standard Does Not Apply	Standard Applies	Standard Applies
	3f		Standard Applies	Standard Applies	Standard Applies	Standard Does Not Apply	Standard Applies	Standard Applies
	3g		Standard Does Not Apply	Standard Does Not Apply	Standard Does Not Apply	Standard Does Not Apply	Standard Does Not Apply	Standard Does Not Apply
4	4a-(i)	CFA	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	4a-(ii)	CFA	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
4b	4b-(i)	CFA	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	4b-(ii)	CFA	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
4c	4c-(i)	CFA	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	4c-(ii)	CFA	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	4c-(iii)	CFA	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
4d	4d-(i)	CFA	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	4d-(ii)	CFA	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	4d-(iii)	CFA	Standard Applies	Standard Applies	Standard Applies - but could be N/A	Standard Applies	Standard Applies	Standard Applies
	4e	CFA	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	4f	CFA	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	4g	CFA	Standard Applies	Standard Applies - but could be N/A	Standard Applies	Standard Applies	Standard Applies - but could be N/A	Standard Applies - but could be N/A
4h	4h-(i)	CFA	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	4h-(ii)	CFA	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies

	4h-(iii)	CFA	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
4i	4i-(i)	CFA	Standard Applies	Standard Applies	Standard Applies - but could be N/A	Standard Applies	Standard Applies - but could be N/A	Standard Applies - but could be N/A
	4i-(ii)	CFA	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies - but could be N/A	Standard Applies - but could be N/A
	4i-(iii)	CFA	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies - but could be N/A	Standard Applies - but could be N/A
	4i-(iv)	CFA	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies - but could be N/A	Standard Applies - but could be N/A
	4i-(v)	CFA	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A
4j	4j-(i)	CFA	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A
	4j-(ii)	CFA	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A
4k	4k-(i)	CFA	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A
	4k-(ii)	CFA	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A
	4k-(iii)	CFA	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A
4l	4l-(i)	CFA	Standard Does Not Apply	Standard Does Not Apply	Standard Does Not Apply	Standard Does Not Apply	Standard Does Not Apply	Standard Does Not Apply
	4l-(ii)	CFA	Standard Does Not Apply	Standard Does Not Apply	Standard Does Not Apply	Standard Does Not Apply	Standard Does Not Apply	Standard Does Not Apply
4m	4m-(i)	CFA	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A

	4m-(ii)	CFA	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A
	4m-(iii)	CFA	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A
	4m-(iv)	CFA	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A
5	5a	CFA	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	5b		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	5c		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	5d	CFA	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
6	6a	CFA	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	6b	CFA	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A
	6c	CFA	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A
	6d	CFA	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A	Standard Applies - but could be N/A
7	7a		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	7b		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	7c		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
7d	7d-(i)		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	7d-(ii)		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	7d-(iii)		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
8	8a		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	8b		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies

	8c		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	8d		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
9	9a		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	9b		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	9c		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	9d		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	9e		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	9f		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
10	10a		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	10b		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	10c		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	10d		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	10e		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	10f		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies
	10g		Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies	Standard Applies