

# Competency Framework for practitioners providing guidance on money management and financial well-being

**Final Report** 

October 2019

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Cert No: QEC19593371/0/Q



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## **Executive Summary**

#### Introduction

Money and Pensions Service<sup>1</sup> (MaPS) want to *know* that people are receiving quality money support. This means helping the sector attract, retain and develop practitioners who give money guidance and support. MaPS want practitioners and their organisations to have easy access to quality resources, training, evidence and insights to help them in this endeavour and to implement positive change in programmes and services.

Pye Tait Consulting were commissioned by the Money Advice Service (MAS) in September 2018 to develop a Competency Framework that will show the competencies needed by <u>individuals</u> to provide good quality money guidance.

The need for this Framework comes from research initially commissioned by the MAS in 2017. Further information about the background and context to this work can be found in 1. Background and context

#### Methodology

There were four key strands to the work:

- Desk research exercise to inform the design of a 'straw man' for developing the competency Framework.
- A practitioner Working Group of cross sector organisations met up on four occasions between November 2018- September 2019. This group advised on structure and content and helped evolve and refine the Framework at key stages in its development. Specialists within MaPS were also called upon to provide feedback on the content of the Competency Framework.
- Alongside the development of the Framework, an extensive mapping exercise was carried out of the relevant training and qualifications that relate to money guidance.
- During April to mid-July 2019 Pye Tait ran a call-for-feedback consisting of an on-line survey, telephone interviews and workshops held across the UK.

The full project methodology can be found in 2.2 Methodology

#### Summary of feedback and amendments

In total c170 individuals provided feedback on the draft Competency Framework. Their views and subsequent actions and revisions are detailed in this report.

<sup>&</sup>lt;sup>1</sup>The Money and Pensions Service was created by Government to bring together the three bodies: Money Advice Service, The Pensions Advisory Service and Pension Wise.



#### **Principles of the Framework**

There was overwhelming support for a Framework for money guidance practitioners from everyone we spoke to during the development process. A Framework would be instrumental in raising the quality of money guidance whilst at the same time raising the profile and improving the networks of money guidance practitioners.

Respondents agreed with the core principles on which the Framework is based:

- 1. Everyone who delivers money guidance needs a minimum level of skills and knowledge
- 2. Those who deliver money guidance operate at different levels (called 'Tiers' in the Framework)

There was strong support for the way the Framework is presented, the key messaging about the difference between advice and guidance, the use of the term 'customers' and, the descriptions of the Tiers.

Respondents also, on the whole, agreed that the Framework is appropriate to practitioners working in different settings (e.g. in groups, one to one, remotely and face to face).

The descriptions of the Tiers were thought to be largely appropriate, however the level of Tier 1, and the principle that everyone should possess Tier 1 technical knowledge was disputed by some – the content of Tier 1 was felt to be too high-level for those who only provide signposting, and as such, one of the principles of the Framework has been changed. An additional Foundation area has been added (Signposting Customers) and practitioners will <u>not</u> be required to meet the Tier 1 competencies in the technical knowledge Domains.

#### Content

#### **Foundations**

The majority of respondents agreed that all of the areas A-E in the Foundations are 'discrete' areas and that they are required by practitioners. With the addition of 'Signposting Customers', the Framework now features 6 Foundations.

#### **Technical knowledge Domains**

Although not all respondents provided guidance on all areas, there was strong agreement that all of the 10 Domains were valid and appropriate for inclusion in the Framework. Tax and investments were identified as omissions which should feature.

Feedback indicated that the content in Domain 2 (Debt Solutions) went beyond that of a money guidance practitioner. Following further consultation with Debt advice specialists within MaPS, the Domain has been reduced to just one tier and the content reviewed.

The importance of having knowledge of, and adhering to, regulated boundaries was a recurrent topic in the call-for-feedback and as such, an additional paragraph has been added to the start of the Domains where regulated boundaries feature.

The Welfare and Benefits Domain generated much debate, with several respondents seeing it as a specialist area beyond the remit of money guidance. However, a number of money guidance practitioners responding to the call-for-feedback confirmed they do provide information and guidance in this area despite its high level of complexity. The content has been reviewed in light of the feedback received and an additional paragraph added to the opening to further explain the Domain's relevance.



## Implementation

Some concerns were expressed over potential duplication with other, existing Frameworks. For example, some organisations already work to internal Frameworks and Quality Standards. Similarly, in the devolved nations many advice and guidance organisations work to the respective Frameworks and Quality Standards already in operation in those nations. This Framework is intended to complement other existing Frameworks/Standards and as such, the finalised Competency Framework has been mapped against relevant Standards and Frameworks which highlights where commonality occurs. Further details on this can be found in 2.2 Methodology.

Embedding the Framework was thought to be an area of challenge, particularly in relation to assessment. Many questions were asked about how the Framework will be assessed; respondents appeared to be in favour of a multi-method approach, using a combination of methods such as self-assessment, peer review, appraisal and achievement of qualifications.

Stakeholder engagement was felt to be incredibly important, particularly to ensure that those who aren't even aware that they are offering money guidance become aware of the Framework and buy-into it.

MaPS will carefully consider this feedback when developing future implementation models.



## Actions taken as a result of the call-for-evidence

Figure 1: Changes to the Framework to form the final Framework

Framework Section	Framework sub- section	Action			
Foundations	A. The boundaries of the service and of	<ul> <li>Restructured into two areas ('Knowledge &amp; compliance' and 'Skills and behaviours') and an additional Foundation area has been added (Signposting customers)</li> <li>Practitioners will be required to meet all the Foundation competencies but will <u>not</u> be required to meet the Tier 1 competencies in the technical knowledge Domains</li> <li>Where appropriate references to digital increased throughout the Framework</li> <li>Content extended to include further knowledge on signposting and referrals</li> </ul>			
	your role  B. Personal qualities and attributes	Content on Rapport building re-written to ensure it is valid to those working in a full range of situations			
	C. Transferable skills	<ul> <li>Additional section added on digital</li> <li>Descriptions of Literacy and Numeracy to be edited to highlight the possibility of differentiation for those working at different Tiers</li> </ul>			
	D. Self-management	Additional content added with regard to support for the practitioner			
	E. Compliance and safeguarding	Restructured content to include a subsection titled 'Safeguarding' with additional relevant content			
Technical Domains	General	<ul> <li>Content of the Framework at Tier one reviewed and toned down where necessary in accordance with the call-for-feedback findings</li> <li>Tier content in the relevant areas has been reviewed and moved up/down Tier(s) when appropriate</li> <li>Two new Domains (Investments, and Taxation) created</li> <li>Competence added to all Tier 1 Domains focusing on awareness of scams and what to do if a customer has been the subject of a scam</li> <li>Included references to behavioural change and empowerment where appropriate</li> </ul>			
	1. Knowing your customer	<ul> <li>Domain retained as a technical Domain as it is indeed too high an expectation for all practitioners in a variety of roles</li> <li>Content reviewed and minor amends and additions have been made to address gaps identified where appropriate</li> </ul>			



2. Debt Solutions	Re-titled the Domain to 'Debt'				
	Stripped back the content to just one Tier as a result of consultation with debt advice specialists within MaPS				
	Added an introductory paragraph to call-out the regulated boundary				
3. Borrowing	Reviewed content at each Tier level and amended where necessary				
	Where appropriate, additional content has been included to reflect the gaps identified				
4. Welfare and	Retained the Domain as a result of feedback which confirms a number of money guidance practitioners do provide				
benefits	information and guidance in this area despite its high level of complexity				
	Content of the Domain has been reviewed and Tier 3 removed as a result of the comments received				
	Additional text added to further explain the Domains relevance				
5. Budgeting and	• The content of Tier 1 has been retained (the changes to the Foundations section and the inclusion of signposting in				
cashflow	this area will ensure coverage of all money guidance practitioners, irrespective of the level at which they practice).				
	Additional content added where appropriate, specifically in respect of making digital payments, digital banking				
	facilities and apps and in the area of the income maximisation.				
6. Savings	Content reviewed and checked to ensure the regulated boundary has been observed				
	Introductory paragraph included to call-out the regulated boundary				
	Additional competence added to Tier 1 and 2 in relation to the benefits of saving and changing behaviours				
7. Insurance	Domain has been retained as a result of the support for it				
	Content checked in respect of the relevant regulated boundary, paragraph added to call-out that boundary				
8. Homes and	The content on mortgages has been moved to Domain 3 (Borrowing)				
mortgages	The Domain has been renamed 'Households'				
	Content added in-line with the feedback received relevant to the running of a household				
	Tier 1 now includes a further competence regarding the differences between social and private housing				
	• Tiers 1 and 2 now include content relating to the grants and funding available for moving costs and adaptations				
9. Retirement and	To aid clarity, the Domain has been re-titled 'Pensions'				
pensions	Content reviewed and checked with specialist pensions advisers at MaPS				
	Paragraph added to call out the regulated boundary				



10. Planning for later life	<ul> <li>Consideration was given to dispersing the content of the Domain throughout the Framework, but this was not felt to be appropriate</li> <li>Awareness (Tier 1) and knowledge (Tier 2) of power of attorney has been added to the Domain</li> </ul>
	<ul> <li>Content has been added to all three Tiers regarding care costs</li> <li>Content relating to pre-paid funeral plans has been added to Tier 2</li> <li>Content has been reviewed in relation to regulated boundaries and these have been called out where necessary</li> <li>The Tier 3 competence 'Knowledge of sideways disinheritance' has been removed (out of scope of a money guidance practitioner)</li> </ul>



## 1. Background and context

People across the UK should be receiving good quality money guidance regardless of where they go to get it.

There are many thousands of practitioners delivering money guidance in the non-regulated space in one form or another. There is huge diversity in the spectrum of practitioners – for example volunteers, community workers, housing officers, mental health workers, money mentors to name a few. Whilst some of the people they serve are specifically seeking money guidance, we know that many are not. They may be seeking advice on a specific life event, be vulnerable, or have complex needs. Money guidance will often form just part of a wider, but interconnected and holistic, service. There is no commonly-held view of what good looks like, a lack of clarity about where regulated boundaries are and there are very few opportunities for practitioners to share good practice.

In October 2015, the Money Advice Service (MAS) launched the Financial Capability Strategy for the UK which introduced, in 2017, the 'What Works Programme'. The programme comprised of three strands of work, one of which carried out research and brought together a consortium of some of the key organisations in the diverse money guidance and financial capability practitioner communities to understand more fully what types of practitioner there are, their learning needs and whether a competency Framework would be part of a viable solution to raising the standard of delivery. Notwithstanding some of the challenges for the provider and practitioner community, there was a clear appetite and need for this work. The full report can be found here: www.fincap.org.uk/practitioners.

## 2. Scope and Methodology

Pye Tait Consulting were commissioned by MAS in September 2018 to develop a competency Framework that shows the competencies needed by <u>individuals</u> to provide good quality money guidance.

#### 2.1 Scope

A Framework needed to be designed for anyone who provides any type of non-regulated money guidance to individuals or groups: from young adults all the way through to older people in retirement.

It must be suitable for someone who only does money guidance for a fraction of their time, or all day, every day. The Framework should be appropriate for individuals who are employed on a full-time or part-time basis, or those who volunteer in a range of different types of organisations. It must be relevant to those individuals that might signpost to sources of money guidance and advice, such as workers in foodbanks and those who work in other public places such as libraries and in register offices.



#### 2.2 Methodology

The project started with a **desk research** exercise, to inform the design of a 'straw man' for developing the competency Framework. Sources used to inform the straw man included:

- job descriptions/job adverts;
- existing standards and Frameworks (e.g. the Scottish National Standards for I&A Providers; Information and Advice Quality Framework Wales; Northern Ireland Financial Capability Strategy; MAS Debt Advice Quality Framework; National Occupational Standards);
- literature/reports, including from the MaPS Phase 1 Report that preceded this current project; and
- Competency Frameworks for other sectors and occupations.

#### **Practitioner Working Group**

A practitioner Working Group of cross sector organisations was set up in November 2018 where the straw man was discussed and further developed. The Framework was revised and refined at two subsequent Working Group meetings (December 2018 and January 2019).

A final Working Group meeting was held in September 2019 to discuss the findings of the call-for-feedback activities and actions to be taken as a result. Feedback received during this meeting was pivotal to several final Framework changes.

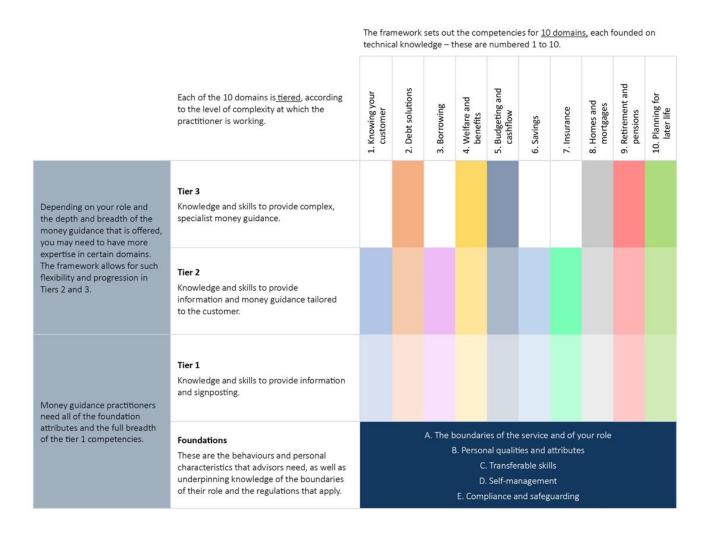
The practitioner Working Group has been key to the development of the Framework and both Pye Tait and the Money and Pensions Service would like to take this opportunity to thank those who took part.

#### Call-for-feedback

A call-for-feedback was launched in April 2019 and a mixed methods approach (survey, telephone interviews and feedback workshops) was used to gain feedback on the draft version of the Competency Framework.

The full draft Competency Framework presented in the 'call-for-feedback' can be found in Appendix 6 - Call-For-Feedback Draft . Below shows a diagram of that version's structure:





The **online survey** was launched on Monday 8<sup>th</sup> April and closed on 10<sup>th</sup> July 2019. A micro-site was established on the Pye Tait website giving access to a copy of the draft Framework and the online survey. The survey consisted of 47 questions (see Appendix 2 – Survey Questionnaire) and a total of 46 responses were received.

As explained in section 1, we know that money guidance practitioners work in a diverse range of settings, with many not being aware that they are even practitioners. It is therefore highly challenging to define the population of money guidance practitioners. For this reason, we did not seek the view of a representative sample of practitioners per se. The sample was self-selecting; those who provided feedback were already highly engaged, and stated they have a good knowledge of money guidance.

#### **Telephone interviews**

A total of 22 telephone interviews have been carried out, each one lasted between 15 and 50 minutes. A topic guide was used to steer discussion (see Appendix 3 – Topic Guide for Depth Interviews) which contained 15 questions and numerous prompts to follow-up and probe respondents for further detail and insights.



#### Feedback workshops

These were held in a variety of key, central locations (Birmingham, Glasgow, North Wales, Leeds, Cardiff, London and Belfast) to ensure those from all four nations had the opportunity to attend. Two further workshops were also held with representatives from Clarion Housing and Which?

Each workshop lasted between 2 and 2.5 hours; discussions were guided by a workshop plan (see Appendix 4).

#### Promotion of the call-for-feedback

Details of the call-for-feedback were made available on the micro-site on the Pye Tait website, which contained a sign-up form, where expressions of interest could be made to attend a workshop and/or to participate in a telephone interview.

- All members of the Working Group were encouraged to promote the call-for-feedback to their networks, and they were provided with a link to the micro-site.
- 1,000 specially-designed promotional postcards were distributed to Working Group members, key MaPS staff and, attendees at feedback workshops.
- An electronic mailing was sent to 10,065 contacts<sup>2</sup> obtained from a reputable research database.
- MaPS promoted the call-for-feedback at 'listening events', via their 'listening document', and in newsletters.
- MaPS staff promoted the call-for-feedback at relevant meetings and through stakeholder networks.

Engaging respondents was a challenge because they are not a homogenous group. Whilst quality standards exist for organisations in the devolved nations, there is no common view of what good looks like for a money guidance practitioner. Furthermore, and as described above, many practitioners for whom this Framework is relevant, will not describe themselves as a money guidance practitioner.

The Framework draft on which views were sought was a lengthy document and not necessarily fully accessible in its current form (a paper-based document). Inviting people to provide their views on it was therefore a big ask.

In view of these challenges Pye Tait and MaPS were pleased with the number of responses received and the level of engagement from those who chose to give their views. Our thanks go to them for their time and effort in taking part in this process.

Consultation	with	<b>Specialist</b>	Senior	<b>MaPS</b>	Advisers



At various stages in the Framework development process we consulted with a range of specialists within the MaPS. Their input has been crucial in the formation of the Tier content of a number of the technical knowledge Domains, particularly pensions, welfare and benefits, and debt.

#### **Mapping to Training and Qualifications**

Alongside the development of the Framework, an extensive mapping exercise has been carried out of the relevant training and qualifications that relate to money guidance. This has helped to inform the Framework, assess training accessibility and gaps and crucially, enabled links to be made to relevant training and qualifications.

#### **Mapping to other Frameworks and Standards**

The Framework is also intended to complement, and link to, other existing Frameworks/Standards and has therefore been mapped to the following relevant Frameworks/Standards:

- The Scottish National Standards for Information and Advice Providers (A Quality Assurance Framework 2009)
- The Information & Advice Quality Framework for Wales (IAQF Wales)
- The NI Advice Quality Standard (August 2014)
- The MaPS Debt Advice Quality Framework
- The Advice Quality Standard (June 2016)



## 3. Call-for-Feedback Response Overview

## 3.1 Response levels

In total, during the 14 weeks of gathering feedback, c.170 individuals participated in the survey, interviews and workshops.

The **Online Survey** gained 46 responses, 22 **telephone interviews** were carried out and, the **feedback workshops** were attended by over 100 interested parties.

## 3.2 Respondent profile

#### Online survey respondents

Overall, 46 respondents completed the survey, they are working for a variety of organisations, most commonly within the voluntary sector (Figure 2).

**Note**: not all of the 46 respondents answered all of the questions in the survey. Therefore, the total (base) numbers of respondents is not always 46 in the charts that follow within this report.

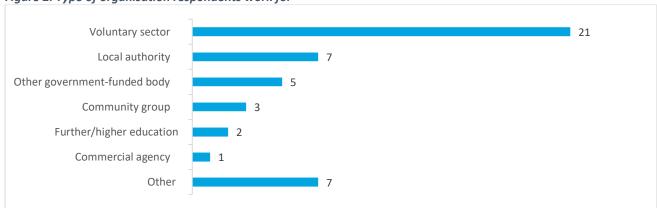


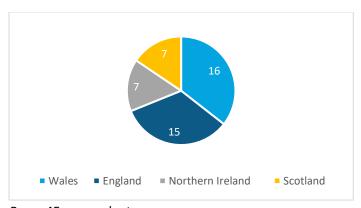
Figure 2: Type of organisation respondents work for

Base: 46 respondents

The survey garnered responses from respondents across all nations (Figure 3), with the majority based in Wales.



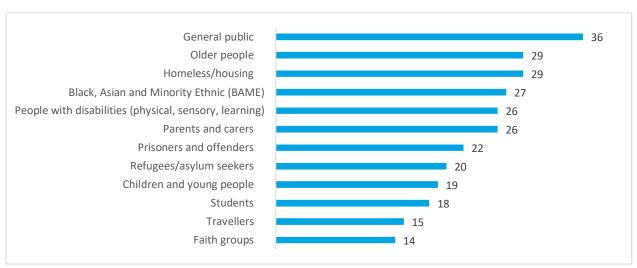
Figure 3: Respondent by nation



Base: 45 respondents

Respondents hold a variety of roles, including coach/mentor, debt adviser, welfare adviser, financial capability officer and housing officer. The majority of respondents work in paid roles (39) with just 7 unpaid. The organisations which respondents work for operate locally (20), regionally (11) and at a national level (15) providing support to a variety of groups. The groups most frequently cited are the general public, older people and those who are homeless (or have housing issues) (Figure 4).

Figure 4: Groups to which organisations provide support



Base: 46 respondents (respondents could select more than one answer)

Respondents provide advice in a variety of areas of specialism (Welfare and benefits, and Budgeting and cashflow being the most common and covered most frequently). Figure 5 shows both the topics covered and the frequency with which respondents deal with those topics.

The responses to this question suggest that most respondents to the survey only provide guidance on a small number of topics because 'never' features so strongly. This is particularly true for the Domains of 'Homes and mortgages' and 'Retirement and pensions'.



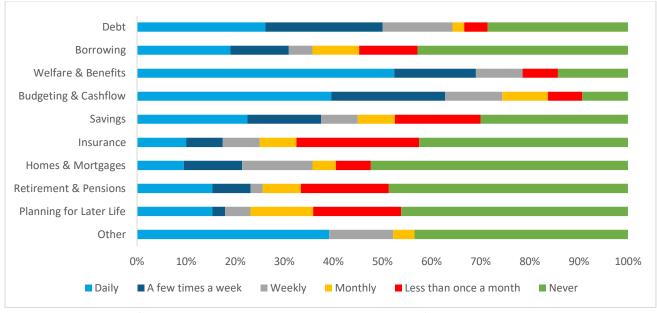


Figure 5: Areas of advice and frequency of occurrence

Base: 45 respondents (respondents could select more than one answer)

The confidence level of respondents was generally high with respect to their knowledge of money guidance (Figure 6). The majority (32) subsequently expressed that they feel they have enough information to help them understand the types of information that can and cannot be provided as part of money guidance.

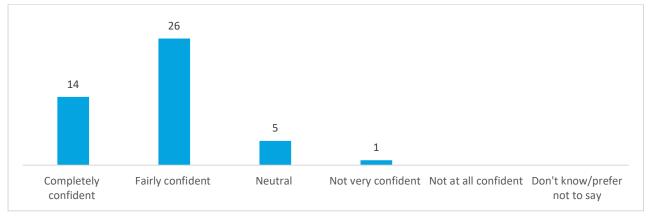


Figure 6: Respondent confidence levels regarding their knowledge of money guidance

Base: 46 respondents

#### Interview respondents

We conducted 22 in-depth telephone interviews with a variety of respondents working in a range of organisations and roles. Respondents primarily work for advice or support organisations, however, we also spoke with a social research organisation, a local Poverty Truth Commission and a social change charity.



### Workshop attendees

Across the nine workshops held all around the country, there were c.100 attendees. These attendees worked at all levels within a broad range of organisations, such as housing associations, Citizen's Advice Bureaux (CABs), local authorities, charities, not-for-profit organisations, credit unions, universities and colleges.



## 4. Call-for-Feedback Findings

## 4.1 Approach and rationale

The online survey gathered respondents' initial impressions to a range of different aspects of the Framework. Figure 7 shows the responses to these questions, the majority of which were answered positively. The findings from the interviews and feedback events broadly support these views.

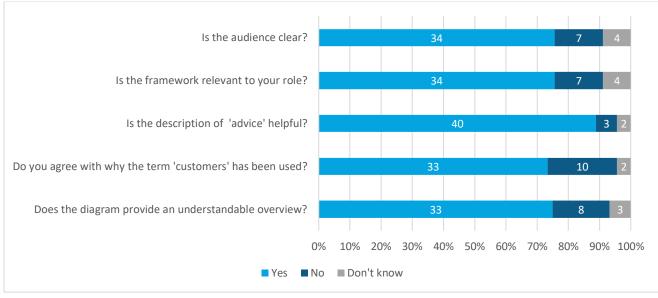
Where there was some element of disagreement, in the main this focussed on the levelling of the 'Tiers'. For example, those who suggested the audience for the Framework was unclear, felt that some of the content of the 'Foundation' level and Tier 1 was too demanding and therefore not appropriate for practitioners who only provide signposting.

Some respondents who disagreed that the diagram is an understandable overview of the Framework were confused about the lack of a Tier 3 in all of the technical knowledge Domains. They also were puzzled by the relevance of the shading in the diagram.

A number of workshop group participants felt that the requirement for all practitioners to possess all the Tier 1 competencies was too high. It was highlighted that this would be particularly difficult for those who work with very specific audiences or for those for whom money guidance is only a small part of their role (i.e. food bank volunteers). Concerns were raised that this requirement may preclude a proportion of those the Framework is aimed at.

#### 4.1.1 Initial impressions

Figure 7: Impressions of the Framework (survey)



On the whole, respondents' initial impressions related to specific areas of content and perceived gaps in content. For example:

- Scams are cross-cutting
- Digital



- Behaviours and behaviour change
- Life-events
- Vulnerable customers
- One group strongly recommended that two new Domains were needed to cover investments and tax.
   Discussions at a number of other workshops also suggested that tax is not sufficiently addressed in the Framework

These points are discussed in section 4.5 A summary of the main gaps raised in the call-for-evidence

The workshops also identified a number of other observations and a few concerns (the following are examples of individual comments):

- The Framework is ambitious in its desire to cover such a wide range of practitioners
- How will the Framework be assessed and implemented? How do you get all people using it and recognising it across organisations?
- There is potential for the unintended consequence of stopping people offering low level advice the Framework gives the opportunity to professionalise money guidance, but it should not cause the loss of good volunteers (i.e. in its current form it is lengthy)
- Perhaps the Framework should only be aimed at organisations that offer money guidance as a primary focus
- There should be parity with other Frameworks, e.g. in the other nations and with organisations' own Frameworks
- Stakeholder engagement is incredibly important particularly to ensure those who aren't even aware that they are offering money guidance, become aware!
- Training is constantly evolving due to industry developments and changes to legislation / policy etc.
- The Framework legitimises money guidance
- The Framework could give caseworkers security.

"It was as I expected it to be - segmented as I expected and based on Tiers which makes sense. The Foundations are great!"

Interview respondent

"I applaud the work done so far - really glad that MaPS are pulling all this together."

*Interview respondent* 

#### 4.1.2 Core Principles

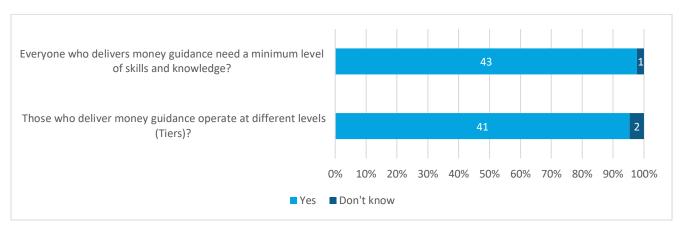
The Framework is founded on two core principles:

- 1. Everyone who delivers money guidance needs a minimum level of skills and knowledge
- 2. Those who deliver money guidance operate at different levels



Respondents to the survey were overwhelmingly in agreement with these points (Figure 8). These sentiments were also echoed via the interviews and workshops.

Figure 8: Agreement with principles (survey)<sup>3</sup>



A key objective for the Framework is to ensure the content is relevant to practitioners working in a range of different settings. On the whole, respondents to the survey agreed that this objective had been met, however there may be some changes needed to ensure the Framework is wholly suitable for those working with groups and those providing guidance remotely (e.g. via telephone) (Figure 9). Feedback from some of the workshops suggested that the personal attributes and transferable skills contained in the Foundations were too demanding and may be unachievable for those working in these settings. For example, those working in a triage role on a telephone helpline will not necessarily have the opportunity to build rapport with a customer to the same extent as someone, such as a caseworker, working in a one-to-one, face-to-face setting.

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<sup>&</sup>lt;sup>3</sup> No respondents selected 'no' in response to these questions



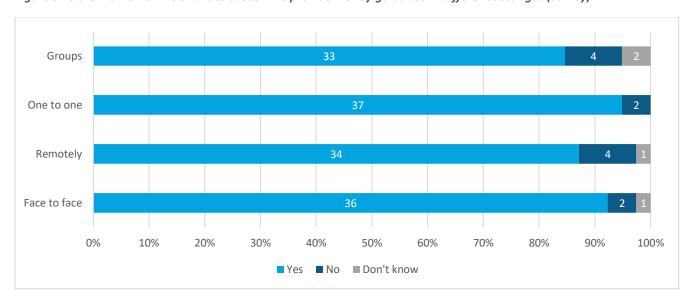


Figure 9: Is the Framework relevant to those who provide money guidance in different settings? (survey)

The survey also sought views on the language used in the Framework – specifically, is it appropriate? The survey results indicated that the language used is applicable to money guidance practitioners (Figure 10). The interviews and focus groups did not identify any issues with the language.

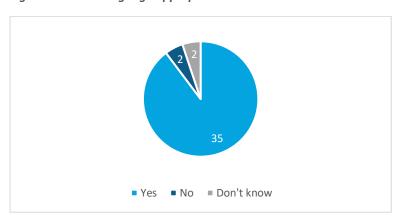


Figure 10: Is the language appropriate?

#### 4.2 Tiers

Of those respondents who agreed with the principle that those who deliver money guidance operate at different levels, nearly all believed the Framework describes the Tiers at which practitioners operate. Figure 11 illustrates the results from the survey, in which the vast majority of respondents were in agreement. Attendees at workshops and interview respondents were also largely in accordance with findings in the discussions, frequently stating that they match their organisational structure.



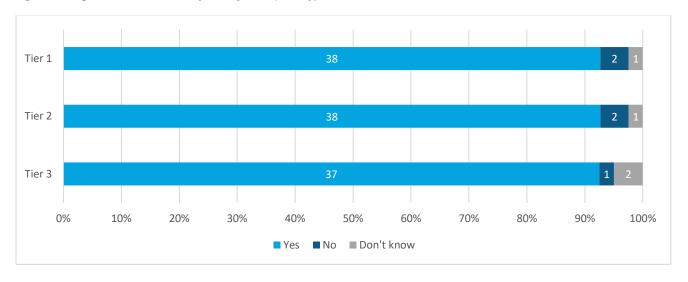


Figure 11: Agreement with description of Tiers (survey)

When survey respondents were asked if they agree with the principle that everyone who provides money guidance should possess all of the skills and knowledge in Tier 1, 39 out of 43 agreed.

The following questions were put to all participants at the events and interviews and have been used to focus on the shape of the Tiers and the relationship with the Foundations.

#### Tier 1 or a 'sub' Tier?

This question prompted much discussion, particularly at the workshops. Attendees frequently supported the coupling of Tier 1 with the Foundations (i.e. Tier 1 'mandatory' for all), however, it was also highlighted that this makes the Framework unachievable for those who may work in a triage-type role using the telephone, or by workers in foodbanks or libraries, where money guidance plays a very small part of their usual role.<sup>4</sup>. There was no consensus on this as some attendees at the workshops commented that the Tier 1 content fits with their organisations' triage roles.

#### Tier 3 for all Domains?

A few technical knowledge Domains only contain content for Tiers 1 and 2, because evidence collected during the development of the Framework suggested that anything beyond this would form regulated activity. Discussions at two workshops disagreed with this, believing that there should be sufficient content to justify three Tiers for all technical knowledge Domains. In their view this would not encroach on regulated activity. Two other workshop discussions put forward a counter view that Tier 3 could cover 'regulated advice'. It was pointed out that such an action would be counter to the overarching objective of the Framework, which is to cover the provision of non-regulated guidance.

#### **Additional Tier?**

One workshop discussion group propose that an additional Tier may be needed to cover those in a management or supervisory role. This suggestion was not supported at other discussions.

#### 4.3 Foundations

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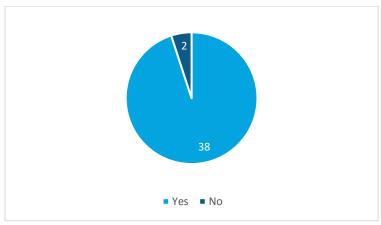
<sup>&</sup>lt;sup>4</sup> The desk review conducted for this project – to inform the development of the first draft Framework – found that providing information and signposting is part of the role for some food bank volunteers.



Most survey respondents (28 out of 39) agreed that areas A-E in the Foundations are discrete areas (Figure 12).

- A. The boundaries of the service and of your role
- B. Personal qualities and attributes
- C. Transferable skills
- D. Self-management
- E. Compliance and safeguarding

Figure 12: Do all money guidance practitioners need competencies A-E? (survey)



Base: 40 respondents

All but one of the survey respondents agreed that the content of these areas cover the 'Foundation' competencies required and that there are no gaps.

The key finding about the Foundations indicated that the content must be relevant to all roles. Much of the feedback pointed to aspects of the content regarded as not achievable by all practitioners. However, there is general agreement that all of the sub-sections are necessary.

"The words are correct, however the descriptors need to perhaps say, to what extent you need to have these, will be dependent on your role."

Workshop feedback

"Each adviser must have all of these because you don't know the type of customer you might have in front of you."

Workshop feedback

#### 4.3.1 Boundaries

The survey received a handful of responses relating to the boundaries of the role (Figure 13). Most agreed that the content is accurate and relevant, however other respondents across the various methodologies suggested that the level of demand is too high.



The following charts display responses from a very small number of respondents, however, the questions were also discussed in the workshops and interviews.

100% 90% 2 2 2 80% 70% 60% 2 50% 40% 30% 20% 10% 0% Comprehensiveness (does the content Accuracy (is the content factually Relevance accurate) cover everything it should) Completely ■ Almost ■ Neutral To some extent ■ Not at all ■ Don't know

Figure 13: Boundaries - Do you agree with the accuracy, comprehensiveness and the relevance of the content (survey)

Base: 7 respondents

Whilst all feedback showed agreement that practitioners need to understand the boundaries of their role – e.g. what information they are and are not permitted to provide – there was a view that not all practitioners would need to have an understanding of regulated products. One respondent, for example, stated that there are too many complex expectations within this section and pointed out that not all practitioners need to 'agree with customers any further activities that are necessary to meet their needs' as is currently stated in the Framework.

#### 4.3.2 Personal qualities

The survey responses showed good support for the accuracy, comprehensiveness and relevance of the content for Personal qualities (Figure 14Error! Reference source not found.). In fact, this is regarded as a key aspect of the Framework and that all elements are appropriate.



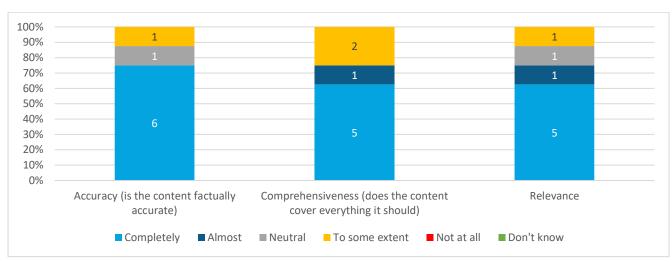


Figure 14: Personal qualities - Do you agree with the accuracy, comprehensiveness and relevance of the content (survey)

Base: 8 respondents

Where respondents suggested changes or improvements to the content on Personal qualities, they felt that some of the expectations might be a little too demanding, particularly around the description of rapport-building. These respondents felt that not all practitioners – particularly those in a signposting or triage role – will have the opportunity to build rapport. Others disagreed with this and suggested that it was possible to do this over the phone and that it is indeed a necessity in order to elicit information. Clearly the content on understanding body language is not relevant to those working virtually or on the telephone.

Regarding 'impartiality', feedback pointed to the need to include content beyond personal feelings and opinions and to highlight products available from organisations that claim to offer money guidance/support but are not necessarily acting impartially (and therefore should not qualify under the Framework).

"... overall the qualities and attributes do suit the role of a financial capability practitioner."

Survey respondent

#### 4.3.3 Transferable skills

Overall the feedback was supportive of the content for Transferable skills in the Foundations (Figure 15). Any concerns related to, typically, expectations around literacy and numeracy and the comprehensiveness of this content.

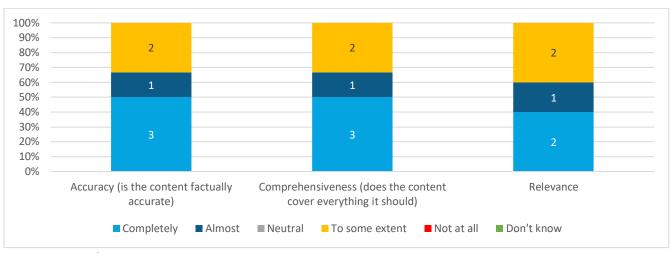


Figure 15: Transferable skills - Do you agree with the accuracy, comprehensiveness and relevance of the content (survey)

Base: 6 respondents

Whilst literacy and numeracy were generally agreed to be essential skills, there was some disagreement about the appropriate level of demand.

**Literacy** – some respondents suggested that the requirements for literacy are too high-level and they could be a barrier for people whose first language is not English. Furthermore, it was argued by one survey respondent that the requirements may differ at different Tiers e.g. for those simply signposting versus those who are required to keep detailed records.

**Numeracy** – a similar sentiment was expressed regarding the expectations for numeracy, with one survey respondent stating that calculating fractions, percentages and simple and compound interest would not necessarily be required, depending on the practitioner's job role.

"...there are some great practitioners out there with English as an additional language or dyslexia etc – they are still excellent practitioners. Numeracy obviously needs to be a higher priority."

Workshop feedback

Feedback from the workshops strongly suggests that digital skills should be added to this section.

Another skill that was potentially missing was the ability to analyse information and to think critically and perhaps to not accept something at face value. This would be usefully applied, for example, when accessing and using comparison websites.

#### 4.3.4 Self-management

There was also fairly strong agreement with the content of 'self-management' (Figure 16). However, there were again some concerns that the level of CPD would need to be flexible dependent upon the role of the practitioner. For example, someone working at Tier 1 – and particularly a volunteer – would not be expected to undertake the same level of CPD as someone at Tier 3.



100% 90% 2 2 2 80% 70% 60% 50% 40% 30% 20% 10% 0% Accuracy (is the content factually Comprehensiveness (does the content Relevance accurate) cover everything it should) ■ Don't know Completely Almost Neutral ■ To some extent ■ Not at all

Figure 16: Self-management - Do you agree with the accuracy, comprehensiveness and relevance of the content (survey)

Base: 6 respondents

"While the concept of continuous professional development is one that all workers should in theory engage with, many carrying out this support role as part of another role, or as volunteers may not have the knowledge or ability to access this development."

Survey respondent

Many of those attending workshops agreed that the sub-topic of 'self-management' should contain more information on the practitioner being able to identify when they need support, and where to obtain it. This would be particularly relevant when the practitioner deals with a traumatic case and needs time to reflect. As one attendee put it: "the adviser needs to understand what the consequences of asking difficult questions are (or might be)".

#### 4.3.5 Compliance and safeguarding

There was some support for the content of this area in survey feedback (Figure 17). Again, a concern pointed out that the level to which someone in a financial capability support role would need to engage with these competencies would be determined by their level of provision (i.e. which Tier they work at).



100% 90% 1 2 80% 70% 60% 50% 40% 30% 20% 10% 0% Accuracy (is the content factually Comprehensiveness (does the content Relevance cover everything it should) accurate) Completely Almost Neutral ■ To some extent ■ Not at all ■ Don't know

Figure 17: Compliance and safeguarding - Do you agree with the accuracy, comprehensiveness and relevance of the content (survey)

Base: 6 respondents

Additional comments from the workshops:

- Reference to the Disclosure and Barring Service (DBS) checks, in reference to managing risk is required;
- The content on safeguarding should be separated out from 'Work safely' into a new sub-area to emphasise its importance;
- Some of the wording was too 'organisation-focused';
- The wording of 'bad practice' should be revised to 'poor' practice.

## 4.4 Technical knowledge Domains

This section presents the qualitative feedback from the survey, interviews and feedback events.

There was strong agreement from all respondents that the 10 technical Domains cover the range of topics for which money guidance practitioners provide information and support (Figure 18). Although not all respondents provide guidance in all areas, the respondents confirmed that all of the 10 Domains are valid and are appropriate for inclusion in the Framework.



Do the 10 technical knowledge domains cover the full scope of money guidance?

Do you see the 10 domains as discrete areas of technical knowledge?

Ow 10% 20% 30% 40% 50% 60% 70% 80% 90% 100%

Yes No Don't know

Figure 18: Coverage of technical knowledge (survey)

Base: 40 respondents

A few suggestions were made for additional Domains such as 'Investments' and 'Tax'. A number of workshops also highlighted a need for behavioural aspects, including empowerment, to be threaded throughout the Framework (particularly at the London event), also life changing events, which are highlighted as providing 'teachable moments'.

Survey respondents were invited to leave detailed feedback on each of the technical knowledge Domains. Figure 19 shows how many respondents chose to provide feedback on each Domain. 'Debt' and 'welfare and benefits' draw most comments:

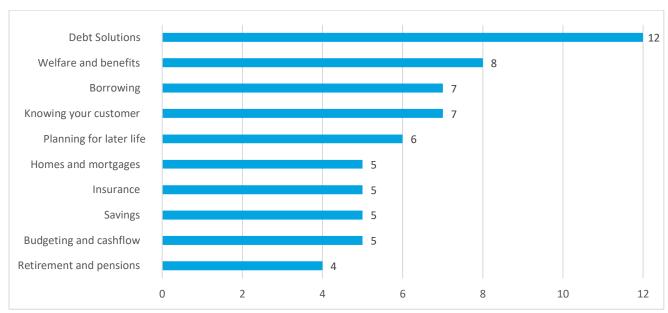


Figure 19: Number of respondents commenting on each Domain (survey)

Base: 46 respondents

The technical Domains discussed in the interviews and focus groups were selected by attendees during discussion, depending on their experience and knowledge. All Domains were discussed collectively across

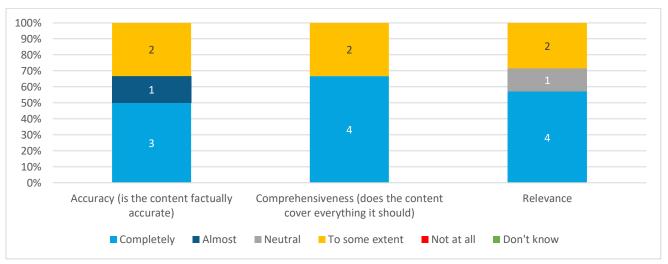


the qualitative activities. 'Knowing your customer' was the most common focus, other discussions were about debt, borrowing, budgeting and cashflow, homes and mortgages. Finally, less well discussed were insurance and welfare and benefits.

#### 4.4.1 Knowing your customer

Few comments were received on this Domain via the survey; however, feedback from the handful of responses received suggested that the content is broadly correct (Figure 20):

Figure 20: Knowing your customer - Do you agree with the accuracy, comprehensiveness and relevance of the content (survey)



Base: 7 respondents

In the workshops and interviews, there was some discussion regarding whether the Domain of Knowing Your Customer belongs under 'Technical knowledge' or whether it is in fact part of the Foundations. There was no consensus on this.

#### Red Flags:

Those in a signposting role should only need awareness of services available to support people and a basic awareness of red flags. Respondents also pointed out that different types of organisations would deal with different 'red flags'; for example, some organisations would routinely deal with those who are in crisis (e.g. no food, no work uniform), rather than those who have suffered bereavement. Feedback also highlighted that additional red flags need to be mentioned, such as health, physical abuse and financial abuse.

For these respondents, the requirements go slightly too far to be an expectation for all practitioners, for example when facilitating a customer to act on their own behalf. In the workshops a few gaps in the Domain were noted:

- Content on awareness of where clients come from (e.g. social background/ethnicity)
- Clarifying customers' goals and expectations (which will dictate which information/guidance is given)
- Understand and identify vulnerabilities perhaps strengthen this, e.g. domestic violence, mental health and those on very, very low incomes who rely on benefits
- The process to be followed if red flags are identified (e.g. how to raise a safeguarding issue)



- An assessment of customers' digital capabilities
- A Tier 3 might be needed for some practitioners who will cover behavioural change aspects in more
  depth, such as when dealing with complex needs; this could also link into an understanding of mental
  capacity (e.g. an understanding of the Mental Capacity Act); also, suicide awareness and how to deal
  with a customer if they refuse help
- A knowledge and skill set around asking the right questions (e.g. have you eaten today, finding out which bills the customer is paying and challenging this)
- Recognising the customer's level of literacy and numeracy and signposting to sources of support

One group suggested that the Framework presupposes that the customer will come to you – but this is not always the case.

Finally, the title of this Domain (Knowing your customer) was commented on in at least two workshops. Attendees felt that because the terminology has a very specific meaning in financial services it might benefit from revision to avoid confusion.

#### 4.4.2 Debt solutions

This Domain attracted the most comments via the survey and promoted much debate at the events. From the survey results there was broad support for this area (Figure 21), however some concerns were expressed about the appropriateness of including 'debt' in the Framework.

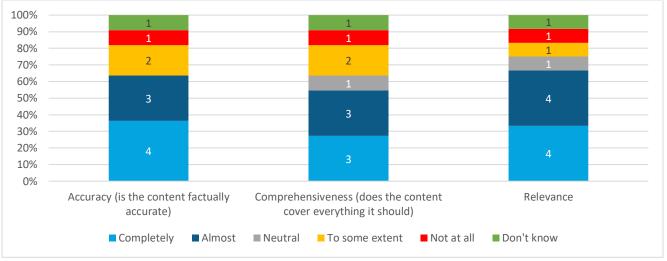


Figure 21: Debt solutions - Do you agree with the accuracy, comprehensiveness and relevance of the content (survey)

Base: 12 respondents

Respondents were to an extent split over whether debt should be covered at all in the Framework – it being a regulated area. The majority view was that practitioners can provide information and guidance on this topic, without straying into regulated activity. Some workshop discussions expressed the view that Tier 1 was too demanding, and the content should simply be triage. A response from one of the devolved nations suggested that Debt should not be covered in the Framework at all because the content would be the realms of a specialist adviser.



At least two workshops felt that the title 'Debt solutions' was inappropriate because it may give the impression that the practitioner can 'solve' the customer's issue. Other suggestions for this area included 'Debt awareness', 'Debt preparation' and 'Financial difficulty'.

Some of the terminology was highlighted as being inappropriate for the devolved nations:

- Practitioners need to be aware of the devolved legislation which provides debt solutions in Scotland
- IVAs (Individual Voluntary Agreements) are not relevant in Scotland
- Reference to 'Council Tax' should be changed to 'Rates' for Northern Ireland
- In the list of debt services, no service for Northern Ireland is included
- Citizens' Advice Bureaux are no longer operating in Northern Ireland
- A reference to DAS/Trust Deed needs to be added to cover devolved options

It was noted that the content of this Domain will also need to be cross-checked against the Money and Pensions Service Debt Framework to ensure there is no overlap.

#### 4.4.3 Borrowing

Views on the content of this Domain were split in survey feedback (Figure 22). One respondent felt the content of Tier 2 should actually be within Tier 1. Another countered this view, suggesting that Tier 1 should be signposting only, with Tier 2 being a general understanding, and Tier 3 focused on a basic understanding of how to improve credit scores.

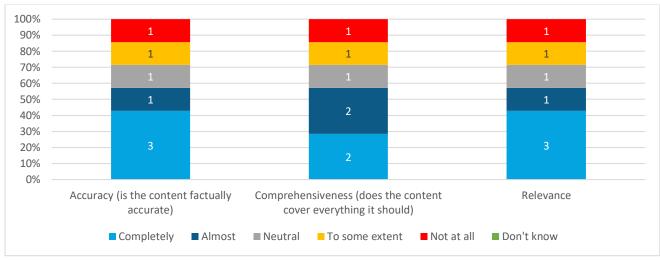


Figure 22: Borrowing - Do you agree with the accuracy, comprehensiveness and relevance of the content (survey)

Base: 7 respondents

Comments made in interviews and at the events suggested the content in this Domain was too light-touch. The following gaps were identified:

- Borrowing options available to those with no/poor credit
- Sources of borrowing, e.g. credit unions
- Loan sharks and informal borrowing (e.g. from friends and family) in terms of 'unhealthy' borrowing
- Access to community/discretionary support/charity funds or grants
- Factors to consider when deciding to borrow
- The implications of borrowing



- The use of tools/calculators to enable customers to see the cost of different forms of credit
- Reference to 'affordable credit' in reference to Scottish context
- Terminating and cancelling payments how to and consequences (ref. credit agreements e.g. for purchasing a car)
- Student loans/student finance and the different arrangements in the devolved nations

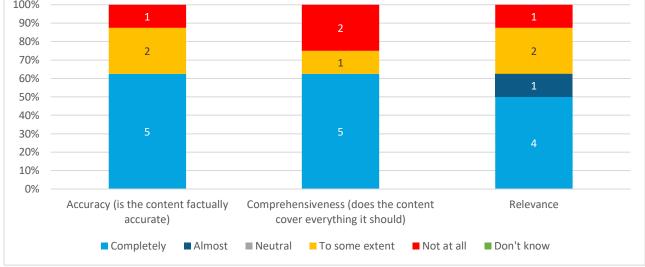
Feedback on Domain 8 'Homes and mortgages' suggested that the content on mortgages should be moved to this Domain (Borrowing). Additional content on equity release could also be relevant here.

#### 4.4.4 Welfare and benefits

The survey feedback on this Domain was largely positive, in terms of its accuracy and relevance (Figure 23), however, there was some discussion about the regulation of advice in this area. This was subsequently explored, and a decision was made that - whilst it is an area of complexity - it warranted continued inclusion.

(survey) 100% 90% 2 80% 70%

Figure 23: Welfare and benefits - Do you agree with the accuracy, comprehensiveness and relevance of the content



Base: 8 respondents

Two survey respondents requested the content be made relevant to the Scottish context, for example in referencing:

- Scottish Social Security Agency
- local authority welfare rights service
- Scottish Welfare Fund
- Carer's Allowance Supplement
- Information on appointeeships
- Council tax reduction and the range of disability related benefits

Some respondents at one workshop suggested that having the right insurance and training needs to be more clearly emphasised; also, that the Framework should better reflect that practitioners in the devolved nations will already have their own Frameworks and Standards.



Overall, findings suggested that this Domain is 'out of kilter' with the others, as it is much more detailed and involved. However, there was no consensus that it should be removed. There was recognition that, because this area is not covered in other Frameworks, and is not covered by regulation, that it should remain in the Framework. Indeed, many respondents who offer money guidance stated that they do cover this area.

"It is a massive area, but it stands out as being different. There's a lot of technical detail." Workshop feedback

Other comments from workshops and interviews include:

- Tier 2 should include knowledge of late appeals
- Using benefits calculators is a Tier 2 activity, rather than Tier 3
- The content on 'intervening with creditors' is inappropriate for the Framework
- 'Disputing benefits' would be at Tier 3, rather than Tier 2
- The content is focused on 'in work' benefits; disability benefit and focus on children is missing
- The content could be supplemented by bringing in the content on benefits from 'Retirement and pensions' and 'Planning for later life'
- Benefits overpayment should be added to Tier 3
- 'Spotting mistakes' is missing, e.g. having an understanding of Universal Credit and being able to spot errors

The discussion in Glasgow pointed to a need to include tax in this Domain and to rename it to 'Income maximisation, welfare and benefits'. Feedback from other workshop discussions did not support this point, as attendees felt it would add to an already lengthy section.

#### 4.4.5 Budgeting and cashflow

Only a handful of survey respondents provided comments on this section, suggesting the content is largely appropriate, comprehensive and relevant (Figure 24). However, one comment proposed that the content at each Tier is too high and should be moved 'up' a Tier.



100% 90% 2 80% 70% 60% 50% 40% 2 30% 20% 10% 0% Accuracy (is the content factually Comprehensiveness (does the content Relevance cover everything it should) accurate) ■ Don't know Completely Almost ■ Neutral To some extent ■ Not at all

Figure 24: Budgeting and cashflow - Do you agree with the accuracy, comprehensiveness and relevance of the content (survey)

Base: 5 respondents

Feedback from workshops tended to support the survey response that Tier 1 in particular, should be toned down.

A few gaps were identified in comments:

- Understanding jargon
- Encouraging clients' self-awareness of their habits
- Expenses
- Completing basic budgeting sheets
- Methods for reducing monthly outgoings (for example someone paying for dental plan and being eligible for NHS dentist)
- Assessing which costs to pay
- Consideration of sustainability of budgeting advice (the overall impact on the customer moving forward)
- Making digital payments

At one workshop, attendees identified a range of content that should be added to Tier 3 including:

- Understanding bank charges
- Managing payments
- Questioning techniques
- Challenging assertively
- Identifying risks in a household's expenditure
- Being honest about when someone can't be helped
- Ability to see where money is missing
- Identifying non-dependents in the property who are not contributing to the household

Content on fraud and identity theft was raised in the survey and workshops as not being relevant to this Domain. One workshop suggested that this Domain should be merged with content on 'Mortgages' (Domain 8). Another felt that the focus of this Domain might be better centred around 'spending money better,



paying bills, setting up home'; this section could also be relevant to someone post-bereavement or when planning for retirement.

One workshop suggested that the title of this Domain could reasonably be changed to 'Banking and money management' as the word 'budgeting' can have negative connotations.

## 4.4.6 Savings

This Domain received only a few comments from online survey respondents (Figure 25). One suggested that generalist advisers would not tend to get involved in advising about savings and that the content of Tier 2 was too close to regulated advice.

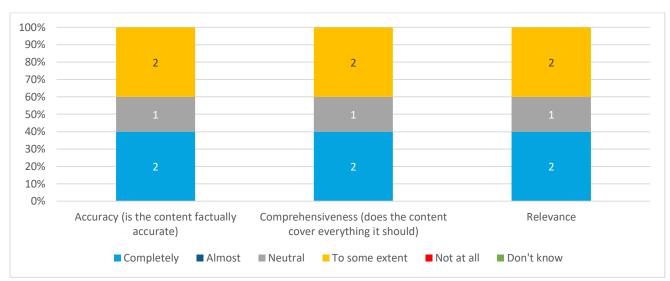


Figure 25: Savings - Do you agree with the accuracy, comprehensiveness and relevance of the content (survey)

Base: 5 respondents

The findings from the workshops and interviews supported the inclusion of 'Savings' as a technical knowledge Domain.

Areas to amend in the existing Tiers include:

- Tone down the references to compound or simple interest this would not be covered by all advisers
- Add something on the 'benefits' of savings as now, even those (in England) with an IVA are able to save
- Add HMRC 'Help to save'
- Knowledge of the range of products on the market might be too much for some practitioners
- A recognition of the benefits of savings appears to be missing and it would be useful to include something on this concept (i.e. having a 'cushion'), also understanding the motivational factors of saving
- Possibly a reference to tax efficiency is needed
- The role of credit unions should be mentioned

Some suggested a Tier 3 should be added and the potential content of Tier 3 could be:

Personal savings allowance



- Products for different age groups, including children's savings
- Taxation
- How to make complaints
- Compensation schemes
- How to find an Independent Financial Adviser (IfA)

#### 4.4.7 Insurance

Only a handful of mixed views were provided on this Domain via the online survey (Figure 26). Supporting comments suggested that the content appears to be broadly correct. However, one respondent felt that there was a cross-over with the role of a generalist and/or debt adviser.

100% 90% 1 80% 2 70% 60% 50% 40% 30% 20% 10% 0% Comprehensiveness (does the content Accuracy (is the content factually Relevance cover everything it should) accurate) Completely Almost ■ Neutral ■ To some extent ■ Not at all Don't know

Figure 26: Insurance - Do you agree with the accuracy, comprehensiveness and relevance of the content (survey)

Base: 5 respondents

Although the content was deemed to be broadly correct and appropriate, workshop attendees queried the level of the content across the two Tiers, with some suggesting that some of the content in Tier 2 is too high-level and thus warrants a Tier 3. For example, insurance claims procedures, British Insurance Brokers Association and regulations would all be considered Tier 3. One workshop group suggested that insurance should be threaded throughout the Domains to link with budgeting and savings. This point was disputed at other workshops, where attendees felt that insurance was often overlooked and warranted its own Domain.

Content on price comparison sites and shopping around was agreed to be wholly appropriate, but that the coverage of funeral insurance has been overlooked.

Other suggestions included:

- Make clear the purpose of insurance
- Recovering Payment Protection Insurance (PPI)
- Understanding the consequences of not being insured, i.e. assessing risk can the customer afford to cancel insurance?



- Contents, car and home insurance are particularly important for Northern Ireland where many people don't have appropriate insurance
- Protection insurance

Content for a new Tier 3 could include some aspects of Tier 2 (described above), plus additional content on understanding policy wording and grounds for complaints; claims and complaint handling.

## 4.4.8 Homes and mortgages

Feedback received from the survey, whilst only from a few respondents, suggested the accuracy, comprehensiveness and relevance of this section was appropriate (Figure 27). However, in separate comments, respondents tended to suggest that the division of skills knowledge and understanding across the three Tiers was not quite correct; there was also a suggestion that renting and owning should be separate.

100% 90% 1 80% 70% 60% 50% 40% 30% 20% 10% 0% Accuracy (is the content factually Comprehensiveness (does the content Relevance accurate) cover everything it should) Completely To some extent ■ Don't know Almost Neutral ■ Not at all

Figure 27: Homes and mortgages - Do you agree with the accuracy, comprehensiveness and relevance of the content (survey)

Base: 5 respondents

The theme of separating renting and owning continued in interviews and workshops, with broad consensus that the content on 'Homes' and 'Mortgages' should be separated into two: content on renting and maintaining a household being retained in Section 8 and the content on mortgages moved to Section 3 'Borrowing'. Suggestions for a new title for this section include:

- Home options
- Households
- Maintaining a household
- Sustaining a household
- Establishing and running your home



In this revised section the following suggestions were made for additional content:

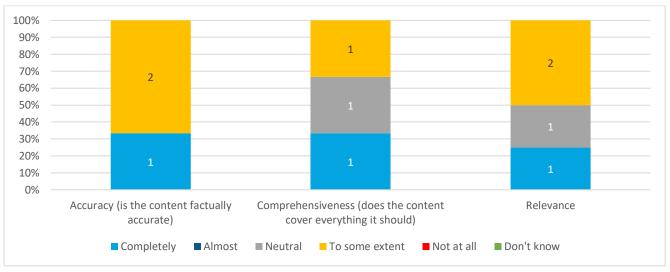
- Funding for care and carers allowance
- Reference to repossessions as a result of rent or mortgage arrears
- The costs of white goods
- Utility bill reading
- Budgeting and affordability
- The costs of home maintenance/repairs
- Rent/mortgage arrears
- More recognition of social vs private rented sectors
- Promotion of recycling centres when moving home and clearing out belongings
- Awareness of high cost credit
- Grants and other ways of furnishing a home
- Difficulty paying bills/priority bills

Rights and responsibilities were felt to be inappropriate by one workshop group, which also felt the content on metering should be pared back as it is a complex area.

## 4.4.9 Retirement and pensions

Very few responses were received on this area via the online survey (Figure 28).

Figure 28: Retirement and pensions - Do you agree with the accuracy, comprehensiveness and relevance of the content (survey)



Base: 4 respondents

Respondents felt that the content in this Domain on state pensions should be moved to Domain 4 (Welfare and Benefits). There were also concerns raised on the level of demand – potentially being too high. For example, it was thought that Tier 1 only need cover awareness of the importance of retirement planning, knowing what pensions are and that auto-enrolment exists.



There was also some uncertainty as to which life stage this Domain refers – is it those taking out a pension, or making decisions about managing a pension, or those pre-retirement?

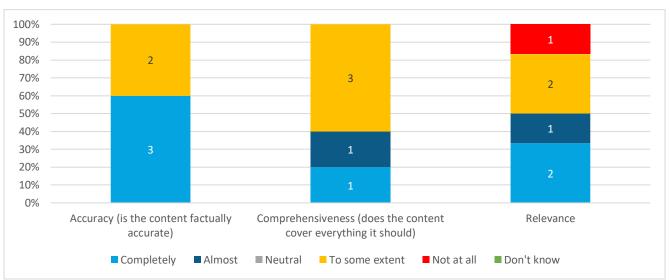
A few gaps were identified, which include:

- How tax relief works
- The options on paying in more to a pension
- Health and social care costs
- Guidance on power of attorney
- · Getting the help of an adviser
- Tax issues
- Lifetime allowance
- Pensions transfers
- Pros and cons of amalgamating pensions and charges
- Inheriting pensions

## 4.4.10 Planning for later life

Again, few people provided feedback on this Domain via the online survey (Figure 29).

Figure 29: Planning for later life - Do you agree with the accuracy, comprehensiveness and relevance of the content (survey)



Base: 6 respondents

The feedback from the survey, interviews and workshops questioned the inclusion of power of attorney, and managing affairs for someone else, when the Domain is about planning for later life – potentially this content should be included. Some clarity over the focus of this Domain is requested.

Some conflicting comments were made in relation to the content of Tier 1. Some suggested the content is too involved, others that it was too 'sparse'. Most feedback tended to suggest that more content was needed, specifically on the topics mentioned above.



Workshop attendees advised that the content of this Domain, overall, felt a bit 'bitty'. They suggested that any content on benefits should be moved to section 4 'Welfare and benefits', as per the comments on section 9 'Retirement and pensions'.

A number of discussions also centred on 'life events' and concluded that some coverage of and reference to life events should be added to this Domain, as should content on care and health. One workshop group explained that bereavement perhaps needs to have more focus within the Framework as this is a common start to spiralling debt.

One group felt that the content of Tiers 2 and 3 go beyond the regulated boundary (e.g. sideways disinheritance) and that perhaps there should only be one Tier. However, there wasn't any support for this proposal at the other workshops.

Areas that were felt to be missing (in addition to those mentioned above) include:

- Funeral planning
- Funeral expenses and help
- Scams e.g. funeral scams
- Equity release
- Ensuring the customer has enough funds (linked to an issue of people under-estimating how long they
  will live for and how much money they will need to sustain them
- Transition and life stages
- Care costs and accessibility
- Awareness of the different arrangements in the devolved nations

One workshop suggested that the title of this Domain should be changed; examples included 'Planning for life stages' and 'Planning for life changes' to emphasise that the Domain is about future planning. Two workshop groups questioned whether this Domain should be merged with 9. 'Retirement and pensions', but this was not suggested at other workshops.

4.5 A summary of the main gaps raised in the call-for-evidence

## Digital

As mentioned before, the importance of 'digital' was flagged by respondents throughout the call-for-feedback. There was a small degree of support for this being a new Domain; the consensus tended to fall on the side of this being an underpinning competence. Respondents also felt it was important for the practitioner to help customers access digital services; for example, attendees described how their organisation is developing a tool that all practitioners can use to diagnose the customer's level of digital ability. In other discussions, attendees disagreed about the extent of the help and support that can be provided by a practitioner.

"Perhaps more is needed on digital - if people are not digitally savvy, they can miss out on the best deals or indeed get themselves into trouble if what they are accessing online is beyond their understanding."

Interview respondent



The basic areas of digital competence were suggested as:

- Being able to check an online journal for Universal Credit (this could be picked up in 'know your customer' rather than a new knowledge Domain).
- Being able to update an App
- Being able to 'diagnose' the customer's level of digital ability

### Behaviour change and empowerment

Two workshop groups felt strongly that the Framework should have a stronger focus on the practitioner working to empower their customers to be financially capable – not just to provide signposting and guidance.

Agreement on this point was not universal however; one workshop group felt that empowering customers was the remit of organisations and not for the practitioner per se nor the Framework. Discussions at two workshops also pointed out that 'behaviour change' was not part of the role of practitioners working in credit unions.

"It's the behavioural area which had been overlooked. I think this is more likely to be a technical Domain perhaps - at Tier 1 would simply be a level of awareness, Tier 2 would be knowledge of and, Tier 3 would be about embedding..."

Interview respondent

Suggestions of the specific aspects of 'Behaviour change' which are missing included:

- Understanding financial behaviour, where people are, how change-ready they are
- Where are they in their journey?

## **Vulnerabilities**

More content is felt to be necessary on being able to identify vulnerable customers, particularly those at risk of (or victims of) financial abuse. This was identified as being largely needed in the 'Knowing your customer' Domain.

Specific comments point to a need for more emphasis on illegal money lending, loan sharks and informal money-lending as vulnerable people are often targeted.

#### Scams

In various places throughout the Framework, respondents identified a need to include more information on helping customers to recognise scams and on knowing how to avoid them.

"Scams is an area that's cross-cutting"

Workshop feedback



Feedback suggested that this topic is not just confined to email scams and phishing, it also encompasses doorstep scams, and this needs to be reflected.

#### Reference to 'life events'

Throughout the workshops this point was raised numerous times. Feedback suggested that more emphasis should be placed on practitioners knowing the potential impacts of life events. It was unclear whether this should be confined to the 'Knowing your customer' Domain, or whether it should be a new Domain. No strong opinions were expressed on this point.

#### Tax

Tax was identified in several discussions as an area that was not covered in sufficient detail in the Framework. It was considered that tax is both an underpinning topic (e.g. to be emphasised in Savings, Pensions etc.) and a Domain in its own right. Discussions at two workshops specifically proposed that Tax should be a new, additional Domain. The key areas highlighted are:

- Some people are on basic rate tax for long periods of time and in fact they should not be paying tax at
- Knowledge of inheritance tax is also needed
- PAYE is no longer automatically taken care of after retirement.
- Understanding of tax codes and National Insurance (in the context of seasonal workers and those on zero hours contracts; checking of deductions etc are lawful)

#### **Investments**

One workshop group in particular strongly recommended that investments should be a separate Domain. Whilst it is a highly specialist area, this group felt that practitioners can develop a high level of competency in the area (up to Tier 3), without going beyond the boundary of regulated advice.

For example, at Tier 1 this would simply cover an understanding of risk and reward and what an investment is; at Tier 2, this would be about the principles of investments, what shares are and using ISAs; Tier 3 would cover how shares and investments work, knowing how funds are valued and being aware of what is a legitimate investment and what is not. Scams would also be covered in this Domain.

## 4.6 Implementation



#### 4.6.1 Qualifications and training

The survey asked respondents if they were aware of any external training and any qualifications that they felt were particularly suited to those providing money management and financial well-being.

Aware of external training 16 Aware of any qualifications 19 0% 10% 20% 30% 40% 50% 60% 70% 80% 90% 100% No ■ Don't know

Figure 30: Awareness of external training and qualifications suited to money guidance practitioners

Base: 39 respondents

The survey and interviews gathered some detailed comments about training and qualifications; workshop discussions tended to focus primarily on the content of the Framework. The findings reveal that there is a great deal of variation in the training offered by organisations, from informal, ad hoc provision to structured training and qualifications (e.g. NVQs) linked to internal Competency Frameworks.

The provision most mentioned in interviews and via the survey are the courses offered by WiserAdviser. Other sources include:

- Child Poverty Action Group
- Christians Against Poverty
- Citizens Advice
- CPAG
- National Association of Student Money Advisers (NASMA)
- Pennysmart
- Shelter Scotland
- The Money Charity
- UK Council for International Student Affairs (UKCISA)

## Specific qualifications include:

- Certificate in Money Advice Practice (CeMAP)
- NVQ Advice and Guidance Level 3/4 Diploma in Advice
- Business and Finance Fundamentals (Open University)
- Supporting the Development of an Individual's Financial Capability (Level 3 Endorsed Course an endorsed course created by Advice NI)
- National Energy Action (NEA)/City and Guilds Levels 2 and 3 qualifications (for the provision of Energy Advice)
- Masters in Social Welfare, Law, Policy and Advice Practice (Staffordshire University)



Views on the availability of current training were mixed; some commented that there is a wide range, others suggested that there is currently a gap and that most training/qualifications focus on 'advice' or 'debt' as opposed to guidance.

"I'm aware of the Financial Coaching Institute in the USA which are bringing together the behavioural side and the money side, but I don't think there is anything like this in the UK"

*Interview respondent* 

"There is a vast amount of benefits training available, however training around savings, debt solutions could be more publicised"

Survey respondent

"I think there should be a general financial wellbeing qualification for people who want to provide this service to people. There are private companies who use financial wellbeing as a means to sell products to clients including loans / insurance, but it's coming under a banner of financial well-being"

Survey respondent

In terms of the way in which provision is offered, again there were mixed views on what is the most appropriate delivery mechanism.

"No one way is better I don't think - it's personal to the individual."

*Interview respondent* 

"Whatever offering is out there I really think it should be face to face and in small groups. Perhaps the very basics could be gained from online training."

Interview respondent

"We provide workplace financial wellbeing money workshops, staff enjoy the information sessions, we then offer financial clinics where staff can have individual appointments with an adviser, these work best"

Survey respondent

## 4.6.2 Implementation feedback

"xxx have provided training to those who provide guidance outside of regulated advice for 10 years, however it has always been in the absence of a structured Framework. This Framework would enable us to deliver better quality learning experiences for our target learners, even potentially to secure accreditation for our courses."

*Interview respondent* 

"The Framework is a really reliable tool for taking on new trainees, and to set standards across the community"

Workshop feedback



"We'd use this to develop our training programmes"

Interview respondent

"The Framework will help with standardisation"

Workshop feedback

In general, thoughts on implementation and use of the Framework were very positive, with a great deal of support being expressed for the introduction of a benchmark and standard of practice for practitioners. However, some were concerned that the introduction of the Framework should not impose an unnecessary burden on organisations or practitioners. This considered two perspectives:

- For small organisations there is a risk of implementation being time-consuming and complex to manage (funding for this may also be an issue)
- For large organisations and those which already have structured training and assessment in place, the Framework should not add another layer. This is pertinent for organisations in the devolved nations for which there are already organisational standards in place<sup>5</sup>

On this second point, respondents stated that the Framework should align and be mapped to the qualification standards/Frameworks in the devolved nations. However, further work will need to be conducted on how well this Framework for individuals is a 'fit' with these others – one set of feedback points to the Information and Advice Quality Framework for Wales (IAQF) being a poor fit because "it's about how things are done" (i.e. activities that organisations should perform, rather than competencies).

There was broad support for aligning the Framework with existing qualifications, and potentially using the Framework to develop new qualifications.

However, there were questions about how the Framework will be implemented in terms of assessment. The feedback on the Framework demonstrated support for using a combination of assessment methods, depending upon the role and level of the practitioner and on the competencies being assessed: for example, 'light touch' methods for those in a signposting role or those at Tier 1 potentially being assessed internally, within the organisation.

The Foundations, particularly the personal qualification and behavioural attributes in this section, would for example be assessed via a combination of self-assessment, peer review and line manager appraisal. For the competencies at Tiers 2 and 3, this could involve more formal assessment via alignment with external training, endorsement of internal training and/or regulated qualifications. There was general agreement with these principles.

"It needs to be aligned with training and qualification to enable people to really work with it."

Workshop feedback

While respondents tended to be in favour of this methodology, some showed concern about whether achievement against the Framework would be required in order to receive MaPS funding. There were mixed views on this point, some suggested this would be a positive move and others aired concerns about the burden it could place on organisations (linked to the earlier points, above).

<sup>&</sup>lt;sup>5</sup> It should be emphasised that this Framework for Money Guidance Practitioners is aimed only at individuals, which therefore differs from existing Frameworks



There were some requests for more clarity on the aims of the Framework.

"Would this provide a quality mark?"

Interview respondent

"The Framework should be implemented by all; however, this is where I think you may have problems - people are likely to shy away from it as 'another thing they have to do' and indeed many may not hear of it unless there are substantial amounts of targeted publicity"

Interview respondent



# 5. Summary and Actions

#### 5.1 Content

This section summarises the main points that emerged from the call-for-feedback and suggested actions that could be taken in response.

#### 5.1.1 General

Overall, the findings on the Framework, from the survey and via the workshops and interviews have been very positive and there appears to be widespread agreement that there is a need for a recognised standard/benchmark for money guidance practitioners in the UK. It has been well received.

Whilst there is a recognition that Frameworks and Quality Standards exist for organisations in the devolved nations, there is not an equivalent expectation set for individual practitioners.

The approach taken to the Framework, of setting out a Tiered structure, with a certain level of 'mandatory' content (the Foundations) and higher levels of competency which are self-selected (the Tiers), was broadly welcomed. There was general agreement with the principles that practitioners work at all levels and that there should be a minimum standard.

Whilst there was agreement that a Tier approach is appropriate, there was some disagreement about the levelling of the content. The greatest area of contention was with regard to Tier 1, which, based on the feedback, should be a mandatory component of the Framework, for all to meet along with the Foundations. Whilst some respondents felt the content in Tier 1 is pitched at the correct level, others felt it is too demanding in consideration of the intention that the Framework is aimed at <u>all</u> those who provide money guidance; from those working in foodbanks to specialist advisers.

**Recommended actions:** discussions with Money and Pensions Service about the feedback and our recommendations has resulted in the following changes.

The Foundation stage has been restructured into two areas ('Knowledge & compliance' and 'Skills and behaviours') and additional content has been added in relation to signposting in the former and also in part D (The boundaries of the service and of your role):

Money guidance practitioners need all the	Foundation – Knowledge and compliance These are the underpinning knowledge of the boundaries of the role and the regulations that apply.	<ul><li>F. Compliance and safeguarding</li><li>E. Signposting customers</li><li>D. The boundaries of the service and of your role</li></ul>
Foundation attributes.	Foundation – Skills and behaviours These are the behaviours and personal characteristics that practitioners need.	<ul><li>C. Self-management</li><li>B. Transferable skills</li><li>A. Personal qualities and attributes</li></ul>



Practitioners will still be required to meet all the Foundation competencies but will <u>not</u> be required to meet the Tier 1 competencies in the technical knowledge Domains.

The content of the Framework at Tier 1 has also been reviewed and toned down where necessary in accordance with the call-for-feedback findings.

Another common theme at some of the workshops and from telephone interviews was the need to strengthen the emphasis on **behavioural change and empowerment**. Some felt that this aspect of support becomes more of a focus as the practitioner moves up the Tiers.

Action: The following competency has been moved from Tier 1 to Tier 3 of Domain 1 (Knowing your customer) - Facilitate customers to act on their own behalf, where appropriate with the aim of empowering them to manage their own affairs and change behaviours. This competency has also been added to Tier 3 of Domain 5 (Budgeting and cashflow) and a related statement has also been included in Tiers 1 and 2 of Domain 6 (Savings).

There were also numerous requests to embed more content on **vulnerable people and safeguarding** particularly within the Foundations and Domain 1 (Knowing your customer).

**Action:** The content of Foundation E (Compliance and safeguarding) has been restructured and now includes a subsection titled 'safeguarding' with additional relevant content. No change has been made to Domain 1 as the area is sufficiently covered within this Domain and within the (mandatory) Foundations.

**Digital skills** were highlighted as important in nearly all discussions. One workshop group suggested that this should be a new technical knowledge Domain, but the remainder of respondents agreed that digital skills should be embedded throughout.

**Action:** Where appropriate references to digital have been increased throughout the Framework. For example, in Tier 2 of Domain 5 (Budgeting and cashflow), the following competency has been added: *Knowledge of how to make digital payments and use online digital banking facilities and Apps.* 

An additional subsection has also been added to the Foundation area of Transferable skills:

#### **B4.** Digital

Depending on the role, skills in the use of online tools and calculators, as well as the ability to use comparison sites and online tools (e.g. mortgage and/or benefits calculators). This will also involve an element of critical analysis to judge the relevance and legitimacy of the information being presented.

## 5.1.2 Foundations

Feedback on the Foundations was very strongly in support of having this as a mandatory element to the Framework and it was agreed that the scope of coverage was appropriate. There was also a strong view that the Foundations would help organisations with recruitment, by setting a clear expectation of the personal attributes and transferable skills required of 'good' practitioners.



Specific comments on the Foundations centred on a need to strengthen content on safeguarding (see above **Error! Reference source not found.**) and to ensure that all requirements are achievable. For example, the current description of 'Rapport building' may not be achievable by those working in a virtual capacity; similarly, the expectations of literacy and numeracy may also need to be reviewed for the same reason. There was also a request for more content around support for the practitioner; for the practitioner to recognise when they might need support when dealing with a traumatic case.

**Action:** The content in the Foundation section Personal Qualities and attributes has been re-written to ensure it is valid to those working in a full range of situations:

## A6. Rapport building

A key aspect of providing money guidance well is having an ability to empathise with a customers' situation and gauging their current level of confidence and ability to manage their money. Practitioners who work face to face with customers should understand the importance of non-verbal communication, such as body language, and how different cultures use and interpret body language in different ways. Practitioners should have an understanding of the importance of building trust and rapport with others, and methods for achieving this in different situations (e.g. over the phone, individuals and in groups) and for a range of people, including customers with challenging behaviours.

The descriptions of Literacy and Numeracy within the Foundation area of Transferable skills have been edited to highlight the possibility of differentiation for those working at different Tiers:

#### **B1. Literacy**

Accurate spelling and punctuation, particularly when practitioners might be required to record customer information, and particularly at Tiers 2 and 3, accurate and succinct writing for record-keeping and making referrals.

#### **B2. Numeracy**

The ability to reason and apply numerical concepts, comprehending fundamental arithmetic (i.e. addition, subtraction, multiplication and division). Depending on the practitioner's role, at Tiers 2 and 3, ability to calculate fractions; percentages; simple and compound interest may be required.

Additional content has also been added to the Foundation area of Self-management with regard to support for the practitioner: The practitioner should take appropriate time for reflection and also seek out appropriate personal support when needed, for example when/after dealing with complex or traumatic cases.

## 5.1.3 Technical knowledge Domains

The feedback suggested that the technical Domains in the Framework are appropriate and comprehensive. The level of demand in some Tiers in numerous Domains was questioned by some in the survey, interviews and at the workshops.

**Action:** Tier content in the relevant areas has been reviewed and moved when appropriate.



Overall feedback identified two new Domains relevant to those who provide money guidance; Investments and Taxation.

**Action:** Two new Domains have been created (Investments, and Taxation), resulting in a total of 12 Domains in the final Framework. The content for those two new Domains has, in part, been taken from other Domains and has also been developed as a result of the feedback received from the survey, interviews and workshops, as well as input from specialists and Working Group members.

Scams were identified by respondents as a cross cutting theme and there was a call for the inclusion of awareness of scams relevant to numerous Domains.

**Action:** The following competence has been added to Tier 1 of all Technical Knowledge Domains: *Awareness* of scams and what to do if a customer has been the subject of a scam.

## **Domain 1. Knowing your customer**

Few comments were received on this Domain via the survey; however, the handful of feedback received suggests the content is broadly right. During the workshops and interviews there was some discussion whether this Domain belongs under 'Technical knowledge' or whether it should be part of the Foundations. In addition, a few concerns were expressed that the demands at Tier 1 were too high and that the requirements go slightly too far to be an expectation for all practitioners. The workshops also identified a few gaps in content. Concern was also shown that the title of the Domain has a specific meaning within the financial services sector.

**Action:** The Domain remains as a technical Domain as it is indeed too high an expectation for all practitioners in a variety of roles. The content has been reviewed, minor amends have been made, along with additions to reflect the identified gaps where appropriate. The title of the Domain was not thought to be an issue for this Framework.

#### **Domain 2. Debt Solutions**

This Domain attracted the most comments in the survey and promoted much debate in the workshops. The majority were in support of its inclusion in the Framework, although, some concerns were expressed as it is a regulated area. Some commented that the title 'Debt solutions' presupposes that the adviser can solve the customers issue.

**Action:** The title of the Domain has been changed to 'Debt' and the content stripped back to just one Tier as a result of consultation with Debt advice specialists within MaPS. An introductory paragraph has also been added to call-out the regulated boundary:

There is a regulated boundary relevant to this area: guidance should provide information and/or options to narrow down customers' choice of debt solution (e.g. bankruptcy, debt management plan etc.), without making an explicit recommendation. You must **not** recommend a specific course of action based on the customers' individual circumstances and/or goals. For further information please visit LINK.

It is important that you are aware of where the regulated boundaries are and do not go beyond them (please refer to Section D 'The boundaries of the service and of your role' on p.13 and the description of advice on p.4)



Views on this Domain were split in the survey in relation to the level of content within the Tiers. Comments made in the interviews, and at the workshops, suggested the content was a little 'light-touch', with numerous gaps identified (detailed in Error! Reference source not found.); for example regarding the practice of borrowing from 'Loan sharks' and informal borrowing.

**Action:** The content at each Tier level has been reviewed and amended where necessary and, where appropriate, additional content has been added to reflect the gaps identified. For example, the competency *Awareness of sources of illegal or informal money lending, such as loan sharks, family and friends* has been added to Tier 1.

#### Domain 4. Welfare and benefits

This Domain attracted largely positive feedback, although there was some disagreement as to whether this Domain should be so detailed in content, a small number questioned whether this Domain should be part of the Framework at all.

**Action:** The Welfare and benefits Domain has been retained in the Framework as a result of feedback which confirms a number of money guidance practitioners do provide information and guidance in this area despite its high level of complexity. The content of the Domain has been reviewed and stripped back as a result of the comments received. The Domain is now limited to Tiers 1 and 2 and (following a final meeting of the Working Group) an additional paragraph has been added to further explain its relevance:

We recognise that benefit entitlement can form a significant backdrop to someone's financial life and that it is important for money guidance practitioners to be aware of its implications.

We also need to recognise that the welfare landscape has changed significantly due to wide scale benefit reforms, increased demand, complexity and scale.

In areas that are regulated (such as debt and pensions), this Framework goes up to but does not *cross* those boundaries. In the case of Welfare and Benefits, in the absence of a regulated boundary but taking into account the specialist nature and complexity of the area, the Framework has been restricted to those areas general money guidance practitioners are likely to cover and we link to existing relevant Frameworks that cover benefits and welfare in more detail.

#### Domain 5. Budgeting and cashflow

The survey response suggested that the content of this Domain was largely appropriate although one set of comments, which gained some support from the workshops, indicated the content at Tier 1 should be toned down. Gaps which were identified included the need for references to digital and to methods of income maximisation.

**Action:** The content of Tier 1 has not been toned down. On review the changes to the Foundations section and the inclusion of signposting in this area do ensure coverage of all money guidance practitioners, irrespective of the level at which they practice. Content has been added where appropriate, specifically in respect of making digital payments, digital banking facilities and Apps and in the area of income maximisation.

#### **Domain 6. Savings**



Some comments made in the survey suggested that the content at Tier 2 was too close to regulated advice and the workshops and interviews suggested a number of revisions to the content, including greater focus on the benefits of saving and changing behaviours in this regard.

**Action:** The content has been reviewed and checked to ensure the regulated boundary has been observed. An introductory paragraph has also been added to call-out the regulated boundary:

There is a regulated boundary relevant to this area: guidance should provide information and/or options to narrow down the customers' choice of savings product (i.e. easy access, ISAs etc.) without making an explicit recommendation. You must **not** recommend a specific savings product based on the customers' individual circumstances and/or goals. For further information please visit LINK.

It is important that you are aware of where the regulated boundaries are and do not go beyond them (please refer to Section D 'The boundaries of the service and of your role' on p.13 and the description of advice on p.4)

An additional competence has been added to Tier 1 and 2 in relation to the benefits of saving and changing behaviours:

Tier 1: Awareness of strategies to help people save and overcome behavioural barriers (e.g. using a separate account for saving; saving on payday rather than at the end of the month etc.)

Tier 2: Understanding of mechanisms and behaviours for developing a savings habit

#### **Domain 7. Insurance**

Few comments were received on this Domain in the survey. The content appears to be broadly correct, however, some felt the content at Tier 2 may be too high-level (and potentially crosses into regulated advice). There was a suggestion from one workshop group that the content of this Domain could be threaded throughout the others. However, other workshops disputed this, highlighting that insurance was often overlooked and warranted its own Domain.

**Action:** The Domain has been maintained in the Framework as a result of the support for it, the content has been checked in respect of the regulated boundary in place and a paragraph added to call-out that regulated boundary:

There is a regulated boundary relevant to this area: guidance should provide information and/or options to narrow down the customers' choice of insurance policy, without making an explicit recommendation. You must **not** recommend a specific insurance policy based on the customers' individual circumstances and/or goals. For further information please visit LINK.

It is important that you are aware of where the regulated boundaries are and do not go beyond them (please refer to Section D 'The boundaries of the service and of your role' on p.13 and the description of advice on p.4)

## **Domain 8. Homes and mortgages**

Feedback suggested that Domain 8 (Homes and mortgages) would benefit from being split, and the content on Mortgages moved to Domain 3 (Borrowing). A number of suggestions were also made for additional content.



**Action:** Content on mortgages has been moved to Domain 3 (Borrowing) and the original Domain has been renamed 'Households'. Additional content has also been added to this Domain in line with the feedback received. Tier 1 includes a further competency: *Awareness of the differences between social housing and private housing*; Tiers 1 and 2 also have additional points relating to the grants and funding available for moving costs and adaptations.

#### **Domain 9. Retirement and pensions**

Very few comments were received relating to this Domain. Where comments were made, they were in relation to its coverage of pensions and benefits, which was felt to fit better into Domain 4. Welfare and benefits. There was some uncertainty as to which life stage this Domain refers to and a few content gaps were also identified.

**Action:** To aid clarity, the title of the Domain has been changed to 'Pensions'. The content has been reviewed and checked with specialist pensions advisers at MaPS and a decision has been taken to retain the content in relation to state pension in this Domain rather than moving it to the Welfare and benefits Domain. An additional paragraph has been added to call out the regulated boundary:

There is a regulated boundary relevant to this area: guidance should provide information and/or options to narrow down the customers' choice of pension scheme and/or how they take money from their pension pot, without making an explicit recommendation. You must **not** recommend a specific pension scheme or method of taking money from a pension pot based on the customers' individual circumstances and/or goals. For further information please visit LINK.

It is important that you are aware of where the regulated boundaries are and do not go beyond them (please refer to Section D 'The boundaries of the service and of your role' on p.13 and the description of advice on p.4)

#### Domain 10. Planning for later life

Survey feedback, interviews and workshops highlighted the possible inclusion of power of attorney in this Domain. Clarification was also sought of the focus of the Domain and thoughts were expressed that it felt a little 'bitty'. Some suggested that some content could be moved to other Domains (i.e. content on benefits moved to Domain 4. Welfare and benefits). It was also suggested that more should be included on care costs and bereavement. Some concern was shown that some content in Tiers 2 and 3 were close to regulated boundaries and overly complex.

Action: This Domain has been retained in the Framework as the content was found to be relevant to the role of a money guidance practitioner. Consideration was given to dispersing the content of the Domain throughout the Framework, however, this was not felt to be appropriate for such a significant topic area. Awareness (Tier 1) and knowledge (Tier 2) of power of attorney has been added to the Domains and content has been added to all three Tiers regarding care costs. Additional content relating to pre-paid funeral plans has also been added to Tier 2. A review of the content was carried out in relation to regulated boundaries and where such boundaries were seen to exist, the relevant boundaries were called out. The Tier 3 competency 'Knowledge of sideways disinheritance' was removed as it was felt not to be within the scope of a money guidance practitioner.



# 5.2 Implementation

Feedback was very positive on the prospect of the Framework's implementation; comments noted that the Framework will be a very useful mechanism by which to set and raise standards for practitioners.

Respondents were keen that the Framework aligns with the relevant Standards/Frameworks for all nations:

- The Information & Advice Quality Framework for Wales (IAQF) (Second Edition, 2018)
- NI Advice Quality Standard (2014)
- The Scottish National Standards for Information and Advice Providers (A Quality Assurance Framework 2009)
- The Advice Quality Standard (June 2016)



# Appendix 1 – What is a Competency Framework

Competency Frameworks are recognised as a tool with multiple applications for workforce development. Many sectors and professions have such Frameworks, for example accountancy, human resources, risk management and in many different aspects of the public sector, including the NHS and justice. Such Frameworks can aid in the development of training and qualifications by setting a benchmark of expected performance across a sector, community or occupation. In this sense, they are a highly valuable means of describing the general sets of competencies required of individuals in broad occupations.

A Framework is useful, on an organisational level, to boost performance and efficiency through improved recruitment and appraisal processes, create more accurate job descriptions, illustrating career progression pathways and opportunities and so on.

Individual competencies (or competences) describe the detailed attributes that individuals must possess, or acquire, to be considered effective in performing their job role. There is no set 'rule' for how a Competency Framework should be structured or laid out, nor how discrete skills, sets of knowledge, behaviours or attributes should be described.



## Appendix 2 – Survey Questionnaire

# **Money and Pensions Service 2019**

## About this survey

The Money and Pensions Service is seeking feedback on the draft Competency Framework for practitioners providing guidance on money management and financial well-being. The survey seeks to gain your views on the following aspects of the Competency Framework:

- Content
- Structure
- Suitability

The survey is being carried out independently by Pye Tait Consulting on behalf of the Money and Pensions Service.

The main part of the survey asks general questions about your impressions and overall observations. This should take no more than 10-15 minutes to complete. Should you have more detailed comments to make, there is an opportunity to do so in the latter part of the survey.

**Please note**, the question numbers may not appear sequentially due to the way you are routed through the survey.

We recommend that you review the Competency Framework before you start to answer the questions. If you wish, you can save your progress and return to complete your response.

The deadline for completion is 10th July 2019.

If you have any queries about this survey, please contact Clare Vokes at Pye Tait Consulting, via c.vokes@pyetait.com (telephone 01423 509433).

Your views will be treated confidentially by Pye Tait Consulting and reported to the Money and Pensions Service anonymously in line with the General Data Protection Regulation (GDPR), the Market Research Society Code of Conduct and the Data Protection Act 2018 (to access our privacy notice please click here). No individuals, companies or organisations will be identified in our resulting report unless explicit permission has been given.



Abo	ut you	
Q1	Whic	ch type of organisation do you work for?
		Commercial agency Statutory body Other government-funded body Local authority Voluntary sector Community group Further/higher education Other
	If oth	ner, please specify
Q2	Whe	re are you based?
		England Northern Ireland Scotland Wales
Q3	Whe	re does your organisation operate?
Q4	U U U U U U U U U U U U U U U U U U U	Nationally Regionally Locally ch group/s does your organisation provide support to? (select all that apply)
	00000	General public Black, Asian and Minority Ethnic (BAME) Children and young people Faith groups Homeless/housing
		Older people Parents and carers People with disabilities (physical, sensory, learning) Prisoners and offenders Refugees/asylum seekers



	<b>1</b> Tra	idents ivellers ner						
If o	other, p	please specify						
_								
Q5 W	/hat is y	our role?						
If	Coal Coal Coal Coal Coal Coal Coal Coal	nefits/welfare adviser ach/mentor mmunity worker stomer service adviser bt advisor/counsellor ancial capability adviser ancial inclusion officer neral adviser lpline adviser using officer oney adviser treach worker cial worker uth practitioner ner						
_								
Q6 Ar	re you							
		d paid						
Q7 Ho	ow ofte	en do you provide money	<b>advice on t</b> Daily	A few times a	g areas? Weekly	Monthly	Less than once a	Never
Bo W Bu			0	week	0	0	month	0000



	Hom Retir	rance les and mortgages rement and pensions ning for later life er					0	0
	If oth	ner, please specify						
Q8	How	confident are you in your kno	owledge of r	noney guid	lance?			
		Completely confident Fairly confident Neutral Not very confident Not at all confident Don't know/prefer not to say	<i>(</i>					
Q9	-	ou think you have enough inf and can't be provided as part			nderstand	the types o	f informati	on that
		Yes No Don't know						
	Com	ments						
Ove	rview	of the Framework - This secti	on asks you	general qu	estions abo	out the Fra	mework	
Q10	In yo	our opinion, is the audience fo	r the Frame	work clear	?			
		Yes No Don't know						
	Com	ments						



Q11 Do you think the Framework is relevant to your role?	
□ Yes	
□ No	
☐ Don't know	
Comments	
A word about 'advice'	
We recognise that the word 'advice' has different meanings in different contexts.	
For certain financial products the word 'advice' means a 'recommendation of what you should do', so as investing your money in a certain product, or buying a certain pension. This will be a personal recommendation based on the customer's specific circumstances and financial objectives. Only firms that are regulated by the Financial Conduct Authority (FCA) can offer this kind of advice. Similarly, de counselling falls into this bracket, as the practitioner will be guiding the customer to a particular cour of action.	bt
Money guidance practitioners do not provide personal recommendations for financial products, or recommendations on a specific course of action. However, money guidance practitioners do need to have a general and broad knowledge of the range of financial products available in the market place.	
Q12 Is the description of 'advice' (above) helpful in explaining the difference between advice and guidance?	
☐ Yes	
□ No	
☐ Don't know	
Comments	



## What are 'customers'?

The words 'customers' and 'clients' are often interchangeable and are used variously by different organisations; some organisations that provide money guidance deliver to 'service users'.

This Framework is aimed at practitioners who provide one-off information (either in a group setting or one-to-one), as well as those who might provide guidance to an individual on a longer-term basis (e.g. case-work). In the case of the latter, the term 'client' is sometimes used, but this word can feel too formal where a practitioner is providing a one-off service.

We have used the word 'customers' throughout the Framework to cover all types of individuals who are in receipt of guidance on money management and financial wellbeing (whether that is delivered in a group setting or on a one-to-one basis).

Q13	Do yo	ou agree with the rationale of why the term 'customers' has been used (above)?
	_ _	Yes No
		Don't know
	Comr	ments
Q14		the diagram (on p9 of the Framework) provide an understandable overview of the ework?
		Yes
		No Don't know
	Comr	ments
Q15	miniı	ou agree with the <u>principle</u> that everyone who delivers money guidance needs to have a mum level of skills and knowledge (we've called these foundations)? Please note, we will ask the content of the foundations later in this survey.
		Yes
		No Don't know
	Comr	ments



Ī	Yes No Don't know			
	omments			
	so, do you agree that the Fra	mework captures all of th	e Tiers at which mor	ney guidance
_	ractitioners operate?  Yes  No			
	_ 110			
Co -	omments			
- B D	o you agree with the descript			
Ti	er 1	Yes	No	Don't know □
Ti	er 2			
Ti	er 3			
Co	omments			
_				



Com	ments
oun	dations
In yo	our opinion, do all money guidance practitioners need competencies A-E?
	Yes
	No
	Don't know
Com	ments
Do y	ou see A-E as discrete areas?
Do y	ou see A-E as discrete areas? Yes
	Yes No
	Yes
	Yes No
	Yes No Don't know
	Yes No Don't know
 Com 	Yes No Don't know
 Com 	Yes No Don't know ments (if you disagree, could any areas be merged, or others split, for example?)
Com Do t	Yes No Don't know  ments (if you disagree, could any areas be merged, or others split, for example?)  he areas A-E cover the broad areas of 'Foundation' competence required?  Yes No
Com Do t	Yes No Don't know ments (if you disagree, could any areas be merged, or others split, for example?)  he areas A-E cover the broad areas of 'Foundation' competence required?  Yes
Com Do t	Yes No Don't know  ments (if you disagree, could any areas be merged, or others split, for example?)  he areas A-E cover the broad areas of 'Foundation' competence required?  Yes No

Technical knowledge



	The Framework includes 10 Domains of technical knowledge. In your opinion, do these cover the full scope of money guidance? (if you wish to provide comments on the detailed content of the Domains, please do so in the next section)
	□ Yes
	□ No
	☐ Don't know
	Comments
Q24	Do you see the 10 Domains as discrete areas of technical knowledge?
	□ Yes
	□ No
	☐ Don't know
	Comments (if you disagree, could any areas be merged, or others split, for example?)
Deta	ail of the Framework – This section asks you to comment on the detail within the Framework
Q25	On which of the following areas of the Framework would you like to provide comments? You will only be asked questions on each of the areas you select from this list.
	If you do not which to make any detailed comments, please select 'next' below
	Foundations
	A. The boundaries of the service and of your role
	A. The boundaries of the service and of your role
	<ul> <li>A. The boundaries of the service and of your role</li> <li>B. Personal qualities and attributes</li> </ul>
	<ul> <li>A. The boundaries of the service and of your role</li> <li>B. Personal qualities and attributes</li> <li>C. Transferable skills</li> </ul>
	<ul> <li>□ A. The boundaries of the service and of your role</li> <li>□ B. Personal qualities and attributes</li> <li>□ C. Transferable skills</li> <li>□ D. Self-management</li> <li>□ E. Legal compliance and safeguarding</li> </ul>
	<ul> <li>□ A. The boundaries of the service and of your role</li> <li>□ B. Personal qualities and attributes</li> <li>□ C. Transferable skills</li> <li>□ D. Self-management</li> <li>□ E. Legal compliance and safeguarding</li> </ul> Technical Knowledge Domains
	<ul> <li>□ A. The boundaries of the service and of your role</li> <li>□ B. Personal qualities and attributes</li> <li>□ C. Transferable skills</li> <li>□ D. Self-management</li> <li>□ E. Legal compliance and safeguarding</li> </ul> Technical Knowledge Domains
	<ul> <li>A. The boundaries of the service and of your role</li> <li>B. Personal qualities and attributes</li> <li>C. Transferable skills</li> <li>D. Self-management</li> <li>E. Legal compliance and safeguarding</li> </ul> Technical Knowledge Domains <ul> <li>1. Knowing your customer</li> <li>2. Debt Solutions</li> </ul>
	<ul> <li>□ A. The boundaries of the service and of your role</li> <li>□ B. Personal qualities and attributes</li> <li>□ C. Transferable skills</li> <li>□ D. Self-management</li> <li>□ E. Legal compliance and safeguarding</li> <li>Technical Knowledge Domains</li> <li>□ 1. Knowing your customer</li> <li>□ 2. Debt Solutions</li> <li>□ 3. Borrowing</li> </ul>
	<ul> <li>□ A. The boundaries of the service and of your role</li> <li>□ B. Personal qualities and attributes</li> <li>□ C. Transferable skills</li> <li>□ D. Self-management</li> <li>□ E. Legal compliance and safeguarding</li> </ul> Technical Knowledge Domains <ul> <li>□ 1. Knowing your customer</li> <li>□ 2. Debt Solutions</li> <li>□ 3. Borrowing</li> </ul>



		e provide comments	J	J	J	J	J	J
	conte	orehensiveness (does the ent cover everything it should) vance						
	accur	•	_	_	_		_	_
			Not at all	To some extent	Neutral	Almost	Completel y	Don't know
<b>Q30</b>	To w	hat extent do you agree with	the content	of <u>transfe</u>	rable skills	•		
	Relev	ent cover everything it should) vance se provide comments						
	Comp	orehensiveness (does the						
	Accur	racy (is the content factually	Not at all	To some extent	Neutral	Almost	Completel y	Don't know
Q29	To w	hat extent do you agree with	the content	of <u>persona</u>	al qualities	and attrib	utes?	
	Pleas	e provide comments						
	conte Relev	ent cover everything it should) vance						
	accur Comp	rate) orehensiveness (does the						
		racy (is the content factually	Not at all	To some extent	Neutral	Almost	Completel y	Don't know
Ղ28	To w	hat extent do you agree with t	the content	t of <u>bounda</u>	ries of the	service an	d of your role	<u>e</u> ?
		<ul><li>7. Insurance</li><li>8. Homes and mortgages</li><li>9. Retirement and pensions</li><li>10. Planning for later life</li></ul>						



To what extent do you agree with	the conten	t of <u>self-ma</u>	nagement?	)		
	Not at all	To some extent	Neutral	Almost	Completel	Don knov
Accuracy (is the content factually accurate)					у П	
Comprehensiveness (does the						
content cover everything it should) Relevance						
Please provide comments						
To what extent do you agree with	the conten	t of <u>legal co</u>	mpliance a	nd safegu	arding?	
	Not at all	To some	Neutral	Almost	Completel	Dor
Accuracy (is the content factually		extent			У	kno
accurate) Comprehensiveness (does the						
content cover everything it should) Relevance						
Please provide comments						
To what extent do you agree with	the conten	t of <u>knowin</u>	g your cust	omer?		
	Not at all	To some extent	Neutral	Almost	Completel	Don kno
Accuracy (is the content factually accurate)					у П	
Comprehensiveness (does the content cover everything it should)						
Relevance						
Please provide comments						



To what extent do you agree with	the conten	t of debt so	lutions?			
, 5	Not at all	To some	Neutral	Almost	Completel	Don
Accuracy (is the content factually		extent			У	kno □
accurate) Comprehensiveness (does the						
content cover everything it should) Relevance						
Please provide comments						
To what extent do you agree with	the conten	t of <u>borrow</u>	ing?			
	Not at all	To some extent	Neutral	Almost	Completel y	Dor kno
Accuracy (is the content factually accurate)					Ó	
Comprehensiveness (does the content cover everything it should)						
Relevance						
Please provide comments						
To what extent do you agree with	the conten	t of welfare	and benef	its?		
	Not at all	To some extent	Neutral	Almost	Completel y	Dor kno
Accuracy (is the content factually accurate)					<b>–</b>	
Comprehensiveness (does the content cover everything it should)						
Relevance						
Please provide comments						



To what extent do you agree with	the conten	t of <u>budget</u>	ing and cas	hflow?			
	Not at all	To some extent	Neutral	Almost	Completel	Don knov	
Accuracy (is the content factually accurate)					у П		
Comprehensiveness (does the content cover everything it should)							
Relevance							
Please provide comments							
To what extent do you agree with	the conten	t of <u>savings</u>	?				
	Not at all	To some extent	Neutral	Almost	Completel y	Dor kno	
Accuracy (is the content factually accurate)					Ó		
Comprehensiveness (does the content cover everything it should)							
Relevance							
Please provide comments							
To what extent do you agree with	the conten	t of <u>insuran</u>	<u>ice</u> ?				
	Not at all	To some extent	Neutral	Almost	Completel y	Don kno	
Accuracy (is the content factually accurate)					Ó		
Comprehensiveness (does the content cover everything it should)							
Relevance							
Please provide comments							



To what extent do you agree with	the conten	t of <u>homes</u>	and mortga	ages?		
	Not at all	To some extent	Neutral	Almost	Completel Y	Don knov
Accuracy (is the content factually accurate)					Ó	
Comprehensiveness (does the content cover everything it should)						
Relevance						
Please provide comments						
To what extent do you agree with	the conten	t of <u>retirem</u>	ent and pe	nsions?		
	Not at all	To some extent	Neutral	Almost	Completel	Dor kno
Accuracy (is the content factually accurate)					у П	
Comprehensiveness (does the content cover everything it should)						
Relevance						
Please provide comments						
To what extent do you agree with	the conten	t of <u>plannin</u>	g for later l	life?		
	Not at all	To some extent	Neutral	Almost	Completel y	Dor kno
Accuracy (is the content factually accurate)					Ó	
Comprehensiveness (does the content cover everything it should)						
Relevance						
Please provide comments						



Hu	l Report						
ne	eral thoughts						
	orar thoughtom						
3	In your opinion, is the langua	ge used throughout the Fran	mework clear?				
	□ v						
	Yes						
	□ No						
	☐ Don't know						
	Comments						
	Comments						
		In your opinion, is the Framework relevant to those who provide money guidance in the following					
		vork relevant to those who p	provide money guid	ance in the following			
	In your opinion, is the Framev contexts?		provide money guid				
	contexts?	Yes	provide money guid No	Don't know			
	contexts?	Yes	No	Don't know			
	contexts?  Face to face	Yes □	No 🔲	Don't know □			
	contexts?  Face to face Remotely	Yes	No □	Don't know □ □			
	contexts?  Face to face Remotely One-to-one In groups	Yes	No □ □	Don't know			
	contexts?  Face to face Remotely One-to-one	Yes	No □ □	Don't know			
	contexts?  Face to face Remotely One-to-one In groups	Yes	No □ □	Don't know			
	contexts?  Face to face Remotely One-to-one In groups	Yes	No □ □	Don't know			
	Face to face Remotely One-to-one In groups	Yes	No □ □	Don't know			
	Face to face Remotely One-to-one In groups Comments	Yes	No □ □	Don't know			
	Face to face Remotely One-to-one In groups	Yes	No □ □	Don't know			
ain	Face to face Remotely One-to-one In groups  Comments  ———————————————————————————————————	Yes	No □ □ □	Don't know			
ain	Face to face Remotely One-to-one In groups Comments  ing and qualifications  Are you aware of any externa	Yes	No	Don't know			
ain	Face to face Remotely One-to-one In groups  Comments  ———————————————————————————————————	Yes	No	Don't know			
ain	Face to face Remotely One-to-one In groups  Comments  ining and qualifications  Are you aware of any externa guidance on money managem	Yes	No	Don't know			
ain	Face to face Remotely One-to-one In groups Comments  ining and qualifications  Are you aware of any externa guidance on money managem  Yes (please provide deta	Yes	No	Don't know			
ain	Face to face Remotely One-to-one In groups  Comments  ing and qualifications  Are you aware of any externa guidance on money managem  Yes (please provide deta  No	Yes	No	Don't know			
ain	Face to face Remotely One-to-one In groups Comments  ining and qualifications  Are you aware of any externa guidance on money managem  Yes (please provide deta	Yes	No	Don't know			
ain	Face to face Remotely One-to-one In groups  Comments  ing and qualifications  Are you aware of any externa guidance on money managem  Yes (please provide deta  No	Yes	No	Don't know			



٠.٠	Are you aware of any <u>qualification</u> which you feel is particularly suited to those providing guidance on money management and financial well-being?					
		Yes (please provide details)				
		No				
		Don't know				
	Details					
And	finally	y				
Q47	Are t	here any further comments you would like to make?				
Q47	Are t	here any further comments you would like to make?				
Q47	Are t	here any further comments you would like to make?				
	For n	here any further comments you would like to make?  nonitoring purposes ONLY, please provide your organisation name. Please be assured your swill be treated confidentially by Pye Tait Consulting and reported anonymously.				
Q48	For n	nonitoring purposes ONLY, please provide your organisation name. Please be assured your s will be treated confidentially by Pye Tait Consulting and reported anonymously.				
Q48	For n view	nonitoring purposes ONLY, please provide your organisation name. Please be assured your s will be treated confidentially by Pye Tait Consulting and reported anonymously.  Se we have any queries on your feedback, please provide your contact details below:				
Q48	For n view	nonitoring purposes ONLY, please provide your organisation name. Please be assured your s will be treated confidentially by Pye Tait Consulting and reported anonymously.  se we have any queries on your feedback, please provide your contact details below:				
Q48	For n view	nonitoring purposes ONLY, please provide your organisation name. Please be assured your s will be treated confidentially by Pye Tait Consulting and reported anonymously.  se we have any queries on your feedback, please provide your contact details below:				

Many thanks for taking the time to share your views. Finally, please remember that in addition to this survey, we are holding a number of **events** around the country and carrying out a number of **telephone interviews**.

If you'd like to attend an event or if you'd be willing to take part in a telephone interview (once you have submitted this survey) please return to the Pye Tait Money Guidance Competence web-page.



# Appendix 3 – Topic Guide for Depth Interviews

#### Topic guide for telephone depth interviews

Pre-arranged interviews will be scheduled to take place from May into early July, targeting up to 50 stakeholders. This topic guide will be used to steer discussion, prompts have been provided to follow-up and probe for further detail and insights from respondents. Each interview will likely take c. 40 minutes (but some may take up to one hour).

#### **Reassurances**:

Please be assured that Pye Tait Consulting operates strictly to the Market Research Society's Code of Conduct and any information you provide will be anonymised by us in all subsequent reporting. Your identity will not be revealed to the Money and Pensions Service in any way unless you wish to have anything directly reported back to the Money and Pensions Service for follow-up where you give us permission to do so.

#### Your organisation

- 1. Please tell me about your role and the role of your organisation:
  - a) What type of organisation do you work for?
  - b) Where are you based?
  - c) Which groups does your organisation provide support to?
  - d) Are you paid / unpaid?
  - e) How often do you provide money guidance?
  - f) How many other people are employed/volunteer in a money guidance role in your organisation?

#### **Overview of the Framework**

- 2. What are your overall impressions of the Framework?
- 3. Does the diagram on page 9 of the document provide an understandable overview of the document?
- 4. Do you agree with the principle that everyone who delivers money guidance needs to have a minimum level of skills and knowledge (we've called these foundations)?
- 5. Do you agree with the principle that those who deliver money guidance operate at different levels (we've called these Tiers)?
- 6. Do you agree with the description of the three Tiers?
- 7. Do you agree with the principle that everyone who provides money guidance should possess all of the skills and knowledge in Tier 1?
- **8.** Throughout the development of the Framework the Working Group advised that it must make clear what money guidance practitioners should and shouldn't do i.e. the boundaries of their role and the difference between 'advice' and 'guidance'. **Do you think we have got this right in the document?** (is there perhaps too much, just the right amount or not enough?)



#### The Foundations

9. Focusing on the content of the Foundations (pages 11-15) Do you have any feedback on the Foundations section of the Framework?

#### Prompts:

- Do all money guidance practitioners need competencies A-E?
- Do you see A-E as discrete areas?
- Do the areas A-E cover the broad areas of 'Foundation' competence required?
- To what extent do you agree with the content of The Foundations?

#### **Technical Knowledge**

**10.** Focusing on the content of the Technical Knowledge Domains (pages 16-27) **Do you have any feedback on the Technical Knowledge section of the Framework?** 

#### Prompts:

- The Framework includes 10 Domains of technical knowledge. In your opinion, do these cover the full scope of money guidance? Are there any areas which have been overlooked?
- Do you see the 10 Domains as discrete areas of technical knowledge?
- Do you agree with the content of each of the Technical Knowledge Domains?
- Is the level of technical detail correct?

#### Finally...

- 11. Is the language used throughout the Framework clear?
- **12.** Do you think the Framework is relevant to those who provide money guidance in different contexts? (prompt: Face to face / remotely / one-to-one / in groups)
- 13. What would organisations need in order to implement the Competency Framework?

#### **Training and qualifications**

- **14.** Are you aware of any <u>external training</u> which you feel is particularly suited to those providing guidance on money management and financial well-being?
- **15.** Are you aware of any <u>qualification</u> which you feel is particularly suited to those providing guidance on money management and financial well-being?



# Appendix 4 – Workshop Agenda

# Money and Pensions Service Competency Framework for practitioners providing guidance on money management and financial well-being

## Workshops – June/July 2019

#### **Arrivals**

Arrivals – meet and greet, tea and coffee

#### Introductions and background (20 mins)

Housekeeping – toilets, fire alarm

Introductions - round table

• To include – <u>briefly</u>: type of organisation and your role, how often do you provide money advice, how many other people are employed/volunteer in a money guidance role in your organisation?

Background, aims and objectives – 'Raising the quality of money management support in the UK'

**Purpose of the session** is to gain feedback on the draft Competency Framework. The current content of the Framework has been informed by:

- o An extensive desk review to scope out broad statements of skills, knowledge and behaviours
- o Framework development guided by a Working Group of money guidance practitioners

After the event, if you wish to provide further views please do! You can do this via telephone, or the online survey. Please alert colleagues!

Postcards will be available to hand out.

Please be assured that Pye Tait Consulting operates strictly to the Market Research Society's Code of Conduct and any information you provide will be anonymised by us in all subsequent reporting. Your identity will not be revealed to the Money and Pensions Service in any way unless you wish to have anything directly reported back to the Money and Pensions Service for follow-up where you give us permission to do so.

Warm up question -

16. What are your overall impressions of the Framework? (in one sentence!)

(If splitting into groups, do so at this point)



#### General overview of the Framework (20 minutes)

- 17. Do you agree with the principle that everyone who delivers money guidance needs to have a minimum level of skills and knowledge (we've called these foundations)?
- 18. Do you agree with the principle that those who deliver money guidance operate at different levels (we've called these Tiers)?
- 19. Do you agree with the description of the three Tiers? (Read these out/slide)
- 20. Do you agree with the principle that everyone who provides money guidance should possess all of the skills and knowledge in Tier 1? (Read out the list/slide)
- 21. Throughout the development of the Framework the Working Group advised that it must make clear what money guidance practitioners should and shouldn't do i.e. the boundaries of their role and the difference between 'advice' and 'guidance'. What are your views on this? (Prompts: do you think there is a clear boundary? Where would you set it? How would you describe it? Do you think people who provide money guidance understand the difference?)

#### The Framework (1 hour)

#### General prompts to guide discussion:

- Is the language and terminology clear?
- Is the content relevant to those who provide money guidance in different contexts? (prompt: Face to face / remotely / one-to-one / in groups)

# **The Foundations**

Copies of the Foundations (pages 11-15) will be provided to attendees

#### Prompts:

- Do all money guidance practitioners need competencies A-E?
- Do you see A-E as discrete areas?
- Do the areas A-E cover the broad areas of 'Foundation' competence required?
- To what extent do you agree with the content of The Foundations?

#### **Technical Knowledge**

Copies of the Technical Knowledge Domains (pages 16-27) will be provided to attendees

#### Prompts:

 The Framework includes 10 Domains of technical knowledge. In your opinion, do these cover the full scope of money guidance? Are there any areas which have been overlooked?



- Do you see the 10 Domains as discrete areas of technical knowledge?
- Do you agree with the content of each of the Technical Knowledge Domains?
- Is the level of technical detail correct?

#### Summary and final questions... (20 minutes)

Facilitator to summarise main points of the discussion

- 22. What would organisations need in order to implement the Competency Framework?
- 23. Final thoughts
  - Thank you and reminder to ask colleagues/networks to feedback
  - Next steps
  - Hand out postcards

#### Training and qualifications (additional questions if time permits)

- **24.** Are you aware of any <u>external training</u> which you feel is particularly suited to those providing guidance on money management and financial well-being?
- **25.** Are you aware of any <u>qualification</u> which you feel is particularly suited to those providing guidance on money management and financial well-being?



# Appendix 5 – Workshop Invitees

# **Call-for-feedback Promotion**

Electronic mailing was sent to 10,065 contacts selected based on their organisations SIC code and obtained from a reputable research database (MINT UK):

6492	Credit granting by non-deposit taking finance houses and other specialist consumer
	credit grantors
87200	Residential care activities for learning difficulties, mental health and substance abuse
87300	Residential care activities for the elderly and disabled
87900	Other residential care activities n.e.c.*
88100	Social work activities without accommodation for the elderly and disabled
64999	Financial intermediation not elsewhere classified
68201	Renting and operating of Housing Association real estate
82911	Activities of collection agencies
82912	Activities of credit bureaus
82990	Other business support service activities n.e.c.*
88100	Social work activities without accommodation for the elderly and disabled

<sup>\*</sup>n.e.c. Not elsewhere classified



# Appendix 6 - Call-For-Feedback Draft Framework







Competency Framework for practitioners providing guidance on money management and financial well-being

**April 2019** 

#### **Pye Tait Consulting**

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# 1. The Money and Pensions Service

The Money and Pensions Service has been created by Government to provide strategic leadership on the provision of debt advice, money guidance, pensions guidance and consumer protection.

It is funded by levies on both the financial services industry and on pension schemes. The new body (which has taken on the responsibilities of Pension Wise, The Pensions Advisory Service (TPAS) and The Money Advice Service (MAS)) is sponsored by the Department for Work and Pensions, but will also engage with HM Treasury, which is responsible for policy on financial capability and debt advice.

2019/20 is an important transition year for the organisation, in which the three services will continue to be delivered alongside a significant "listening phase" (for more information click here) which will inform the National Strategy and Corporate plans.

The Money and Pensions Service is committed to raising the quality of money guidance provision, so as part of the wider listening phase Pye Tait are seeking feedback on the draft competency framework which is set out in this document.

# 2. Context and background

People across the UK should be receiving good quality money guidance regardless of where they go to get it.

There are many thousands of practitioners delivering money guidance in the non-regulated space in one form or another. They range from volunteers, youth workers and housing officers, who might only be doing it for a fraction of their time, to advisors who do it full time - and everyone in between. Whilst some of the people they serve are specifically seeking money guidance, we know that many are not. They may be seeking advice on a specific life event, be vulnerable, or have complex needs. Money guidance will often form just part of a wider but interconnected and holistic service.

There are **thousands of practitioners**, most of whom don't recognise themselves as giving money guidance and many of whom **won't be aware of the boundary with regulated advice**. **Currently, there is no common view of what good looks like** and there are very few opportunities for practitioners to access evidence about how to most effectively improve the money skills of the people they serve.

The Money and Pensions Service wants to raise the status and profile of money guidance and the quality of its delivery. Its vision is that people across the UK will be consistently receiving good quality money guidance, leading to better outcomes. Confidence and competence will be raised and there will be a community of engaged organisations and practitioners with which to communicate, learn from and with which we can share good practice.

In 2017 MAS brought together a consortium of some of the key organisations in the diverse money guidance and financial capability practitioner communities<sup>6</sup> and undertook research to understand more fully what types of

<sup>&</sup>lt;sup>6</sup> Age UK; Citizens Advice (England, Wales & Scotland); Improvement Service; National Youth Agency; Money Advice Scotland; National Skills Academy for Financial Services; UK Youth; National Association of Student Money Advisers; Quaker Social Action; Law Centres Network; Toynbee Hall; Institute of Money Advisers; Money Advice Trust; Advice NI; Christians Against Poverty.



practitioner there are, their learning needs and whether a competency framework would be a viable solution to raising the standard of delivery. The full report can be found here: <a href="www.fincap.org.uk/practitioners">www.fincap.org.uk/practitioners</a>
The vision is to support the work of Money Guidance Practitioners through four key strands:

- 1. Competency framework: Design and implement a competency framework for *all money guidance practitioners*, linked to training and qualifications and developed in collaboration with the varied cross sector community.
- Engage with and build a practitioner community: <u>Build engagement</u> with and create a money guidance
  practitioner community to make a difference on the ground, turn evidence into action and understand drivers,
  challenges and levers.
- 3. Engage stakeholders and influencers: Engage with and garner support from key influencers, funders and commissioners.
- 4. Training: Ensure that practitioners have access to affordable, quality training and resources.

# 3. Developing a competency framework

# 3.1 What is a competency framework?

Competency frameworks are recognised as a tool with multiple applications for workforce development. Many sectors and professions have such frameworks, for example accountancy, human resources, risk management and in many different aspects of the public sector, including the NHS and justice. Such frameworks can aid in the development of training and qualifications by setting a benchmark of expected performance across a sector, community or occupation. In this sense, they are a highly valuable means of describing the general sets of competences required of individuals in broad occupations.

A framework is useful, on an organisational level, to boost performance and efficiency through improved recruitment and appraisal processes, create more accurate job descriptions, illustrating career progression pathways and opportunities and so on.

Individual competences (or competencies) describe the detailed attributes that individuals must possess, or acquire, to be considered effective in performing their job role. There is no set 'rule' for how a competency framework should be structured or laid out, nor how discrete skills, sets of knowledge, behaviours or attributes should be described.

# 3.2 Methodology

Pye Tait Consulting were commissioned by MAS in September 2018 to develop a competency framework that shows the competencies needed by <u>individuals</u> to provide good quality money guidance.

The project started with a desk research exercise, to inform the design of a 'straw man' for developing the competency framework. Sources used to inform the straw man include:

Job descriptions/job adverts.



- Existing standards and frameworks (e.g. the Scottish National Standards for I&A Providers; Information and Advice Quality Framework Wales; Northern Ireland Financial Capability Strategy; MAS Debt Advice Quality Framework; National Occupational Standards).
- Literature/Reports, including from the Phase 1 Report that preceded this current project.
- Competency frameworks for other sectors and occupations.

A practitioner working group of cross sector organisations was set up in November 2018 where the straw man was discussed and further developed. The framework has since been revised and refined at two subsequent working group meetings (December 2018 and January 2019).

Alongside the development of the framework, an extensive mapping exercise is being carried out of the relevant training and qualifications that relate to money guidance. This will help to inform the framework, assess training accessibility and gaps and crucially, once the framework has been completed, links to further information, training and qualifications can be added against the relevant places within the framework.

# 4. The competency framework

# 4.1 Who is the competency framework for?

The framework is designed for anyone who provides any type of non-regulated money guidance to individuals or groups: from young adults all the way through to older people in retirement.

This could mean someone who only does it for a fraction of their time, or all day, every day. These individuals may be employed full-time, part-time, or they might be volunteers in a range of different types of organisations. There are a huge range of Money guidance practitioners – from community workers, general advisors, volunteers, housing officers, youth practitioners, to contact centre staff who provide money management support all day, every day.

There are hundreds of job roles that involve some kind of money guidance, be that face to face, on the phone, one to one or in groups. Because job titles can differ markedly between organisations, the framework does not focus on each specific role; instead it focusses on the type of information or guidance that is being delivered and how.

# 4.2 Links to information, training, qualifications and other frameworks

Alongside the development of this framework, we have also been mapping relevant qualifications and training relating to money guidance across the UK. Once the content of the framework is complete (in August) we will undertake a piece of work to add in the relevant links which will provide the users of the framework with more information about particular training or technical knowledge.

The framework is also intended to complement, and link to, other existing frameworks.



These other frameworks are each structured differently; for example, the Scottish Framework describes three different 'types' of service, the Welsh Framework divides information and advice into five headings. These frameworks are aimed at both organisations and individuals.

This framework is aimed at individuals who provide bespoke, impartial advice and guidance on money management and financial wellbeing.

#### Other frameworks

The Scottish National Standards for Information and Advice Providers (A Quality Assurance Framework 2009)

The Information & Advice Quality Framework for Wales (IAFQ Wales)

The MAS Debt Advice Quality Framework



#### A word about 'advice'...

We recognise that the word 'advice' has different meanings in different contexts.

As part of the HM Treasury/FCA Financial Advice Market Review (FAMR), the Financial Advice Working Group devised and tested concise definitions of advice and guidance (see table below).

Guidance	Advice
Guidance is an impartial service which will help you to identify your options and narrow down your choices but will not tell you what to do or which product to buy; the decision is yours.	Advice will recommend a specific product or course of action for you to take given your circumstances and financial goals. This will be personal to you, based on information you provide.
<ul> <li>Providers of guidance are responsible for the accuracy and quality of the information they provide but not for any decision make based on it.</li> <li>Guidance is free unless your provider clearly tells you otherwise.</li> </ul>	Advice will be provided by a qualified and regulated individual or online by a regulated organisation.  Providers of advice are responsible and liable for the accuracy, quality and suitability of the recommendation that they make and you are protected by law.
It will suggest what you could do.	You will usually pay a fee for advice. Fees will be disclosed before you are asked to commit yourself.
	It will recommend what you should do.

For certain financial products the word 'advice' means a 'recommendation of what you *should* do', such as investing your money in a certain product, or buying a certain pension. This will be a personal recommendation based on the customer's specific circumstances and financial objectives. Only firms that are regulated by the Financial Conduct Authority (FCA) can offer this kind of advice<sup>7</sup>. Similarly, debt counselling falls into this bracket, as the practitioner will be guiding the customer to a particular course of action.

Money guidance practitioners do not provide personal recommendations for financial products, or recommendations on a specific course of action. However, money guidance practitioners do need to have a general and broad knowledge of the range of financial products available in the market place.

<sup>&</sup>lt;sup>7</sup> Information taken from the FCA website, here: https://www.fca.org.uk/consumers/understanding-advice-guidance-investments



#### Customers

The words 'customers' and 'clients' are often interchangeable and are used variedly by different organisations; some organisations that provide money guidance, deliver to 'service users'.

This framework is aimed at practitioners who provide one-off information (either in a group setting or one-to-one), as well as those who might provide guidance to an individual on a longer-term basis (e.g. case-work). In the case of the latter, the term 'client' is sometimes used, but this word can feel too formal where a practitioner is providing a one-off service.

We have used the word 'customers' throughout the framework to cover all types of individuals who are in receipt of guidance on money management and financial wellbeing (whether that is delivered in a group setting or on a one-to-one basis).



#### The Framework

The competency framework for money guidance practitioners sets out the skills, knowledge and behaviours required to deliver impartial guidance on money management and financial wellbeing in the non-regulated space. The diagram below illustrates how the competency framework is structured.

The framework sets out the competencies for 10 domains, each founded on technical knowledge - these are numbered 1 to 10. . Budgeting and cashflow Retirement and Debt solutions Planning for later life 1. Knowing your Welfare and benefits Each of the 10 domains is tiered, according 8. Homes and mortgages to the level of complexity at which the Borrowing customer 7. Insurance Savings practitioner is working. Tier 3 Knowledge and skills to provide complex, Depending on your role and the depth and breadth of the specialist money guidance. money guidance that is offered, you may need to have more expertise in certain domains. The framework allows for such flexibility and progression in Knowledge and skills to provide Tiers 2 and 3. information and money guidance tailored to the customer. Tier 1 Knowledge and skills to provide information and signposting. Money guidance practitioners need all of the foundation attributes and the full breadth A. The boundaries of the service and of your role of the tier 1 competencies. **Foundations** B. Personal qualities and attributes These are the behaviours and personal C. Transferable skills characteristics that advisors need, as well as underpinning knowledge of the boundaries D. Self-management of their role and the regulations that apply. E. Compliance and safeguarding



# Levels of competence

Anyone delivering any kind of money guidance needs to have some "must haves" - a minimum level of skills and knowledge. Then, depending on your role and your customers you may need to have more expertise in certain areas. The framework allows for such flexibility.

The framework sets out the competencies for the core cross-cutting **foundations** (based on the behaviours and personal characteristics that practitioners need) and the **10 domains**, each of which are founded on technical knowledge. In order to deliver a safe, effective service, <u>every</u> money guidance practitioner needs to possess both the cross-cutting "Foundation Competencies" and all of the Tier 1 knowledge and skills set out in each of the 10 domains; these are the minimum requirements.

Each of the 10 domains is **tiered**, according to the level of complexity at which the practitioner works. Not all domains require a specialist Tier 3 level. Tiers 2 and 3 can be self-identified, completely dependent on the depth and breadth of service you or your organisation offers regarding money guidance. You may never provide the type of guidance set out in any of the domains at these higher tiers, or you may identify with particular domains.

Within each domain the tiers provide clear progression and, in order to identify at a tier 2 or 3 in any of the domains, a practitioner must meet all of the competencies in the previous tiers, for that domain.

Further descriptions of each tier can be found below:

#### Tier 1

At this level, practitioners provide customers with factual information (or access to the information) which enables them to do more about their own situation. They have a general awareness of other services or resources that might be able to offer further help and advice, and part of this role involves signposting customers to these. They may also explain terminology or provide clarification of a document (such as a bank statement).

#### Tier 2

Practitioners at this level focus on customers' individual circumstances, exploring their needs, setting out options available to them and identifying the implications and consequences of any action. The practitioner may see the same customer/s on an ongoing basis and may offer practical assistance with interpreting letters and forms. As well as signposting customers to other sources and agencies, the practitioner might also formally refer customers to other organisations.

#### Tier 3

Tier 3 focuses on specialist areas of bespoke information provision. At this level, practitioners will likely specialise in a particular area such as benefits and welfare, or housing. This naturally requires them to have an in-depth knowledge of the relevant regulations and organisations as well as the features of specific products and services.



#### **Foundations**

Practitioners operating at each Tier should have the foundation competencies in:

- A. The boundaries of the service and of your role
- B. Personal qualities and attributes
- C. Transferable skills
- D. Self-management
- E. Compliance and safeguarding

The foundation competencies are a prerequisite for providing a safe, quality service to customers. Whilst some are specific to money guidance, many of these competencies are related to giving good, effective advice in general. They may already feature in practitioner job descriptions, within organisational frameworks or within general advice guidelines. As such, they are such a fundamental part of being able to deliver good quality money guidance and the practitioner community is so diverse that we felt it was essential to include them here.

# A. The boundaries of the service and of your role

Every practitioner must be aware of what they can and can't say to customers, depending on the organisation he or she works for, and depending on the type of advice and guidance being given.

#### Regulated financial products and activities8

- Understanding of which financial products are regulated (e.g. pensions and investments, mortgages).
- Understanding of which financial activities are regulated (e.g. debt advice, consumer credit, investment businesses, funeral plan contracts, electronic money, insurance business and distribution, operating a dormant account, home finance).
- Awareness of the regulations that cover regulated products and activities.
- Understanding of the difference between providing information and guidance, and advice, particularly with relevance to regulated financial products and activities.

#### Introduce the service to others

- Provide information to customers about the service you are providing, including:
  - Explaining what information you can and cannot provide.
  - Explaining any costs and fees associated with using the service if applicable.

# Providing support within the limits of your role

- Provide information and guidance within the limits of relevant financial regulations and in line with organisational policies and procedures, and check customers' understanding.
- Agree with customers any further activities that are necessary to meet their needs.
- Identify any needs that cannot be met and refer customers to alternative sources in line with organisational policies and procedures.

<sup>&</sup>lt;sup>8</sup> The Financial Conduct Authority maintains a list of the financial activities they regulate, here: https://www.fca.org.uk/firms/authorisation/how-to-apply/activities



# B. Personal qualities and attributes

These qualities are at the core of The Framework. The breadth and complexity of information and guidance on money management and financial wellbeing means that practitioners need to draw deeply upon their personal qualities to handle the demands of the role.

#### **Personal integrity**

Those who offer guidance on money management and financial wellbeing bring a sense of integrity to what they do. There should be an insistence on openness and communication, motivated by values about inclusiveness and getting on with the job. The practitioner will act as a role model for involvement with customers and demonstrate a commitment to equal opportunities.

#### **Self-awareness**

Practitioners should know their own strengths and limitations and use failure or misjudgement as an opportunity for learning. Practitioners need to have an awareness of their own emotions and know how to control them, adapting them appropriately to the situation. They will be aware of their own personal impact on others, particularly when they are under pressure.

#### **Impartiality**

Providers of money guidance must do so impartially. Practitioners will therefore be objective, not allowing themselves to be influenced by personal feelings or opinions. They must also be empathetic and sensitive to the wishes of the customer but not allow those feelings of empathy to influence the provision of best advice and guidance. Awareness of actual and potential conflicts of interest and what actions to be taken in those circumstances is important.

#### **Diplomacy**

Practitioners must possess the quality of diplomacy and be sensitive and skilful in managing relations with others. The ability to maintain a positive attitude is an attribute which they should possess alongside reliability.

#### **Flexibility**

Practitioners must be flexible in their approach, showing awareness and understanding of the needs and preferences of others. For example, they may need to adapt the way in which they present income and expenditure details to a customer to enable them to understand it fully.

# **Rapport building**

Practitioners should understand the importance of non-verbal communication, such as body language, and how different cultures use and interpret body language in different ways. A key aspect of providing money guidance well is having an ability to empathise with a customers' situation and gauging their current level of confidence and ability to manage their money. Practitioners should have an understanding of the importance of building trust and rapport with others, and methods for achieving this for a range of people, including challenging customers.



## C. Transferable skills

Strong transferrable skills are fundamental to the provision of impartial guidance on money management and financial wellbeing. This includes working well with others – including colleagues and other agencies – as well as correctly using the appropriate organisational systems and procedures, keeping accurate records and attention to detail. Practitioners should also have good levels of literacy and numeracy to communicate what can often be complex information in a straightforward and understandable way.

#### Literacy

Accurate spelling and punctuation, particularly when recording customer information, and accurate and succinct writing for record-keeping and making referrals.

#### Numeracy

The ability to reason and apply numerical concepts, comprehending fundamental arithmetic (i.e. addition, subtraction, multiplication and division); fractions; percentages; simple and compound interest.

#### ΙT

Computer skills to ensure accurate records can be maintained and relevant information accessed in a timely, secure manner. Practitioners may also require the ability to use comparison sites and online tools (e.g. mortgage and/or benefits calculators).

#### Attention to detail

Accuracy and attention to detail are essential for maintaining clear and accurate records (including any reference numbers and codes; information about customers' circumstances). Well-developed listening skills are closely linked into this area of competence.

#### Communication

The ability to communicate effectively both verbally and in writing. When communicating with others, the practitioner uses appropriate language, respecting equality and diversity and, where relevant, using appropriate non-verbal cues.

#### **Working with others**

The practitioner identifies and confirms the needs and expectations of colleagues and customers, establishing and maintaining productive working relationships with relevant people. They have the ability to deal with disagreements in an amicable and constructive way to maintain good relationships. Where appropriate, the practitioner should contribute actively to effective team working by co-operating with colleagues, using appropriate methods of communication; identifying conflicts which may cause problems to productivity and promptly seeking solutions from the responsible person.

#### **Record-keeping**

Record relevant information in a manner which is easy to follow and allows other workers to understand it, ensuring that information is grouped logically and is readily accessible. Practitioners should identify any barriers or factors that might impact on outcomes and exchange information according to organisational procedures.



# D. Self-management

This domain is about maintaining adequate knowledge and skills to deliver a good service and, in some cases, developing knowledge and skills in order to provide guidance at a higher tier. This may mean keeping up to date on financial matters, for example, updates to legislation and regulations and key organisations which is important for ensuring that practitioners are giving accurate and up to date information, and for knowing where to signpost customers. In addition, it may involve self-reflection, gaining knowledge or improving skills. Practitioners may develop their practice using either formal and/or informal methods.

#### **Self-management**

Self-management, supported by emotional self-awareness, enables practitioners to regulate their own behaviour, even when provoked. This quality sees practitioners recognising the limits of their authority and knowing the actions to be taken when that limit is reached. They should be tenacious and resilient in the face of difficulty and be able to cope with an increasingly complex environment – with the blurring of organisational boundaries and the requirement to work in partnership with other organisations (e.g. when making or taking referrals).

#### Improve practice

Practitioners should be capable of accepting feedback/criticism in a positive manner and assessing its validity and importance. They should seek to evaluate their own performance, either against set targets and goals, or by reflecting on their own work and actions. Setting and prioritising clear and realistic goals and targets for own development and using a range of valid and reliable evidence to assess own work, which includes an assessment of the effects of own behaviour and values on others, is a critical part of practitioners' improving practice/continuing professional development.

#### **Continuing professional development**

Practitioners must keep up to date with legislation, codes of practice and guidelines, understanding the importance of complying with national, local, professional and organisational requirements. It is imperative that practitioners maintain an understanding of the limitations of their role, their own limits and those of the service. Finally, they must maintain the required soft skills necessary to deal with customers e.g. effective communication skills.



# E. Compliance and safeguarding

This domain is about working legally and safely. This means working in compliance with the relevant regulations, legislation and organisational procedures that govern confidentiality and data protection, as well as those that protect the rights of customers. Practitioners must also work safely to protect themselves and others from any physical risk or hazards.

#### Handle information safely and securely

- Understand the legal requirements for the protection of personal data (Data Protection Act, GDPR).
- Apply organisational protocols and principles for the storage and security of personal data.
- Understand and respect individuals' right to confidentiality.
- Understand who is entitled to access records/data.
- Keep accurate records in line with security, confidentiality and data protection.
- Handle and destroy data safely.

#### Work safely

- Understand and comply with health and safety procedures in the workplace.
- Support safeguarding practices that help to safeguard individuals from harm or abuse.
- Be aware of the appropriate actions to take when faced with cases of actual or potential harm or abuse.
- Knowledge of organisations and agencies to which safeguarding concerns can or should be reported.

#### Dealing with bad, illegal or unsafe practice

- Understand how to identify bad, illegal or unsafe practice.
- Understand your own responsibilities for reporting bad, illegal or unsafe practice.
- Understand the escalation procedures and systems for reporting (internally and to outside agencies).



# **Technical Knowledge Domains**

The following sets out the competencies for the 10 domains (detailed on p9) according to the level of complexity at which the practitioner is working.

## 1. Knowing your customers

This domain is about understanding customers' needs – which they may or may not be aware of – and draws on many of the cross-cutting behaviours and skills that underpin practice. It requires the practitioner to develop an understanding of their customers, including background, circumstances, expectations and goals. The competences are relevant to those who are providing one-off interventions, as well as repeat and ongoing contacts with customers, be it one to one or in group settings.

#### Tier 1

- Ask questions and listen carefully to the customers' responses, clarifying when appropriate, to determine the complexity and urgency of need.
- Awareness of:
  - Different reasons customers may have for seeking information
  - The type of information or areas in which support might be sought (e.g. debt, borrowing, welfare and benefits)
  - The holistic nature of money guidance, and that many areas are linked (e.g. debt and benefits; homes and mortgages and borrowing)
  - The importance of timely action
  - The ways in which life events can affect an individual's circumstances, for example:
    - o Pregnancy and childbirth
    - o Illness
    - Redundancy
    - o Bereavement
    - o Divorce, separation and relationship breakdown
  - The 'red flags' indicating urgent need and/or vulnerability, and how to identify them:
    - Risk of self-harm/safeguarding risk
    - No food
    - Risk of homelessness
    - Bailiff and/or enforcement action
    - o Economic and financial abuse
- Facilitate customers to act on their own behalf, where appropriate with the aim of empowering them to manage their own affairs.
- Where red flags are identified, alert, or refer customers to, appropriate authorities (e.g. police, food bank, shelters) as per your organisation's own policy.

- Ask detailed and probing questions, listening carefully to:
  - Understand customers' own awareness of their need and their level of prior understanding.
  - Understand if customers' circumstances have recently changed or if they are likely to.



- Explore options, their pros and cons and whether alternatives might be more suitable (e.g. saving instead of borrowing) to the customers' circumstances.
- Identify any additional problems or needs.
- Ask detailed and specific questions about customers individual circumstances which may include personal data and sensitive information.
- Help customers to identify their own issues, goals and priorities, including any potential challenges or barriers.
- Clarify customers' goals, expectations and, where appropriate, an understanding of the service and its policies.
- > Check customers' understanding of their options, assessing their level of understanding through questioning.
- Conduct research
  - Into local, regional and national agencies for signposting and referrals
  - To identify up to date information concerning the customers' need or issue
- Understand how much information should be provided for different types of customers/what type of information is suitable.
- Understand how to address concerns about fraud or identity theft.



# 2. Debt solutions

#### Tier 1

- Awareness of:
  - The common types of debt on which customers typically seek advice and guidance (e.g. credit cards, loans, rent, council tax).
  - The difference between priority and non-priority debts.
  - When customers may need to be signposted to sources of help and advice.
  - Local and national organisations that provide advice and guidance on debt issues (e.g. debt counselling).
- > Determine if customers are managing to keep up with payments, or if they cannot cope.
- Know where the regulated boundaries are and do not go beyond them (please refer to A. The boundaries of the service and of your role and the description of advice on p. 11).
- Signpost or refer customers to appropriate debt advice services and sources of support (e.g. National Debtline; Citizens Advice; StepChange; PayPlan).

#### Tier 2

- Understanding of:
  - The likely triggers for debt
  - How to identify priority and non-priority debts and their implications
  - When to make appropriate internal/external referrals (including assistance with formal proceedings such as bankruptcy)
  - What specific, targeted information to provide to the customer, depending on their circumstances and the urgency of need
- Conduct fact-finding and probing to identify where targeted support may be needed.
- Talk through potential courses of action and the possible implications of each (e.g. bankruptcy).
- Provide factual information in response to specific, targeted questions (e.g. describing a debt management plan; debt relief order; individual voluntary arrangement).
- Refer customers to specialist debt advice services and/or make appointments for customers.

#### Tier 3

Support customers in accessing online portals and using toolkits, which might include completing information on their behalf.



## 3. Borrowing

#### Tier 1

- Awareness of:
  - Main sources of credit and lending and the differences between them
  - How to work out the costs involved in borrowing
  - The difference between secured and unsecured borrowing
- Signpost or refer customers to appropriate sources of information on loans and other products, including price comparison sites.

- Knowledge of:
  - Credit scores, how they can be affected (including how they can be improved) and how they are used
  - How to correct incorrect information on a credit file
  - The range of sources of credit and borrowing, their advantages and disadvantages, including typical terms
  - The types of products that are available to individuals with poor credit history
  - Sources of guidance for calculating interest and repayments, such as online calculators
  - Credit reference agencies (Experian, Equifax, Callcredit)
  - How to use price comparison sites, calculators and other tools, and advice customers on their use



#### 4. Welfare and benefits

#### Tier 1

#### Awareness of:

- The main benefits available, covering the life events relevant to your customers (e.g. births, deaths, bringing up children, divorce/separation, job loss, retirement, illness and disability, caring).
- Which agencies and offices administer different types of benefits (e.g. DWP, HMRC, Local Authorities etc.)
- Which organisations offer specialist benefits advice and tools for benefits calculations, familiarity with websites and how to refer customers to them (e.g. Turn2Us, Citizens Advice, Policy in Practice, Entitled to).
- Identify any vulnerabilities in customers which may prove a barrier to making or managing a successful benefits claim (or dealing with a benefits problem).
- Signpost to relevant sources of support (e.g. literacy and numeracy, mental health, substance misuse, physical mobility, digital confidence and access, economic or domestic abuse).

#### Tier 2

#### Knowledge of:

- The application process for welfare benefits and the basic information required (e.g. which forms of ID are acceptable, which banks offer fee-free basic bank accounts, how to provide proof of address, importance of the claimant commitment in some benefit claims)
- The financial considerations of making and managing a Universal Credit claim (e.g. payment in arrears, needing a transactional bank account, managing five-week wait for first payment, paying own rent, fluctuating income, implications of taking out an advance payment)
- Other government and non-government sources of support (e.g. DWP loans and advances, local welfare assistance, grants and discounts)
- The range of government benefits and statutory payments available and the ability to use this to explore a customer's situation to give an indication of the benefits that are likely to be available to them
- How changes in circumstance might affect a claimant's eligibility (e.g. triggering a claim for Universal Credit)
- How to complete benefits applications (online and paper-based)

#### Understanding of

- The principles of Universal Credit (UC) (including devolved nation differences)
- The process involved and impact on the customer when moving from legacy benefits onto UC and where to signpost for further support
- The rules governing general benefit entitlement (e.g. Right to Reside, satisfying the Habitual Residence Test, age restrictions, Benefit Cap, Local Housing Allowance, Bedroom Tax, differences between contributory, means tested and non-contributory, non-means tested benefits)
- The process for disputing a benefits decision (e.g. two stage process, strict one-month time limit for responding).
- How the principle of means testing affects benefit eligibility and entitlement (e.g. how total household income and savings will affect benefits)
- Potential triggers within the benefits system for increased financial hardship and to explain to the customer how to mitigate (e.g. coping with gaps in benefit payments, sanctions, impact of Benefit Cap, Local Housing Allowance or Bedroom Tax, drop in income from migration to UC)



- Ways to deal with vulnerable claimants facing hardship and solutions available (e.g. Alternative Payment
  Arrangements for people on UC, negotiating with DWP to reduce repayments for advances and benefit
  arrears when there is a risk of debt). Ability to effectively signpost to further support
- Ability to run through a benefits calculator tool with a customer (i.e. how much they are likely to get, check if they will be better or worse off when moving from legacy benefits to UC).
- Signpost to support for disputing a benefits decision (Citizens Advice, local law centres).

- Knowledge of:
  - How to use specialist benefits calculators to check accurate benefit entitlement, based on detailed information provided by customer
  - How to make effective claims and backdating requests
  - How to resolve issues which arise during the claims process (incorrect forms/insufficient evidence provided/time limits etc.)
  - How to effectively intervene with creditors when benefit claims are delayed
- Confidently use reference sources (e.g. Child Poverty Action Group (CPAG) Welfare Benefits and Tax Credits Handbook and its online resource) to solve more complex benefits queries.
- ➤ Build up a network of access to specialist support (e.g. Universal Credit contact centres, DWP vulnerable work coaches, welfare benefits specialists at Citizens Advice, Citizens Advice Universal Support, CPAG adviser helpline, local solicitors and law centres specialising in welfare benefits case law).



# 5. Budgeting and cashflow

#### Tier 1

- Awareness of:
  - The principles of budgeting
  - Available tools to assist with budgeting and planning
  - Methods for reducing household outgoings (e.g. loyalty cards, switching energy provider etc.)
  - Ways of increasing income (e.g. selling unwanted goods)
  - The different types of bank accounts (e.g. current, savings, basic, joint etc.) and the differences between them
  - The basic process of how to open a bank account, including the suitable documentation needed
  - How to set up regular payments e.g. standing orders, direct debits
- Understanding of why a bank account is useful (e.g. keeping money secure; managing income/outgoings; receiving payments).
- Signpost or refer customers to appropriate sources of information on insurance products, including price comparison sites.

#### Tier 2

- Knowledge of:
  - How to complete (or assist/guide) a straight-forward personal budget sheet/financial statement
  - Typical day to day and often overlooked expenses that should be budgeted for
  - The advantages of using fin-tech e.g. money management apps, online/ mobile banking, digital payments and how it can assist with budgeting and monitoring income and outgoings
  - How to address concerns about fraud or identity theft
- Familiarity with basic banking product features, benefits, exclusions and warranties.

- Detailed knowledge of:
  - How to draw up a comprehensive budget and use a budget planner to break down spending
  - How to use toolkits and online calculators and how to advise on getting the best out of them



# 6. Savings

#### Tier 1

- Awareness of:
  - The benefits of saving
  - The differences between saving versus borrowing
  - The difference between savings and investments
  - The availability of a broad range of savings products on the market
  - How to set up regular payments
  - How to compare the features of different savings products
- Know where the regulated boundaries are and do not go beyond them (please refer to A. The boundaries of the service and of your role and the description of advice on p. 11).
- Signpost or refer customers to appropriate sources of information on savings products, including price comparison sites.

- Understanding of:
  - How to calculate the affordability of saving and the factors to take into account (e.g. using a budget planner)
  - How to calculate the minimum savings required to provide security for an individual, based on their individual circumstances (e.g. income and outgoings)
  - The difference between simple and compound interest
  - Ways of maximising savings
  - The circumstances in which investments may be suitable for an individual to consider, and the risks involved
- Knowledge of:
  - The broad range of savings products available on the market (easy access, notice savings, regular saver; ISAs; bonds)
  - The range of accounts available for different age groups, e.g. children's accounts and trusts the range of taxable and non-taxable savings products, the advantages and disadvantages of each
  - Ways of increasing tax efficiency (e.g. use of tax-free savings products: ISAs)
  - The Personal Savings Allowance



#### 7. Insurance

#### Tier 1

#### Awareness of:

- The purpose and benefits of insurance
- The main types of insurance products (e.g. buildings and contents; car; travel; pet and medical)
- Different types of protection insurance
- National and local sources of guidance on insurance products, including comparison sites
- The importance of shopping around for an insurance policy
- How to make an insurance claim
- Know where the regulated boundaries are and do not go beyond them (please refer to A. The boundaries of the service and of your role and the description of advice on p. 11).
- Signpost or refer customers to appropriate sources of information on insurance products, including price comparison sites.

#### Tier 2

#### Knowledge of:

- A range of different types of insurance and their purposes (e.g. Home Buildings Insurance, Home Contents Insurance, Pet Insurance, Car Insurance, Guaranteed Asset Protection (GAP) Insurance, Travel Insurance, Life Insurance/Critical Illness Cover/PPI, Medical/Dental Insurance)
- Ways in which insurance products can be purchased (e.g. brokers, comparison sites, banks, building societies, supermarkets etc.)
- Insurance claims procedures including steps involved and likely timescales
- The regulations covering insurance

#### Understanding of:

- The factors to take into account when assessing whether or not to take out an insurance policy
- What counts towards the risk when taking out an insurance policy, and how risk factors affect insurance premiums
- The circumstances under which a customer may require specialist insurance and methods of securing this (including referrals to the British Insurance Brokers' Association (BIBA))
- The different types of protection insurance and their main features
- The process of making an insurance claim
- How to make a complaint when something goes wrong
- The ability to use comparison sites to compare insurance policies and quotes



## 8. Homes and mortgages

#### Tier 1

#### Awareness of:

- The typical costs involved in renting or owning a home (deposit; rent/mortgage; council tax; service and utilities water, gas, electricity)
- Other costs and typical bills (e.g. TV licence, phone, insurance, TV and/or broadband)
- The process of renting a home (e.g. references; deposit; removals)
- The process of buying a home (e.g. securing a mortgage; deposit; valuation and surveys; removals)
- Ways to save energy around the house
- The features of and how to read common household bills (e.g. council tax, water, gas, electricity)
- Know where the regulated boundaries are and do not go beyond them (please refer to A. The boundaries of the service and of your role and the description of advice on p. 11).
- Signpost or refer customers to appropriate sources of information on renting and home ownership, including price comparison sites and mortgage calculators.

#### Tier 2

- Knowledge of:
  - The main features of tenancy agreements and the fees involved in taking out a rental agreement (including agency fees)
  - Tenant's and landlord's rights and responsibilities
  - The typical costs involved in moving home (e.g. removal, storage; furnishings and decoration)
  - The up-front and ongoing costs involved in home-ownership (legal fees; stamp duty; insurance; maintenance)
  - The factors that are taken into account by lenders when making a mortgage offer
- Understanding of:
  - The advantages and disadvantages of renting versus buying a home
  - The procedures used by main lenders
  - The role of mortgage advisors
  - The changes in personal circumstances that might affect an individual's ability to pay their rent/mortgage

- Knowledge of:
  - Government and other low-cost buying and 'assist-to-buy' schemes (including shared ownership)
  - The different types of mortgages (interest-only; repayment; fixed rate; variable rate; tracker)
- Familiarity with and ability to use confidently, online toolkits and calculators (e.g. stamp duty calculators, mortgage affordability calculators).
- > Support customers in accessing online portals and using toolkits, which might include completing information on their behalf.





# 9. Retirement and pensions

#### Tier 1

- > Awareness of:
  - The importance of retirement planning
  - What a pension is and how to distinguish between different types
  - Auto-enrolment and how it works
  - When and how the State Pension can be claimed and that it is based on an individual's National Insurance contributions
- Know where the regulated boundaries are and do not go beyond them (please refer to A. The boundaries of the service and of your role and the description of advice on p. 11).
- Signpost or refer customers to appropriate sources of information on pensions and/or support for retirement planning.

#### Tier 2

- Knowledge of:
  - The features and main differences between types of pension (e.g. State Pension, defined benefit, defined contribution)
  - When and how the State Pension can be claimed and that it is based on an individual's National Insurance contributions
  - The advantages of retirement planning, including how to obtain a pension forecast
  - How to read a pension statement
  - The potential implications and effects of auto-enrolment on an individual's circumstances
  - Pensions eligibility criteria
  - The effect of deferring retirement pension
  - Entitlement to Additional State Pension
- Understanding of:
  - The factors to take into account when considering investing in a pensions scheme
  - Pensions Law
  - How the State Pension is calculated, its qualifying period and how to claim
  - How to top up a State Pension

- Knowledge of:
  - How to use specialist pensions and retirement calculators
  - How to check on how much has been accrued in an individual's pension pot
  - How to resolve issues which arise during the claims process
- Confidently use reference sources to solve more complex benefits queries.
- ➤ Build up a network of access to specialist support (e.g. Universal Credit contact centres, DWP vulnerable work coaches, welfare benefits specialists at Citizens Advice, Citizens Advice Universal Support, CPAG adviser helpline, Pensions Ombudsman, local solicitors and law centres specialising in welfare benefits case law).



# 10. Planning for later life

#### Tier 1

- Awareness of:
  - What a will is and why you may have one
  - The process for creating a will
  - The factors that contribute towards funeral costs (e.g. casket, cremation, burial etc.)
  - Support available nationally and locally for carers
- ➤ Know where the regulated boundaries are and do not go beyond them (please refer to **A. The boundaries** of the service and of your role and the description of advice on p. 11).
- Signpost or refer customers to appropriate sources of information and support.

#### Tier 2

- Knowledge of:
  - The procedure of will design
  - The difference between a will and a trust
  - The eligibility criteria and application process for support for carers (e.g. Carers Allowance), and other routes such as NHS and Local Authority funding
  - The impact of claiming support on other benefits entitlements
  - Inheritance tax, when this applies and when this doesn't apply

- Knowledge of:
  - The use of wills and trusts and the role of an Attorney and an Executor
  - The regulations covering wills and legacy planning and recognise the limits of advice that can be given
  - · Reasons for 'sideways disinheritance'
  - The use of trusts and other structures to meet long-term wishes
  - The impact of intestacy (including when partners are not married/civil partnership), powers of attorney or court protection
- Understanding of probate and how this can affect liability for debts.