



**Consultation on MaPS proposals for  
the delivery of its debt advice strategy:**  
Summary of responses and next steps



**Money &  
Pensions  
Service**

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# Foreword

**In January 2024, we published the 'Consultation on Money and Pensions Service (MaPS) proposals for the delivery of its debt advice strategy', following work with the debt sector to gather evidence and views to support the development of our approach. The publication of this report, a summary of the feedback we received, concludes our consultation exercise. As we move into the next stage of our work, we look forward to continuing to engage with stakeholders to shape the procurement of MaPS funded community based debt advice.**

More than 60 organisations and individuals have generously given their time and views to help us shape our thinking. My team and I are grateful for the clarity, candidness and richness of the responses. The consultation exercise provides essential input as MaPS continues its work to commission the best advice services for people in debt.

We have been working through the detail of the responses received, looking at sentiment, prioritisation and themes. This document provides a summary of what you told us and sets out some next steps to show how we intend to take things forward.

I've been impressed by the insightful and open conversations happening between MaPS and our stakeholders, exploring how we can all work together to make sure that clients get the help they need to resolve their debt problems. As you will see from the report, there are multiple views about what MaPS and the debt sector should do, and it's not going to be possible to deliver everything everyone wants. However, as we move from the consultation into the early stages of engagement with potential bidders to shape the approach we take, and the services we fund, I hope that we can maintain the same quality of collaboration, communication and openness to achieve our shared goals.

Debt advice can be life changing, and making sure our funding is used as effectively as possible will help drive even more positive transformation for clients and the advice sector. Thank you again to everyone who put their energy and effort into helping shape the consultation and into sharing their views.

Oliver Morley  
CEO, MaPS



# Introduction

## Purpose of the document

This document provides a summary of the responses to the Money & Pensions Service's (MaPS) 'Consultation on MaPS proposals for the delivery of its debt advice strategy' (subsequently referred to as the consultation). It provides a summary of the key themes and sets out information on how MaPS will take forward any next steps based on the proposals and consultation responses.

The views expressed in relation to proposals are those of respondents and have been summarised by MaPS. The inclusion of comments or responses in this document should not be considered an endorsement of those views by MaPS.

## The Consultation

In 2021/22 MaPS undertook a major commissioning exercise for debt advice. Following this exercise MaPS committed to carrying out a public consultation in order to help shape our future strategic approach to debt advice and help us understand the best ways to commission national and locally based services over the longer-term.

We set out an intention to undertake a three-stage approach:

- a phase of evidence gathering, analysis and planning
- a consultation – where we formally invite people to respond on our proposals
- a process of engagement with the market leading into subsequent commercial activity

The consultation sets out the MaPS' approach to debt advice up to 2028. It explored how we interpret our remit in relation to debt advice and the role that we could take in working with the wider debt sector on some of the key issues and challenges identified. As well as looking at MaPS as a commissioner of services, it also explored other areas, because we know that to be an effective commissioner – and make decisions about how to invest the funds we receive – now and in the future, we need to understand the challenges facing debt advice providers and the clients they are supporting.

The consultation set out 33 questions seeking views on the proposals within the document. Respondents were able to select which questions and proposals they wanted to respond to and did not require respondents to answer every question. Respondents were able to submit evidence that supported or countered the proposals and to suggest alternative proposals.

The consultation ran from January 2024 to early April 2024. To support the consultation process we also held six stakeholders webinars including three targeted events for Housing Associations, Local Authorities and Financial Services. These events reached 320 attendees from 145 stakeholder organisations.

## Respondents

MaPS received 64 responses from a broad range of stakeholders including advice providers, financial services firms, membership and trade bodies, the housing sector, and credit management firms. In total, 55 responses were made on behalf of organisations while a further nine responses were received from individual respondents.

A full list of respondents can be found [here](#).

MaPS is grateful to all those who engaged with the consultation process and for the time and effort taken to respond.

# Summary of Responses

This section of the playback document summarises the responses to each of the chapters and the proposals and questions in each section. The key themes emerging from the responses received are set out. When certain points of view were held predominately by a particular stakeholder group, MaPS has highlighted this. However, for the most part, the views expressed came from a mix of different stakeholders.

Information is also set out on how MaPS intends to take forward any next steps and actions.

## Chapter 1: The debt advice services that MaPS funds now and what we could commission in the future

The proposals in this chapter were:

- 1.1 MaPS will continue to commission a range of services from nationally accessible to community and place-based services. MaPS believes this is the best approach to meet the needs of people in debt.**
- 1.2 Alongside mainstream services MaPS will continue to commission business debt advice, the Mental Health Crisis Breathing Space service and Debt Relief Order Hubs**
- 1.3 MaPS could also commission some different types of debt services or different ways of delivering services in the future**

This chapter sought views on the debt advice services funded by MaPS – both mainstream and more specialist client facing services – with respondents asked for their views on how well services were meeting the needs of people in debt, the mix of services funded and the scope of the provision. Feedback was also sought on some different specialist debt advice services and approaches that MaPS could fund.

### High levels of engagement with the questions posed

There were high levels of engagement with the proposals and questions within this chapter, with all respondents offering some views on the services MaPS should commission.

### Availability of data and evidence to support decision making on commissioning

Many respondents, particularly those from financial services and their membership organisations, stated that MaPS should share more data about the effectiveness and costs of services currently funded to support decision making. Respondents were keen to understand more about the outcomes achieved by the services MaPS funds and the cost effectiveness of different delivery approaches.

### Support for consumers in vulnerable circumstances

Some respondents suggested MaPS should consider how requirements for our funded services could better support their organisation's processes for consumers in vulnerable circumstances, particularly ensuring that referrals organisations make into MaPS services are appropriate and deliver good outcomes. There were some suggestions that MaPS should do more to require our funded providers to share data with referral organisations.

Working through the proposals and supporting questions within the chapter in turn, the feedback received was as follows:

### **1.1 MaPS will continue to commission a range of services from nationally accessible to community and place-based services. MaPS believes this is the best approach to meet the needs of people in debt.**

- Most respondents agreed that MaPS should continue to fund a range of debt advice provision as they broadly agreed this is the right way to meet the diverse needs of people in debt.
- Some respondents reflected on the benefits of a mix of services including the choice and flexibility offered by different approaches, such as out of hours availability and the anonymity of digital services.
- On the question of the mix of services and the proportion of funding going to different service lines, some respondents questioned if the current balance was the right one, with some questioning the evidence base informing the current funding mix.
- More insight on the levels of unmet demand was suggested as a way to help inform future decisions about the 'right' mix.
- One respondent referenced the geographical inconsistencies of funding for community-based services in England, highlighting the lack of MaPS funded services in some communities.
- Some respondents thought that MaPS should increase provision for nationally accessible services. They thought that the high volumes delivered by these services was an effective route for addressing increasing levels of debt need and demand.
- Some suggested MaPS increase end-to-end digital journeys for the same reasons.
- Almost all respondents thought that MaPS should increase provision for community-based debt advice. This was partly due to:
  - Their view that community-based provision is more accessible for people in vulnerable circumstances.
  - Their view that community-based provision can provide more comprehensive forms of advice, including casework, when compared to nationally accessible services.
- Respondents also highlighted some of the additional benefits that community-based provision offers to some people in debt:
  - Community-based provision may deliver better outcomes for people with local debts. Respondents tended to highlight council tax debt and social housing arrears as a factor, both of which have increased significantly in recent years.
  - Community-based provision may be more effective for some people in debt as they can address wider advice (housing and welfare benefits) and support services such as foodbanks and local mental health provision.
  - Some people in debt need or highly value accessing in-person support in trusted community, informal and/or non-government settings.
- A number of respondents cited challenges with service capacity as the reason MaPS should increase the level of funding going to community-based services – this was often based on observations of the respondent's own services, with wait times and increased client need mentioned as evidence of this.

*"We believe MaPS' future commissioning should not just seek to enable community-based services to maintain current provision but move to a settlement where community-based agencies are enabled to grow and thrive."*

Community-based provider, MaPS funded

- A small number of respondents suggested that MaPS significantly prioritise or almost only fund community-based debt advice. The rationale for this included:
  - Their view that there are sustainable funding mechanisms and business models outside of the levy that enable nationally accessible services to be delivered sustainably and at scale. Therefore, MaPS funding for nationally-accessible services potentially destabilises and/or duplicates this funding and does not create additional debt advice capacity.
  - An interpretation of MaPS' statutory functions – particularly objectives to fund *where there are gaps* and focus on the *most in need* – which they broadly equate with funding community-based provision.
- Respondents stated that there could be good reasons for MaPS to consider expanding the scope of debt advice and providing additional advice areas given the increase in debt advice case complexity, meaning clients typically need additional advice and support. Respondents highlighted the need for:
  - increased income maximisation support to address the needs of clients of deficit budgets
  - provision of welfare benefit and housing advice. This was mainly because many people in debt need these services to progress with their debt advice issues and achieve sustainable outcomes.
- However, many respondents warned against expanding scope of provision if this meant reduced funding or provision for what they considered core debt advice activities.
- Some respondents, particularly nationally accessible advice providers and financial service organisations questioned MaPS' ability to expand scope in the way it was described in the consultation given our current statutory role and remit, and the overarching purpose of the debt advice levy.

*“More resource is needed to support these people as debt advice services alone will not help them manage their budgets and deal with their debts; they need holistic advice on a range of issues, such as housing, benefits, employment, immigration, and consumer protection. [We] would like to see a funding model that acknowledges the complexities and understands that debt advice cannot be provided in isolation.”*

Community-based debt advice provider – MaPS funded

## 1.2 Alongside mainstream services MaPS will continue to commission:

### a) Business Debt Advice

### b) The Mental Health Crisis Breathing Space Service (MHCBS)

### c) Debt Relief Order (DRO) Hubs

- Most respondents supported MaPS continuing to fund Business Debt Advice and MHCBS. The reasons given for this varied but generally respondents highlighted:
  - The level of technical knowledge and understanding of the needs of the client group justified ringfenced provision or a standalone service.
  - The level of resource and process change required to deliver a high-quality service justified ringfenced provision or a standalone service.
- While remaining broadly supportive of funding Business Debt and MHCBS, some respondents suggested MaPS should review the access needs of people who need in-person support, as these services are delivered via telephone and digital channels.
- A number of respondents shared views on the business debt service, noting that demand for this specialist support was high, and questioning if there was enough capacity and resilience within the current provision to support this.
- Feedback was also received on the utilisation of the MHCBS with a small number of respondents questioning if greater promotion of the service was required to increase uptake of the service.

- Views on the proposal to continue funding DRO hubs were mixed.
- Some respondents supported the approach, noting that they enabled providers referring to the hubs to preserve 'overstretched' Approved Intermediary resource within their services to support more vulnerable clients and those with complex cases.
- However, some respondents, particularly those from community-based debt advice services, expressed concerns about MaPS funding for DRO hubs. This was due to:
  - Concerns that referring to a centralised hub would result in a disjointed client journey. Respondents were particularly concerned that clients could disengage at the point of referral.
  - Concerns that hub provision risks of de-skilling advisers and reducing the number of Approved Intermediaries in community-based services.
  - Some respondents also highlighted issues with the DRO hub processes, particularly the level of resource required to make a referral.
- Some respondents suggested that increased demand for DROs due to recent changes in eligibility criteria and removal of the fee means that DRO provision should be seen as a 'day-to-day' activity for debt advisers. In this context, some questioned the logic of specialist provision, suggesting instead that MaPS ensure there is a sufficient level of resource so that DROs can be provided across MaPS national and community-based services.
- Others felt that the hubs were playing an important role in serving increased demand following recent changes to criteria.
- Some respondents suggested that MaPS fund a 'dual' service, with DRO hubs continuing to take referrals for those clients where a referral is suitable, but with funding also available for cases where the client would benefit from remaining with their debt advice provider.

**1.3 MaPS could also commission some different types of debt services or different ways of delivering services in the future including: services that address the increase of debt advice clients in a deficit budget; services that improve the accessibility and availability of debt solutions; services that better meet the needs of people in vulnerable circumstances and those most in need of debt advice; funding place-based and community-based organisations to provide engagement and access to debt advice, particularly for those facing barriers to access and engagement; and, the provision of service 'navigators'**

- There were a wide range of views expressed on the proposals in this section.
- Broadly speaking, most respondents were unsupportive of proposals to focus on specific groups, concerned that this might fragment provision and client journeys.
- Instead, respondents suggested that MaPS should focus on driving quality outcomes for all clients with effective support integrated through mainstream services.
- Respondents flagged a number of concerns about the ideas set out in this section:
  - The risk of creating silos, a disjointed client journey and de-skilling debt advisers.
  - That new services would be prioritised at the expense of current provision.
  - That there is insufficient debt advice provision to make navigator roles and engagement services viable and valuable.
- Some respondents felt that funding the service proposals would take MaPS outside of its statutory remit to provide debt advice, although others made the case for MaPS' funding to provide more holistic services.
- Most respondents did not support proposals for MaPS to fund debt solution provision beyond DROs. Respondents urged that MaPS exercise caution on proposals relating to funding DMPs as this could disrupt existing sector-wide funding, resulting in a reduction to overall capacity.



- Some respondents suggested there is some merit in services or dedicated resources for people with mental health problems, survivors of economic abuse and black and minority ethnic communities, but that any new service would require a strong evidence-base setting out need, value added and that any service should be piloted extensively. They also noted that developments or new services should be in addition to the capacity already funded by MaPS.
- Where respondents did provide a view on prioritisation, opinions were mixed on the areas that should be focused on first.

**Please note that given the common themes in these chapters, the next steps on the debt advice services that MaPS funds now and what we could commission in the future are listed at the end of Chapter 2.**



## Chapter 2: MaPS' role as a commissioner and funder

The proposals in this chapter were:

- 2.1 MaPS commits to best practice in our commercial approach and believes that collaborating with the debt advice sector and other key stakeholders when commissioning will lead to the creation of more effective services.
- 2.2 MaPS acknowledges the impacts that can result from changes in our funding or strategic approach. MaPS will aim to balance its own requirements with the interests of advice providers, the sector workforce and clients.
- 2.3 MaPS believes that by collaborating with other funders of advice there are opportunities to create services that can meet a range of other advice and support needs. In the longer-term, MaPS may seek to co-fund or co-commission services in ways that enhance the financial sustainability and level of service on offer.

This chapter sought views on MaPS' role as a commissioner and funder of debt advice. It asked for views on a set of principles that will underpin our approach and thoughts on how a more collaborative approach with the sector could be realised. It sought views on how to mitigate the challenges of making changes to our funding and service provision, and explored ideas about working with other funders of advice.

### Tension between MaPS' ambitions and a 'competitive' commissioning environment

There was a strong theme from the responses about the perceived tension between MaPS' stated ambition to work collaboratively with the sector and a competitive commissioning environment. Respondents raised concerns about processes which they feel force providers to compete for funds and questioned the appropriateness of this approach for not-for-profit organisations working with vulnerable clients. Concerns were also raised that commissioning could be a threat to the diversity of provision in the sector, with a view that having to deliver to set service specifications may drive the homogenisation of approach.

### Perception of commissioning as inherently a 'race to the bottom'

There were strong views from a number of providers of debt advice that commissioning creates a focus on volume and cost, and that inevitably creates a 'race to the bottom' reducing the effectiveness of services and the wellbeing of debt advisers and the wider workforce.

### Barriers to participation in commissioning

Many respondents flagged concerns about the capacity and capabilities required to participate in commissioning processes, particularly for smaller organisations. There were calls for MaPS to ensure that providers are not excluded from participation.

*"MaPS need to ensure that the resource constraints and an over reliance on economies of scale when making commissioning decisions does not rule out smaller but more specialist providers"*

Community-based provider, non-MaPS funded

Working through the proposals and supporting questions within the chapter in turn, the feedback received was as follows:

## **2.1 MaPS commits to best practice in our commercial approach and believes that collaborating with the debt advice sector and other key stakeholders when commissioning will lead to the creation of more effective services.**

- Most respondents indicated a broad level of support for the commissioning principles set out in the consultation.
- A small number of respondents flagged concerns with the proposed principles. One noted that they were not explicit on how MaPS intended to work with smaller debt advice providers and another cited a lack of clarity and imagination in their ambition.
- Many respondents noted there was an underlying tension between competitive commissioning and MaPS' aims around engagement and collaboration. Some respondents flagged concerns about MaPS' ability to deliver on these principles, especially within a competitive commissioning environment.

*“Ideally these principles would create the ways that MaPS operates, but in reality it appears to be the way that MaPS operates has then created the principles. The result is that MaPS can appear to lose sight of the people in need of debt advice”*

National provider, not MaPS funded

- Significant numbers questioned or raised concerns about the appropriateness of a competitive commissioning process within a debt sector predominately made up of not-for-profit organisations.
  - Many stated that introducing competition was counter-intuitive to how the advice sector functioned, as providers do not see themselves as being in competition with one another.
  - Many cited the diversity of approaches as a strength of the sector, and something potentially at risk through commissioning.
  - These views were widespread across different types of providers (i.e. beyond those involved in delivering service).
- Some respondents questioned of the use of the term 'market' in relation to commissioning activities, noting it implied a more commercially driven set of services competing for clients.
- Some thought commissioning encouraged providers to target the same cohorts of clients, 'cherry-picking' the easiest to serve.
- There was strong feedback about the need for commissioning processes to not exclude smaller providers:
  - Participating in commissioning takes significant levels of resource and capabilities that many smaller providers may struggle to provide.
  - Many smaller providers lack the capacity and the capabilities to participate.
  - Bidding for funds shouldn't add to the burden organisations already face.
  - Commissioning should be 'fully inclusive'.
- Some respondents stated that they believed funding for debt advice should mainly be made available through grants. However, for the majority of responses support for this approach appeared to be based on a misconception that awarding grants would avoid the need for competition or a commissioning process.
- There was a strong message from community-based providers in receipt of MaPS funding that MaPS should continue to fund these providers – services have been operating effectively for many years and meeting KPIs. There was concern about anything that would destabilise the current workforce.

- Others felt that there was more space for innovation and new ideas, and that commissioning risked getting more of the same.
- There were some conflicting views on how prescriptive MaPS should be in specifying services. Some felt MaPS should give more clarity and a tight perimeter on what providers should deliver, others felt MaPS should focus more on the outcome of debt resolution and enable more flexibility in what is done to support clients to that point.
- Respondents were supportive of a more collaborative approach, with a number of views about what this might look and feel like:
  - Many advocated for a co-creation or co-design phase with active input and engagement from community-based providers.
  - Some noted concern about approaches that were driven by service managers or top-down approaches from larger providers cutting out the expertise and input of frontline advisers.
  - Some respondents stated that they saw the MaPS Adviser Panel as having a role in developing and/or signing off parts of the commissioning process.
  - Some advocated for a more joined up approach with creditors and regulators taking an active role.
- There was broad support for MaPS to do more to ensure the voices of those with lived experience informed commissioning decisions. Some suggested that MaPS establish a lived experience panel, others advocated for linking up with pre-existing groups that could support.
- Many noted that working with clients in vulnerable circumstances required a long term commitment, couldn't be a 'once and done' and would require time and careful handling to do this well.
- Many providers felt that they effectively represented the 'voice of the customer' and suggested that MaPS should look to them for this input.
- Some respondents noted that the focus should be on those who need debt advice but aren't seeking it (rather than on existing clients).

**2.2 MaPS believes that by collaborating with other funders of advice there are opportunities to create services that can meet a range of other advice and support needs. In the longer-term, MaPS may seek to co-fund or co-commission services in ways that enhance the financial sustainability and level of service on offer.**

- Responses were broadly positive about the acknowledgement of the impact that changes in funding and strategic approach may have. Amongst those supportive of the assessment of impact, two strong themes emerged:
  - Duration of funding agreements, with many suggesting longer agreements would mitigate the impact changes – where respondents did suggest timeframes five years was often cited, with one respondent suggesting that a 10-year road map would help the sector attract wider investment.
  - Transitional periods when funding does change were also frequently cited – many felt three months' notice was insufficient, proposing that six to nine months would enable those losing funding more time to seek alternative funding. Others noted three months was insufficient for new providers to scale up their provision.
- One respondent suggested MaPS should undertake an impact assessment of changes to community-based debt advice jointly with providers.
- Some respondents didn't agree that MaPS' assessment of impact was sufficient. Some felt the best way to mitigate negative impacts from funding changes was to seek and put additional funding into community-based services.
- Many respondents made reference to the wider advice funding landscape for community-based services, particularly the importance of local authority funding and the interplay between local advice funding and MaPS funded services.

**2.3 MaPS believes that by collaborating with other funders of advice there are opportunities to create services that can meet a range of other advice and support needs. In the longer-term, MaPS may seek to co-fund or co-commission services in ways that enhance the financial sustainability and level of service on offer.**

- Responses were mixed, with the majority broadly supportive of the core principles of working with other funders.
  - Some respondents thought the approach could enable them to access a funding mix to provide service meet the wide range of advice needs.
  - Many referenced the importance of MaPS working in a way that enabled local authorities to be engaged.
  - Some suggested there should be a greater focus on core funding for providers through this approach.
  - Respondents representing financial services were more likely to be unsupportive of these proposals – saying MaPS’ focus should be firmly on funding debt advice and that wider advice needs of clients should be met through referrals to other organisations that have appropriate funding in place.
  - Some respondents felt that working with other funders was unlikely to lead to sustainable increases in capacity, and many noting concerns about the debt advice funding landscape more broadly.
- Whilst the majority of respondents were positive about working with other funders of advice, there were a few areas of caution that were flagged, specifically:
  - Many raised concerns that work might displace existing funding and not bring any additional funding into the sector.
  - Some noted that co-commissioning or pooled funding might create more cliff edges and add additional risk to provider sustainability.
  - Some flagged concern that there might be misalignment in approach and expectations between MaPS funding and other advice funding – particularly in relation to quality standards. Some felt this should be a high priority for MaPS, while others raised concerns about the impact of different standards on the workforce
- However, respondents also saw some positives, particularly that greater collaboration between MaPS and other funders could lead to streamlined reporting requirements.
- One respondent – whilst positive about the notion of greater collaboration between funders – noted that the proposals felt less realistic outside urban areas, noting that more rural communities did not have the range and breadth of funders and providers.



## **Next steps on the debt advice services that MaPS funds now and what we could commission in the future, and MaPS' role as a commissioner and funder**

MaPS intends to take forward the feedback received in the following ways:

- The consultation responses provided a rich and varied source of views about the services MaPS does provide, and how we work with the debt advice providers and wider sector to commission services that deliver excellence for clients. As a public body MaPS needs to operate within the rules and guidelines surrounding public sector commissioning, and ensure that funds we receive are used effectively. We will take forward the feedback received through our ongoing programme of debt commissioning, looking to build and enhance our ways of working and the services we fund. We will work to ensure our decision making is robust, evidence-based and transparent.
- Feedback about the importance of ensuring commissioning is inclusive has been noted, as has the feedback about the resource challenges for smaller providers. As set out in the consultation, any future commissioning exercise will be supported by engagement with stakeholders and providers to help shape the approach and proposition, and our planning for this is being informed by the responses received.
- MaPS will start the commissioning activities for community-based services in late 2024. The feedback we have received on how we should work with stakeholders and better understand the impact the potential impact of changes to funding arrangements are informing how this work will be taken forward. Specific feedback about the ways that the impact of change could be mitigated – e.g. longer transitional periods – is being considered by the project team.
- It was clear from responses that stakeholders want to understand more about the services that MaPS funds, who they are reaching, how well they are working and how effective they are. Our intention is to make more information about our funded services available. This will include publishing a Debt Impact Report providing an annual look back at the highlights of MaPS' debt work. We will also explore ways that we can make data from our funded services available on a more regular basis.
- Views about who needs help and how MaPS should interpret our remit in relation to those 'most in need' were varied. We know that there are multiple barriers to seeking debt advice and don't want to exacerbate this further, so we remain committed to ensuring the services we fund are accessible to all who need them. Feedback on how we should interpret 'most in need' is being fed into MaPS' planning for our next Corporate Strategy.
- Feedback received on the DRO Hubs suggests that the experience of referring in may not be working as well as it could be for some stakeholders. Also, given recent changes in DRO eligibility and fees, there are questions about whether the hubs model is the right approach for the mid to long-term. MaPS entered into multi-year contracts to provide the hubs in early 2023 and will continue to work with providers to improve the service. Feedback received on the hub model and alternative approaches will inform future decisions around MaPS provision.
- MaPS will continue to explore how the voices of those with lived experience inform our work on debt advice. Feedback about the commitment required to do this well has been noted, and we will work to ensure our approach is sensitive to the needs of this group.
- The feedback highlighted some of the challenges and opportunities there are for MaPS and the debt sector in taking a more collaborative approach with other funders (including local authorities). We intend to continue exploratory work with other funders of advice to identify potential opportunities, and to ensure that our commissioning activities are informed and aligned in a way that does not limit collaboration.

## Chapter 3: Focusing on adviser wellbeing and supporting the debt advice workforce

The proposals in this chapter were:

- 3.1 MaPS believes that there are opportunities to improve how the sector supports the debt advice workforce. Working collaboratively with the sector to address challenges with recruitment, training, retention and adviser wellbeing will help debt advice providers be more effective.**

This chapter sought stakeholder views on the role MaPS should play in supporting and developing the debt sector workforce through the organisations we fund, and in the wider sector. The core proposal was that MaPS should be working with the sector to address and improve some of the issues impacting on recruitment, training, retention, and adviser wellbeing, and sought feedback on existing initiatives and proposals for new areas of work.

### Engagement between MaPS and advice providing organisations

The majority of respondents were positive about the steps that had been taken to improve the level of engagement between advice providers and MaPS on workforce related issues. MaPS' analysis of the issues impacting on adviser wellbeing and the increased level of engagement on the issues was welcomed. Many respondents stated their support for further ongoing collaboration on these issues in broad terms and did not offer views on specific initiatives or priorities.

Some respondents noted that responsibilities for the workforce mainly lay with employers. One respondent noted that some of the factors impacting adviser wellbeing – such as the prevalence of deficit budgets and the emotional toll of supporting clients in distressing circumstances – were outside of the direct control of MaPS and the employers of advisers.

### Other factors contributing to poor adviser wellbeing

Many respondents shared their views on the factors that they believe are contributing to low adviser wellbeing. These included issues linked to commissioning and service management such as:

- The length of funding agreements creating job instability.
- A lack of core funding leading to services needing to be cross subsidised.
- A competitive commissioning environment leading to 'a race to the bottom' on cost and target culture.

A small number of debt advice providers flagged the quality framework as an issue, whilst others raised factors relating to the role such as the effort required to write up case notes and other administrative tasks as key issues related to wellbeing.

*"An intuitive casework operating system that can extract data entered, and create a tailored letter for you, perhaps with the use of AI technology. This doesn't replace debt advisers by any means but could maybe speed up letter writing."*

Community-based provider, MaPS funded

### Sector funding and the impact on wellbeing

A small number of respondents highlighted the interaction between the level and types of funding and workforce wellbeing. This included one respondent who supported the proposals for additional activities and resources but stated that addressing these issues should not be at the expense of the level of frontline support available. However another acknowledged the trade-offs that might be required if funding levels into services are not increased. One respondent noted that steps had been taken to try and improve wellbeing but that a more strategic focus on increasing funding levels would have a greater impact as this could provide better pay and conditions and allow for other support to be provided.

Working through the proposals and supporting questions within the chapter in turn, the feedback received was as follows:

### **3.1.1 Responses to current work to improve how the sector supports the debt advice workforce**

As noted above, many of the responses received addressed the proposals in broad terms. However, there were some more specific areas where feedback was provided:

#### **Engaging directly with debt advisers through the adviser panels to understand more and build evidence about their experiences of working in the sector.**

- There was broad support for MaPS to continue engaging directly with advisers.

#### **Working with the organisations we fund to put in place measures to support adviser wellbeing.**

- Where views were expressed, there were mixed opinions about whether MaPS should focus on driving wellbeing through the organisations it funds or take a broader sector-wide approach. One respondent questioned if the 'wellbeing time' approach adopted in MaPS' contracts was providing sufficient incentive for funded organisations to focus on adviser wellbeing.

#### **Continuing to provide the Debt Advice Quality Framework by accrediting training courses supporting the consistency and quality of debt advice, and enhancing this approach based on stakeholder feedback.**

- Some respondents referenced the quality framework as a negative factor impacting adviser wellbeing – however these responses did not specify what elements of the framework were creating these impacts.
- A small number of respondents made reference to adviser training – one called for more standardised qualifications across the sector and one suggested training should be more joined up, as not all organisations have their own schemes.

#### **Participating in sector-wide initiatives linked to workforce issues.**

- There was broad support for MaPS to continue this.

### **3.1.2 Responses to proposals on how MaPS could take a more active role in co-ordinating initiatives to improve how the sector supports the debt advice workforce**

Many of the respondents provided broad statements supporting initiatives but not offering detailed thoughts on prioritisation or specific potential activities. Where respondents did reference the set of proposals for new activities supporting the adviser workforce some stated a desire for MaPS to prioritise investment in advice delivery and resolving known issues in the services it funds (longer funding terms, reducing workload pressures) and the wider sector (administrative burden).

Some respondents questioned if MaPS were the most appropriate body to lead some of the proposed areas, or if MaPS should support other organisations to lead. Some suggested that if new initiatives are undertaken there needs to be a strong evidence base about the anticipated value they would add, and felt they should only be pursued if there was confidence changes would be implemented successfully.

Where specific proposals were referenced, respondents provided the following feedback:



### **Exploring with stakeholders how salary benchmarking for debt advice could work and the impact it might have on the current workforce, employers and funders.**

- Where respondents referenced it, there was positive support for salary benchmarking to take place within the sector.
- Some respondents flagged that the exercise had potential impacts beyond MaPS funded services and questioned if MaPS was the most appropriate body to understand these wider impacts and lead the work.
- Some respondents referenced the link between funding levels and a salary benchmarking exercise. They felt MaPS would need to ensure that appropriate additional funding was in place to ensure that smaller advice organisations are not pushed out of the market in the event of significant change within the current salary landscape.

### **Exploring the development of a competency framework.**

- Only a small number of respondents referenced this proposal – one felt it should be a priority for MaPS to lead, another suggested there were other organisations more suited to leading this work.
- Some flagged concern about the challenges for smaller delivery organisations in supporting the implementation of a new competency framework.
- Some felt any work in this area needed to involve the regulator.

### **Exploring how more consistent sector wide career pathways could be created.**

- There was a positive response to mention of apprenticeship schemes, with a number of respondents suggesting they are a potential way to help recruitment and retention across the sector.
- Some suggested that evaluation of existing debt sector apprenticeship schemes should take place prior to making any decisions about future schemes.
- One respondent felt it was important that any future apprenticeship scheme should be available for both the younger and older end of the adviser workforce.

### **Co-ordinating cross sector work to look at best practice and initiatives for organisations that employ debt advisers, such as recruitment and adviser wellbeing.**

- As noted above there were mixed views about co-ordinating or initiating any new collaborative cross-sector work on adviser wellbeing.
- Some respondents felt that MaPS would be ideally placed to lead, while other spoke to needing buy in and consensus from the sector on any future projects (especially as MaPS' insight might be limited as it did not directly employ advisers).
- There was some positive support for organisations to do more to share their recruitment and retention best practice.

### **Leading the development of a sector-wide workforce strategy for debt advice.**

- There was a mixed response to this proposal with some explicitly stating they felt it was more appropriate for organisations other than MaPS, with more specialist expertise to lead any workforce strategy.
- Other respondents suggested they felt this area would add value, with one respondent stating they felt commissioning services and ensuring there was a coherent sector-wide workforce strategy sat hand in hand.

Where respondents did offer a view on the prioritisation of these proposed activities, salary benchmarking was the initiative cited most often.

## Other suggestions

Respondents also suggested that more proactive support for advisers who may be struggling with complex and/or stressful cases could help to improve wellbeing. Suggestions on what this might consist of included:

- A sector-wide mentor scheme which could be co-ordinated by MaPS allowing more experienced advisers to mentor newer recruits.
- Training in mental health and trauma should be available for advisers.
- An Employee Assistance Programme which is fit for purpose.



## Next steps on adviser wellbeing and supporting the debt advice workforce

MaPS intends to take forward the feedback received in the following ways:

- Our intention is to continue to engage directly and work with adviser panels to help ensure the voice of advisers is closer to the decision making at MaPS. The purpose and function of the smaller adviser panel – originally established to help in the development of the consultation – will be reviewed and we will work with the sector to look at membership and the ongoing workplan for this group to ensure that discussions continue to add value to members and the wider sector.
- We will undertake a review of how effectively the adviser wellbeing measures introduced in the recent MaPS commissioning cycle are working and will share the results with the sector.
- Over the next 12 months, we intend to complete a review of the Debt Advice Quality framework to determine if it is still relevant and appropriate. This will be part of our wider review where we will be consulting on the proposed changes to the MaPS Standards. We intend to engage with both our delivery partners and the sectors that we operate in to consult on the changes that we are planning to make.
- MaPS debt policy function will continue to have a focus on sector workforce issues – a colleague will continue to participate in existing initiatives (such as the Propel Pay and Conditions Taskforce). We do not intend to initiate any new initiatives in the short term, but the colleague will continue to hold an active brief to monitor and identify suitable opportunities to progress-related work, including work on career pathways, apprenticeships and opportunities to share best practice.
- Based on the feedback received we do not intend to initiate any work to develop a competency framework for debt advisers or a sector-wide workforce strategy in the immediate future.
- It was clear from the responses that salary benchmarking for the sector is considered a priority, but that many feel it is not appropriate for MaPS to lead this work. We will continue to advocate for appropriate ways that the sector can begin to address issues related to adviser pay and conditions. MaPS will consider how concerns related salary benchmarking can inform any future commissioning we undertake.
- Feedback received about longer term funding commitments, job security and the impact of targets on adviser wellbeing will be fed into MaPS' future commissioning activity.

## Chapter 4: Helping to make debt advice easier to deliver and looking to the future

The proposals in this chapter were:

**4.1 MaPS believes there are opportunities to make debt advice easier to deliver through shared infrastructure, continuous improvement and with the use of technology. Working with the sector to improve the adoption and use of new and emerging technologies could improve the availability of services.**

This chapter sought views on the role that MaPS could play in investing in new infrastructure for the sector and reducing effort in the advice process. The premise was that some of the challenges faced by debt advice providers and the advice-giving workforce could be reduced by investment in technology and other innovations, reducing the effort required to give advice and making services more effective for clients. Views were sought on existing initiatives, potential new areas of focus and how these should be prioritised.

### **Broad support but a range of views on the extent of MaPS' role**

Most respondents supported the core proposal, recognising the role of technology and infrastructure in making advice easier for those providing services and their clients. Views on the best way to approach these challenges and the role that MaPS should play in this space were much more varied. Some suggested MaPS was well placed to be a facilitator where an independent third party was required (for example, data sharing protocols). Others felt MaPS should be a convenor, hosting and sharing the innovation already taking place across the sector. There were mixed to unsupportive response to the idea of building infrastructure – some respondents said MaPS doesn't have the capability to deliver this while others suggested if MaPS don't build it then no one will.

### **Caution and approach to risk**

The risks associated with a focus on technology and infrastructure were raised in many responses. They urged MaPS to be cautious in its approach, questioned which organisations within the sector had the right skills and capabilities to drive technological and infrastructure changes. A number of respondents flagged concerns with creating an over reliance on the role of innovation in client-facing interactions and instead urged MaPS to focus on back end technologies. However more tech enabled respondents emphasised that the investment is worth the returns and called for a more ambitious approach.

### **Interplay between technology and infrastructure and MaPS' commissioning role**

A number of respondents flagged the balance between investing in service delivery, and technology and innovation. While broadly supportive of proposals, they were keen that investment was not at the expense of funding frontline services. While some felt MaPS should be mandating the adoption and usage of certain technologies through commissioning, others flagged concerns that use of shared systems might become a requirement of commissioned services. Some questioned how in a commissioning environment MaPS could work to ensure infrastructure and innovation benefits the whole sector.

Working through the proposals and supporting questions within the chapter in turn, the feedback received was as follows:

#### **4.1.1 MaPS believes that we should continue to play a role in supporting the sector to make debt advice easier to deliver through shared infrastructure, continuous improvement and the use technology**

The views were as follows:

##### **Continuing to provide and enhance the Standard Financial Statement (SFS)**

A large number of respondents supported MaPS maintaining and improving on the SFS, and no respondents flagged the SFS as an area MaPS should deprioritise.

- Participants were supportive of work to increase uptake and engagement with the SFS amongst creditors.
- A number of participants did raise where the SFS could be improved, including: compatibility with Open Banking and other data sources, supporting the customer experience in filling out the form including a digital journey, a more customer friendly output for legibility, and better transferring of the information between organisations digitally (APIs, for example).
- Some calls were made for changes to the structure of the SFS and the methodology used to calculate the spending guidelines.

■ *“We feel the SFS is a really good opportunity for MaPS to deliver value to the entire system.”*

Debt Advice Provider, MaPS funded

##### **Continuing to work with the adviser panels to identify areas of the debt advice process that could be improved and understand the root cause, and advocate for improvements through our policy function (for example, influencing creditors and government bodies to use the SFS, improve processes and the availability of information)**

- A significant number of respondents were positive about MaPS being actively involved in supporting the sector in addressing various pain points. For example, they saw a role for MaPS in:
  - Confirmation of Advice Letter standardisation with better customer comprehension
  - Letters of Authority Standardisation
  - Improving the information of CCJs in CRAs with the Registry Trust
  - Co-ordinating with other sector bodies, such as the Insolvency Service, to improve data flow through APIs
  - Improvements in recording and compiling information for quality assurance

##### **Continuing to support continuous improvement activities within services funded by MaPS**

- MaPS role in supporting continuous improvement activities attracted little comment with no respondents expressing strong views in support or against this work.

##### **Continuing to make funding for infrastructure improvements available on an ad-hoc basis, subject to budget availability and other priorities**

- As noted above many respondents (representing all stakeholder groups) expressed a preference for MaPS' funding to be prioritised on frontline service delivery over investment in innovation and infrastructure. However, some did raise concerns about the current ad-hoc nature of funding for technology projects, leading to a piecemeal approach. Some emphasised that there is a need for consistent funding towards infrastructure.
- Views were mixed on whether the funding that is available should be distributed to providers to utilise or coordinated by MaPS on sector-wide investment and tools.

■ *“Whilst we recognise the intent to promote the adoption and testing of new technologies that might enhance the quality and efficiency of debt advice, we have reservations around the potential for MaPS to divert resource and funding for this activity”*

Financial Services Trade Body

#### **4.1.2 MaPS could take a more active role in supporting debt advice providers to capitalise on the potential benefits of new and emerging technological developments**

##### **Developing a technology horizon scanning function, bringing together debt advice providers, financial services organisations and the public sector to identify new and existing technology that could improve how debt advice is delivered**

- There was positive support given to the idea of MaPS being a convenor of innovation.
- Some felt MaPS' role should be more active and suggested the onus to create change through the sector sat with MaPS.
- There were some suggestions that MaPS should own a technology roadmap for the sector.

##### **Providing expertise to debt advice providers wanting to adopt, evaluate and pilot new approaches**

- Engagement with this proposal was limited, with a handful suggesting the convening role should involve sharing best practice.

##### **Providing more consistent and ongoing funding to sector to support the adoption and testing of new technologies (subject to budget availability and other priorities)**

- There was support for a more consistent approach to funding, but not at the expense of frontline delivery.

##### **Exploring opportunities to provide or enable more shared infrastructure or common processes between debt advice providers, creditors and clients (for example, creating a common data framework, enabling more effective exchange of information by standardising elements such as data definitions and governance, to create more consistency for smoother referrals)**

- There was a positive reception to MaPS being involved in projects when an independent 3<sup>rd</sup> party was required such as establishing cross-sector data standards.
- However, there were mixed responses about MaPS' role in building any new shared infrastructure.

##### **Doing more to set out examples of best practice that could support more efficient services (for example working with providers and the regulator to improve confirmation of advice letters, encouraging them to be more salient and concise)**

- There was not strong engagement with this proposal beyond existing work looking at 'pain points'.

## Next steps on making debt advice easier to deliver

MaPS intends to take forward the feedback received in the following ways:

- We will continue our work to provide the Standard Financial Statement, to support adoption and adherence and to keep updating the tool and spending guidelines with the support of the SFS Governance Group. We are carrying out early engagement with stakeholders to consider the benefits and options for initiating a programme of work to develop an updated version of the SFS.
- We will continue to work with the sector, including through the adviser panels, to identify 'pain points' within the advice-giving process and identifying potential solutions (including policy related and technology and infrastructure related) that could reduce non-productive effort. Our intention is to place a greater emphasis on optimising the supply of debt advice as MaPS develops our next three-year corporate strategy for debt advice.
- MaPS is scoping the establishment of a debt sector technology forum. We are keen to ensure that this forum works effectively and adds value for its members so plan to undertake a request for information (RFI) to help the development of the technology forum and how it may operate. The feedback we receive from this RFI will shape the nature of the forum however activities are likely to include horizon scanning and rapid testing of new technology; the co-creation of a technology roadmap for the sector and what to prioritise; and, the creation of a community-of-practice for people delivering debt technology transformation programmes.
- The feedback received on funding has been noted and will be taken forward into discussions about future budgets for debt advice and our future commissioning approach. In the meantime, any opportunities for innovation funding are likely to remain ad hoc tactical responses.
- We will consider how the feedback received to proposals in this chapter should be taken forward in our commissioning activities.
- While they will not be prioritised in the short-term, some of the ideas explored in this chapter (common data framework, referrals infrastructure, more effective approaches to confirmation of advice and case recording) may be taken forward by the technology forum in the future.

## Chapter 5: Increasing public awareness and engagement with debt advice

The proposals in this chapter were:

**5.1 MaPS believes that there are opportunities to improve public awareness and engagement with advice, and that coordinated work with the sector could reduce barriers to advice seeking and help clients more easily find the help that is right for them**

This chapter sought stakeholder views on the role MaPS should play in raising public awareness and engagement with debt advice. Feedback was requested on existing propositions such as the Money Adviser Network and debt advice locator tool, as well as thoughts on new initiatives and priorities within this area.

### Low levels of awareness of MaPS' tools and initiatives

The feedback received on the current activities MaPS undertakes to support awareness raising and engagement with debt advice was mixed. Some of the responses, particularly from smaller organisations, indicated a low level of awareness of the Debt Advice Locator Tool (DALT) and the Money Adviser Network (MAN) which reduced the level of detail in responses.

### Tension between supply and capacity and the benefits of increasing public awareness and engagement

Many respondents acknowledged the potential benefits of raising awareness of debt advice but raised concerns about the impact this may have on services already at capacity. Respondents thought MaPS' focus should be on increasing the capacity within the sector rather than on awareness and engagement. Some respondents added that those organisations referring clients to debt services should be contributing financially to support the provision of advice.

Working through the proposals and supporting questions within the chapter in turn, the feedback received was as follows:

#### 5.1.1 MaPS believes we should continue current work to increase public awareness and engagement with debt advice

**Providing the Money Adviser Network (MAN) as a referral route into debt advice for organisations looking for a single point of entry to debt advice. Continuing to enhance the MAN, including improving the targeting of referrals and exploring the level of reporting and management of information shared between parties. Continuing to build evidence about the effectiveness of the MAN**

- There was broad, but not universal, support for continuing to provide the MAN.
- Some respondents recognised the value of a single route into debt advice, especially in light of challenges of poor advertising practices making it challenging for clients trying to find help.
- Some respondents suggest that MAN should be expanded to enable non-MaPS funded providers to be part of the service, and one felt it should be open to any debt advice providers (including those not part of the MaPS quality framework).
- Some respondents were keen for more partners (particularly local authorities) to start referring their clients into the network, while a small number said they thought it was important that any organisations referring into the service were contributing to funding the advice provided.
- Others felt that their low awareness and the lack of evidence about the efficacy of MAN meant they were unable to offer views.
- Some respondents suggested that the additional resource required to support MAN was not always providing value and that the proposition should be reviewed .



### **Providing and enhancing the Debt Advice Locator Tool (DALT) on MoneyHelper**

- There was broad support from across the sector (providers and creditors) to continuing to provide a trusted place to send clients so they could find the debt services that were right for them.
- Some felt that the approach to which providers are listed on the tool was 'patchy' and there were calls to expand the tool and list more providers.
- There were calls to expand the providers listed to include local authority providers and those not part of the MaPS quality framework – though there was recognition that the tool needed some mechanism or form of assessment to ensure the quality of providers listed.
- One provider suggested that there should be an application process for organisations wanting to be listed on the tool.
- Several respondents suggested listing wider support services such as gambling, addiction and mental health support on the tool.
- Others supported doing more to help clients understand the extent of service being provided – for example listing which solutions providers deliver, or asking more questions to help identify complexity of need before suggesting a channel or providers.

*"We would recommend that this service [DALT] is expanded to be a more comprehensive overview of available services."*

Trade Body

### **Continuing to work with creditors and their industry bodies to influence broader supportive debt collection practices through our policy function**

- Fewer respondents offered views on MaPS' policy work with creditors on collection practices.
- Where feedback was provided, respondents were positive about the value this could provide.
- Some felt more should be done to work with housing associations and credit unions.
- One respondent urged MaPS to do more cross-sector work (including with regulators to create greater compulsion) to strengthen referrals and move from signposting into seamless referral mechanisms.

### **Continuing to work collaboratively with the sector on issues related to awareness and engagement such as online advertising**

- As noted above, while respondents recognised that raising awareness of advice was positive, there were some broad concerns about the potential impact of awareness raising activities (and particularly any new initiatives) creating more demand for services that are at capacity.
- Some respondents shared their views on the benefits of awareness-raising, including the role it could play in destigmatising advice, reducing mis-selling and reaching those most in need.
- There was less direct engagement with the proposal to continue work on online advertising, however the support received was positive, with those that did engage universally supporting continuation of policy focus in this area.
- Many respondents echoed the concerns about online advertising and the harms that accessing inappropriate debt solutions can create.

### 5.1.2 MaPS could undertake additional activities to increase public awareness and engagement with debt advice

**Coordinate work with creditor sectors and debt advice providers to develop consistent language and approaches to referrals into debt advice (including further development of the 'journey map'). Work with the sector to develop a common framework to describe the extent of the service that is provided.**

- There were a limited number of responses that made direct reference to this proposal, those that did were mainly supportive with respondents referencing how this could benefit clients trying to select a service.
- Some of the feedback provided on the DALT, though not directly referencing a 'common framework', suggested that more consistent ways of describing and codifying services would be useful enhancements.
- A small number of respondents felt that it would not add value and could lead to clients becoming confused about options.

#### **Targeted awareness-raising campaigns**

- Feedback on targeted campaigns again was tempered by concerns about sector capacity.
- Several respondents stated awareness campaigns and community outreach should be led by individual organisations rather than MaPS, as this will be more successful in reaching clients who may be hard to reach or in vulnerable circumstances.
- One organisation suggested MaPS create a central marketing hub to house marketing collateral.



## Next steps on increasing public awareness and engagement with debt advice

MaPS intends to take forward the feedback received in the following ways:

- Our intention is to continue to provide the MAN infrastructure but to continue to assess the value it is adding and how it is operating. Any developments or improvements are likely to take time to consider and plan effectively, meaning rapid changes are not anticipated. The Money Adviser Network, as a public service has to be compliant with the Government Service Standard Principles. During 23/24 MaPS undertook a review of the MAN (ongoing at the point the consultation was published). In the meantime the programme has paused on onboarding new referral partners, and the current focus is on ways of working with DWP as we believe there is significant strategic value in improved ways of working with the debt sector. Feedback on the funding of MAN has been understood and will be fed into any future strategic planning for the proposition.
- The DALT will continue to be available via the MoneyHelper website. In 24/25 we will be gathering evidence on clients' use of the tool and conducting user research to improve the tool to ensure clients can find services that are right for them.
- MaPS will continue to undertake policy work related to awareness and engagement with debt advice. This will include some roles dedicated to creditor practice that will focus on driving improved practices with a range of creditor sectors.
- Work to minimise the harm created by online advertising (and other online activities) will continue with dedicated MaPS policy resource. This initiative currently forms part of the delivery plan for the 'Better Debt Advice' strand of the UK Strategy for Financial Wellbeing coordinated by MaPS. Feedback from this consultation exercise will inform any future review of the Strategy and this workstream.
- Based on the responses received we do not plan to initiate a major cross-sector project to look at consistency of language in referrals and service descriptions. We do however, plan to further test the 'journey map' concept (as set out in the 'Motivations and Barriers' research) and as an initial step are looking at what might be possible within the MoneyHelper estate. We believe that finding ways to manage customer expectations, help clients be better prepared for advice, and reduce any concerns they have about loss of autonomy would help engagement with advice. We are currently scoping how we might test the concept further, and we will monitor the impact of any activity we do take and share plans and results with the sector in due course.
- Feedback about capacity concerns within the sector and the tension this creates with awareness-raising has been noted, along with the views that providers are better placed than organisations to undertake campaigns. MaPS does not have any plans to initiate new work to raise awareness of debt advice through targeted campaigns.

## Chapter 6: Building evidence and influencing others

The proposals in this chapter were:

### 6.1 MaPS believes we hold a unique place within the sector to build evidence and influence change through policy work and convening.

This chapter sought stakeholder views on MaPS' approach to our strategy and policy function. It set out current ways of working, the policy intentions driving these activities, and proposed some potential new approaches or focus areas.

#### Mixed views on the role of MaPS as a policy influencer

There were mixed views on the proposals linked to MaPS' strategy and policy function. Broadly, most respondents felt MaPS should continue work to convene, coordinate and influence. This support varied in strength with some offering qualified support while others called for MaPS to be bolder and more ambitious. However, some felt there was an inherent conflict in MaPS' status as an ALB that restricted the ability to effectively influence debt policy issues.

#### Calls for more transparency on the effectiveness of MaPS' work

There were a small number of calls for MaPS to be more transparent about the effectiveness of its current influencing work and other initiatives including the effectiveness of funded services.

#### Concern about the trade-offs between funding services and other activities

As with other sections of the consultation, many respondents made the link between the trade-off between funding frontline services and other activities MaPS could prioritise. A number stated a desire that MaPS prioritise the funding of service delivery, while some stated they felt the focus of MaPS' policy and influencing work should be on securing additional sustainable funding for the sector.

Working through the proposals and supporting questions within the chapter in turn, the feedback received was as follows:

### 6.1.1 MaPS believes we should continue work to build evidence and drive change through policy and influencing

**Providing a policy function that undertakes collaborative work, such as facilitating the Debt Advice Reference Group (DARG), undertaking calls for evidence and research to build evidence and insight**

- The majority of respondents supported MaPS continuing to provide this function.
- Larger organisations with their own established policy functions were more likely to be supportive than smaller organisations or individual respondents.
- Some called for more insight on the effectiveness of the approach before they could offer a view.
- One organisation suggested continuing to 'rebuild' relationships with the sector should take precedence over other policy and influencing workstreams.
- Some expressed concerns about perceived barriers for MaPS in delivering an effective policy function.

## **Continuing to work closely with other government departments, regulators and arm's length bodies to drive improvement in the debt advice landscape for clients and advisers**

- Where respondents made reference to this proposal there was broad support for activity continuing, with some stating they felt this was a core and unique part of what MaPS could offer the sector.

*“Working closely with other government depts, regulators and arm's length bodies to drive improvements for the debt advice sector is a particularly useful function for MaPS”*

Debt Advice Provider, MaPS funded

## **Continuing to work collaboratively with the devolved administrations**

- Some respondents questioned MaPS' work with the devolved administrations given that the remit for MaPS to fund debt advice is England only.
- One respondent urged MaPS to do more across the nations, specifically citing doing more to secure the adoption of the SFS in Scotland.

### **6.1.2 MaPS could initiate collaborative work with the sector to drive a more consistent approach and improve sector wide understanding of the value of debt advice**

#### **Leading a sector-wide approach to impact measurement**

- There was a mixed response to proposals to initiate work looking at common impact measurement across the sector, with a broadly even split of those in favour and those less convinced.
- Responses included some suggestions of what a framework might include.
- Where sentiment was positive, respondents stated they felt MaPS was uniquely placed to take on this work.
- Building the case for increased funding for debt advice was cited as a potential benefit of a more consistent approach to measurement.
- Where respondents were less supportive, they raised concerns about the complexity of the task (and resource it may require) and the risk that standardised approaches could lead to homogenisation of delivery.

#### **Further collaboration across the sector and nations**

- There was less support for new and additional collaborative projects.
- As noted above, concern about the trade-off between providing funding to frontline services and a sector coordination role were flagged, along with a desire to understand more about the impact of current activities.
- Some respondents suggested MaPS should do more to secure additional funding for the sector and that this should be the focus of policy and influencing efforts.

## Next steps on building evidence and influencing others

MaPS intends to take forward the feedback received in the following ways:

- MaPS will continue to provide a core debt policy function to support our statutory functions and continue to provide insight to the sector. This will include (but not be limited to) supporting the DARG, working with the devolved administrations and the debt need survey.
- Through our policy function we intend to continue to provide support to the sector (particularly issues related to making advice easier to give and reducing the effort required to provide effective advice). This will include work to influence government departments and other key stakeholders.
- MaPS will continue to build evidence on the effectiveness and impact of debt advice services. Our intention is to improve our own reporting on the services we fund, increasing transparency and the availability of data. We will also continue the multi-year project looking at the longitudinal impact of debt advice, sharing details of the findings with the sector in due course. We do not intend at this stage to initiate any new major projects on impact measurement or common outcomes.



## Feedback 'out of scope' received

In line with the principles of effective consultation, MaPS' debt strategy consultation only sought views on areas that fall within the scope of MaPS decision-making. We set out what we believed to be some of the key areas we were not seeking views on in the introduction to the document. The areas highlighted were:

- The appropriateness of MaPS' role in the sector
- The MaPS Standards and the Quality Assurance Framework for our funded services.
- What the overall level of debt advice capacity should be.
- How much funding should be available for debt advice (through MaPS or other sources).
- What the sources of funding for debt advice should be.

Some respondents did share views on these areas. The key themes of this feedback are summarised below:

### Sector funding

- Many respondents raised the issue of debt sector funding. Many of their comments were about the perceived 'fairness' of the way debt advice is funded:
  - Many noted that the FCA collected debt levy, which funds MaPS' work, is only paid by financial service firms, and a wider set of creditors are benefiting from debt advice.
  - There were calls for MaPS to do more to ensure the base of organisations contributing to national debt advice funding was broader (for example, through levies on the energy, water and telecoms sectors).
  - There were some calls for the energy sector funding that does go into the advice sector to be better targeted.
  - Some called for contributions from gambling firms and 'buy now pay later' lenders, seeing these as 'polluters' causing bad debts.
- Respondents raising these issues came from a wide range of organisations – all the financial service respondents raised the issue of sector funding as did debt advice providers and policy influencers.
- There were some calls for more wholesale reform of the funding landscape – particularly of 'fairshare' (a scheme where some creditors make voluntary donations to three of the debt advice providers who offer debt management plans):
  - One respondent suggested the fairshare scheme needed reform to ensure all providers of debt management plans receive funds (removing their need to charge clients).
  - Some respondents proposed an alternative approach to fairshare, basing payments on advice rather than repayments
- There was also a call to remove any bilateral funding arrangements between creditors and debt advice providers due to perceived conflict of interest.

## Supply, demand and capacity

- Some respondents noted that the lack of discussion about MaPS' overall budget limited their ability to respond as this was critical to understanding how resources should be prioritised.
- Some respondents were disappointed that the consultation did not set out any proposals about the overall level of debt advice required in the UK:
  - Some suggested they wanted to see a clearer roadmap on how the gap between need and capacity could be reduced.
  - Some wanted MaPS to undertake work on the funding level required to provide 'sufficient' levels of debt advice.

## MaPS' role in the sector

- Some respondents commented on the scope of MaPS' role – particularly the restrictions which require a focus on debt advice and its funding, when clients face a cluster of wider social welfare advice needs (such as housing, benefits and debt).
- Some noted the lack of an equivalent body to MaPS funding welfare and/or benefits advice consistently across the country, and suggested there could be benefit in increasing the scope of work MaPS funded advisers can undertake.
- Some suggested MaPS should do more to influence the regulatory regimes on debt advice providers and insolvency practitioners.
- One suggested that MaPS should only work with not-for-profit debt advice providers and its remit should reflect this.



# Full list of respondents

Advice Services Alliance  
AdviceUK  
Angel Advance Ltd  
Auriga Services Ltd  
bpha Ltd  
Christians Against Poverty  
Citizens Advice  
Citizens Advice Allerdale  
Citizens Advice Cheshire East  
Citizens Advice Cornwall  
Citizens Advice Gateshead  
Citizens Advice Knowsley/Greater Merseyside  
Money Advice Partnership  
Citizens Advice Leeds  
Citizens Advice Southwark, Impact on Urban Health, Rooted Finance and Rooted By Design (in partnership)  
Citizens Advice Sutton  
Clean Slate Training & Employment CIC  
Community Advice and Law Service/EMMA partnership  
Community Money Advice  
Credit Services Association  
Credit Union Sustainability Partnership  
Debt Managers Standards Association (DEMISA)  
Derbyshire Law Centre  
Elifinty  
Finance and Leasing Association  
Financial Services Consumer Panel  
GamCare  
Homemaker Southwest  
IE Hub  
Institute of Money Advisers  
Lloyds Banking Group  
Local Government Association  
London Citizens Advice  
Lowell  
Mental Health and Money Advice/Rethink Mental Illness  
Money Advice Plus  
Money Advice Trust  
Money and Mental Health Policy Institute  
Money Wellness  
MoneyPlus Group  
National Housing Federation  
NatWest  
PayPlan  
Riverside Money Advice  
Salford Citizens Advice  
Shelter  
St Vincent's, Leeds  
Staffordshire North & Stoke-on-Trent Citizens Advice Bureaux  
StepChange Debt Charity  
Stockton & District Advice & Information Service  
Talking Money  
The Trussell Trust  
Toynbee Hall  
UK Finance  
We Are Debt Advisers/Centre for Responsible Credit  
We Are Group  
Plus nine responses from individual respondents.

