

MaPS Customer Facing Standards

Advice Assessor Toolkit

Digital Overlay Version

April 2025

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Introduction

Since the formal introduction of Customer Facing Assessment (CFA) following a period of ‘testing’ there have been a number of iterations of the Advice Assessor Toolkit (AAT).

The AAT has become the primary source of guidance for assessors assessing the customer facing standards. Until now the AAT has been a resource which underpins the overarching guidance for the customer facing standards. MaPS has taken the decision to merge these two documents to create a single set of guidance for customer facing assessment.

The Toolkit Guidance is structured to reflect a typical customer journey with the relevant standards woven throughout the journey to help to clarify how they fit. It also reflects the standards which run throughout the journey and can be picked up during assessment at any point.

In addition, it is explicit about the circumstances in which the not applicable option can be used, and it nudges the assessor towards impact on the customer when making a judgement. The toolkit guidance does not negate the challenge of considering each case individually based on the circumstances of each customer and their presenting need, but it goes further than the overarching guidance in explaining what the assessor is looking for when assessing a debt advice case

Assessment queries are invited via the CFA Clarification Hub and MaPS will continue to respond to queries which are associated with CFA and individual case scenarios

The appeals process is in place for challenging assessment outcomes for eligible cases where the delivery partner has a good case for confirming that the standard should have initially been assessed as ‘met’.

Calibration sessions currently remain in place as an option for delivery partners where there are queries which are not easy to respond to via the hub and are not eligible for appeals.

How to use Overlays

The ‘base toolkit’ provided applies to all debt advice activity regardless of channel or advice type (e.g. holistic full debt advice, limited to presenting issue etc.). Some channels and advice types require additions or amendments to the base toolkit. You can find these by holding clicking on the appropriate button underneath the Standard description – this will then take you to the appropriate overlay. When you’re done simply click the ‘go back’ button to return to where you were.

For the purpose of alternative channels and advice types, the word ‘practitioner’ should be inferred to mean ‘the service’ generally.

Scope and Purpose

The Advice Assessor Toolkit is for use when assessing debt advice cases. It provides delivery partners and IQAS with one reference point when determining what sufficient looks like to meet the Customer Facing MaPS Standards when assessing debt advice. It is very specific to debt and provides a range of examples relating to the types of evidence required to demonstrate compliance.

The purpose of the toolkit is to further develop consistency when making judgements about the extent to which a case is compliant with the MaPS Standards. It is intended to increase the reliability of assessment outcomes across all parties, injecting as much objectivity as is possible, into very nuanced situations.

The broad objectives for developing the toolkit are:

1. To increase the level of consistency in assessment.
2. To provide clarity on the interpretation of the MaPS Standards for debt advice.
3. To have one reference point for all advice assessors.
4. To address queries currently coming through calibration and appeals.
5. To improve the customer journey and build on best practice.

A positive customer experience is at the centre of the services provided by MaPS and its delivery partners, and the discussions which have taken place over the past 18 months, have demonstrated a real desire to continuously improve both our delivery and assessment processes. The Advice Assessor Toolkit is intended to aid practitioners in doing this.

The Advice Assessor Toolkit supports the MaPS Customer Facing Standards Guidance and has been developed to align with it. Practitioners and Assessors should have access to three key documents. These are:

The MaPS Standards

The MaPS Customer Facing Standards Advice Assessor Toolkit

The MaPS Feedback Management Spreadsheet

All three documents do not need to be used to undertake an assessment of a case but should be available for reference.

Assessors will need to be trained prior to using the toolkit for assessment. Delivery partners and IQAS will be required to ensure that training is undertaken with any new onboarding assessors, and where possible, MaPS will support with this.

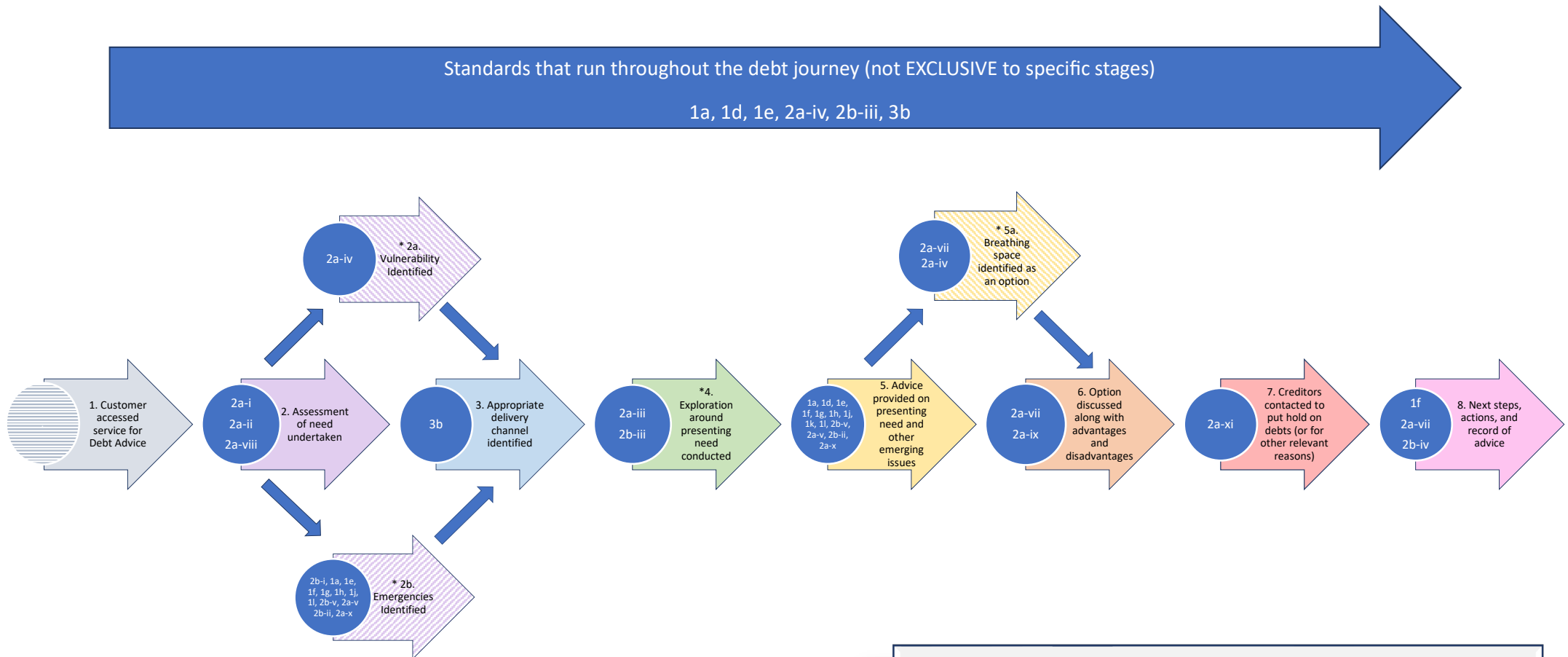
Assessment Outcomes

An overview of the options for assessment outcomes is outlined in the table below:

Assessment Outcomes	Guidance	Indicator
Met	<ul style="list-style-type: none"> Fully meets the expectations of the standard. 	<ul style="list-style-type: none"> There is evidence that all the requirements of the standard have been met.
Not Met (Unsuitable - No impact)	<ul style="list-style-type: none"> Has not met the expectations of the standard. There is no evidence of poor customer outcomes. No evidence detriment (financial loss or harm). 	<ul style="list-style-type: none"> There is not sufficient evidence to demonstrate that the standard has been met. There is no evidence of impact on the customer.
Not Met (Unsuitable - Impact, No financial loss or harm)	<ul style="list-style-type: none"> The standard is not met. There is evidence of impact. There is no evidence of financial loss or harm. 	<ul style="list-style-type: none"> There is not sufficient evidence to demonstrate that the standard is met. There is evidence that there has been an impact on the customer. There is no evidence of financial loss or harm.
Not Met (Unsuitable with Detriment - Impact, Financial loss or harm)	<ul style="list-style-type: none"> The standard has not been met and there is evidence of detriment (financial loss or harm). 	<ul style="list-style-type: none"> There is not sufficient evidence to demonstrate that the standard is met. There is evidence that there has been an impact on the customer. There is evidence of actual financial loss or harm.
N/A	<ul style="list-style-type: none"> The standard does not apply to the customer's situation. 	<ul style="list-style-type: none"> The standard is not applicable to the customer's situation.

MaPS Customer Facing Standards

1. Debt Customer Journey



*Vulnerability, Emergencies, Exploration, Delivery Channel and Breathing Space have been placed at typical points in the consumer journey, but it is important to note that they can emerge at any point in the journey and will be assessed in the context of the point at which they emerge.

Please also note that untailored factsheets do not replace the need for advising the consumer. Where factsheets are used to help deliver the advice, consumers must be made aware of the relevant sections to read (either by highlighting them or stating the relevant sections in the call/advice letter). Without this tailoring, factsheets are viewed as being information only.

2. Assessment of need is undertaken

2a-i

N/A Option? **No**

Expects the consumer to be **informed** about the scope, purpose, and limitations of the

Digital

This Standard may be evidenced by a Customer Agreement, Service Promotion Leaflet or verbally (in a call recording).

Case records may include a line to confirm that scope and purpose has been discussed - full detail of the discussion is not necessary.

Telephone and Webchat evidence is likely to be contained within the IVR pre-amble (Pre-Assessment Information submission).

If not evident at triage stage, then early in the interaction with a debt practitioner.

One form of evidence is sufficient, it is not necessary to have multiple evidence sources to meet this standard.

2a-ii

N/A Option? **No**

Expects the practitioner to **inform** the consumer of the personal and financial information they need to request from them during the session in order to provide advice.

Digital

Where there are drop-in arrangements in face-to-face services and the consumer is immediately transferred to a debt practitioner without accessing triage, the debt practitioner will assess need and move immediately into requesting the information, as assessed under 2a-iii, and therefore this standard can be assessed as met.

There should be evidence that the consumer has been **informed** of the information the practitioner will request. This can be implicit in nature, for example, if the practitioner is able to provide advice based on the information they have, this has clearly been done.

The standard may be evidenced by a Customer Agreement, Service Promotion Leaflet etc. Telephone and Webchat evidence is likely to be contained within the IVR pre-amble (Pre-Assessment Information submission). If the call recording, case record, or any other information on the case suggests that the consumer has been informed of this, the standard is considered to be met.

It is not necessary to evidence that the specific information has been **requested** at this stage, or has been **provided**, just that the consumer has been **informed** of what the practitioner will need to request.

2a-viii

N/A Option? **No**

Expects the service to **inform** the consumer about managing their personal data.

It should be evident that the consumer has been **informed** about how the service will manage their personal data. This should be evident early on in the case, so the consumer is aware from the outset.

There should be evidence that the consumer has been told about the personal information we collect and what we use it for.

The expectation is not to provide or obtain anything from the consumer, but that the consumer is **informed**. This standard may be evidenced by a Customer Agreement, Service Promotion Leaflet, Privacy Notice etc. Telephone and Webchat evidence is likely to be contained within the IVR pre-amble (Pre-Assessment Information submission).

This does not negate the providers responsibility to obtain consent from the consumer, however, consent is not being assessed under this standard.

2a. Vulnerability has been identified

2a-iv

N/A Option? **No**

All practitioners must ensure they take a pre-emptive approach to identifying consumers in vulnerable circumstances and tailor sessions to meet their needs as far as possible.

Digital

This Standard is in two parts:

1. Whether there has been sufficient exploration to identify vulnerability/safeguarding and the impacts to the consumer.
2. If vulnerability has been identified, whether sufficient action been taken to tailor the session, including the advice appropriate to the consumer's vulnerability, to accommodate the consumer's vulnerability if adjustments are required.

The standard references a pre-emptive approach therefore we would expect steps to be taken/questions to be asked, to identify vulnerability, i.e., questioning whether there any changes to be made to the service to account for a condition and to act on the information declared.

Indicators below are not exhaustive:

The standard may be evidenced as being met by the following indicators listed below:

- If the consumer is specifically asked questions to explore if a vulnerability exists and necessary adjustments are made to accommodate.
- If the consumer is specifically asked questions to explore if a vulnerability exists and no vulnerability has been identified.
- If the consumer is specifically asked questions to explore if a vulnerability exists and no vulnerability is identified, but a vulnerability emerges through the intervention and is accommodated accordingly.

Instances that do not provide sufficient evidence to meet the standard:

- The consumer has not been specifically asked about their circumstances which could assist in identifying vulnerability and inform whether adjustments are required, and
- Vulnerability is evident in the case records and the practitioner has not explored and made any necessary adjustments.

Examples of possible evidence of vulnerability include:

- Consumer declares mental health issues,
- Consumer is receiving ongoing care of doctors,
- Limited ability to use IT/online platforms,
- Literacy issues are identified.

Practitioners should attempt to understand the severity of the consumer's health conditions when exploring their circumstances. This is with the aim of ensuring advice is relevant and tailored to the consumer's needs.

Where a consumer has vulnerabilities that could indicate additional advice is appropriate, such as on the SMI exemption for Council Tax, this advice would expect to be delivered. The relevance of this additional advice must be determined on a case-by-case basis, depending on the information provided by the consumer in each case, as each person can be impacted differently by different health conditions and vulnerabilities.

If the severity of the consumer's mental health impairment cannot be refuted, it is expected that advice on SMI exemption is evident within the case record. Where there is ambiguity in relation to the severity of the mental health impairment, the practitioner's judgment must be trusted on the requirement of this advice. Additional information and examples can be found within the MaPS Feedback Management Spreadsheet.

Where a consumer does not wish to engage with the questioning on the severity of their health condition, or does not wish to receive this additional advice, then further exploration/advice is not necessary.

2b. Emergencies have been identified

Emergencies

1a
1e
2b-v
2a-v
2b-ii
1j
1l
1f
2a-x

Emergencies are likely to be identified at the assessment stage of the consumer journey but there is always potential for them to be picked up at any point during the journey.

At whatever point an emergency is identified, this will have an impact on the whole consumer journey and may affect the:

- Accuracy and impartiality of the advice 1a,
- The timeliness and relevance of the advice 1e,
- Whether interventions outside of the session structure are required 2b-v,
- Consideration around vulnerability 2a-v,
- Whether consumers need to be alerted to other sources of information, advice, or guidance 2b-ii,
- The standards associated with incentives 1j, 1l,
- Advice seeking to drive informed decisions 1f,
- Referral to a list of financial products, providers, or practitioners 2a-x.

The sections of the toolkit relating to these standards should be referred to when dealing with assessment around emergencies.

2b-i

N/A Option? **No**

Debt advice practitioners must ensure they: Identify any emergency or urgent issues related to the consumer's debts.

Digital

An **emergency** is defined as a serious, unexpected, and often detrimental situation if not resolved that is requiring immediate action. This could be related to both debt and non-debt related issues. The case specifics will determine what the emergency is and whether it has been missed or addressed.

This standard focuses on **identifying** urgent issues and asking probing questions, rather than providing advice or a solution for the emergency. The advice given on how to deal with an emergency will usually be assessed under 1f.

When an emergency emerges, the whole case is assessed in the context of the emergencies and other debt-related issues. The practitioner should explore potential urgent issues with appropriate questions depending on the presenting emergency.

3. Appropriate delivery channel

3b

N/A Option? **No**

Services must demonstrate that appropriate delivery channels have been identified by drawing on best available evidence about needs, consumer behaviours and preferences, to ensure advice and guidance is delivered in accessible and convenient ways.

Digital

The channels offered should be discussed with the consumer and the question must be asked **what channel the consumer prefers**. If the consumer is presenting vulnerabilities or expressing a preference for an alternative channel for the advice session, it is expected that the practitioner takes that into consideration.

Where the consumer has contacted the service via **webchat**, this channel has already been chosen by the consumer and therefore it can be assumed that this is the appropriate channel (unless the chat transcript is indicating this is not the best channel for the consumer, such as if the consumer presents difficulties engaging with the advice journey via webchat).

Where the consumer has contacted the service via **telephone call** and the consumer directly expresses a preference for an alternative channel during the call, this should be discussed with the consumer on how best to proceed by the practitioner.

Where it is felt that the delivery channel is inappropriate and it appears to have overwhelmed the consumer, this standard may not be met. Consumers who appear to be overwhelmed may benefit from separate advice sessions over time or a channel shift.

Where the practitioner is unable to offer the type of **channel needed/requested** by the consumer (such as due to the limitations of the service), the practitioner should inform the consumer of the **alternative services** available which can offer the delivery channels needed.

It would not be appropriate to push a consumer towards a channel that may not be suitable for them i.e., actively pushing a consumer to digital self-serve when they are not digitally savvy or have additional learning needs.

Practitioners can also refer to the Debt Advice Locator Tool although this is not required to meet the standard.

Indicator:

Prior to giving advice, the most appropriate channel should be discussed with the consumer.

4. Exploration around the presenting issue

2a-iii

N/A Option? **No**

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

Digital

This standard is assessing whether relevant information has been **requested** from the consumer in relation to their presenting debt-related issues. Relevant financial and personal information would usually include any number of the following:

- ✓ Housing status and living arrangements
- ✓ Immigration status
- ✓ Employment status
- ✓ Health conditions
- ✓ Number of people in household
- ✓ Caring responsibilities
- ✓ Details of debts (including debt type, prioritisation, and status/action taken)
- ✓ Liability of debts
- ✓ Income and expenditure details (including unusual spending where it could impact the debt options)
- ✓ Deficit budget (how the consumer is currently managing their financial situation/is the budget accurate or is the debt increasing)
- ✓ Any savings
- ✓ Any assets

This list is not exhaustive and relevant requests may change based on the consumer's circumstances. Probing questions should be used to explore further to ensure all relevant information is requested.

Where the consumer presents additional information which could be further explored, but this is not carried out, it will only have bearing on compliance with this standard if the missed exploration will impact the consumer regarding:

- The ability to create an accurate and reflective SFS,
- The advice on consequences of non-payment,
- The advice on debt options, and
- The necessary next steps to conclude the debt journey.

Debt Prioritisation:

Practitioners will need to use the facts of the case when determining the prioritisation of square peg debts. This will depend on the debt type, the potential enforcement action that can be taken, and whether this will deprive the consumer from their essential goods/services, home, or liberty. Case records should reflect why a square peg debt has been identified as a priority debt to help establish whether the correct approach has been followed.

Notes to consider:

This standard is not assessing the accuracy of the SFS, it is exploring the necessary information to be able to create an accurate SFS. Where it cannot be identified that the record is inaccurate due to inadequate exploration, only 2a-iii will be affected as without the exploration, it cannot be confirmed that the record is inaccurate.

4. Exploration continued...

2b-iii

N/A Option? **No**

Create and maintain a detailed consumer record.

Digital

2b-iii focuses on the need for an **accurate** consumer record to be created and maintained. There needs to be **sufficient evidence** in the form of case notes or file details, that the consumer's case file has been recorded accurately and has been regularly updated at each interaction.

Accurate recording is based on the advice provided, therefore if the advice delivered to the consumer is inaccurate and the case record reflects the inaccurate advice, 2b-iii would be considered met, however 1a would be considered not met. This is because the case record has been maintained in line with the advice provided, although the advice itself is inaccurate. Please note, both 2b-iii and 1a could potentially be marked as not met for reasons beyond this example.

Within the case recording, where there are instances of inconsistency which has **no impact** on the consumer, the standard may still be considered to be met. *For example, where a CRM has an inaccurate record of an element of the consumer's personal circumstances, but the rest of the case record accurately reflects those circumstances and does not impact the advice provided.*

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

- ✓ Confirmation of the exploration of the consumer's personal and financial circumstances in line with the guidance for 2a-iii.
- ✓ Confirmation of the advice given, and the options discussed.
- ✓ A financial statement which is adequately completed to enable the provision of accurate debt advice and to action agreed next steps.
- ✓ Documents that directly link to the advice being given, e.g., paperwork the consumer has provided to evidence their debt or to verify their financial statement and any subsequent correspondence between the practitioner and the consumer.
- ✓ Benefit entitlement calculation if this has been completed and has a direct impact on the amount of income the consumer could, should, or cannot claim. Please note that this standard is not checking whether the benefit check was needed, it is checking that the benefit check is on the case record if the case recording shows that this has been carried out.

Supporting evidence would not be required if a tool has been used with no change in outcome to the consumer and the practitioner provides case notes confirming the tool has been used. For example:

- ✓ Where a benefit entitlement calculation has been completed and the case record states that there is no change to the consumer's benefit entitlement.
- ✓ Check for charitable grants that results in no available options.
- ✓ Checks to the Individual Insolvency Register (if this is added to the case, any third party details must be redacted).
- ✓ Tailored factsheets are not needed so long as tailored advice has been given.

If the advisor has agreed to send the customer a template letter/self-help tool and there is evidence suggesting that this was not sent, this would be assessed under 2b-iii.

Standard Financial Statement:

The accuracy of the SFS can be determined based on the impact to the consumer. Therefore if there is an error in the recorded figures, or there is rounding up/down of figures, this should be viewed in the context of impact to the advice on the debt options, specifically those with a qualifying threshold. Where there is no impact, and no other issues on the case record, the standard can be considered met.

Cost of Living Payments will need to be included on an SFS where a DRO is a chosen debt solution and there is evidence that the payment has been received within the previous month.

5. Advice provided

1a

N/A Option? **No**

The information, guidance or advice provided must be impartial and accurate.

Digital

Accuracy

The standard covers the accuracy of the advice given based on the consumer's personal and financial circumstances. Practitioners should ensure that they provide accurate information, guidance or advice which is in date at the time of the interaction. This includes advice on:

- ✓ Emergencies
- ✓ Consequences of non-payment
- ✓ Options/solutions/breathing space

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

Inaccuracies within the case record due to a recording error, such as within the SFS or advice letter, will be considered under 2b-iii. However, if inaccurate advice has been delivered and is reflected within the case record, the case record will be considered to have been maintained in accordance with the advice provided, and therefore will not impact 2b-iii.

Where the practitioner has provided inaccurate advice or completed an inaccurate application due to an incorrectly completed SFS (e.g., incorrectly advising that the consumer has a disposable/deficit budget), standard 1a will be not met.

Where the SFS has errors and is being used to enact a consumer's chosen debt option, this may impact the assessment of 1a (e.g., applying for a DRO or negotiating with creditors). The exception to this is where an error clearly will not impact the outcome of the application, such as rounding up of figures where no impact can be determined.

Impartiality

Practitioners must not express personal views or opinions. The practitioner can provide a professional recommendation in relation to the consumer's most suitable options. All advice must be provided based on the facts of the case. The consumer must make their own choices.

Where the provider also provides debt solutions, they must ensure the consumer is made aware that other suppliers may also provide same/similar debt solutions. The practitioner must confirm with the consumer that they are happy to proceed with the delivery partner's own product as opposed to seeking alternatives. The practitioner can be clear to the consumer that they are not able to provide advice on the products of other product providers, but they can signpost if required.

Signposting or referrals to select financial services/advice or banking should be assessed under 1a if there is not a financial incentive for the practitioner as it may not be considered to have been impartial advice. If the practitioner has recommended a service/provider and there is a financial incentive to the practitioner, then this would be assessed under 1l instead.

5. Advice provided

1d

N/A Option? **No**

The practitioner must understand the difference between advice and guidance and comply with the boundary between regulated and non-regulated activities.

This standard seeks to ensure that the boundary between regulated and non-regulated activities are not crossed. Boundary breaches for a debt practitioner could include where they have provided:

- Financial advice
- Pensions advice
- Legal advice

This is not an exhaustive list.

If there is no evidence to confirm that a boundary has been breached, this standard would be considered Met.

1e

N/A Option? **No**

The information, guidance or advice provided must be timely and relevant to the consumer.

Digital

Timely is defined as addressing key dates for the consumer, understanding the impact of not meeting these dates and delivering advice that is relevant to the time constraints involved. It is the impact of not meeting key dates which determines whether or not this standard is met.

Where the practitioner has outlined in the case record: **1)** Actions they themselves will complete by an agreed date, and **2)** There is no evidence that this commitment has been met, and **3)** No mitigating reason is evidenced in the case record, then standard 1e will be not met. Depending on the consumer's circumstances and emergency issues, the timeliness of entering a consumer into breathing space would be considered.

Relevant is defined as providing suitable information, guidance, or advice relevant to the consumer's needs and circumstances.

Generic factsheets can be used as a supplement or supporting document relevant to the advice given but should not be used in the absence of relevant advice. Use of generic factsheets (excluding single issue/single subject factsheets) as an alternative to giving advice would not be considered relevant advice, unless:

- The consumer's attention has been drawn to the sections they have been advised upon. This can be highlighted in the factsheet, recorded in the advice letter, or heard within a call recording. This includes factsheets containing debt options. Or,
- A qualifying statement is within the advice letter outlining what is or isn't applicable, for example stating where advice only applies if the consumer is a homeowner.

Where an unavailable option has been presented to a consumer, or irrelevant advice has been highlighted in a factsheet, this would be assessed under this standard as it is not relevant to the consumer. Where the practitioner has provided advice on irrelevant debt options due to an incorrectly completed SFS, standard 1e will be not met. If an available/suitable debt option has not been advised on, this would be assessed under 2a-vii as this is a missed option.

5. Advice continued...

1f

N/A Option? No

The information, guidance or advice provided must: Seek to drive informed decisions and actions. Where applicable, MaPS and its delivery partners must provide clear calls to action, next steps, or hand-offs to other organisations.

This standard focuses on ensuring sufficient advice has been provided to the consumer to enable them to make informed decisions. The advice provided and choices made will allow the consumer to clearly understand their next steps/actions to be taken by the practitioner and the consumer.

Sufficient is defined as the consumer being provided enough advice to make informed decisions and understand their next steps/actions. Sufficient advice includes advice needed on:

- ✓ Consequences of non-payment, including advice on safe bank accounts (where applicable) and what action the creditor can take as well as the action the consumer can take.
- ✓ What will happen next within the debt process.
- ✓ Court action and emergency issues (where applicable).

Generic information sheets that have not been drawn to the consumer's attention, nor has been discussed during the appointment, or highlighted in the advice letter, is not sufficient advice. It is expected that the advice needed to drive informed decisions is presented to the consumer up front. Where the consumer needs to click through a chain of multiple weblinks to access the advice, this would not be viewed as being drawn to the consumer's attention, and so would not meet the requirements under this standard.

The standard also assesses whether the consumer has been signposted/referred to an organisation for further advice/support where this is needed as part of their next steps such as to Housing Specialists/Legal advice/other specialist services.

Where signposting is not necessary for the consumer to progress their debt case, but necessary to meet the broader needs of the consumer, this will be assessed elsewhere in the standards (e.g., 2b-v, 2a-v, 2a-x, or 2a-xi).

The next steps and agreed actions should be clearly defined. This differs to Standard 2a-vii which focuses on identifying and providing relevant information on options and taking next steps related to their chosen debt option. Where agreed actions and next steps cannot be determined, then standard 1f will be not met.

1g

N/A Option? Yes

The information, guidance or advice provided must make the consumer aware of digital tools on MaPS' website and that of delivery partners.

The minimum criteria for this standard to be met is that the practitioner informs the consumer that there are tools available on the MoneyHelper website and that of delivery partners. There are no further expectations to meet this standard.

This standard would be assessed as not applicable only in instances where the consumer is digitally excluded.

5. Advice continued...

1h

N/A Option? **Yes**

The information, guidance or advice provided must: Support consumers to complete the digital tools, as required.

Digital

In some cases, practitioners may need to support consumers with using digital tools. This can include the practitioner completing the tool on the consumer's behalf or guiding the consumer through the tool (e.g., talking the consumer through the process over the telephone or face to face). The practitioner should gauge whether the consumer needs assistance/support to complete a digital tool.

- Where the consumer requires support with digital tools and this is not offered/acknowledged by the practitioner, this standard will be considered not met.
- If the practitioner supports the advisor with using digital tools (regardless of the consumer's capability), this would be assessed as met.
- If the consumer is capable of completing the digital tools on their own without guidance and the practitioner does not support with using the tool, then this standard would be not applicable, and the signposting would be assessed under 2b-v for self-support.
- This standard may also be assessed as being not applicable where the consumer is digitally excluded and cannot access the results of the digital tool.

Interactive self-help tools can include the Shelter Tenancy Checker, obtaining credit reports, using budgeting tools, benefit entitlement calculation, etc. The Standard Financial Statement is not considered a digital tool for the purposes of this standard so will not be considered when assessing this standard. It also does not include applications such as for Breathing Space, DRO or Bankruptcy.

1j

N/A Option? **No**

The information, guidance or advice provided must: not introduce or explicitly or implicitly recommend a specific product, provider of a financial service product, or financial practitioner, unless to facilitate debt adjustment and resolution.

Consumers must have sufficient information, guidance, or advice to make an informed choice. A choice of provider, for financial services/products and financial advice must be brought to the consumers attention.

Direct referrals will be considered under this standard and are acceptable in meeting the standard where the consumer has made the choice. Practitioners do not need to explain specifics about providers simply to **alert** the consumer to the fact that there is a **choice of provider**.

Practitioners may meet this standard where:

- ✓ The consumer was provided with a **choice** of financial advisers/products/practitioners.
- ✓ The consumer was signposted to the MoneyHelper website for a list of financial products/services/practitioners.

The standard will not be met where:

- ✓ The consumer has been told about only one provider/product/financial practitioner when a choice is available.

5. Advice continued...

1k

N/A Option? **No**

The information, guidance or advice provided must: not sell, arrange, or facilitate the sale of a financial service or product.

This standard assesses whether the practitioner has engaged in selling, arranging, or facilitating the sale of a financial service or product.

Advising consumers on a debt solution which has a cost attached would not be considered making a sale providing the advice is impartial and all suitable options are discussed. See information relating to standard 2a-vii.

Where the practitioner is open with the consumer about benefits to their organisation such as charitable donations, and the consumer can make a choice over whether they proceed, this will not be considered a sale.

Financial benefit to the practitioner or any third party recommended by the practitioner, are not acceptable whether the practitioner is open about this or not.

If it is evident that the practitioner has recommended a product for sale or directly makes a sale, this standard would be considered not met.

1l

N/A Option? **No**

The practitioner must not receive any inappropriate or improper payment or incentive as a result of the guidance or advice provided to a consumer.

This standard assesses whether the practitioner has been financially incentivised in providing the guidance or advice to the consumer. Direct referrals will be considered under this standard where there is a financial incentive for the practitioner.

Where the practitioner is open with the consumer about benefits to their organisation such as charitable donations, and the consumer is comfortable to proceed, the standard is likely to be met.

Personal benefits to the practitioner are not acceptable whether the practitioner is open about this or not.

Signposting/referring to select financial services, banking, financial advice (anything that is not debt related) should be assessed under this standard if there is a financial incentive for the practitioner.

If the practitioner has recommended a service/provider and there is no financial incentive to the practitioner, then this would be assessed under 1a as it may not be considered to be impartial advice.

5. Advice continued...

2b-v

N/A Option? No

Practitioners may also deliver interventions which are outside of the session structure which may include self-help support.

This standard is focusing on signposting to services/organisations where the outcome of the signposting is not associated with the debt solution. If the signposting is necessary to progress the consumer's chosen debt solution, this would be assessed under standard 2a-vii.

Practitioners should consider whether the consumer has been appropriately signposted to relevant services/self-help tools outside of the main advice session. This is for services which support the broader debt issues and non-debt issues that are not considered an emergency.

Examples include signposting to:

- ✓ Another organisation for an issue which cannot be dealt with by the adviser (e.g., housing, employment, tax).
- ✓ Credit reference agencies for credit checks.
- ✓ Local council (e.g., for discretionary help, DHPs, fuel vouchers) where it is intended to improve the consumer's financial situation, not to resolve the debt.

2a-v

N/A Option? Yes

Signpost, refer or warm-transfer consumers in vulnerable circumstances to specialist services as required, with particular reference to people in acute emotional or financial crisis.

This standard considers consumers in financial crisis or that have acute emotional needs. If it is not evident that this applies to the consumer, this standard would be not applicable.

Examples include, but are not limited to, signposting to:

- ✓ MIND
- ✓ Mental Health Crisis teams
- ✓ Gingerbread
- ✓ Samaritans
- ✓ Food Bank
- ✓ Specialist housing advice for crisis housing issues
- ✓ Specialist advice for asylum seekers/refugees
- ✓ Addiction Support (e.g., AA)
- ✓ Creditor welfare/Vulnerability teams
- ✓ Priority services register (where there are appropriate indicators suggesting signposting is needed, e.g., deficit budget and PPM, vulnerable and with energy/water arrears etc).

5. Advice continued...

2b-ii

N/A Option? No

Debt advice practitioners must ensure they **alert** consumers to other sources of information, guidance, and advice as appropriate and at relevant points during, or following the intervention.

As a minimum, case notes should reference what information has been provided. **Alerting** in the context of this standard means drawing the information to the consumers attention which can be verbal or in document form.

This standard is assessing whether the sources of information, guidance and/or advice is in-date and from a reputable source. For example, the government approved websites and MaPS' funded organisations' websites.

Sources can be provided verbally or in writing. The sources can be given alongside debt advice to supplement the advice, or as information for non-debt related issues, such as financial capability support and income maximisation (this would include alerting the consumer to information and advice on managing their deficit budget moving forward).

If the practitioner has already provided relevant advice, any additional sources of information do not need specific elements drawing to the consumers attention (e.g., factsheets). Where irrelevant advice has been given, this would be assessed under Standard 1e.

If a vulnerability has been identified and it is considered inadequate to have only provided this information verbally to consumer, this would be assessed under 2a-iv.

2a-x

N/A Option? Yes

All practitioners must ensure they: Refer them to a directory or other list of financial practitioners or providers of financial services or products, as required.

This standard considers signposting and referrals relating to financial practitioners/providers and financial services/products, including basic bank account providers, pensions providers, mortgage providers, re-financing, etc.

Practitioners may meet this standard if:

- ✓ The consumer was signposted to a weblink/list to find pension advice/mortgage advisers/financial advisers when it was identified that financial advice was required. This includes signposting to MoneyHelper for a list of financial services/products.
- ✓ The consumer was signposted to a weblink/list to find a provider of a DMP or insolvency where required (such as where the service does not offer that solution).
- ✓ The consumer has been signposted to a weblink/list to find all basic bank account providers where needed, rather than signposted to a select few which offer basic bank accounts. (Please note that this standard is assessing referrals and does not assess whether advice on basic bank accounts has been provided as this would be assessed under standard 1f)

Where the consumer has an underlying issue and requires financial advice, the practitioner should provide the consumer with a list of relevant services who may be able to assist.

5a. Breathing Space

Breathing Space

2a-vii

2a-ix

Digital

Breathing Space should be assessed as a short-term option and advised upon where relevant to the consumer's circumstances. It is important that the case record reflects that, where the consumer is potentially eligible for Breathing Space but it is not considered appropriate, the case record must reflect the reasons why.

Assessors will assess that this has been advised upon appropriately against standard 2a-vii. In the context of Standard Breathing Space and 2a-vii, relevant advice includes advising the consumer on the Midway Review and the consumer's responsibilities during the moratorium.

The advantages and disadvantages should be made clear to the consumer which will be assessed against standard 2a-ix.

6. Debt options & solutions

2a-vii

N/A Option? **No**

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

Digital

This standard focuses on identifying and providing sufficient advice on **ALL** suitable options (debt-specific and overall). Suitable options are defined as available options which are based on the consumer's circumstances, preferences and potential outcome. In summary:

- ✓ Consumers must receive full advice on all **suitable** options (including advice on advantages and disadvantages which is assessed under 2a-ix).
- ✓ Practitioners should evidence in the case record the reasons why they consider available options to be **unsuitable** where applicable.
- ✓ There is no requirement for full advice to be given on options that are **unsuitable** as long as reasons why the option has been deemed unsuitable by the practitioner have been recorded.

Example 1: *Insolvency is an option but not suitable for the consumer due to their concerns of the potential effect on their immigration status. Full advice on insolvency is not expected, but the case record should reflect the reasons why it is unsuitable.*

Example 2: *Bankruptcy is an option but not suitable for the consumer due to their debt total being below or close to the bankruptcy fee. Full advice on bankruptcy is not expected (unless there is a clear impact to the consumer), however the case record should reflect the reasons why it is unsuitable.*

Example 3: *IVA is an option but the delivery partner understands creditor voting behaviour which can impact the chance of success. In recognition of Consumer Duty along with the necessity to reach a solution efficiently, the practitioner's professional judgment (where applicable, supported by evidence of previous creditor voting behaviour) on the suitability of this option should take precedence, ensuring consumer time is preserved.*

Relevant advice on options:

In the context of Standard 2a-vii, **relevant** advice is defined as including advice on: the debt option/solution including the detail of what it is, the qualifying debts, any eligibility criteria, any costs involved, application process and the end result if successful. Any other advantages and disadvantages should be assessed under standard 2a-ix only.

Where an **available** option has not been identified and reflected in the case record, even where it is not considered the most suitable, this standard would not be met. Where the practitioner has not identified all available debt options due to an incorrectly completed SFS, standard 2a-vii will not be met. In the context of the standards, where an **unavailable** option has been presented to the consumer, this will be assessed under standard 1e.

Next steps and taken by whom:

Consumers should be provided with clear agreed actions to enable them to progress their chosen debt solution/s. This should include the steps for them to take, who is taking them and by when. Debt-related next steps ought to be considered under 2a-vii. Non-debt related next steps should be assessed under 1f.

Liability advice: For any debts that indicate liability issues, the consumer should be provided with the relevant information and next steps they can choose to take.

Income maximisation: Deferring benefit deductions to repay a debt will be viewed as a debt option as opposed to maximising income and so will be assessed under 2a-vii. Advice on Section 13a/DHPs/grants to clear debts would also be expected to be provided where relevant – where this advice is not linked to the consumer's debt but to increasing income only, this would be considered under 2b-ii.

6. Options & solutions continued...

2a-ix

N/A Option? **No**

All practitioners must ensure they provide consumers with information about particular types of financial products or services that may be relevant and the potential advantages and disadvantages of these, as required.

Digital

It must be evident that the advantages and disadvantages, of any options deemed **suitable** by the practitioner, are advised to the consumer. Where an advantage or disadvantage of a debt option is also one of the following areas assessed under 2a-vii, then it will not also be assessed under 2a-ix: the qualifying debts, any eligibility criteria, any costs involved, application process and the end result if successful.

A factsheet containing the advantages and disadvantages of the suitable options is sufficient as long as the consumer is signposted to the relevant sections of the factsheet. The practitioner must ensure the factsheet contains sufficient information for the options which are suitable. If a consumer has vulnerabilities which indicate that a factsheet is not sufficient, this will be assessed against standard 2a-iv.

Where an available option is identified as **unsuitable** (due to the specifics of the case or the information the consumer has provided) and the reasons it is considered not suitable have been recorded, there is no requirement to provide full details of the advantages and disadvantages.

If an **available** option has been missed, it is not possible for the practitioner to assess its suitability and the advantages and disadvantages will be missed, therefore as a consequence, this standard would not be met.

Where a consumer is presented with a suitable debt option, but they do not want to receive advice on this option as they do not wish to enter into it, the practitioner should inform the consumer of the risk of making decisions without all of the information. This should be clearly noted in the case record along with the reasons why this is not a suitable option based on the consumer's choice.

7. Creditors contacted *(where needed)*

2a-xi

N/A Option? Yes

All practitioners must ensure they refer consumers to their existing product provider where the consumer needs further information that the provider can provide, or where that provider is required to take action to implement one of their options.

An existing product provider in the context of debt advice may include a creditor (e.g., a provider with whom the consumer has a credit product), an enforcement agent, or a debt solution provider (e.g., IVA/DMP provider with whom they have an IVA/DMP). Action may be required to implement a debt solution or to alert the product provider to a change of circumstances.

Examples included below:

- ✓ The practitioner contacted/consumer advised to contact their existing provider to obtain balances/request debt status/request a hold on the account (informal moratorium)/let them know they were seeking debt advice. This includes contacting the courts, contacting existing IVA/DMP providers and creditors in general.
- ✓ The consumer is provided with a template letter to send to their creditors to notify them about a change in circumstances/request a hold/request further information.
- ✓ The consumer advised to inform LA/DWP/HMRC/Pension provider regarding a change of circumstance that would affect them if not notified.
- ✓ The practitioner may need to refer the consumer back to their debt provider/utility provider to check the accuracy of their bills/statements.
- ✓ The practitioner may need to refer the consumer back to their debt provider to gather further details of their debt for the breathing space application.

This is not an exhaustive list.

8. Next steps, actions, and record of advice

2b-iv

N/A Option? **No**

Debt advice practitioners must ensure they provide consumers with a record of their advice intervention and agreed actions.

Digital

Consumers must be offered a record of their advice intervention and agreed actions. If the consumer refuses receiving confirmation of the advice and the refusal is recorded in the case notes, this standard may still be assessed as being met.

For telephone calls: If the advice letter contains information/advice which has not been provided during the telephone call, and the consumer has not been advised that additional information is available within the letter, this standard will not be met.

For webchat: The consumer must be advised on how to obtain a copy of the transcript unless the consumer explicitly states they do not want a copy.

Assessors should also refer to the information associated with assessing standard 1f as it should be evident that the record of advice seeks to drive informed decisions and actions. Where applicable, MaPS and its delivery partners must provide clear calls to action, next steps, or hand-offs to other organisations.

Definitions

Wording	Definition
Financial products and services	In the context of standard 2a-ix, this includes debt options and solutions.
Timely	Addressing key dates for the consumer, understanding the impact of not meeting these dates and delivering advice that is relevant to the time constraints involved.
Relevant	Providing suitable information, guidance, or advice relevant to the consumer's debt advice needs and circumstances avoiding confusion.
Adequate	Adequate in the context of the standards is defined as enough or sufficient to enable the provision of accurate debt advice.
Appropriate	Similar to 'relevant' but takes account of consumer's specific and personal needs.
Inappropriate	Inappropriate advice is defined as irrelevant advice that would negatively impact the consumer's circumstances and/or wellbeing if they followed it.
Sufficient	Sufficient is defined as the consumer being provided enough advice to make informed decisions and understand their next steps/actions.
Suitable	See appropriate – appropriate and suitable cross over. Also see standard 2a-vii for a specific definition when assessing debt options.
Inform	The expectation is not to provide or obtain anything from the consumer, it is that the consumer is informed. This can be done verbally or in writing.
Alert	The expectation is to make consumers aware of a source of information or similar. This can be done verbally or in writing. There is no expectation to provide advice or to obtain information.
Request	The expectation is to request information which will help progress the case. There is no expectation that information is obtained, but that a request has been made.
Impact	If there is remedial action expected, this would be marked as not met with impact . Assessors will determine according to the definitions whether there is financial loss or harm associated with the impact. If no remedial action needed, standard would be marked as not met - no impact or met , depending on the evidence available.

Digital Debt Advice Additions & Amendments

DIGITAL DEBT ADVICE ADDITIONS AND AMENDMENTS TO BASE TOOLKIT

2a-i

In the context of digital debt cases, it is expected that the consumer is:

- Informed of the limitations of the advice tool where certain scenarios are complex and require adviser-led interaction.
- Made aware that the advice provided is subject to the accuracy of the consumer's input.

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2a-ii

The consumer must be informed of the personal and financial information they will need to provide before the 'advice stage' of their digital journey. This could be before or during any triage element of the digital debt advice tool.

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2a-iv

- It is expected that the digital advice tool assists the consumer to self-identify vulnerable circumstances and provide opportunity for disclosure during the digital journey.
- Evidence of the tool's accommodation for vulnerabilities may be found in the service design as opposed to a case record (for example ensuring accessibility is met via the Web Content Accessibility Guidelines).
- The advice populated at the end of the digital tool should address the vulnerabilities disclosed and provide information on how to get further support.
- It is recognised that a digital tool may not be able to determine the severity of a consumer's health condition or vulnerability based on the information they are able to gain from the consumer.

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2b-i

The digital advice tool should pro-actively enable the consumer to self-identify whether their situation constitutes an emergency or urgent issue, such as by providing additional information on what defines an emergency to support disclosure. Relying only on the consumer's existing awareness of what is defined as an emergency would not be sufficient to meet this standard.

It is expected that consumers are provided with advice on disclosed emergencies and urgent issues. However, if the advice tool cannot deal with an emergency or urgent issue and the consumer is prompted to change channels for urgent advice from an adviser-led service, or are given a very clear call to action to address the issue, then this would be accepted. If, having been presented with the above, the consumer chooses to continue with the digital tool at that point in time, this would also be acceptable.

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3b

It is expected that consumers are provided with the option to choose another channel before starting the advice tool and during the digital journey.

A channel shift should be encouraged where the consumer's inputs indicate a need for this (e.g., where the consumer discloses a complex situation which are beyond the limitations of the tool). If the consumer continues to engage with the advice tool after being encouraged to change channels, then this would be accepted.

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2a-iii

Efforts to ensure the accuracy of the consumer's input is expected to take place prior to the advice output.

It is expected that the advice tool identifies gaps, inconsistencies and unusual inputs from the consumer as they progress through the digital journey. Probing questions or targeted prompts should be used to encourage accurate input from the consumer. A generic approach to confirm all inputs are correct would not be sufficient on its own where input appears to contain errors.

Where efforts have been made to ensure accuracy and the consumer does not make amends to their information, this would be accepted.

There is no expectation on the digital tool to determine the prioritisation of square peg debts. However, it is expected that advice reflects the possibility of square peg debts being a priority.

The consumer should have an opportunity to disagree with the prioritisation of their debts. This could be through the digital tool itself or a prompt to contact an adviser-led channel.

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2b-iii

It is expected that the advice tool can reproduce an unaltered copy of the advice initially provided to the consumer. If the advice is amended or updated later on, it is expected that an unaltered copy of the new version of the advice can also be reproduced.

Standard Financial Statement

Issues arising in relation to the SFS, such as possible errors in the information the consumer has inputted, are assessed under 2a-iii for exploration purposes. Where there is evidence in the case record that the consumer's input during the digital journey and the advice output does not match, this will be assessed under 2b-iii.

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1a

The accuracy of the advice provided will be based on the information the consumer has disclosed within the digital journey. Where the advice populated at the end of the tool does not align to consumer input, then this will be assessed under 1a.

If consumer input appears to be inaccurate or inconsistent with other inputs (for example, it is clear that the benefit income does not align with the typical amounts received for the consumer's situation), and this has not been sufficiently explored, then this will be considered under 2a-iii for exploration and prompting accurate input.

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1e

Timeliness is assessed on the actions or next steps carried out by the advice tool and whether they were completed in a timely manner. For example:

- The advice tool sends written advice via email and there is a delay which would impact the consumer's ability to engage with the advice.
- The advice tool agrees to make a warm referral for the consumer and this is not completed within the agreed timeframe.

Relevant advice

Generic advice cards and factsheets can be used where:

- The topic as a whole is relevant to the consumer and advice is caveated where needed.
- It does not contain information that could be deemed 'inappropriate', given the consumer's circumstances.
- The consumer is signposted to the most relevant sections.

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DIGITAL DEBT ADVICE ADDITIONS AND AMENDMENTS TO BASE TOOLKIT

Breathing Space

Digital advice tools are expected to identify where a consumer may be eligible for Breathing Space, however it is not expected to fully determine the eligibility or appropriateness of this option, as this is for a debt adviser to determine. Consumers should be routed into an adviser-led service if they want to explore this option further and confirm eligibility/appropriateness.

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2a-vii

It is expected that relevant advice on debt options are presented to the consumer up front without the need to click through a chain of weblinks to access them. In the context of standard 2a-vii, relevant advice is further defined in the base Debt Advice Assessor Toolkit. This is to enable the consumer to make comparisons with other options at a high level.

It is accepted that most solutions will require some sort of human intervention to be implemented. It is not expected that the tool supports the consumer to fully implement their chosen debt option, however the consumer should be advised how they can proceed with their chosen solution (the onward journey) or how they can get further advice from an adviser.

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2a-ix

It is expected that advantages and disadvantages are presented to the consumer up front without the need to click through a chain of weblinks to access them. It is accepted that a digital tool would not know if a customer would not want to receive advice on a particular debt option, and so the final paragraph of the base toolkit can be disregarded.

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2b-iv

It is expected that the consumer can access an unaltered copy of the advice initially received when completing the digital journey.

If the advice is amended or updated later on, it is expected that the consumer can also access an unaltered copy of the new version of the advice. Any changes to the advice that may impact the consumer's ability to make an informed decision should be drawn to the consumer's attention.

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1h

This standard is not applicable to digital debt advice and won't be on your MS form to submit.

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