The Money and Pensions Service

Debt Advice Peer Assessment Scheme (DAPA)

Scheme Principles and Guidance Document

Edition Eleven September 2021

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# 1.0 Glossary of Terms

|  |  |
| --- | --- |
| Assessment | DAPA assessment of debt advice provision |
| Assessor | DAPA Scheme Assessor |
| DAPA | Debt Advice Peer Assessment Scheme |
| Lead Organisation | The organisation contracted directly with MAPS |
| MaPS | The Money and Pensions Service |
| Participant Organisation | A debt advice organisation appointed by a Recipient, working under a MaPS grant |
| Quality Initiative | A series of metrics which inform the MaPS Performance Management framework |
| Recipient | An organisation in recipient of MaPS grant funding, commonly referred to as a Lead Organisation |
| RE | Recognising Excellence |
| RLD | Recipient Level DAPA |
| Scheme Administrator | Recognising Excellence |
| Scheme | The Money and Pensions Service Debt Advice Peer Assessment Scheme |
| TSV | Technical Site Visit |
| TTSV | Triggered Technical Site Visit |

# 2.0 Introduction and Overview

This document aims to provide a comprehensive overview of the principles of the MaPS DAPA Scheme and the various quality initiatives which form part of the MaPS Performance Management Framework as stipulated within the MaPS grant funding agreement.

The approach, methodology and service level agreements which underpin each of the quality initiative programmes are detailed separately in the appendices. The MaPS quality programmes which are based upon the DAPA Scheme criteria currently comprise of:

* Recipient Level DAPA
* Technical Site Visits
* Triggered Technical Site Visits
* DAPA Webchat Scheme
* DAPA Telephone Scheme

# 3.0 Overview of the DAPA Scheme

The objective of the Debt Advice Peer Assessment (DAPA) Scheme is to consider the quality of advice provided to over-indebted individuals by organisations (Recipients and Participants) who are in receipt of grant funding from the Money and Pensions Service (MaPS).

DAPA is the successor to the previous Peer Review Scheme April 2015 - March 2018 and was launched in April 2018.

The DAPA Scheme considers the quality and process of advice delivered through the varying delivery models available. Variations of the scheme and its component criteria exist for the channels of both webchat and telephone advice provision.

DAPA plays a core role in ascertaining a participant’s eligibility for continued funding from MaPS, measured via their Performance Management Framework. Accordingly, MaPS and the Lead funding Recipients receive full insight into assessment findings and the performance data resulting from these, with a direct feed into the MaPS commissioning team. Participation with the assessment process is a **mandatory requirement** for all organisations who are in receipt of funding from MaPS and/or one of the Lead Organisations.

# 4.0 Appointed Scheme Administrator

Recognising Excellence (RE) has been appointed by MaPS as the DAPA Scheme Administrator. For any queries in relation to the DAPA assessment process, scheduling arrangements and delivery approach, in the first instance, please contact:

Recognising Excellence

Unit 3, Twigworth Court Business Centre

Tewkesbury Road

Twigworth

Gloucester, GL2 9PG

Helpline: 01452 688 357

Email: [peerreview@recognisingexcellence.co.uk](mailto:peerreview@recognisingexcellence.co.uk)

## 4.1 DAPA Scheme Assessors

DAPA Scheme Assessors are employed and/or contracted directly by the DAPA Scheme Administrator. All representatives of the DAPA Scheme have been recruited with specific consideration to their background and experience of the debt advice process and all have been, or continue to be, specialist level debt advisers. The team of Assessors represent a broad range of debt advice experience from both independent advice organisations, Citizens Advice members and national telephone providers as well as individuals who have previously worked in a webchat setting. Consideration of previous experience also extends to the DAPA Scheme Quality Manager and Moderator resources.

# 5.0 DAPA Scheme Expectations

The DAPA Scheme criteria and expectations of advice organisations are identified within the appendices below. Where applicable, the assessment criteria used to underpin the assessment process has been specifically adapted for the channel subject to an assessment. i.e., Face to Face, Webchat, Telephone. All organisations working under a MaPS grant agreement will be subject to a DAPA assessment, against one or more of the MaPS quality initiatives.

## 5.1 New Entrants to a MaPS Contract

For those organisations that are working under the MaPS grant agreement for the first time, a process of ‘on-boarding’ will be managed directly with the Lead Organisation. A grace period of 6-months will be permitted by MaPS, whereby no DAPA Scheme assessment interventions will be scheduled. For new entrants to the channel of webchat and telephone, this time period will be reduced to reflect the volume of advice given and organisations will be included in the next assessment round immediately following completion of the on-boarding process. **Note**. **This grace period does not extend to the requirements of the grant agreement in relation to Technical Supervision and internal file review.**

## 5.2 What is Good Debt Advice?

Central to the expectations of MaPS grant requirements and therefore the DAPA Scheme is the assurance of the quality of advice provision. Quality and consistency of advice is key to this. The DAPA Scheme provides a mechanism for assessment of these aspects facilitated through a comprehensive review of client files and/or telephone audio recordings, and through site-based observation of advisers facilitating client interviews and appointments.

Specifically, the DAPA assessment looks at the content of debt advice, the client journey, and processes in place to facilitate high-quality advice. The quality of the case file and record of advice given to clients is therefore critical to the assessment process. DAPA, similar to the previous peer review scheme, requires a high standard of case recording to facilitate the assessment process and expects the case record to fully demonstrate the content of client interaction and advice given. Where case files provide limited evidence of the client interaction and/or the advice given, the DAPA approach will be to clearly distinguish this as a contributing factor to the assessment score.

It is recognised that clients are primarily seeking a means to achieve a positive outcome for their situation (i.e., resolution of their debt crisis) and the level of service they receive is a contributing factor to the success or failure of the outcome.

As part of the drive towards higher levels of service and better outcomes, it is essential that debt advisers manage client expectations; advisers are required to be clear about the likely client outcomes from receiving advice, which are to:

* Know their rights and responsibilities
* Be able to act to resolve a problem
* Have a better understanding of the options open to them.

As a given, all advice provided and action taken by an adviser must have regard to the client’s best interests, be appropriate to the client’s individual circumstances and be based upon on a sufficiently full assessment of the client’s financial situation. Indicators used in the assessment include requirements for advice to have been:

* Accurate and legally correct
* Appropriate to the client’s individual circumstances
* Comprehensive and addressing linked issues beyond those presenting
* Given in time and at the right time
* Facilitated through the use of suitable tactics and strategies to achieve the best outcomes for clients
* Efficient, effective, and appropriate follow up that works toward a positive outcome for the client

## 5.3 The Debt Advice Journey

Organisations providing debt advice generally follow a straightforward approach[[1]](#footnote-2) of explore, advise, and action for each client. The Child Poverty Action Group (CPAG) Debt Advice handbook provides a model for a staged approach to debt advice, outlined in three key stages, via **Exploration**; **Options** and **Action**, split further into nine steps, per the diagram[[2]](#footnote-3) below. This model is widely accepted within the debt advice sector and has informed the development of both the DAPA Scheme and assessment criteria and therefore the CPAG handbook, in conjunction with CONC 8 is the main reference source for the DAPA Scheme. However, it is also recognised that there may be legitimate reasons based on the specific debt issue presented, where this model is not followed, or that the linear approach is not taken, and these factors are given appropriate weight in the assessment process.

## 5.4 Work Level Definitions

The DAPA Scheme criteria recognises the varying delivery models in place across the sector and the different complexities of the advice process. Scheme criteria has been adapted not only to reflect the different channels of advice delivery, but also, the complexity and level of advice as follows:

### 5.4.1 Advice Level Criteria

Includes diagnosing the client’s problem(s), giving information, and explaining options and helping the client decide between options. The provision of information alone is not advice according to the FCA, information involves statements of facts or figures. (PERG 17.5 in the FCA Handbook has a Q and A on the meaning of advice in the context of debt advice). Advice can include some action such as a referral to another organisation, identifying options and next steps, giving assistance such as form filling and contacting third parties for information. There is no rule about the maximum number of contacts. (Note: If an Adviser has contact with a creditor during a one-off advice session, this will be assessed as Advice only. Ultimately, the responsibility for action following the session will lie with the client. The only time the Scheme will assess the file as Casework is when it is clear the adviser is taking responsibility for acting on behalf of the client after the initial advice session.)

### 5.4.2 Casework Level Criteria

The advice organisation takes on responsibility for the conduct of a case and an adviser takes action on behalf of the client. The organisation drives and manages the case, generally devolving responsibility to a caseworker(s) who has a continuing relationship with the client. There is no rule about the number of contacts which constitutes casework. Negotiation, advocacy, and representation, where appropriate, are common features of casework.

## 5.5 DAPA Scheme Definitions

The assessment approach extends to all of the ‘Essential’ criteria which are identified within the Scheme criteria requirements below. Specifically, the assessment will focus on the following areas:

### 5.5.1 Tailored Advice

It is important that advice given to a client is tailored to their individual circumstances in order to enable them to make an informed decision and resolve their particular situation.

Case records should be appropriately tailored so that they accurately reflect the advice that was given to the individual client. The use of Information/fact sheets is acceptable, but these should be provided in addition to the advice given in order to confirm it and not as a substitute for actually providing the advice. Passages or sections (of the materials) which are irrelevant to the particular client should be deleted to avoid confusion. Without **recording the sections discussed with the client**, a DAPA assessment will take the view that ‘information’ was given to the client, not specialist debt advice. The use of standard paragraphs in case notes are helpful and can be time saving, however, these need to be appropriately tailored/detailed so that they accurately reflect the advice that was given to the individual client.

### 5.5.2 Comprehensive Advice

Clients need to be advised thoroughly. It is important the advice includes everything that is necessary to ensure the client can make an informed decision on their available options. This is so that the option chosen is the best one for the client. ‘Comprehensive’ advice includes advice on the possible consequences of non-payment or of making reduced contractual payments and on their chosen debt solution option. The advice should be detailed and cover all matters relevant to the client’s personal/financial circumstances. For advice to be comprehensive, advisers need good technical knowledge of debt advice in a range of different areas, including insolvency, local government finance, court procedures etc. Case records should fully identify the detail and depth of advice given to clients.

### 5.5.3 Legally Correct Advice

As a given, all advice should be legally correct and accurate to avoid possible client detriment. Inaccurate or legally incorrect advice can lead clients to make the incorrect decisions in their situation, e.g., incorrect advice about Enforcement Agents could lead to a client allowing Enforcement Agents into their home. Training and continual professional development of advisers is extremely important. All training platforms strive to provide subject training which is up-to-date and relevant.

# 6.0 Assessment Activities – The Practicalities

Whilst the assessment approach will vary according to the quality initiative being measured, the Scheme has adopted a common position in the following areas:

## 6.1 Client Consent

The Scheme has considered its lawful basis for processing data with specific consideration of the GDPR requirements and has determined there is no longer a reliance on explicit client consent to enable Scheme Recipients and Participants to share client data.

Where the processing is for something that MaPS is required to do by government, this is what will provide the authority to process data, rather than the consent of individuals or other lawful bases.  The organisations functions are described in the following:

* [Financial Services and Markets Act 2000](http://www.legislation.gov.uk/ukpga/2000/8/contents)
* [Schedule One](http://www.legislation.gov.uk/ukpga/2010/28/schedule/1) and (Section 26) of the Financial Services Act 2010
* [Schedule 15](http://www.legislation.gov.uk/ukpga/2012/21/schedule/15) of the Financial Services Act 2012

**These are core activities that MaPS is required to deliver by the Government.** In January 2019, this was superseded by the **Financial Guidance and Claims Act 2018:** especially clauses 2 and 3 on functions and objectives. Clause 3(3)sets out that the MaPS can do anything that is ‘incidental or conducive’ to its advice, guidance, and strategic functions. That is the sub-clause cited so that MaPS could commission any research it liked that delivered its strategic functions:  <http://www.legislation.gov.uk/ukpga/2018/10/contents/enacted> .

With regards to the processing of Special Category Data the organisation is subject to the Public-Sector Equality Duty (PSED).  The equality duty was created under the Equality Act 2010.  **This is a strategic duty placed on public bodies and others carrying out public functions**.  To meet the requirements of the PSED, the organisation is required to use the available and developing evidence base in order to pay due regard to equality in project delivery and service provision.

All cases are therefore eligible for assessment unless a client has specifically stated that they do not wish for their details to be shared.

## 6.2 Eligibility of Case Files for Assessment

As a general rule, and to ensure an accurate view of the quality of advice and the end-to-end debt advice process can be established, the Scheme will consider only closed case files. Irrespective of which quality initiative is being measured, the following considerations are considered essential when determining whether a client file is eligible for assessment. Closed case files must always:

* 1. Relate to a debt issue
  2. Have resulted in complete advice being given to the client
  3. Relate to MaPS funded advice only
  4. Have been opened no earlier than 1st April 2019 and closed within the time period specified by the MaPS quality initiative
  5. Has not been subject to any prior assessment by the DAPA Scheme

In situations where there is a concern regarding eligibility of a case file selected for assessment, the Scheme Administrator should be contacted in the first instance. Where it is considered appropriate to do so, a replacement file will be selected.

## 6.3 Submission of Case Files for Assessment

It is essential that the case record provided for assessment purposes contains a full and accurate record of the advice given.

Each case file provided for assessment should clearly identify:

* Name of Recipient / Participating Organisation
* The name of Adviser
* Open and closure date
* Classification of Advice Only or Casework
* Identification of any relevant linked file submitted (where applicable)
* A clear indication that Technical Supervision has/has not taken place on the file

Documentation to be included within the case file should include as a minimum:

* Preliminary Client Profile, including Data Protection, Consent to store Special Category data, Authorisation to Act, Conflict of Interest Check, Complaint’s procedure, Equal Opportunities Monitoring, copy of the CIA or other tool, Client Agreement, Pre-Apt Debt Advice Pack (where utilised)
* Full set of Case Notes in a logical order and the supporting Information Sheet.
* Proof of debt and Creditor correspondence – incoming and outgoing correspondence.
* Budget Sheet and Standard Financial Statement.
* Proof of Income / Income and Expenditure Review / Copy of the completed benefit check.
* Confirmation of Advice (letter or factsheet) where applicable, including any advice that was given, any agreed action plan/next steps.
* Copies of any applications made, including DRO Applications.
* Copies of any credit reports obtained / valuation checks, or Individual Insolvency Register checks carried out.
* Information Sources used (as appropriate) particularly in relation to ‘specialist level’ advice.
* Evidence of Technical supervision/IFR/ and remedial action requested from these
* Case notes from any appropriate Linked File (these should be clearly marked).

For the Telephone and Webchat versions of the Scheme, it is recognised that the documentation identified above will not always be relevant. For webchat, as a minimum, the Scheme will expect to receive a copy of the chat transcript, as well as any standard information pre-loaded into the chat platform and any written information resources that support the advice session. For Telephone, the Scheme will expect to receive a copy of the audio recording as well as any supporting written information resources and case records that support the advice session. Further detail is set out in the relevant appendices below.

### 6.3.1 Submission Structure

The assessment process provides for electronic file submission only. This can be via a password protected email submission, via direct access into an appropriate case management system or via access to a secure portal provided by the Scheme Administrator. The Scheme will no longer accept physical files.

Where a case file comprises multiple documents, it is recommended that a folder/sub folder structure is applied to aid the assessment process. A suggested approach is as follows:

* Preliminary Information (Equal opportunities / Form of Authority/ Special Category data etc)
* DAT Information
* Financial Information (Budget sheet, SFS, MART, proof of income/expenditure
* Creditors Correspondence
* Client Correspondence
* Confirmation of Advice (Letter, Factsheets, Information Leaflets
* Application Forms (Benefit Checks, QBC, DRO, DHP, Trust Funds, Court Docs

It is the responsibility of the Recipient/Participant Organisation to ensure all cases submitted for assessment are a full and accurate record of the advice given. As per the DAPA Scheme principles, there will be no opportunity for supplementary documentation to be provided once the assessment process has commenced.

## 6.4 Linked Files and Repeat Clients

Where a case file selected for assessment relates to a client with multiple linked files, and/or in instances where the linked file could help to demonstrate the full range of advice given to the client, the linked files should also be submitted for assessment to enable the DAPA Assessor to see the full extent of advice provided. This will help avoid a file being scored down for ‘missing’ information where the entirety of the case is held over multiple files. **This is only required where it may not be clear from the most recent case record on the file selected.**

**Note:** Only cases **pre-dating** the one selected for assessment should be submitted. Where **post-dated** case notes are provided, these will be considered only when determining any urgent remedial action that be required.

## 6.5 Assessment Approach

The role of the DAPA Scheme is to examine the **quality** of advice and any associated actions that are carried out on behalf of the client, based on the **evidence** contained within the case record. The case is assessed against the DAPA Scheme criteria relevant to the channel being assessed i.e., Advice level, Casework, Webchat, Telephone. Not all criteria are relevant to every case, but every relevant criterion will be assessed for applicability.

‘Evidence’ = something within the case record which points to whether the criterion has been fulfilled or not. There are many areas where advice is given as a matter of routine; in these cases, the DAPA Assessor will need to see within the case record that this routine advice has been given, to be sure the case has been handled correctly.

‘Accurate’ and ‘appropriate’ are commonly used in the criteria. ‘Accurate’ = factually and legally acceptable. ‘Appropriate’ = having regard to (i) the circumstances of the case; (ii) the level of information available (which in turn relies on sufficient information having been obtained from the client and recorded and (iii) ethical, practical, tactical, and legal considerations.

In conjunction with quality of advice, the assessment also considers process and DAPA Assessors will therefore assess Case Recording and Case Management issues in addition to the quality and accuracy of advice. Therefore, to ensure the consistency and success of a DAPA assessment, an Assessor will:

* Consider the evidence presented in an impartial and objective way
* Only consider the evidence contained within the case record/chat transcript/audio recording
* Not assume anything. If the DAPA Assessor is not able to evidence what they are looking for from the case records, the score will be reflective of this.
* Focus on whether the outcome and the solution were the most appropriate option for the client’s individual circumstances.

The fundamental nature of peer assessment is it involves the judgement of an experienced practitioner. The assessment process will consider, from the evidence presented whether the adviser has demonstrated they have dealt with the case effectively.

## 6.6 DAPA Scheme Scoring Approach

In April 2020, following a period of consultation and piloting with MaPS debt advice funded stakeholders, a new scoring mechanism was implemented for the DAPA Scheme. The new approach moves away from the method of a 0-3 score and instead calculates an overall percentage score for each case file assessed. The percentage-based model gives due consideration to case files that previously scored 0 (detriment), and also the good practice criteria requirements that would have resulted in a file score of 3.

Using the new approach, the individual DAPA criteria are assessed as either:

* Met
* Not met
* Detriment (actual or potential)
* Not applicable (NA).

The percentage approach compares the total number of criteria which are assessed as met against the total number of criteria assessed as met, not met and detriment which is then expressed as a percentage, both in the individual criteria sections and, for the file as a whole, which in turn gives the file its percentage score.

Essential and Good Practice criteria assessed as met score 1 point. Assessment criteria assessed as not met or detriment, score 0 points. Assessment criteria assessed as not applicable are disregarded for the purpose of calculating the percentage score as are the Organisational criteria regardless of whether they are assessed as met, not met or not applicable.

A mathematical formula has been programmed into the Scheme’s criteria Excel workbooks in order to accurately calculate the percentage. For clarity, where a criteria requirement is assessed as NA, this does not have a negative impact on the percentage score.

Where an Area of Concern is identified during the assessment, (based upon the facts presented within the file), a percentage reduction of 20% is applied to the total overall score. This 20% reduction is only applied once to the percentage score, regardless of how many Areas of Concern are identified.

Where detriment (actual or potential) has been identified, the overall percentage score for the file will be 0%. However, the individual sections of the form will illustrate what the file could have scored without the detriment outcome.

To ensure greater transparency of the assessment findings, instances of an Area of Concern and/or where Limited Case Records have impacted on the assessment findings will be clearly highlighted against each of the relevant Scheme criteria.

### 6.6.1 Scoring Definitions

In addition to scoring the individual requirements of the DAPA Scheme criteria, any not met criteria will be categorised as follows:

* Area for Concern
* Area for Improvement
* Area for Development

The specifics of the individual case and situation of the client will largely influence the three possible categories that will be applied to a Not Met criteria.

### 6.6.1.1 Area for Concern

An Area for Concern will be identified during the assessment when an essential criterion has been deemed as ‘Not Met’ and where the client has not received full advice to enable the client to understand their debt situation and what steps need to be taken to resolve their debt issue(s). This will include situations where there has been actual or potential detriment to the client’s situation. Detriment in this context means ‘damage, loss or harm’. An Area of Concern is also likely to be identified when advice did not go beyond the presenting issue(s) and/or there was a missed issue(s). A ‘missed issue’ means something which should have been advised on.

In addition, if the DAPA assessment is unable to determine from the file, either the facts of the case, the details of the actual advice given, or any subsequent action taken, this will also be classed as an Area for Concern as the lack of information on file means that it is not possible for it to be confirmed, without a doubt, that the client journey could not have definitely been improved.

### 6.6.1.2 Area of Concern and Detriment

As noted above, the DAPA Scheme defines detriment as ‘damage, loss or harm’. Examples of client detriment (potential or actual) will also be identified as an area of concern.

### 6.6.1.2.1 Actual Detriment Definition and Examples

The Scheme defines Actual Detriment as missed or incorrect advice that places the client in a worse situation. There does not always have to be evidence of actual “damage, loss or harm”, but the consequence of the advice or action taken (or not taken) is deemed to have worsened the client’s position.

The following are examples of Actual detriment. Please note this is not an exhaustive list.

* The case record does not evidence the client was advised on **enforcement agent’s rights of entry** when the debt(s) were at enforcement stage
* There was no evidence the client was advised on **switching bank accounts** where the account was linked to a debt owed to the bank.
* The case record identified the potential of an **unaffordable repayment arrangement** with a priority creditor which is likely to lead to those arrangements being unsustainable (see CONC 8.5.3(1) and (2)). This includes where the client has a deficit budget and offers are made without any evidence of how the client is going to be able to make the payments i.e., how they are to be funded. The detriment is not the client defaulting as such, but the consequences to the client of defaulting in terms of the creditor’s likely or potential response(s), which will obviously depend on the circumstances of the case
* No evidence a **qualifying debt** was included in a **Debt Relief Order** application
* Evidence a client was wrongly advised they were **liable for a debt** with the result that they made arrangements to pay it
* A possible **defence to a possession order** was missed
* There is no evidence of advice when a client has **rent or mortgage arrears** and there is **a threat of eviction**
* Advice to **suspend a Possession Order** was not evidenced
* Advice to **suspend a Warrant of Possession Order** was not evidenced
* **Incorrect income** for a client on a **DRO application**. If the correct income was used, the client would not have been eligible for this solution.
* No advice on the **powers of Enforcement Agents** where the client has a **CCJ being enforced** by the agent
* There was no evidence of advice on the **client's priority debts** or the **consequences of non-payment** (depending on the facts of the case, this could also be identified as potential detriment)
* The case file contained a notice of **enforcement HCEOs** giving warning of their intended visit. It was not clear from the case notes if advice had been provided on the **HCEO powers of entry.**

### 6.6.1.2.2 Potential Detriment Definition and Examples

Potential detriment involves there being a likelihood of actual detriment (although it is not necessary for this to be inevitable, the possibility should not be too remote), or whether as a result of the advice given and action taken, the client has potentially been placed in a worse position.

The following are examples of potential detriment. Please note this is not an exhaustive list.

* The case record identified the potential of an **unaffordable repayment arrangement** with a non-priority creditor which is likely to lead to those arrangements being unsustainable (see CONC 8.5.3(1) and (2)). This includes where the client has a deficit budget and offers are made without any evidence of how the client is going to be able to make the payments i.e., how they are to be funded. The detriment is not the client defaulting as such, but the consequences to the client of defaulting in terms of the creditor’s likely or potential response(s), which will obviously depend on the circumstances of the case. There is more likely to be potential for detriment in the case of unaffordable offers to priority creditors however depending on the stage of the debt and/or the possible sanctions then it may also be detriment to make an unaffordable offer to a non-priority creditor.   Consideration should also be given to the potential length of the arrangement as an arrangement which is intended to be only temporary may be sustainable where an arrangement intended to be longer term may not be sustainable
* The case records provide no evidence the **status of the client’s priority debts was established,** nor that advice was provided on those debts such as the **consequences of non-payment** or on options for dealing with them
* The significance of a **missed issue which is likely** to cause detriment
* Missed advice where debt(s) were at **County Court Judgement** stage
* **Payment arrangement** agreed with a **Priority Creditor** which appears unsustainable
* **Legally Incorrect Advice** with potential impact **likely** to cause detriment
* Where the client has a **County Court Judgement** not currently being enforced by the agent**,** but there is the **potential that this could happen,** and the case record does not evidence **advice on their powers**
* There was no evidence of advice on the **client's priority debts** or the **consequences of non-payment** (depending on the facts of the case, this could also be identified as actual detriment)
* It was recorded that the client had an **outstanding Magistrates Court Fine** which was evidenced as being enforced by Enforcement Agents. It was not clear he had been advised how to **secure his vehicle** to ensure it was not taken into control.

#### 6.6.1.2.3 Other Areas for Concern

The following examples would also be viewed as an Area for Concern during the assessment process. Please note this is not an exhaustive list.

* Case records do not evidence advice was given on all of the client’s **suitable** and **available options/strategies**
* There is no evidence **detailed advice** was given on the option chosen by the client
* In relation to DROs, there is no evidence of compliance with the requirements of r9.5 of the **Insolvency Rules 2016** and the **Intermediary Guidance Notes**. Under r9.5, intermediaries are required to advise the client about the qualifying conditions, the effects of a DRO (including the moratorium period, discharge from the qualifying debts, the duties, and restrictions on the client), the possible consequences of providing false information or omitting information from the application and inform the client that the Insolvency Service will carry out verification checks
* A DAPA assessment will expect **full advice** to the client regarding a DRO **before** a client is referred to the DRO Unit, which includes confirming the client is **eligible**.  Therefore, there may be situations where it is appropriate that **a credit report is obtained prior to referral** to the DRO Unit (despite the Unit not requiring this as part of their criteria for referral) which includes the following:
  + where a client is unsure of their levels of debt.
  + where the client is close to the eligibility threshold.

It may not be appropriate if the client has instructed the adviser not to get a credit report, or it is an emergency and a DRO is required quickly; Where a DRO is managed within the local service, the DAPA Scheme would expect a **minimum of one credit report** (and good practice requires three) to have been obtained prior to an application being made

* Where it is clear from the case file that the client was **entitled** to benefit(s) or **additional benefit**(s) which were not being claimed e.g., client in receipt of UC but no claim for CTR) and there is no evidence a benefit check was carried out and nor was the client signposted/referred for a benefit check, this will be treated as a missed issue. Where the client is not clearly entitled to a benefit, but it is clear that a claim is possible, this will be treated as an example of ‘more could have been done’ and an Area of Improvement
* In relation to Casework, there is no evidence **reasonable steps** were taken to **verify the client's income** (which will usually take the form of written proof of income of which a copy has been placed on the file. This may include a screenshot). In the case of Advice only, where there is no evidence of reasonable steps to verify the client's income, this will not affect the score unless e.g., the intention was to share the financial statement with a third party, or the client has chosen the option of a DRO and is being given detailed advice. It is worth bearing in mind that the requirement under these criteria is not to obtain the necessary verification but to take ‘reasonable steps’ to do so. The Scheme expects verification of income and expenditure to be requested on at least **two occasions**, one of which should be in writing. For example, if the client is sent pre-appointment information explaining what to bring with them to the appointment, including verification documents, if they do not bring these, it would be expected they would be asked again at the appointment. The criteria would be met. If they were asked to provide verification for the first time at the appointment and then in a confirmation of advice letter, then the criteria would again be met. If two requests were made and both were verbal, then a written reminder would also have to be sent for the criteria to be met. What constitutes verification depends on the facts of the case e.g., mobile banking, photographing a document and emailing/texting the photograph
* **Deficit budgets**. (i) Where a client presents with a **deficit budget**, there is no evidence the reason(s) for this have been **explored** and/or whether this is a **temporary or long-term** situation and/or how the **deficit is funded** has been established and/or that the **deficit has been addressed** (as far as possible). (ii) Where a deficit budget has been sent to a third party, there is no evidence of (i) above nor that the justification for presenting a deficit budget to the third party has been explained and, in the case of temporary deficits, that appropriate debt solutions have been considered e.g., moratorium. Consideration will also be given to whether this has led to either actual or potential client detriment
* There is no evidence the client has been informed about the potential of getting the **rate of recovery** from benefit towards Social Fund debts/benefit overpayments reduced should the current rate of deductions be causing financial hardship
* There is no evidence advice was given on the possibility of **recovery action** being taken if either the creditor does not accept the offer, or no offer is made
* Where a client presents with only one debt, there is no evidence they were asked if they have **any other debts** and, if so, offered any advice on these, **or** the case record does not clearly state the client did not want help with any other debts
* No detail within the case record of the **advice given**. The case notes merely state that the client was advised on xxxx but there is no evidence of the advice actually given anywhere in the case record
* No advice on the **consequences of non-payment**. The Scheme expects that clients will be given accurate advice about the consequences of non-payment of their debts whether they are priority or non-priority debts
* Where there is no evidence **confirmation of advice** has been provided in a **Casework** case or, where **complex advice is given** and/or the client is a **vulnerable person** in an Advice only case. Where confirmation of advice has been provided but it has not been tailored, see below
* Where there is evidence that advice given was generic and not **tailored** to the circumstance of the client
* If the client has a County Court Judgement which was obtained **more than 6-years previous** and is not currently being enforced by agents, and the case records **do not evidence** advising on their powers of enforcement agents.
* The case record identified there was an opportunity to complete a **financial statement**, however this was not accomplished which affected the advice on the available options and whether the options advised were available options for the client.
* The financial statement indicated a **surplus budget**, which appeared inconsistent with the other facts of the case. Case records did not evidence that this as discussed with the client, such as did the client have savings, did the client agree with the surplus, was the surplus due to non-payment of the client’s debts.
* It was not evidenced that it was investigated or recorded why the expenditure listed for specific spending was **higher than the SFS expenditure guidelines** (e.g., high expenditure for food and housekeeping for the family size.

Additional examples of an Area of Concern in relation to criteria requirement 3.8b/7.4b ‘Comprehensive Advice’ are as follows:

* There was no evidence of advice on the option of the client making an application under **Section 13a of the Local Government Finance Act 1992** to remit or reduce his CT liability.
* The client was seeking advice on her energy arrears and was noted as being in **receipt of ESA**. It was not clear if the option of Fuel Direct had been discussed with the client.
* The credit reference file showed the client had an **outstanding CCJ** but there was no evidence of advice on a **variation application**.

Examples for criteria requirement 3.8c/7.4c Comprehensive Advice – Consequences of Non-Payment:

* In consideration of the amount of rent arrears outstanding, the tenancy type and the threat of action from the landlord it would have been appropriate to provide advice on the **risk of possession action.**
* There was no evidence of advice on the **client's non-priority debts** or the **consequences of non-payment.**
* As the water debt was not regulated by the CCA 1974 and **over £600**.00 was owed it would have been appropriate to provide advice on the risk of **High Court Enforcement Officers**. It could not be evidenced from the case notes that this advice had been provided.

Examples for criteria requirement 3.8D/7.4d, Comprehensive Advice in relation to the Powers of Enforcement Agents where the debt(s) is at the stage of enforcement:

* The case file contained a notice of **enforcement HCEOs** giving warning of their intended visit. In consideration of the client’s noted vulnerability, it was not clear whether the Taking Control of Goods – National Standards had been advised.

Further examples relevant to the DAPA Webchat Scheme are as follows:

* There was no evidence of advice re. **establishing financial hardship**
* There is no evidence advice was given on the possibility of **recovery action** being taken if either the creditor does not accept the offer, or no offer is made
* Where a client presents with only one debt, there is no evidence they were asked if they have **any other debts** and, if so, offered any advice on these, **or** the case record does not clearly state the client did not want help with any other debts
* No detail within the case transcript of the **advice given**. The case record merely states that the client was advised on xxxx but there is no evidence of the advice actually given anywhere in the case record. **Note:** There will be no limited case record outcome for the webchat channel as the transcript is a true record of the contact
* Stage of **enforcement action** was not established
* Indicators of a vulnerable client’s **mental health** were not recognised by the adviser

### 6.6.2 Area for Improvement

An Area for Improvement may be identified in situations where an essential criterion which has been deemed as ‘Not Met’ where the detail of the actual advice given to the client is not recorded or the issue not advised upon is not central to the client’s situation. If any of the preliminary’s criteria section is found to be ‘Not Met’ these will also be noted as an Area for Improvement however these improvements are organisational issues and will not have contributed to the overall score.

6.6.2.1 Examples of Areas for Improvement

Please note this is not an exhaustive list**.**

* The **progress of the case** has been **delayed** and there is no evidence the adviser has reviewed the file with sufficient regularity; Note: if the delay has had an impact on the case as a whole, this would be an Area of Concern
* **Confirmation of advice** must be **tailored**. Where standard paragraphs are used, these will usually need to be amended to make them relevant to the client’s particular circumstances. Where confirmation of advice has been provided but it is not tailored, the Scheme criteria would be not met
* There was no evidence that the client was offered, or signposted for a **benefit check** however it was not possible to confirm that this would definitely increase the client’s income
* The client successfully obtained a Debt Relief Order which was evidenced on file but there was no evidence that the client had been advised on the **consequences of non-payment**. As the DRO dealt with all debts, this can be an Area for Improvement
* There was no copy of the **Utility Trust Fund** **application** which was completed by the Advisor on file
* The client had **multiple health issues** and there was no evidence that a possible application for PIP was considered
* There was no evidence that a **conflict-of-interest check** had been carried out
* There was no evidence that the client was informed that the **case was closed** following casework being carried out
* **Case records** are difficult to follow and do not follow a logical approach
* There was no evidence the adviser had made the client aware of the Pre-Action **Protocol for Debt Claims.**
* The client had stated they had **let enforcement agents into the property** and a list of goods (**CGA) had been completed**, which the client had signed. There was no evidence of advice on the fees that can be charged by an Enforcement Agent.
* The case file contained a notice of **enforcement HCEOs** giving warning of their intended visit. It was not clear from the case notes if advice had been provided on the **fees** that could be charged.
* The draft budget sheet confirmed a **deficit budget**. There was no evidence of an exploration as to how this would be met. However, as it was a **very small deficit** and the client's outgoings were already low therefore, this has been identified as an Area for Improvement.
* A Financial Statement was provided in **draft form**, however there were **missing expenditure figures** due to the client not having the information. However, to provide a more realistic picture SFS expenditure guidelines could have been used.
* There was no evidence the client was advised on the **time limits** to respond to the County Court Claim. This **may** also be classed as an Area of Concern dependent on the stage of enforcement of the debt and whether a County Court Claim had been issued.

Further examples relevant to the DAPA Webchat Scheme are as follows:

* Client was not signposted for a **benefit check** where a clear trigger was identified within the chat
* The adviser did not confirm the **client’s understanding** of the advice given during the chat
* The adviser did not include a signpost link to **written information sources** which were referenced during the chat

### 6.6.3 Areas for Development

Areas for Development will largely relate to a good practice criterion which has been deemed as Not Met which would have ‘added value’ to the client’s situation.

6.6.3.1 Examples of Areas for Improvement

Please note this is not an exhaustive list**.**

* There was no evidence that the client was provided with **financial capability** advice where it was particularly relevant to do so, or it was not possible to confirm the detail of the advice provided on financial capability measures
* There was no evidence that the client was offered or signposted for a **tax code check**
* There was no evidence that the client was advised on the various **payment methods available** for making the negotiated repayment
* There was no evidence that **charitable assistance** with the cost of the DRO application was discussed when it was unclear how the client could afford to make the payment
* The **financial statement** did not correctly identify the **gross benefit income** under income and full liabilities under expenditure. **Deductions were not recorded separately** e.g. Child benefit deduction, UC Advance payment deduction.

### 6.6.4 Breathing Space (v5 DAPA Scheme V5 Guidance Sept 21)

There are two 2 types of Breathing Space: the standard Breathing Space and the Mental Health Crisis Breathing Space. These will be referred to as the generic Breathing Space for the remainder of this guidance document.

Following discussions with MaPS and consultations with the Lead Organisations, it has been decided that as the Debt Respite Scheme is a unique development for the Debt Sector and to ensure that the role of the Adviser is considered fully in the context of the debt advice process, additional criteria should be introduced into the DAPA Scheme.

The new criteria has been introduced for all delivery channels (Face to Face, Webchat and Telephone) and for all levels of debt advice – (Advice Only and Casework). The additional requirements bespoke to Breathing Space have been incorporated into the DAPA Scheme criteria, version April 2021.

The DAPA Scheme will consider the Breathing Space criteria for all cases opened on or after 4th May 2021. The Scheme will not consider the criteria requirements for Breathing Space legislation retrospectively.

The Scheme has not set any expectation regarding the opening and closing of case files in preparation for the Breathing Space mid-term review. The Scheme will assess what is submitted and the use of NA will be applied as appropriate. Organisations should identify the approach they are taking to manage mid-term reviews as part of the pre-assessment questionnaire/RLD Insight Form to assist the assessment process.

It is intended that the sections below will provide guidance as to how Breathing Space will be considered by the DAPA Assessment Scheme during the course of assessment activities. As Breathing Space is a new and unique development for the debt advice sector, this guidance will be kept under review and updated as appropriate.

As a general guide, if a client enters the Breathing Space Scheme, the case will be considered under the DAPA Scheme Casework criteria, if the adviser keeps the case open for the full duration of the Breathing Space moratorium period. If a client is advised on Breathing Space but does not enter the Scheme nor does the debt adviser take responsibility for acting on behalf of the client after the initial advice session, then this will be considered as Advice Only. Where the Adviser assists the client to enter into Breathing Space and then closes the case before the end of the moratorium period then the Scheme will consider this case as Advice Only.

Where this document refers to specific Regulations these will be contained in The Debt Respite Scheme (Breathing Space Moratorium and Mental Health Crisis Moratorium) (England and Wales) Regulations 2020. Reg. 23(7) defines the term advice as, - ‘In Paragraph (2) ‘advice’ means as to the suitability, conditions and consequences of a breathing space moratorium for the debtor.’

Where the term ‘Breathing Space’ is mentioned within the DAPA Scheme criteria this will also be interpreted as the Mental Health Crisis Breathing Space, if appropriate for the client.

The requirements of Breathing Space introduced into the Scheme criteria are as follows:

|  |  |  |  |
| --- | --- | --- | --- |
|  | **DAPA Scheme Reference**  **Advice Only**  **(Face to Face and Telephone)** | **DAPA Scheme Reference Casework**  **(Face to Face and Telephone)** | **DAPA Scheme Reference Webchat** |
| **Breathing Space or the Mental Health Crisis Breathing Space is considered for the client and if appropriate further advice given. Areas to be considered include:** | | | |
| a) The eligibility criteria for the Breathing Space have been considered and it is recorded that the client meets the eligibility criteria | 3.11a | 7.7a | 3.12a |
| b) Whether it is appropriate for the client to enter Breathing Space | 3.11b | 7.7b | 3.12b |
| c) Debts covered by Breathing Space | 3.11c | 7.7c | 3.12c |
| d) Advice on the client's responsibilities during the period of Breathing Space | 3.11d | 7.7d | 3.12d |
| e) Advice given on Breathing Space is accurate and legally correct | 3.11e | 7.7e | 3.12e |
| f) Advice given on Breathing Space is comprehensive | 3.11f | 7.7f | 3.12f |
| g) There has been compliance with the requirements under Breathing Space by all the relevant parties regarding all aspects | 3.11g | 7.7g | 3.12g |
| h) Consequences of Breathing Space advised to the client | 3.11h | 7.7h | 3.12h |

**Note:** As per the current approach of the DAPA Scheme, if any of the criteria are not applicable in the case being assessed, then the criteria will be marked N/A ensuring that there is no adverse impact on the file score.

DAPA assessments will consider specific issues under each requirement, summarised as follows:

**a) The eligibility criteria for the Breathing Space have been considered and it is recorded that the client meets the eligibility criteria.**

The eligibility criteria of Breathing Space and/or the Mental Health Crisis Breathing Spaceeach need to be considered to ensure its suitability for the client being advised.

The client should be advised of the eligibility criteria of Breathing Space to ensure that the client is aware of the criteria, and they know they qualify for Breathing Space.

The eligibility criteria should be checked to ensure the client qualifies for Breathing Space and the relevant checks made on the different registers, Individual Insolvency Register and Breathing Space Register.

It must be recorded within the case records that these considerations, checks and advice have been carried out/given to the client considering Breathing Space.

The client needs to be reminded that they or anyone acting on their behalf needs to give accurate information, and that they should not withhold any relevant information.

**b) - Whether it is appropriate for the client to enter Breathing Space**

Once it has been established that the client is eligible for Breathing Space then the adviser must consider whether it is appropriate for the client to enter into Breathing Space.

Sufficient information must be gathered to understand the client’s financial situation. This will ensure that it is appropriate for the client to enter Breathing Space. However, it is not necessary to complete the full debt advice process with the client before Breathing Space is considered.

This will mean the adviser will need to consider the following:

* Whether the client has funds or income available to them to pay ongoing liabilities, as defined by Reg 2 (1), as they fall due, as per Reg. 16.2(b). However, the Scheme is aware that there is a view within the debt sector that if the client is unable to pay the defined ongoing liabilities this may not preclude the client from entering Breathing Space. This will be considered on case-by-case basis, based on the facts in the case.
* The client cannot, or are unlikely to be able to, repay all or some of their debt as it falls due.
* The client would benefit from entering a debt solution, either based on their current circumstances or following a change in their circumstances in the immediate future.
* The client may be eligible to enter a debt solution during, or as soon as possible after, the standard Breathing Space has ended.
* A standard Breathing Space is necessary for the adviser to assess which debt solution would be most appropriate to the client, to advise the client on an appropriate debt solution, or to put a debt solution in place.
* Also have regard to any other factor that the adviser considers relevant,

**c) - Debts covered by Breathing Space.**

The client requires advice on which of their debts will be covered by Breathing Space and which of their debts are ‘non-eligible debt or Excluded Debts’. The client requires advice on how the qualifying debts will be dealt with under Breathing Space. Further advice to the client will be required as to how the client’s excluded debts will be dealt with, whilst the qualifying debts are subject to the Breathing Space moratorium.

This may entail other options/strategies to be advised to the client regarding the ‘non-eligible debt or Excluded Debts’ and further action to be taken by the adviser and/or the client regarding the ‘non-eligible debt or Excluded Debts’.

**d) - Advice on the client's responsibilities during the period of Breathing Space**

The client should be advised on their rights and responsibilities during the period of the Breathing Space. This will ensure the client knows what and when to act if certain situations arise during the period of the Breathing Space. This will include:

* The client should take reasonable care to provide accurate information and not deliberately withhold information.
* The client should provide details of all debts that are owed at the date of application. If the client becomes aware of any additional debts discovered after the start of the Breathing Space or any change of creditor holding a debt that is part of the client’s Breathing Space application, the client must provide this information to the debt adviser as soon as possible, so it can be added to the Breathing Space Scheme.
* The client must engage with the debt adviser at the midway review for the standard Breathing Space, to make ensure the Breathing Space is still appropriate.
* The client must stay in contact with the adviser and pay their ongoing liabilities if they can afford to do so.
* The client must advise the debt adviser if there are any changes in their circumstances. This could mean a new job, a new source of income, or a problem that would affect their ability to pay their ongoing liabilities or engage with the debt adviser.
* The client should not obtain any additional credit individually or jointly with another person (including any overdraft facility) that exceeds £500 at any point.

**(e) - Advice given on Breathing Space is accurate and legally correct.**

It is important that advice given to clients should be accurate and legally correct as otherwise Breathing Space may not be appropriate for the client.

Inaccurate or legally incorrect advice can lead clients to make incorrect decisions regarding their situation. Training and continual professional development of advisers is extremely important. All training platforms strive to provide subject training which is up-to-date and relevant.

Ensure advisers are up to date with the latest legal cases. Ensure advisers have access to sufficient resources such as the Debt Advice Handbook, Quarterly Account, or WiserAdviser etc.

The organisation is also directed to  [[Raising the Standards of Debt Advice (debtquality.org.uk)](https://debtquality.org.uk/)](https://www.i-m-a.org.uk/resource-sharing/resources-directory/)  where MaPS have produced resources to assist advisers stay up to date with information on various issues.

The organisation may also wish to consider Debt Respite Scheme (Breathing Space) guidance for money advisers - GOV.UK (www.gov.uk).

**(f) - Advice given on Breathing Space is comprehensive**

Clients need to be advised thoroughly. It is important the advice includes everything that is necessary to ensure the client can make an informed decision that Breathing Space is appropriate for them.

This includes advice on the eligibility, the client’s responsibilities whilst in Breathing Space, the duties of creditors, the possible actions of some creditor’s dependant on the stage of enforcement and the possible consequences if the client does not comply with the requirements of Breathing Space. This may require particular advice on joint debts and guarantor loans.

Some examples of advice are, but not limited to

* the possibility of withholding the client’s address from the Register.
* possible creditor applications for review
* possible creditor applications to Court for permission to take an enforcement step.
* the adviser being required to carry out the midway review (a separate issue from the client’s responsibilities during the BS)
* the cancellation of a Mental Health Crisis BS if the ‘nominated point of contact’ does not confirm that treatment is on-going.

The advice should be detailed and cover all matters relevant to the client’s personal/financial circumstances.

For this advice to be comprehensive, advisers need good technical knowledge of debt advice. The case file needs to fully record the detail and depth of advice given to client.

The Insolvency Service have confirmed that Breathing Space is not a payment holiday, as creditors can still take payments for ongoing liabilities. A payment holiday is a separate option to Breathing Space.

**(g) - There has been compliance with the requirements under Breathing Space by all the relevant parties regarding all aspects.**

The client requires full advice on their responsibilities and duties during the period of Breathing Space.

The client also requires advice on the responsibilities and duties of their creditors during the period of Breathing Space.

The debt adviser must be aware and monitor both these sets of responsibilities and duties to ensure compliance with the Breathing Space legislation and guidance.

The debt adviser must also be aware of the responsibilities and duties of the debt adviser during the same period of Breathing Space and ensure compliance with these duties and responsibilities.

If at any time any party is not complying with these responsibilities and duties, then the debt adviser must take the necessary steps to resolve the situation.

If the debt adviser has taken the decision to cancel the Breathing Space, it would be required that that the reasons for cancelling the Breathing Space are noted thoroughly within the case record and communicated to the client. Conversely where the Adviser has made the decision not to cancel the Breathing Space moratorium, for example in response to a creditor request, it would be expected that there would be, it would be required that that the reasons for not cancelling the Breathing Space are noted thoroughly within the case record and communicated to the client and to the creditor.

If the debt adviser considers that a moratorium should be cancelled in respect of some or all the moratorium debts, the adviser is required to consult the debtor to whom the moratorium relates prior to doing so to the extent that the debt adviser is able to do so.

**(h) - Consequences of Breathing Space advised to the client.**

The client needs to be advised that Breathing Space is not a debt solution in itself but allows the client time to work with the debt adviser to consider the various debt solution options and choose the most appropriate considering the client’s personal circumstances.

The client needs to be advised that the debts in the Breathing Space are still owed. The debts have not been written off or reduced and must still be dealt with. The purpose of the Breathing Space is to give the client the time and space to deal with their problem debt, with help from the debt adviser.

Once the Breathing Space has ended then the client needs to be advised that their creditors can start applying interest, fees, penalties, and charges to their debt from the date of the end of the Breathing Space and take any action to enforce their debt, including contacting your client.

**Breathing Space Scoring Examples (Detriment, Area of Concern, Improvement, Development)**

The following examples are intending to provide insight into the approach that will be taken during a DAPA assessment in relation to the Breathing Space criteria. Please note in all examples provided below, these are not exhaustive and are likely to be further refined.

**Actual Detriment**

The following are examples of Actual detriment linked to the Breathing Space criteria:

* Client had a buy now pay later debt that could have been included in the breathing space moratorium. There was no evidence that the client was advised that debts which have not yet fallen due can be included. This would normally be an Area of Concern but, where the debt falls due during the moratorium period and it was not included in the breathing space, this will be Actual Detriment – **Criteria Requirement C**
* The debt adviser made the decision to cancel the Breathing Space moratorium however it did not appear to be fair or reasonable to do so. – **Criteria Requirement G**
* The debt adviser has made the decision not to cancel the Breathing Space moratorium, for example in response to a creditor request, however it did not appear to be fair or reasonable to do so. – **Criteria Requirement G**
* Where the debt adviser considers that a moratorium should be cancelled in respect of some, or all the moratorium debts and the debt adviser has not tried to contact the client to discuss this intention. **Criteria Requirement G**

**Potential Detriment**

The following are examples of potential detriment linked to the Breathing Space criteria:

* The client had received a reminder notice for unpaid instalments of Council Tax and therefore the Council Tax owing for the remainder of the year could have been listed as a qualifying debt – **Criteria Requirement C**
* The client mentioned that a number of debts had not been paid for over 5 years and advice was provided on statute barred debts. There was no evidence that the client was advised that a breathing space moratorium could be viewed as an acknowledgement – **Criteria Requirement F**
* There was no evidence that the creditor details had been updated on the Breathing Space register in a timely manner – **Criteria Requirement G**

#### **Areas for Concern**

The following examples would also be viewed as an Area for Concern during the assessment process.

* There was no evidence on the file that the client was considered for a Standard Breathing Space - **Criteria Requirement A**
* Breathing space did not appear to be appropriate for the client i.e., client needed to enter a debt solution straightaway and be in the position to enter a debt solution straightaway.
* The adviser had not established whether the client could maintain their ‘ongoing liabilities’ during the moratorium period- **Criteria Requirement B**
* Client incorrectly advised that a debt was not a qualifying debt **Criteria Requirement C**
* The client was incorrectly advised that the deductions from her Pre-Payment meter for her arrears would stop, when in fact they would continue if the client had given consent for the prepayment meter to be fitted prior to the start of the moratorium period **Criteria Requirement E**
* The client was not advised that his third-party deductions for ongoing liabilities for rent, utilities and water charges from UC would continue during the Breathing Space moratorium **Criteria Requirement F**
* There was no evidence that the midway review was carried out at the appropriate time **Criteria Requirement G**
* The client was not advised that if they have any joint debts interest, fees and charges can still be applied to the debt in respect of the joint debtor. **Criteria Requirement H**

**Area for Improvement**

* The client not advised about when Breathing Space ends for an additional debt added during the Breathing Space period **Criteria Requirement H**
* A joint debt was included, and the client was incorrectly advised that the protection from enforcement action does not apply to their partner who is the joint debtor **Criteria Requirement E**

**Areas for Development**

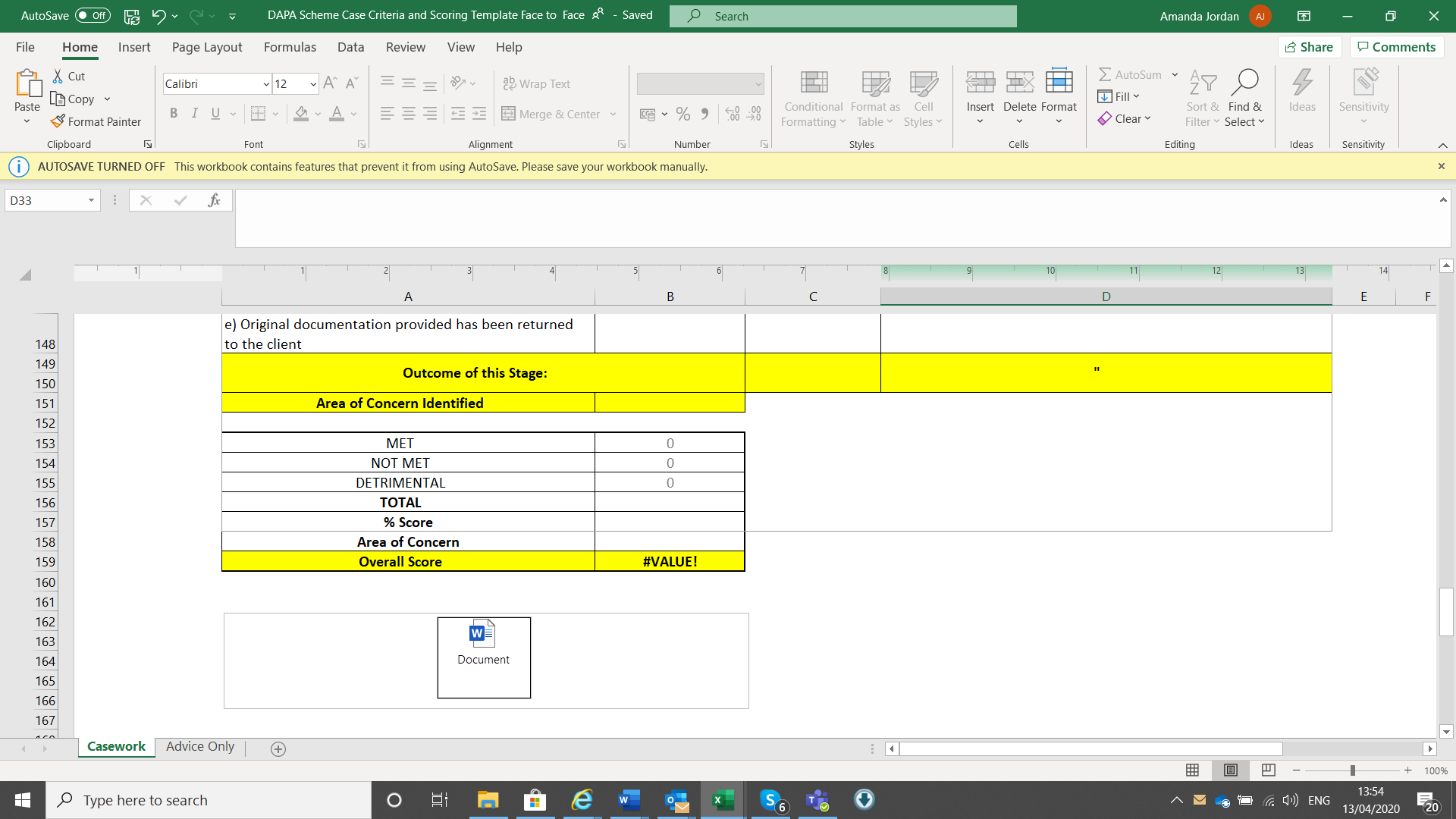
There are currently no Areas for Development criteria in relation to Breathing Space. Any Good Practice identified, above and beyond the essential criteria in Breathing Space will be noted in the Good Practice section of the Report.

### 6.6.5 Presentation of Assessment Findings

Much like previous Scheme versions, each individual Scheme criteria will be assessed and marked as either met, not met, detriment (actual or potential) or not applicable. To help the reader, any criteria marked as not met, detriment and/or where there is an Area of Concern identified, will have a clear corresponding statement to state the exact issue. In addition, a narrative summary of the presenting issue, action taken, and examples of good practice will continue to be documented within the Word document embedded into the Scheme forms.

Where a Scheme criteria requirement is marked as ‘Not Met’ **and** an Area of Concern has been identified, the concern will be highlighted in red. For example, ‘There was no evidence that the client was advised on the consequences of non-payment.’ This clearly highlights the Area of Concern at glance to anyone reading the assessment report.

Where an Area for Concern is identified within the assessment findings, **‘Yes’** will be selected from the drop-down menu at the end of the last criteria section.



This will automatically calculate the 20% reduction which will be applied to the overall percentage. **Please note**, in instances where the assessment identifies multiple Areas of Concern, only a single 20% reduction will be applied.

Full transparency and a formal write up with be shared with the Recipient/Participant organisation being assessed, for every individual case file assessed.

### 6.6.6 Limited Case Records

Limited case records will have a direct effect on the assessment and consequently the percentage score of the file. Limited case records are where the case record is vague, generic or lacks detail. When the assessment is being undertaken, if the DAPA Scheme cannot determine the actual advice that has been given to the client then it will directly affect the possibility of the criteria being met or not met.

Examples of Limited Case Records include (please note this is not an exhaustive list):

* Lack of detail in relation to exploration of the client’s situation – personal situation, reasons for the indebtedness, temporary/long term problems.
* Vague statements of advice being given to the client – e.g., Advised on powers of bailiffs, advised on the consequences of non-payment of priority debts – These statements are too vague and general for the Assessor to confirm what specific advice was given to the client on these issues.
* A note of documents being completed but the document is not on file, for example, a financial statement.
* Lack of detail regarding the actual advice given to the client on their available options.

Where a limited case record is identified, the issue will be highlighted in blue. For example, ‘Due to limited case notes, it was not possible to confirm the detail of the advice given on the clients available options.’ This highlights the limited case record at a glance to anyone reading the report. For each individual Scheme criteria where it was deemed the case record was limited, the blue highlight will be applied.

### 6.6.7 Using the New DAPA Scheme Criteria Forms for Technical Supervision and Internal File Reviews

In addition to the DAPA Scheme approach outlined above, for any organisation wishing to adopt the DAPA Scheme criteria as part of Technical Supervision and/or Internal File Review activities, the Scheme has developed the following guidance:

### 6.6.7.1 Dual Counting

When assessing files, care needs to be taken that the same issue is not being counted more than once within the same criteria. This is especially relevant where what were previously considerations have now been split into their own criteria e.g., Criteria 2.1. A common-sense approach to file reviews is recommended when reviewing these sections.

It is important to note that sometimes the same issue may appear to be counted twice under different criteria i.e., Tailored advice may be noted under 7.4 CW and also 10.5 CW if the COA is also not tailored. As these criteria are assessing different elements e.g., Advice given and the confirmation of the advice provided, these sections are both applicable and will both be ‘Not Met.’

### 6.6.7.2 Percentage Score Assessment Outcome

The percentage score will start to calculate as each of the criteria requirements is marked with an outcome:

* Met
* Not Met
* Detriment
* NA

Each individual section of the criteria form will identify a percentage for that section, and once every section is complete, the percentage score for the file as a whole will be presented. **Note:** A percentage score will not calculate for the Organisational criteria section, as this section has no bearing on the overall file score.

### 6.6.7.3 Key Principles

* Assessment criteria assessed as not applicable are disregarded for the purpose of calculating the percentage score
* Every individual criteria requirement should be marked with an appropriate outcome
* Where one or more Areas of Concern are identified, the appropriate box should be ticked at the end of the form, to enable the 20% reduction to be applied. **Note:** In cases where multiple Areas for Concern are identified, a single 20% reduction will be applied
* Where detriment (actual or potential) has been identified, the overall percentage score for the file will be 0%. However, the individual sections of the form will illustrate what the file could have scored without the detriment outcome. Also, to ensure the accuracy of the overall indicative scorewhere an Area for Concern has been identified, the appropriate box will still be ticked in order for the 20% reduction to be applied
* Where one or more of the criteria requirements within an individual section is identified as Not Met, the Scheme form will automatically mark the whole section as Not Met

# 7.0 Assessment Cycle

The assessment cycle for both Recipients and Participants is governed according to the specific quality initiatives that are applied. A broad overview is as follows:

* Recipient Level DAPA – Quarterly assessment rotation
* DAPA Webchat Scheme – 6-monthly assessment cycle
* DAPA Telephone Scheme – Annual assessment cycle
* Technical Site Visit – at least one visit per year
* Triggered Technical Site visit – activated in instances of actual client detriment (as defined by the DAPA Scheme) identified as a result of one or more of the above assessment outcomes.

Whilst the assessment cycle will vary, there are a number of stages of the process which are common across all quality initiatives:

* Selection of file sample
* Agreement of file sample
* Assessment
* Quality Assurance and Moderation activities
* Reporting and Feedback
* Action plan and response

The sections below provide further detail on the assessment approach and individual Service Level Agreements which underpin each.

## 7.1 Detriment Alert Process (July 2021)

During July 2021, MaPS introduced a change of approach in managing the way instances of ‘actual’ client detriment (as defined by the DAPA Scheme) were to be managed. From July 21 onwards, as soon as an example of client detriment is identified during the DAPA assessment, the DAPA Assessor will immediately pass the case and assessment findings through to the Scheme Quality Manager/Moderator for verification. The Quality Manager/Moderator in turn will review both the assessment findings and the case file submitted for assessment to verify the outcome of ‘actual’ client detriment.

Once verified, the detriment finding (which will include a full copy of the assessment summary) will immediately be reported to the Recipient/Participant Organisation, the MaPS Quality Team, and the relevant MaPS Delivery Manager. The reporting of the detriment outcome is to enable the relevant organisation to determine whether action needs to be taken with the client to reverse the detriment from the client’s perspective i.e., to correct the issue and for this action to be taken as quickly possible. Follow up actions and ongoing management of the detriment reported, will be managed centrally by MaPS instead of the DAPA Scheme. This change in process will not impact on the overall assessment process and the SLA currently in place for verification and representations will continue as normal.

7.2 Detriment Verification Process

In April 2021, MaPS introduced a change to the SLA for activating a Triggered Technical Site Visit (TTSV). Previously a TTSV could not be triggered until the representations process had concluded for the relevant assessment programme (Recipient Level DAPA, Webchat, Telephone). However, it was identified that due to impact on the client and the potential risk relating to the detriment outcome, that the resulting TTSV needed to be activated more quickly. Therefore, to ensure that the resulting TTSV was completed in a timely manner the following changes took effect from 1st April 2021:

* There will be 72hrs (3 working days) from when assessment findings have been released to **ONLY** consider any actual detriment findings and whether there is an intention to appeal the assessment outcome. Where the finding of actual detriment is agreed with, a TTSV will be triggered immediately. The TTSV process will then continue within the normal SLA timeframes
* In the event there is an intention to appeal the finding of actual detriment, the existing SLA, including the appeals process will continue under the current terms.

# 8.0 Representations and Appeals Process

## 8.1 Scope of Representations and Appeals Process

The Debt Advice Peer Assessment (DAPA) Scheme provides an opportunity for organisations to make formal representation against the findings of the DAPA assessment. This process is available for those case files that achieve an assessment score of **74% or lower**.

## 8.2 Conditions for Appeal

An appeal may be made on the following grounds:

* The organisation disputes a score awarded to one or more case files within the assessment sample, scoring 74% or lower; and
* The appeal relates to the technical findings and/or an Area of Concern of the assessment
* The appeal content may not exceed a maximum word limit of 150 words per criteria for each case to be challenged. **Note:** where it is necessary to quote legislation or other resources (e.g., Advisernet) to support the content of the appeal, this will not be counted within the 150-word limit.
* Representations must be received by Recognising Excellence no later than 5pm on the submission deadline.

**Any appeal received outside of these conditions will immediately be rejected.**

## 8.3 Notification of Intention to Appeal

In all circumstances, formal representations must be received within the parameters of the Service Level Agreement in place at the time of assessment. Deadlines for submission of appeals will vary accordingly to individual quality initiatives and Participants are directed to Scheme Administrator communications which will confirm the actual date that applies. In all instances, appeals should be submitted directly to [peerreview@recognisingexcellence.co.uk](mailto:peerreview@recognisingexcellence.co.uk). Representations must be received by Recognising Excellence no later than 5pm on the submission deadline.

Representations must be submitted using the Scheme’s Representations Documentation which can be downloaded from our website[**here.**](https://www.recognisingexcellence.co.uk/mas/debt-advice-peer-assessment-scheme-dapa/)

## 8.4 Content of Appeal

Representations made should clearly reference the Scheme criteria requirement, technical finding and/or Area of Concern being appealed. Where multiple criteria are challenged within the same case file, please include these within the same appeal. E.g., Representation One, Case File Five, Criteria challenged 2.1b, 3.2a, 5.1b etc. Please note the maximum word limited per criteria challenged stipulated above.

## 8.5 DAPA Technical Expert

All appeals will be considered by the DAPA Scheme Technical Expert who acts as an impartial advisory to the DAPA Scheme. The Technical Expert will be the only individual involved in the representations process. (A contingency arrangement is in place for those instances where the Technical Expert is not available to ensure that the appeal can still be considered within the timeframe determined by the Scheme SLA. In this instance, a DAPA Scheme Moderator will be appointed who has not been involved with the assessment and moderation activities during the formal assessment stage of the process).

## 8.6 Supporting Documentation

The Technical Expert will consider the original case file submitted for assessment only and **no additional documentation** can be accepted as part of the Representations process. The original case file in its entirety will be shared however consideration will only extend to the criteria that is the subject of the appeal.

## 8.7 Appeals Process and Possible Outcomes

The Technical Expert will independently consider the written appeal in conjunction with the original case file to determine if the assessment findings are to be upheld, or if, with consideration to the representations received, an adjustment to the assessment findings should be made.

There are two possible outcomes:

* The original score(s) is upheld
* The original score (s) is revised

## 8.8 Representations Panel Report Addendum

The Technical Expert will complete the DAPA Representation Submission and Scheme Response Report which will include a full response to the representations received. Upon conclusion of the representations process, the report addendum will be shared with the organisation, the Lead Organisation (where applicable) and with The Money and Pensions Service (MaPS).

The DAPA Scheme Response Report will act as an addendum to the DAPA Assessment Summary Report. In addition to the report addendum, and in the event that amendments are made to the assessment findings as a result of the findings of the appeals process, updated versions of the formal assessment and case summary report(s) will be issued.

## 8.9 Service Level Agreement

The DAPA Scheme service level agreement and all subsequent engagement indicators for organisations will be placed on hold during the representations process. Organisations will not be obligated to respond to any urgent remedial action identified on a case being appealed during this time. However, it is expected that urgent remedial action identified on any case that is not being appealed, is completed within the service level stipulated. In addition, there will be no requirement to sign and return acceptance of the Assessment Summary Report until the representations process has concluded.

Upon conclusion of the representations process, the service level agreement will recommence.

## 8.10 Further Recourse

The findings of the representations process will be considered final, and there will be no further recourse available to the organisation.

## 8.11 Guidance for Scope of DAPA Appeals Process

The DAPA Scheme Representations process allows participants to appeal against findings identified during the assessment process in strictly limited circumstances, including that the appeal relates to **technical findings and/or an Area of Concern** of the assessment.

The purpose of this guidance is to assist participants to identify situations where a criteria has **not** been assessed as an Area of Concern but either as an Area for Improvement or Area for Development or Not Applicable which can be the subject of representations because that criteria is treated as relating to a ‘technical finding’. It is not relevant that the criteria in question is classified by the Scheme as ‘Essential’. Nor is it relevant that the criteria in question would contribute to the overall percentage score if assessed as Met and would not contribute to the overall percentage score if assessed as Not Met in the same way as an Area of Concern would be scored (although, of course, the first criteria assessed as an Area of Concern leads to a 20% reduction in the file score and a further finding of Actual or Potential Detriment leads to the overall file score being reduced to 0).

In general terms, a finding will be treated as ‘technical’ where either debt advice has been provided or the Assessor has found that debt advice should have been provided in relation to the particular activity covered by the criteria. Conversely, if the activity in question is essentially Administrative or Organisational, it will not be treated as ‘technical’.

More specifically:

In addition to **any** criteria assessed as an Area of Concern being treated as technical, any criteria that the Assessor would usually assess as an Area of Concern but because of the particular circumstances of the case assesses as an Area for Improvement as explained in the findings, will be treated as technical.

Generally, the Good Practice criteria identified as Areas for Development will **not** be treated as technical, but there are some exceptions which are noted below where they apply.

Section 1 of the Assessment Report form (Case Record Preliminaries) is organisational and has no impact on the scoring so will not be treated as technical.

Exploration is the foundation of debt advice and is so closely allied to the provision of debt advice that it seems appropriate to treat it as ‘relating to a technical finding’. Section 2 (Casework (‘CW’)) and section 2 (Advice Only (‘AO’)) criteria 2.1(a) – 2.3 and criteria 3.1 will, therefore, be treated as technical.

Section 3 (Deal with urgent issues) (CW) usually involves the provision of debt advice and so will be treated as technical and the same applies to section 4 (Check liability) (CW), including the Good Practice criteria 4.2 as by definition use of 2nd tier support ‘relates to a technical finding’. The corresponding AO criteria – 2.4, 2.5, 2.6 and 2.7 – will also be treated as technical.

Although Income Maximisation (3.2(a) (AO)/5.1(a) (CW) is an essential part of the debt advice process, it is not necessarily technical in the sense of involving the provision of debt advice. This criteria will not usually be treated as technical unless there is evidence that income maximisation advice has been provided to the client or the Assessor has found that it should have been provided in relation to a particular debt or liability, for example, claiming a DHP to clear rent or CT arrears, claiming CT exemption to reduce arrears.

Income verification (3.2(b) (AO)/5.1(b) (CW)) is an administrative activity and will not be treated as technical.

Benefit/Tax Credit check (3.2(c) (AO)/5.1(c) (CW)) is another essential part of the debt advice process but it does not even have to be carried out by the debt adviser as the client can be sign-posted. If it is carried out by the debt adviser, the technical knowledge required relates to benefits and tax credits rather than debt advice. This criteria will not be treated as technical in the sense defined above. Whether or not a copy of any benefit check is on the file is an administrative not a technical issue. For the avoidance of doubt, the Good Practice criteria 3.12, 3.13, 3.15 (AO)/5.2, 5.3, 5.4 (CW) will not be treated as technical.

Section 6 (Financial Statement) (CW)/criteria 3.4(a) – 3.5 (AO) will all be treated as technical except for criteria 3.5 (AO)/6.3 (CW) which is organisational in connection with use of the SFS and administrative in relation to a copy being on the case file. The final part of criteria 3.4(c) (AO)/6.2 (CW) – ‘particularly high or low expenditure areas and the absence of any obvious items of essential expenditure investigated’ – will be treated as technical. For the avoidance of doubt, the Good Practice criteria 3.17 (AO)/6.4 (CW) (Gross income/expenditure) will not be treated as technical.

Section 7 (Explore options) (CW)/3.3, 3.7 – 3.11 (AO) will all be treated as technical including Good Practice criteria 3.14 (AO)/7.8 (CW) (Appropriate research).

Sections 8 (Priority creditors) (CW) and 9 (Other creditors) (CW) will all be treated as technical including Good Practice criteria 9.3 (CW) (Repayment plans) as will criteria 3.6 (AO) and Good Practice criteria 3.16 (AO).

Section 4 (AO)/Section 10 (CW) (Implement action plan) will be treated as technical with the exception of criteria 4.4 and 4.5 (AO)/10.7, 10.8 and 10.9 (CW) as these are organisational. For the avoidance of doubt, the Good Practice criteria will not be treated as technical.

Section 5 (AO)/Section 11 (CW) will not be treated as technical as these activities are essentially administrative/organisational with the exception of criteria 11.3 (CW) (the corresponding AO criteria is 4.6).

**Note:** If any of the individual criteria discussed above are assessed as an Area of Concern, they are automatically eligible to be the subject of an appeal and the participant’s representations will be considered and a response given subject to the file score being 74% or lower and the maximum word count not being exceeded.

# Appendix One Recipient Level DAPA – Overview and Guidance Document v5 Sept 21

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| **Overview and Guidance Document**  **Recipient Level DAPA** | | |
| **To be read in conjunction with** | * Recipient Level DAPA Service Level Agreement * Case File Sampling Tool * Supply Chain Delivery Insight Form * Case File Submission Checklist * DAPA Scheme Assessment Criteria (Face to Face) * DAPA Scheme Representations and Appeals Process | |
|  | | |
| **Key Principles** | * The assessment cycle will run on a 3-monthly rotation, timed to enable the process to fully complete in advance of Quarterly Commissioning Review (QCR) meetings * All Participant Organisations within the Recipient’s supply chain will be included in each assessment rotation * There should be one central point of co-ordination between the Scheme Administrator and the Recipient who can agree the sample of cases selected and who will be responsible for collating and submitting these for assessment * The sample of case files to be assessed will be drawn from the pool of files that have been subject to Technical Supervision during the preceding 3-month period, as per Grant Agreement Clause 2.3.1 in Schedule 1 * All case files will be scored using the DAPA Scheme Percentage Score approach * A KPI benchmark of 75% per file assessed has been set by MaPS which will run cumulatively for the grant year as a whole * The assessment Service Level Agreement (SLA) will run to the hard deadlines determined, as per the principles of the DAPA Scheme. Engagement reporting to MaPS remains a feature of the SLA management * Where remedial action has been identified as part of the Technical Supervision approach, this should be clear within the case record and will be considered as part of the assessment approach. The DAPA Scheme will not request the same action to be completed as a result of the assessment findings * The assessment findings will not look to make recommendations for future action. Instead, the written record of assessment findings will highlight the key themes that have been observed against the areas of Good Practice, Areas of Concern, Areas for Development and Areas for Improvement. Quality Managers will in turn be responsible for working with funded participants to address the findings. | |
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| **Approach** | The Recipient Level DAPA programme is aimed at the MaPS funded recipient. The DAPA Scheme Administrator will liaise directly with nominated individuals acting on behalf of the funded Recipient. All members of the funded recipient’s supply chain will be included in the assessment activities in each assessment rotation.  Funded Recipients will be required to provide a list of all members of their supply chain along with a list of all closed case files that have been subject to Technical Supervision, in each assessment rotation. This information should be captured within the Case File Sampling Tool which will be provided by the Scheme Administrator.  From the information provided, the DAPA Scheme Administrator will select a sample of closed files for assessment. Each member of the supply chain will have a minimum of one case file assessed in each assessment rotation.  The Recipient will lead on agreeing the sample of files selected are suitable for assessment and collating those files ready for assessment. In addition, the Recipient should ensure that the Supply Chain Delivery Insight form is refreshed and submitted for each member of their supply chain, and for each assessment rotation.  The sample of case files will be assessed against the DAPA Scheme criteria. Assessment activity will be completed by an appointed representative of the Scheme Administrator. All case files will be scored against the DAPA Scheme percentage scoring spectrum.  All assessment findings will be subject to full quality assurance and moderation activities prior to release. Once completed, assessment findings will be shared with the Recipient and with MaPS as the funder.  Where it is considered appropriate, urgent remedial action may be requested as a result of the assessment findings. In addition, Recipients should consider the wider findings of the assessment to determine any additional support and guidance that may be required for their supply chain.  To conclude the assessment activity, the DAPA Scheme Administrator will facilitate a post assessment discussion with the Recipient to clarify any queries raised as a result of the assessment findings. This stage of the process is optional, and Recipients can choose to opt out if they so wish. A Representations and Appeals process will be available for all case files scoring 74% or below. Please refer to the separate Representations and Appeals guidance documentation for further information.  All assessment activity activities will be delivered against the agreed MaPS Service Level Agreement. | |
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| **Assessment Cycle** | Assessment activity will be scheduled as a rolling programme of activity on a quarterly cycle. All members of the Recipient’s supply chain will be included within the assessment sample in each rotation. | |
|  | |
| **What is being measured?** | MaPS has clearly set out its expectation of the extent of advice expected via the DAPA Scheme criteria. The criteria have been developed with the nine steps of the debt advice process central to its requirements with consideration to both CONC8 requirements and the Child Poverty Action Group (CPAG) Debt Advice handbook. Two versions of the DAPA Scheme criteria have been created – Advice Only and Casework. Quality of advice will be measured through these criteria.  A performance benchmark (KPI) of 75% has been set by MaPS with the expectation that all case files assessed will reach this level by the end of the grant year. | |
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| **Overview of Activities – Pre-Assessment** | The Recipient will receive notice from the DAPA Scheme Administrator each quarter to formally commence the assessment process. A Case File Sampling Tool will be provided which should be completed and returned within a maximum period of 5 working days.  The Case File Sampling Tool should identify all members of the Recipient’s supply chain, and all closed case files in the preceding period which has been subject to Technical Supervision. From this information a sample of case files will be randomly selected for assessment. The Recipient should consider the sample selected against the Scheme’s eligibility requirements and confirm acceptance of the assessment sample. Where it is considered necessary, reselections will take place as appropriate.  Once agreement is reached on the file sample, Recipients will collate/prepare the files for submission with consideration to the eligibility and pre-submission check requirements identified below. In addition, Recipients should ensure the Supply Chain Delivery Insight form is refreshed and submitted for each member of their supply chain, each assessment rotation.  Funded Recipients will need to respond to the Scheme communications as set out in the Service Level Agreement. | |
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| **Case File Selection** | The case file selection process is a randomised, fully automated process which is managed by the Scheme Administrator. Using the information provided within the Case Sampling Tool, a random sample of files will be selected for assessment. No consideration will be given to the proportionality of advice levels. i.e., advice / casework. Due to the focus of this assessment, which is targeted at the funded recipient, file sampling will not consider whether Advisers remain current members of the funded supply chain. The assessment sample will be drawn from the pool of MaPS funded advice only.  The number of files required for assessment will be influenced by the value of MaPS funding being received. Sample bands are confirmed as:   |  |  | | --- | --- | | **Value (M)** | **No. of files based on methodology per Quarter\*** | | Up to 2m | 15 | | 2.0 - 3.0 | 23 | | 3.1 – 4.0 | 30 | | 4.1 - 5.0 | 45 | | Over 5.0 | 60 |   **Note:** The sample size has been determined with consideration to funding value and other MaPS quality initiatives currently in place. If either element changes, the sample size may be subject to an increase/decrease. In instances where a funding Recipient falls into the first banding i.e., funding value of up to £2m, and has more than 15 participant organisations within their supply chain, the sample size will increase to ensure that every participant has at least one file assessed.  Case files eligible for assessment must have been opened no earlier than 1st April 2019 and closed within the period defined by the assessment period stated. (This will vary for each assessment rotation). The sample selected will include at least one file per organisation within the supply chain and will be drawn from the pool of files that have been subject to Technical Supervision. **Note:** Where an insufficient number of files are available from this pool, the sample will be supplemented with case files closed in the previous operating quarter.  Once the sample has been drawn, the Scheme Administrator will provide notification to the Recipient of the case files selected and seek confirmation of the appropriateness to proceed with the sample. Recipients will be required to agree the sample is eligible to proceed with the assessment. **Note:** The agreed sample should not include any files previously assessed by the DAPA Scheme, through one or more of the MaPS quality initiatives.  If a selected case file is considered not to be appropriate to submit for assessment, the Recipient should contact the Scheme Administrator to discuss the concerns. Where it is considered appropriate to do so, a new sample will be drawn.  All case files should be prepared and submitted for assessment within a maximum period of 20 working days. | |
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| **Case File Eligibility** | The eligibility principles of the DAPA Scheme will apply for all cases to be assessed. i.e., each case file must:   1. Relate to a debt issue 2. Have resulted in completed advice being given to the client 3. Have opened no earlier than 1st April 2019 and closed within the period defined by the assessment cycle (typically 2 -3 months prior) 4. Have not been subject to any prior assessment by the DAPA Scheme   Recipients will be asked to verify and accept the sample of case files selected for assessment within a maximum period 5 working days of receiving the notification of the assessment sample. | |
|  | | |
| **Case File Submission and Pre-Submission Checks** | The assessment process provides for electronic file submission only. This can be via a password protected email submission, via direct access into an appropriate case management system or via access to a secure portal provided by the Scheme Administrator. The Scheme will no longer accept physical files. Please note, where access is provided into a case management system, a minimum of two user accounts will be required for the Scheme Assessor and Moderator. Access should remain live throughout the duration of the assessment process and may be required out of office hours.  Where a case file comprises multiple documents, it is recommended that a folder/sub folder structure is applied to aid the assessment process. A suggested approach is as follows:   * Preliminary Information (Equal opportunities / Form of Authority/ Special Category data etc) * DAT Information * Financial Information (Budget sheet, SFS, MART, proof of income/expenditure * Creditors Correspondence * Client Correspondence * Confirmation of Advice (Letter, Factsheets, Information Leaflets * Application Forms (Benefit Checks, QBC, DRO, DHP, Trust Funds, Court Docs   It is the responsibility of the Recipient to ensure all cases submitted for assessment are a full and accurate record of the advice given. As per the DAPA Scheme principles, there will be no opportunity for supplementary documentation to be provided once the assessment process has commenced. Where applicable, any relevant linked file which **pre-dates** the file selected, should also be submitted for assessment. Linked files should be clearly identified. Where **post-dated** case notes are provided, these will be considered only when determining any urgent remedial action that be required.  Recipients will have a maximum period of 20 working days to prepare and submit case files for assessment. All cases should be submitted directly to the Scheme Administrator.  **File Contents:**  Each file should clearly identify:   * The name of Participant Organisation within your supply chain. * A unique file reference number * Open and closure date. * Classification of Advice Only or Casework. * Clear identification of any relevant linked file submitted (where applicable). * A clear indication that Technical Supervision/IFR has/has not taken place on the file   Documentation to be included within the case file should include as a minimum:   * Preliminary Client Profile, including Data Protection, Consent to store Special Category data, Authorisation to Act, Conflict of Interest Check, Complaint’s procedure, Equal Opportunities Monitoring, copy of the CIA or other tool, Client Agreement, Pre-Apt Debt Advice Pack (where utilised) * Full set of Case Notes in a logical order and the supporting Information Sheet. * Proof of debt and Creditor correspondence – incoming and outgoing correspondence. * Budget Sheet and Standard Financial Statement. * Proof of Income / Income and Expenditure Review / Copy of the completed benefit check. * Confirmation of Advice (letter or factsheet) where applicable, including any advice that was given, any agreed action plan/next steps. * Copies of any applications made, including DRO Applications. * Copies of any credit reports obtained / valuation checks, or Individual Insolvency Register checks carried out. * Information Sources used (as appropriate) particularly in relation to ‘specialist level’ advice. * Evidence of Technical supervision/IFR/ and remedial action requested from these * Case notes from any appropriate Linked File (these should be clearly marked).   Prior to submission of the agreed assessment sample, it is recommended that Recipient Quality Managers ensure:   1. Each file submitted for assessment is eligible for assessment i.e., contains evidence of debt advice. 2. Is a full and accurate summary of the advice given. 3. The agreed file does not include any files which have been previously assessed by the DAPA Scheme, through one or more of the MaPS Quality initiatives. 4. The full sample of files selected for assessment has been provided i.e., there are none missing. 5. The file reference numbers match against the reference numbers identified with the file sample list provided by the Scheme Administrator. 6. There is a clear indication on file where Technical Supervision has taken place   In addition to the sample of case files, Quality Managers should ensure that the Supply Chain Delivery Insight Form has been updated as appropriate and is also submitted for consideration at the same time as the file sample.  **Note:** Each assessment round must be treated as a standalone activity. The Scheme does not hold copies of document provided once the assessment process has been concluded. Therefore, even if template documentation has been provided previously, these should be resubmitted to support the assessment process at future interventions. This extends to Supply Chain Delivery Insight Forms and any Participant Organisation policies and procedures which support these. It is recommended that organisational policy documents are embedded in the Delivery Insight Form, to ensure that the most current versions are always available. | |
|  | | |
| **Void Assessments** | The Recipient Level DAPA programme does not provide for a void assessment outcome. It is therefore recommended that case files are checked centrally by the Recipient to confirm eligibility and submission contents, prior to sharing with the Scheme Administrator. Please refer to the Case File Submission Checklist to assist with this process.  If a case file is determined to be unsuitable for assessment after submission, the following actions will apply:   * The Scheme Administrator will select a replacement file from the original file list provided * The Recipient will be asked to prepare the replacement file for submission, within a maximum period of 2 working days | |
|  | | |
| **Pre-Assessment work required by the Recipient –** | * Complete and return the Case File Sampling Tool identifying both supply chain members, and closed file activity for the specified assessment period * Confirm agreement of the sample of case files selected for assessment, ensuring that they are each ‘eligible’ for assessment by the DAPA Scheme * Prepare the agreed assessment sample for electronic submission, with consideration to the requirements identified in the Case File Submission and Pre-Submission Checks section, to support this activity. * Refresh individual Supply Chain Delivery Insight forms for each member of the supply chain and submit for consideration at the same time as submitting the case file sample for assessment. | |
|  | | |
| **Overview of Activities - Assessment – The Practicalities** | All case files provided will be assessed against the DAPA Scheme criteria appropriate to the level of advice contained. i.e., Advice or Casework.  The fundamental nature of Peer Assessment is it involves the judgement of an experienced practitioner. The DAPA Scheme Assessor will consider, from the evidence contained within the case file and any other documentation provided, whether the Adviser has demonstrated they have dealt with the case effectively against the DAPA Scheme principles of comprehensive, tailored and legally correct advice. The individual DAPA criteria will be assessed as either met, not met, detriment or not applicable.  All case files assessed will be scored using the DAPA Scheme percentage scoring approach. A formal written summary of the assessment findings will be prepared for each case file assessed.  Assessment activity will conclude within a maximum period of 15 working days, as determined by the Scheme Service Level Agreement.  In instances where an example of ‘actual’ client detriment (as defined by the DAPA Scheme) is identified during the assessment, the Scheme Quality Manager will immediately review the assessment finding and case file presented, to verify the outcome. In turn, the detriment finding (which will include a full copy of the assessment summary) will immediately be reported to the Recipient, the MaPS Quality Team, and the relevant MaPS Delivery Manager. The reporting of the detriment outcome is to enable the relevant organisation to determine whether action needs to be taken with the client to reverse the detriment from the client’s perspective i.e., to correct the issue and for this action to be taken as quickly possible. Follow up actions and ongoing management of the detriment reported, will be managed centrally by MaPS. This interim reporting will not impact on the overall assessment process and the SLA currently in place for moderation and post assessment activities and representations will continue as normal. | |
|  | | |
| **Overview of Activities –**  **Quality Assurance and Moderation** | All findings of the assessment process will be subject to full quality assurance and moderation activities. Upon conclusion of the assessment, both the assessment findings and the original case file submitted for assessment will be shared with the DAPA Scheme Quality Manager/Moderator to support the quality assurance activities. The moderation process will be two staged, focusing on both the technical findings and scores, as well as the overall summary and recommendations. Moderation activities may result in amendments to the assessment findings and therefore no outcomes will be shared until the final version of the assessment results are ready for release.  Moderation and quality assurance activities will conclude within a maximum time period of 12 working days from completion of the assessment. | |
|  | | |
| **Post Assessment – Reporting on Findings** | Within 32 working days of file submission, the formal findings of the assessment process will be released. These will be shared electronically with an appropriate password encryption with both the Recipient and with MaPS as the funder.  The formal written record of the assessment will comprise:   * Overarching summary report of assessment findings and high-level comparisons * Formal performance write-up against the DAPA Scheme criteria and resulting score, for each case file assessed   All written reports will identify examples of good practice where these were noted. In addition, the reports will summarise Areas of Concern and Areas for Improvement/Development which have been identified. Assessment reports will no longer look to make recommendations for future action.  Urgent remedial action may be requested as a result of the individual assessments. Urgent remedial actions are likely to arise due to the perceived risk of detriment/potential detriment, as well as the significance of a missed issue to the client’s situation. They are likely to relate to case files where an Area of Concern has been identified. **Note:** The assessment process will only require re-engagement with the client in those examples where it is felt that the client’s circumstances could be improved through further advice from the organisation.  Urgent remedial action reporting will be managed directly with the Recipient and MaPS as part of the QCR meeting.  Recipients will be required to return signed acceptance of the assessment findings within a maximum period of 15 working days.  Where detriment has been identified (actual) through the assessment findings, a Triggered Technical Site Visit (TTSV) intervention will be scheduled for the Participant Organisation concerned. To ensure the TTSV assessment can proceed in a timely manner, Recipients will have a period of 72hrs (3 working days) from when assessment findings have been released to consider any actual detriment findings and confirm whether there is an intention to appeal the assessment outcome. Where the finding of actual detriment is agreed with, a TTSV will be triggered immediately. The TTSV process will then continue within the normal SLA timeframes. Where there is an intention to appeal, the normal SLA timescales and representations process will apply. | |
|  | | |
| **Post Assessment – Feedback Discussion** | Recipients will have an opportunity to discuss assessment findings with both the DAPA Scheme Administrator and the DAPA Assessor. This element of the assessment process is optional, and recipients can choose to either engage with this element or opt out of it.  A conference call or Microsoft Teams meeting will be scheduled at a mutually convenient date and time, which must take place within 15 working days of the assessment findings being shared, as determined by the MaPS Service Level Agreement. The call will be limited to approximately one hour in duration.  Where there are queries and clarifications relating to the technical findings of the assessment, Recipients should submit their queries directly to the Scheme Administrator in advance of the meeting. Any file specific queries must be received at least 3-working days prior to the call taking place to provide the DAPA Scheme Assessor with an opportunity to consider ahead of the meeting. Unfortunately, the Scheme will not be able to discuss specific technical points regarding assessment findings, unless these are received in advance. Assessment scores will not be changed as a result of this clarification process but will provide insight for organisations on specific queries. A stand-alone Representations and Appeals process is available to the Recipient should they wish to challenge the assessment findings. | |
|  | | |
| **Post Assessment – Representations and Appeals** | The DAPA Scheme provides an opportunity for organisations to make formal representation against the findings of the DAPA assessment report. This process is open for any case file assessed as achieving a score of **74% and below.**  An appeal may be made on the following grounds:   * The organisation disputes a score awarded to one or more case files within the assessment sample, scoring 74% or lower; and * The appeal relates to the technical findings and/or an Area of Concern of the assessment * The appeal content may not exceed a maximum word limit of 150 words per criteria for each case to be challenged. * Representations must be received by Recognising Excellence no later than 5pm on the submission deadline.   The Recipient will have a maximum period of 15 working days from receipt of assessment findings to submit a formal appeal. Please see the DAPA Scheme Representations and Appeals process for further detail. | |
|  | | |
| **Useful Documents** |  | |
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# Appendix One A Recipient Level DAPA Service Level Agreement

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| **Activity** | | | **By Whom** | **SLA Lead Time**  **(Working Days)** |
| **Pre- assessment** | | | | |
| 1. | Notice of assessment to Recipient | | RE |  |
| 2. | Recipient to receive and verify closed file list from Participant, ensuring that all Participants are included in the return | | Recipient | 5 w/days |
| 2a. | Case File List and Participant List to be returned to RE | | Recipient |
| 3. | Case File Selection | | RE | 5 w/days |
| 4. | File Sample confirmed as accepted | | Recipient | 5 w/days |
| 5. | Case File Submission | | Recipient | 15 w/days |
| 5a. | Updated Supply Chain Delivery Insight Forms Submitted | |
| **Assessment** | | | | |
| 6. | DAPA Assessment Activity  Assessment findings submitted for Moderation  \*Detriment reporting (actual) to Recipient and MaPS as appropriate | | DAPA Assessor | 15 days |
| 6a. | Case files identified as ineligible for assessment replaced | | Recipient | 2 days |
| 7. | Moderation Activity   1. Technical findings and assessment score 2. Summary report and recommendations 3. Urgent action identified as appropriate   \*Detriment reporting (actual) to Recipient and MaPS as appropriate | | Moderator  RE | 12 days |
| **Post Assessment** | | | | |
| 8. | Peer Assessment findings shared with Recipient and MAPS | | RE | 5 days |
| 8a. | | Client detriment (actual) findings reviewed as appropriate. Confirmation of agreement with finding or intention to appeal | Recipient | 3 days |
| 9. | | Feedback Meeting with Recipient (Optional) | Recipient | 15 days |
| 10. | | DAPA Assessment findings report signed and returned to RE\*  Signed report shared with MAPS Delivery Manager  \*Deadline for submission of appeal |
| 11. | | Electronic Case Files Destroyed | RE | 3 days |
| **Representations Process (where applicable)** | | | | |
| 10 (a) | | Written Representations Submitted | Recipient | As per Step 9  15 days |
| 10(b) | | Appeal considered by DAPA Scheme Technical Expert  Formal written response prepared | Technical Expert | 7 days |
| 10(c) | | Moderation of Representations response  Final report and assessment findings (amended as appropriate) shared with Recipient and MAPS Delivery Manager | RE | 3 days |
| 10(d) | | DAPA Assessment findings report signed and returned to RE  Signed report shared with MAPS Delivery Manager | Recipient | 5 days |

**Note:**

1.The Service Level Agreement will run to the hard deadlines stated.

2. Steps highlighted in grey are Participant/Lead Organisation activities and possible SLA failure points. The Scheme Administrator is under obligation to immediately report any service level failure directly to MaPS, as the failure occurs.

# Appendix Two DAPA Webchat Scheme – Overview and Guidance Document v4 Sept 21

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| **Participant Overview and Guidance Document**  **DAPA Webchat Scheme** | | |
| **To be read in conjunction with** | * Pre-Assessment Questionnaire for Webchat Scheme Participants * DAPA Webchat Scheme Service Level Agreement * Webchat Case File Sampling Tool * Webchat Transcript Submission Declaration * DAPA Webchat Scheme Assessment Criteria * DAPA Scheme Representations and Appeals Process | |
|  | | |
| **Key Principles** | * The assessment cycle will run on a 6-monthly rotation, timed to enable the process to fully complete in advance of Quarterly Commissioning Review (QCR) meetings * All Advisers working within the chat platform will have a sample of 2 client interactions assessed within each assessment rotation * All transcripts will be assessed using the DAPA Scheme Percentage Score approach * A KPI benchmark of 75% per transcript assessed has been set by MaPS which run cumulatively for the grant year as a whole * The assessment Service Level Agreement (SLA) will run to the hard deadlines determined, as per the principles of the DAPA Scheme. Engagement reporting to MaPS remains a feature of the SLA management * The assessment findings will not look to make recommendations for future action. Instead, the written record of assessment findings will highlight the key themes that have been observed against the areas of Good Practice, Areas of Concern, Areas for Development and Areas for Improvement. Participant Organisations will in turn be responsible for working with their MaPS Delivery Manager to address the findings. | |
|  | | |
| **Approach** | Participant Organisations will be invited to complete and return the DAPA Scheme Pre-Assessment Questionnaire for Webchat Scheme Participants, and in addition, provide a list of completed chat activities per Adviser, that have taken place in the proceeding 2 -3-month period.  The DAPA Scheme Administrator will select and agree a sample of transcripts with the Participant Organisation, which should then be provided in electronic form to enable the assessment activity to commence. The agreed sample of transcripts should be submitted for assessment within a maximum period of 15 working days.  Chat transcripts will be assessed against the DAPA Scheme criteria, which has been specifically adapted for this channel. Assessment activity will be completed by an appointed representative of the Scheme. All transcripts will be scored against the DAPA Scheme percentage scoring spectrum.  All assessment findings will be subject to full quality assurance and moderation activities prior to release. Once completed, assessment findings will be shared with the Participant Organisation, with MaPS as the funder, and where applicable, with the Lead Organisation.  Where it is considered appropriate, urgent remedial action may be requested as a result of the assessment findings. In addition, Participant Organisations should consider the detailed findings of the assessment to determine whether it is appropriate to make any changes to their delivery model/service structure.  To conclude the assessment activity, the DAPA Scheme Administrator will facilitate a post assessment discussion with the Participant Organisation to clarify any queries raised as a result of the assessment findings. This stage of the process is optional, and Participants can choose to opt out if they so wish. A Representations and Appeals process will be available for all transcripts scoring 74% or below. Please refer to the separate Representations and Appeals guidance documentation for further information.  All assessment activity activities will be delivered against the MaPS Service Level Agreement for Webchat. | |
|  | | |
| **Assessment Cycle** | Assessment activity will be scheduled as a rolling programme, working on a 6-monthly rotation. The full complement of individual Advisers involved in delivering MaPS funded advice, including any volunteer resource, will be included within the assessment sample in each rotation. | |
|  | |
| **What is being measured?** | MaPS has clearly set out its expectation of the extent of advice expected via the channel of webchat channel as demonstrated in the DAPA Webchat Scheme criteria which has been specifically adapted to reflect the MaPS expectations and requirements of the channel. It is acknowledged that Webchats are not the equivalent of face-to-face or telephone advice. In general, the aim of webchat is to:   * Establish why the client has made contact and what they want to achieve * Provide the client with appropriate advice based on the information provided * Deliver that advice clearly, avoiding the use of jargon and check for the client’s understanding * Help the client to identify the next steps which will progress their situation * Provide clients with links to relevant information and signpost/refer, where appropriate   Quality of advice will be measured through the DAPA Scheme criteria.  A performance benchmark (KPI) of 75% has been set by MaPS with the expectation that all transcripts assessed will reach this level by the end of the grant year. | |
|  | | |
| **Overview of Activities – Pre-Assessment** | The Participant Organisation will receive communications from the DAPA Scheme Administrator giving notice that an assessment has been scheduled. Notification of a scheduled assessment will be two staged:   * A 3-month notice will be issued to alert the Participant Organisation that an assessment is imminent. A copy of the Pre-Assessment Questionnaire will be provided for information purposes only at this stage, to enable Participants to familiarise themselves with the content. * 8 weeks prior to the scheduled assessment a second notification will be released. At this stage, the Pre-Assessment Questionnaire will be re-issued, and the Participant will be invited to complete and return within a maximum period of 10 working days.   To support the completed Pre-Assessment Questionnaire, a list of completed chat activities, per Adviser, reflecting the previous 2 – 3 months should also be provided at this stage. In addition, a list of current staff resources delivering the advice service should be identified. The Scheme Administrator will provide a Case Sampling Tool in the form of an Excel workbook which Participants will be required to populate. The workbook will facilitate an automated approach to identifying the assessment sample and therefore the Scheme will only be able to accept the information requested on this template. This information should be provided to the DAPA Scheme Administrator within a maximum period of 10 working days.  The Scheme Administrator will identify a sample of transcripts to be considered during the assessment. The Participant Organisation should consider the sample selected against the Scheme’s eligibility requirements and confirm acceptance of the assessment sample. Where it is considered necessary, reselections will take place as appropriate.  The Participant Organisation will need to respond to the communications within the timeframes set out in the Service Level Agreement. | |
|  | | |
| **Case/Transcript Selection** | The Case Sampling Tool workbook will request information about the resourcing of the webchat service and specifically, it will require confirmation of the individual Advisers that deliver the advice function. Participants will need to ensure that they have appropriate authorisations in place with both employees and volunteer resources, to enable their details to be shared with the DAPA Scheme.  The assessment will consider a sample of chat transcripts that have been completed by both current and previous employees. Where there has been a high turnover of staff within the period, please highlight this information within the Pre-Assessment Questionnaire. Volunteer resources that deliver advice through the chat facilities will also be included within the scope of the assessment.  Case/Transcript selection is a randomised, automated process which is managed by the Scheme Administrator. Using the information provided within the Case Sampling Tool, a random sample of chats will be selected for assessment. The standard sample drawn will be 3 chats per Adviser. Of the 3 chats identified, 2 will be assessed. All 3 chats selected should be prepared and submitted for assessment.  The assessment sample will be drawn from the pool of MaPS funded advice only. For Participant Organisations being assessed for the first time, chats will be drawn from the preceding 6-month period. For the second assessment rotation and onwards, chats will be drawn from the previous 3-month period and outside of any action plan implementation period that may follow the previous assessment. The sample will predominately be drawn from the most recent month of activity (month 3) and only adjusted to include months 2 and 1 if there are difficulties in drawing a sample for specific Advisers within the first period.  Once the sample has been drawn, the Scheme Administrator will provide notification of the chats selected to the participating organisation and seek confirmation of the appropriateness to proceed with the sample. Participating Organisations will be required to agree the sample is eligible to proceed with the assessment.  If a selected transcript is considered not to be appropriate to submit for assessment, the Participant Organisation should contact the Scheme Administrator to discuss the concerns. Where it is considered appropriate to do so, a new sample will be drawn.  All transcripts should be prepared and submitted for assessment within a maximum period of 15 working days. | |
|  | | |
| **Case/Transcript Eligibility** | The eligibility principles of the DAPA Scheme will apply for all transcripts to be assessed i.e., each transcript must:   * 1. Relate to a debt issue   2. Have resulted in advice (not information) being given to the client i.e., the client was not signposted or immediately referred for further help   3. Contain sufficient advice within the transcript irrespective of whether there is a clear end point   4. Relate to an advice activity within the preceding 3-month period and preferably, more recently than this.   5. Has not been subject to any prior assessment by the DAPA Scheme   Participant Organisations will be asked to verify and accept the sample of chats selected for assessment within 5 working days of receiving the notification of the assessment sample. | |
|  | | |
| **Case/Transcript Submission and Pre-Submission Checks** | The assessment process provides for electronic file submission only. This can be via a password protected email submission, or via direct access into an appropriate case management system. The Scheme will no longer accept physical files. Please note, where access is provided into a case management system, a minimum of two user accounts will be required for the Scheme Assessor and Moderator. Access should remain live throughout the duration of the assessment process and may be required out of office hours.  It is the responsibility of the Participant Organisation to ensure all transcripts submitted for assessment are a full and accurate record of the advice given. As per the DAPA Scheme principles, there will be no opportunity for supplementary documentation to be provided once the assessment process has commenced.  Participant Organisations will have a maximum period of 15 working days to prepare and submit transcripts for assessment. All transcripts should be submitted directly to the Scheme Administrator.  Where the chat transcript itself does not provide the full record of the advice given, additional information should be provided as appropriate. Examples of supporting documentation may include:   * + Screen shot of chat entry platform Preliminary Client Profile, including Data Protection, Confidentiality and Nature and role of the service.   + Confirmation of advice (where applicable)/ Factsheets/weblinks used to support the advice given   + Information Sources used (as appropriate) particularly in relation to ‘specialist level’ advice   + Any relevant CRM record/chat transcript from a Linked File where the client has returned for further advice.   Each assessment round must be treated as a standalone activity. The Scheme does not hold copies of document submitted for assessment once the assessment process has been concluded. Therefore, even if template documentation has been provided previously, these should be resubmitted to support the assessment process at future interventions.  At the point of submission, Participant Organisations will be required to sign and return a declaration form. The declaration will seek confirmation that the submission is complete and reflects the full and complete record of advice for each chat provided for assessment. The assessment process will not be able to commence until the signed declaration has been received by the Scheme Administrator. | |
|  | | |
| **Overview of Activities - Assessment – The Practicalities** | All transcripts submitted for assessment will be considered against the DAPA Scheme Webchat criteria.  The DAPA Scheme Assessor will consider, from the evidence contained within the transcript and any other documentation provided, whether the Adviser has demonstrated they have dealt with the chat effectively. The individual DAPA criteria will be assessed as either met, not met, detriment or not applicable.  The fundamental nature of Peer Assessment is it involves the judgement of an experienced practitioner. DAPA Scheme Assessors will consider the limitations of the advice process through this channel, recognising that Webchat is primarily a client led channel. The DAPA Scheme acknowledges that webchats will generally not go beyond the presenting issue. However, where on the information provided by the client, other issues present themselves, the Scheme expects these issues to be explored and advised on appropriately.  Where the client has discontinued the webchat before the adviser has had the opportunity to go through the ‘closure procedure’, including asking the client whether they have any other debts where this has not already been established, the Assessor will need to make a judgement as to what the adviser could have been expected to cover during the chat, up to the point when the chat ended. Consideration will extend to the steps of the debt advice process. Any criteria which the Assessor feels the adviser could not have been expected to cover up to the point when the chat ended will be assessed as NA. On the other hand, if, in the Assessor’s judgement, the adviser had the opportunity to address any particular criteria, but they were not addressed, then those criteria should be assessed as not met.  Each transcript assessed will be scored using the DAPA Scheme percentage scoring approach. A formal written summary will be prepared for each case/transcript assessed.  Assessment activity will conclude within a maximum period of 8 working days.  In instances where an example of ‘actual’ client detriment (as defined by the DAPA Scheme) is identified during the assessment, the Scheme Quality Manager will immediately review the assessment finding and transcript presented, to verify the outcome. In turn, the detriment finding (which will include a full copy of the assessment summary) will immediately be reported to the Participant, the MaPS Quality Team, and the relevant MaPS Delivery Manager. The reporting of the detriment outcome is to enable the relevant organisation to determine whether action needs to be taken with the client to reverse the detriment from the client’s perspective i.e., to correct the issue and for this action to be taken as quickly possible. Follow up actions and ongoing management of the detriment reported, will be managed centrally by MaPS. This interim reporting will not impact on the overall assessment process and the SLA currently in place for moderation and post assessment activities and representations will continue as normal. | |
|  | | |
| **Void Assessments** | An assessment may be deemed as void in the following circumstances:   * + During the chat selection process and in situations where it has not been possible to identify and/or agree the full sample of webchats required for assessment * During the assessment and once the chats have been submitted for assessment, if it transpires that the eligible number of chats available for assessment falls below the number required. E.g., chats **submitted** for assessment which do not relate to a debt matter, have resulted in no advice given to the client.   If the assessment sample falls below 2 eligible chats per Adviser, the assessment will be void. MaPS will charge an administration fee to the Participant Organisation and a further assessment will be scheduled to take place at a later date. | |
|  | | |
| **Overview of Activities –**  **Quality Assurance and Moderation** | All findings of the assessment process will be subject to full quality assurance and moderation activities. Upon conclusion of the assessment, both the assessment reports and the original transcript submitted for assessment will be shared with the DAPA Scheme Quality Manager/Moderator to support the quality assurance activities. The moderation process will be two staged, focusing on both the technical findings and scores, as well as the overall summary and recommendations. Moderation activities may result in amendments to the assessment findings and therefore no outcomes will be shared until the final version of the assessment results are ready for release.  Moderation and quality assurance activities will conclude within a maximum period of 10 working days from completion of the assessment. | |
|  | | |
| **Pre-Assessment work required by the Participant Organisation –** | * Complete and return the DAPA Webchat Scheme Pre-Assessment Questionnaire * Provide a list of completed chat activities within the proceeding 2-3-month period using the Excel Case Sample Tool provided along with a list of current staff resources delivering the advice service * Confirm agreement of the sample of chats selected for assessment, ensuring that they are each ‘eligible’ for assessment by the DAPA Scheme * Prepare the agreed assessment sample for electronic submission, with consideration to the requirements identified in the Case/Transcript submission and Pre-Submission Checks section, to support this activity. | |
|  | | |
| **Post Assessment – Reporting on Findings** | Within 23 working days of chat submission, the formal findings of the assessment process will be released. Findings of the assessment will be shared with the Participant Organisation, their Lead Organisation (where applicable) and MaPS.  The formal written record of the assessment will comprise:   * Overarching summary report of assessment findings, high level themes arising and high-level comparisons to previous assessment findings * Formal case write-up and assessment score for each case/transcript assessed   Where it is appropriate to do so, comparisons will be drawn against previous DAPA Scheme findings.  All written reports will identify examples of good practice where these were noted. In addition, the reports will summarise Areas of Concern and Areas for Improvement/Development which have been identified. Assessment reports will no longer look to make recommendations for future action.  Urgent remedial action may be requested as a result of the individual assessments. Urgent remedial actions are likely to arise due to the perceived risk of detriment/potential detriment, as well as the significance of a missed issue to the client’s situation. It is recognised that due to the nature of this channel, it will not be possible for an urgent action to require re-engagement with the client. Any urgent actions that arise from the assessment are likely therefore to be limited to adviser technical knowledge and supervisory points only. The Scheme requests that urgent action is completed within a period of 20 working days following receipt of the assessment report.  Participant Organisations will be required to return signed acceptance of the assessment findings within a maximum period of 20 working days.  Where detriment has been identified (actual) through the assessment findings, a Triggered Technical Site Visit (TTSV) intervention will be scheduled for the Participant Organisation concerned. To ensure the TTSV assessment can proceed in a timely manner, Participants will have a period of 72hrs (3 working days) from when assessment findings have been released to consider any actual detriment findings and confirm whether there is an intention to appeal the assessment outcome. Where the finding of actual detriment is agreed with, a TTSV will be triggered immediately. The TTSV process will then continue within the normal SLA timeframes. Where there is an intention to appeal, the normal SLA timescales and representations process will apply. | |
|  | | |
| **Post Assessment – Feedback Discussion** | Participant Organisations will have an opportunity to discuss assessment findings with both representatives from the DAPA Scheme Administrator and the DAPA Scheme Assessor. This element of the assessment process is optional, and organisations can choose to either engage with this element or opt out of it.  A conference call or Microsoft Teams meeting will be scheduled at a mutually convenient date and time, which must take place within 15 working days of the assessment findings being shared. The call will be limited to approximately one hour in duration. Organisations will also have the opportunity to invite a representative from their Lead Organisation (where relevant) to participate with the call if they wish to do so. It will be for the Organisation to decide who should participate in this discussion. Participation will be limited to two individuals from the organisation, one of whom should be the person responsible for the MaPS DAPA Scheme and quality.  Where there are queries relating to the technical findings of the assessment, Participant Organisations will be required to submit their queries directly to the Scheme Administrator in advance of the meeting. Any chat specific queries must be received at least 3-working days prior to the call taking place to provide the DAPA Scheme Assessor with an opportunity to consider ahead of the meeting. Assessment scores will not be changed as a result of this clarification process but will provide insight for organisations on specific queries. A stand-alone representations and appeals process is available to any organisation wanting to challenge the assessment findings. | |
|  | | |
| **Post Assessment – Representations and Appeals** | The DAPA Scheme provides an opportunity for organisations to make formal representation against the findings of the DAPA assessment report. This process is open for any chat assessed as achieving a score of **74% and below.**  An appeal may be made on the following grounds:   * The organisation disputes a score awarded to one or more transcripts within the assessment sample, scoring 74% or lower; and * The appeal relates to the technical findings and/or an Area of Concern of the assessment * The appeal content may not exceed a maximum word limit of 150 words per criteria for each transcript to be challenged. * Representations must be received by Recognising Excellence no later than 5pm on the submission deadline.   The Participant Organisation will have a maximum period of 20 working days from receipt of assessment findings to submit a formal appeal. Please see the DAPA Scheme Representations and Appeals process for further detail. | |
|  | | |
| **Useful Documents** |  | |
|  | | |

# Appendix Two A DAPA Webchat Scheme Service Level Agreement

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| --- | --- | --- | --- |
| **Activity** | | **By Whom** | **SLA Lead Time**  **(Working Days)** |
| **Pre- assessment** | | | |
| 1. | Assessment notice and guidance issued to Participant | RE | Three months prior to assessment date |
| 1a. | Opportunity for Q and A Session (optional) | Participant | Within three-month notice window |
| ***Participant Engagement with Pre-Assessment Process Starts***  ***(Step 2 activity will always start on the first working days of the month)*** | | | |
| 2. | Pre-assessment questionnaire and Case Sampling Tool released to Participant | RE | 8 weeks prior to assessment date |
| 2a. | Participant completes and returns Pre-assessment questionnaire and Case Sampling Tool | Participant | 10 days |
| 3. | Peer Assessor allocated, and conflict check completed | RE | 1 days |
| 4. | Case sample selection | RE | 5 days |
| 5. | Case Sample Agreed | Participant | 5 days |
| 6.. | Case Transcripts submitted for assessment along with Submission Declaration | Participant | 10 days |
| 6a. | Case Submission shared with Assessor | RE | 1 day |
| 6b. | Peer Assessor confirms if sample is suitable for assessment or Void | Peer Assessor | 1 day |
|  | | | |
| 7. | DAPA Assessment Activity  Assessment findings submitted for moderation  \*Detriment reporting (actual) to Recipient and MaPS as appropriate | Peer Assessor | 8 days |
| 8. | Moderation Activity   1. Technical findings and assessment score 2. Summary report findings 3. Urgent action identified as appropriate   \*Detriment reporting (actual) to Recipient and MaPS as appropriate | Moderator  RE | 10 days |
| **Post Assessment** | | | |
| 9. | Peer Assessment findings shared with Participating Organisation, Lead Organisation (where applicable) and MaPS Delivery Manager | RE | 5 days |
| 9a. | Client detriment (actual) findings reviewed as appropriate. Confirmation of agreement with finding or intention to appeal | Participant | 3 days |
| 10. | Feedback Meeting (optional) | RE  Participant  Peer Assessor | 15 days |
| 11. | Assessment report signed and returned to RE  Signed report shared with MaPS Delivery Manager and Lead Organisation (where applicable)  \***Deadline for submission of appeal** | Participant  RE | 5 days |
| 12. | Urgent Remedial Action Reporting (as appropriate | Participant |
| 13. | Case transcripts destroyed | RE | 3 days |
| 14. | Action plan and response to recommendations (Non-Urgent Action) reported directly to MaPS Delivery Manager and Lead Organisation (where applicable) | Participant/Lead Organisation | 65 days |
| **\*Representations Process (where applicable)** | | | |
| 11(a) | Written Representations submitted | Participant | As per Step 11 |
| 11(b) | Appeal considered by Technical Expert. Formal written response prepared | Technical Expert | 7 days |
| 11(c) | Moderation of Representations response  Final report and assessment findings (amended as appropriate) shared with Organisation, MaPS and Lead Organisation | RE | 3 days |
| 11(d) | Assessment report signed and returned to RE  Signed report shared with MaPS Delivery Manager and Lead Organisation (where applicable) | Participant  RE | 5 days |
|  | Urgent Remedial Action Reporting (as appropriate | Participant |
| **Activity** | | **By Whom** | **SLA Lead Time**  **(Working Days)** |

In the event that Representations are made, the SLA for steps 11 and 12 will pause for the duration of the Representations process. The SLA will recommence after this time.

**Note:**

1. Each step of the process will run to the hard deadline stated
2. Steps highlighted in grey are possible Participant SLA failure points. Recognising Excellence is under obligation to immediately report any service level failure directly to both MaPS and the Lead Organisation, as the failure occurs.

# Appendix Three Technical Site Visit – Overview and Guidance Document

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| **Participant Guidance and Overview Document**  **Technical Site Visit** | |
| **To be read in conjunction with** | * Technical Site Visit Service Level Agreement * DAPA Scheme Criteria – Face to Face * Technical Site Visit Observation Form |
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| **Goal** | The Technical Site Visit seeks to provide an up-to-date snapshot of the quality of advice provision using the same criteria as in the Money and Pensions Service (MaPS) Debt Advice Peer Assessment (DAPA) Scheme. File reviews and observations of Debt Advisers conducting client appointments will provide a real time view on the quality of advice being delivered and help identify good practice, areas for improvement and wider topics to consider for training.  To achieve the goal, we ask that Participant Organisation’s do not instruct Debt Advisers to behave, or conduct client interviews, any differently than they normally would. |
|  | |
| **Approach** | Prior to each Technical Site Visit, the Participant Organisation will be contacted in line with the MaPS requirements.  At the point of initial contact, the Participant Organisation will be provided with a Pre-Visit Questionnaire. The Pre-Visit Questionnaire should be completed and returned to the DAPA Scheme Administrator with a list of case files closed within the last 3 months. This should be actioned within a maximum time period of 10 working days.  In the hope of minimising disruption to the service run by the Participant Organisation, an introductory planning call will be scheduled with the Technical Debt Assessor to discuss the logistical arrangements of the visit upon receipt of the completed Pre-Visit Questionnaire. A schedule of activities will be finalised as part of this discussion.  The Technical Site Visit will take place within one month following receipt of the Pre-Visit Questionnaire. Consideration will be given to the delivery model, size of the service, adviser numbers and likely volumes of clients for appointments/drop in when determining the schedule of activity.  The Technical Debt Assessor will determine with the Participant Organisations a range of activities to ensure they can view the whole client journey including the end-to-end debt advice process.  Where Participant Organisations are unable to provide direct access into a CRM system on the day of the visit, 5 cases files will be selected in advance from the list provided by the Participant Organisation, to enable these to be prepared in readiness for the site visit. |
|  | |
| **Assessment Cycle** | Each MaPS funded participant will be scheduled for a Technical Site visit at least annually. Where client detriment (actual) is identified, additional visits may be scheduled. Please refer to the DAPA Scheme principles document for further guidance and the Scheme’s definition of client detriment. |
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| **Multiple Sites** | A Technical Site Visit will take place at a single office location. Where Participants operate across several sites, the Technical Debt Assessor will discuss, as part of the Pre-Visit Introductory call, the most appropriate office to visit. |
|  | |
| **What is being measured?** | Closed case files will be reviewed for:   * Accurate, timely and tailored advice. The Technical Debt Assessor will use the criteria from the DAPA Scheme, Advice only or Casework as appropriate. * Clear recording of deadlines and relevant events.   Client appointments/Interviews will be observed for:   * Clear exploration of the client’s circumstances, * Clear explanation of all relevant options, * Clear explanation of the actions required by the client and the adviser. |
|  | |
| **Overview of Activities - Before the Visit** | Prior to the visit, the Participant Organisation will receive communications from the DAPA Scheme Administrator, giving the Participant Organisation about a month notice of the visit, as explained in the Approach section.  The Technical Debt Assessor will attempt to accommodate any specific requests e.g., a specific day or date. Where the Participant Organisation feels there is an appropriate reason as to why the visit needs to be delayed, a formal request should be made to the DAPA Scheme Administrator via [peerreview@recognisingexcellence.co.uk](mailto:peerreview@recognisingexcellence.co.uk). All requests will be considered; however, it should be noted that site visits will only be delayed in extreme circumstances.  You will be required to complete and return the Pre-Visit Questionnaire and provide a list of closed case files, closed within the preceding 3-month period. This information will be used as the basis for selecting and agreeing a sample of cases for the assessment and should be captured within the Case File Sampling Tool that will be provided with your notice of visit.  Following the receipt of the communication, the Participant Organisation will liaise  with the Technical Debt Assessor and complete the activities listed in ‘Pre-Visit Work  required by the Participant’. The Participant Organisation will need to respond to the  communications within the timeframes set out in the ‘Approach’. |
|  | |
| **Case File Selection** | Where Participant Organisations are unable to provide direct access into an appropriate case management system, case files will be selected in advance of the site visit, to provide sufficient time for the files to be collated in readiness for the site visit.  A sample of 5 case files will be chosen at random from the information provided within the Case File Sampling Tool. The sample of files selected for assessment will only include files closed in the three months prior to the visit with a preference for the most recently closed cases to be considered to ensure the end-to-end debt advice process can be considered.  **Note:** Case files provided for assessment should not have been previously assessed via the MaPS programme of quality initiatives.  Once the sample has been drawn, the Scheme Administrator will provide notification of the selection and seek confirmation of the appropriateness to proceed with the files chosen. In the event that one or more files within the initial selection are not deemed as eligible, Participants should contact the Scheme Administrator to discuss the concerns. Where it is considered appropriate to do so, a new sample will be drawn.  Where direct access into a case management system is permitted, a sample of files will be chosen at random on the day of the visit. |
|  | |
| **Case File Eligibility and Preparation Checks** | The eligibility principles of the DAPA Scheme will apply for all cases to be assessed. i.e., each case file must:   1. relate to a debt issue, 2. have resulted in completed advice being given to the client, 3. have opened no earlier than 1st April 2019 and closed within the last 3 months, and preferably more recently than this, and 4. have not been subject to any prior assessment by the DAPA Scheme.   Documentation to be included within the case file should include as a minimum:   * Preliminary Client Profile, including Data Protection, Consent to store Special Category data, Authorisation to Act, Conflict of Interest Check, Complaint’s procedure, Equal Opportunities Monitoring, copy of the CIA or other tool. * Full set of Case Notes in a logical order and the supporting Information Sheet. * Proof of debt and Creditor correspondence – incoming and outgoing correspondence. * Budget Sheet and Standard Financial Statement. * Proof of Income / Income and Expenditure Review / Copy of the completed benefit check. * Confirmation of Advice (letter or factsheet) where applicable, including any advice that was given, any agreed action plan/next steps. * Copies of any applications made, including DRO Applications. * Copies of any credit reports obtained / valuation checks, or Individual Insolvency Register checks carried out. * Information Sources used (as appropriate) particularly in relation to ‘specialist level’ advice.   Case notes from any appropriate Linked File (these should be clearly marked). |
|  | |
| **Pre-visit work required by the Participant Organisation – How to Prepare for a Technical Site Visit** | * Complete and return the Pre-Visit Questionnaire. * Provide list of closed cases in previous 3-month period using the Excel template provided. * Preparation of case files in advance of visit once selected by the DAPA Scheme Administrator (only where direct access into the case management system is not granted). * Planning and booking appointments across a mix of Debt Advisers to ensure the Technical Debt Assessor can view the complete client journey at the Participant Organisation. (Participant Organisations may consider it appropriate to ring the client in advance of their appointment, to confirm their consent for the Technical Debt Assessor to observe the appointment). * Identification of diarised sessions on the day, if appropriate. |
|  | |
| **Overview of Activities –**    **The Visit -**  **Briefing Session** | At the start of the visit, the Technical Debt Assessor will facilitate a briefing session to introduce themselves to the Participant’s representatives (this could be the Manager, Supervisor or Senior Adviser). During the Briefing Session, the Technical Debt Assessor will outline the schedule for the day, provide an overview of how the client appointments/advice sessions and files will be assessed. Any issues/queries identified from the Pre-Visit Questionnaire will also be discussed. |
|  | |
| **Overview of Activities -**  **The Visit -**  **Observations of Client Appointments** | The Technical Debt Assessor will observe several client appointments ideally across all Debt Advisers delivering MaPS funded debt advice. The number of appointments will vary depending on the delivery model of the Participant Organisation. The expectation is the total number of appointments completed will provide the Technical Debt Assessor the insight required of the client journey.  During the observation, the Technical Debt Assessor will record their findings on the Technical Site Visit Observation Form. If the Technical Debt Assessor observes the adviser causing client detriment either through the advice being provided or through not providing advice, the Technical Debt Assessor will raise this with the Participant Organisation in the Feedback Session. The Technical Debt Assessor will accompany the adviser whenever they leave the interview space.  If the Technical Debt Assessor believes the interview is taking too long, then they will be able to leave the interview the next time the adviser leaves the interview space.  **Note:** If no appointments take place during the visit, either due ‘no shows or clients not consenting to the Technical Debt Assessor observing their appointment, a further Technical Site Visit will be scheduled with a minimum of 4 weeks’ notice but may be arranged at shorter notice by mutual agreement. |
|  | |
| **Overview of Activities –**  **The Visit -**  **Case File Reviews** | The Technical Debt Assessor will complete file reviews which they will randomly select from the list of closed files provided in advance of the visit. The random selection may result in files from the same adviser being selected.  Files selected for review will only include files closed in the three months prior to the visit. Case files can be reviewed either in hard copy or digital format. Where case files are to be provided in hard copy, a total of 5 files will be identified in advance of the visit, to enable the files to be prepared and ready on the day.  **Note**: No case files previously assessed under the DAPA Scheme should be put forward for assessment for a second time.  The Technical Debt Assessor will use different criteria when reviewing files based on whether the files are casework or advice only. The criteria for reviewing case files are based upon the MaPS DAPA Scheme.  All case files assessed will be scored using the DAPA Scheme percentage scoring approach. A formal write up will be prepared for each case file assessed.  Where the schedule of activities allows, case file reviews can be conducted in the presence of the Adviser who managed the case. Participant Organisations should discuss this approach as part of the pre-visit planning discussions. (Please see Approach section above). |
|  | |
| **Overview of Activities –**  **The Visit -**  **Feedback Session** | At the end of the Technical Site Visit, each Participant Organisation will be provided with an opportunity to give and receive feedback on the initial findings. The session provides an opportunity for examples of good practice to be highlighted, to discuss areas that have been identified as needing improvement and to ensure that all relevant information is recorded.  Comparisons will be made between the findings of the file reviews completed and observed client appointments. Where possible, comparison will also be drawn between previous DAPA Scheme findings, identified through Participant Level DAPA or Recipient Level DAPA.  The feedback session should be attended by the representatives of the Participant that attended the briefing session. The feedback will be recorded by the Technical Debt Assessor and included in the report. Where possible, the Quality Manager from the Lead Organisation will also attend the feedback session. |
|  | |
| **Overview of Activities –**  **Quality Assurance and Moderation** | All findings of the assessment process will be subject to full quality assurance and moderation activities. Upon conclusion of the visit, written findings of both the completed case files and the observed client appointments will be shared with the DAPA Scheme Quality Manager/Moderator to support the quality assurance activities. The moderation process will be two staged, focusing on both the technical findings and scores, as well as the overall summary and recommendations.  Moderation and quality assurance activities will be concluded within a maximum time period of 8 working days from completion of the site visit. |
|  | |
| **Post-visit comms/follow up -**  **Reporting of Findings** | Within 10 working days of the Technical Site Visit, the Participant Organisation, their Lead Organisation and MaPS will receive a copy of the formal report.  The report will comprise of:   * A summary report of activities completed during the visit and high-level findings, * A formal case write-up and score for each case file assessed, and * A formal observation write-up for each client appointment observed.   Case files will be scored using the DAPA Scheme percentage scoring approach. Observed client appointments will not be scored.  Where it is appropriate to do so, comparisons will be made between the findings of the file reviews and observed client appointments, and where applicable, against the findings of previous Participant Level DAPA or Recipient Level DAPA activities. Any comparisons made will be noted within the Summary of Activity Report.  All reports will identify examples of good practice where these were noted. In addition, the reports will summarise where Areas for Concern, and Areas for Improvement have been identified.  Where detriment has been identified (actual) either through the observation of client appointments and/or file review process, a Triggered Technical Site Visit intervention will be scheduled.  Participant Organisations will be provided with an opportunity for a follow up telephone call to discuss any clarifications required from the visit report. |
|  | |
| **Post-visit comms/follow up –**  **MaPS and Lead Organisations** | Where follow up actions have been identified, this will be reviewed at the following Quarterly Commissioning Report (QCR) / Monthly Commissioning Report (MCR) meetings  Where the Technical Debt Assessor has identified that detriment to the client has occurred, the review will focus on how the action plan has addressed the detriment.  QCR/MCR meetings will also cover training needs, learning opportunities, and identified good practice. |
|  | |

# Appendix Three A Technical Site Visit Service Level Agreement

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|  | **Activity** | **Action to be Taken by** | **SLA Lead Time (Working Days)** |
| 1. | Notification of Technical Site Visit to Participant Organisation | RE |  |
| 2. | Pre-Visit Questionnaire and Case file list closed within last 3 months provided | Participant | 10 w/days |
| 3. | Pre-Visit Information considered and Introductory call with Participant completed. Site Visit Date Agreed | Technical Debt Assessor and Participant | 5 w/days |
| 4. | Case File Sample Selected | RE | 3 w/days |
| 4a. | Case File Sample Agreed | Participant | 5 w/days |
| 5. | Technical Site Visit Completed | Technical Debt Assessor | Date of Visit |
| 6. | Summary of Visit Report prepared | Technical Debt Assessor | 5 w/days |
| 7. | Quality assurance and moderation activities | Quality Manager | 3 w/days |
| 8. | Assessment Findings Released | RE | 2 w/days |
| 9. | Detriment findings reported to MaPS as appropriate |

**Note:**

1.The Service Level Agreement is likely to be more fluid than the approach taken by other MaPS quality initiatives. Progress through the various stages of the SLA will be activated as soon as the previous step has been completed.

2. Steps highlighted in grey are Participant activities and possible SLA failure points. The Scheme Administrator is under obligation to immediately report any service level failure directly to MaPS, as the failure occurs.

# Appendix Four Triggered Technical Site Visit – Overview and Guidance Document v7 Sept 21

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| **Participant Guidance and Overview Document**  **‘Triggered’ Technical Site Visit** | | |
| **To be read in conjunction with** | * Triggered Technical Site Visit Service Level Agreement * DAPA Scheme Criteria – Face to Face / Webchat / Telephone | |
|  | | |
| **Key Principles** | **Note:** **At the present time, all Triggered Technical Site Visit activities are being completed remotely due to the impact of the Covid-19 pandemic.**   * A Triggered Technical Site Visit is intended to be a one-off risk-based intervention. Further visits will only be scheduled if additional examples if ‘actual’ client detriment are identified. * A sample of 10 files will be selected for the triggered visit * The triggered visit must be completed within 20 working days of the detriment being reported * All case files will be scored using the DAPA Scheme Percentage Score approach * A KPI benchmark of 75% per file assessed has been set by MaPS for each case file assessed * The assessment Service Level Agreement (SLA) will run to the hard deadlines determined, as per the principles of the DAPA Scheme. Engagement reporting to MaPS remains a feature of the SLA management * The assessment findings will not look to make recommendations for future action. Instead, the written record of assessment findings will highlight the key themes that have been observed against the areas of Good Practice, Areas of Concern, Areas for Development and Areas for Improvement. | |
|  | | |
| **Approach** | A Triggered Technical Site visit will be activated if ‘actual detriment’ is identified via one or more of the following:   * A case file assessed through the Recipient Level, Webchat or Telephone DAPA quality programme * A case file assessed as part of a Technical Site Visit * During Adviser Observations completed as part of a Technical Site Visit * Technical Supervision activities undertaken by the Lead/Recipient Organisation and reported to MaPS Delivery Manager through the monthly MCR activities.   Notice of a Triggered Technical Site Visit will be sent directly to the Participant organisation with a copy to the Lead Organisation (where applicable). Participants will be required to provide a list of case files, closed within the preceding 3-month period, within a maximum period of 5 working days. This information should be returned directly to the DAPA Scheme Administrator.  A Pre-Visit Introductory Telephone Call will be scheduled between the Participant and a Technical Debt Assessor to discuss the logistical arrangements of the visit. During this call a date for the visit will be agreed with the Participant. The visit should take place within a maximum period of 20 working days from the instance of detriment being finalised or reported to MaPS in a Monthly Commissioning Report.  A sample of 10 case files will be selected from the information provided by the Participant with a requirement for the file sample to be prepared for submission to the Scheme Administrator within a maximum period of 10 working days. When confirming the selected sample is suitable for assessment, Participants should consider the DAPA Scheme requirements, confirmed below in sections Case File Eligibility and Case File Submission and Pre-Submission Checks. Where appropriate, replacement case files will be reselected until a full sample is agreed.  The Technical Debt Assessor will complete approximately half of the case file assessments prior to attending the offices to complete the site visit, with the remainder completed on the day of the visit. Where the schedule of activities allows, case file reviews can be conducted in the presence of the Adviser who managed the case. Participant Organisations should discuss this approach as part of the pre visit planning discussions.  Findings of the case file assessments will be subject to full moderation and internal quality assurance prior to release. Once finalised, findings will be shared with the Participant Organisation, the Lead/Funded Organisation (where applicable), and MaPS.  Upon receipt of the findings, Participants and Lead/Funded Organisations (where applicable) will be offered the opportunity for a post visit discussion. This is an optional activity which should take place within 5 working days of receiving the findings. If regarding a Participant organisation, the Lead/Funded Organisation will be encouraged to attend as appropriate.  Where further examples of detriment are identified as a result of the Triggered Technical Site Visit, the Lead/Funded Organisation will be responsible for developing an action plan in conjunction with the Participant and for on-going reporting to MaPS. A further Triggered Technical Site visit may be scheduled as appropriate. | |
|  | | |
| **Definition of Detriment** | The DAPA Scheme defines detriment as ‘damage, loss or harm’.  The following are examples of actual client detriment. **Please note this is not an exhaustive list.**   * The case record does not evidence the client was advised on **enforcement agent’s rights of entry** when the debt(s) were at enforcement stage * There was no evidence the client was advised on **switching bank accounts** where the account was linked to a debt owed to the bank, particularly where that debt is included in an insolvency option * The case record identified the potential of an **unaffordable repayment arrangement** with a priority creditor which is likely to lead to those arrangements being unsustainable (see CONC 8.5.3(1) and (2)). This includes where the client has a deficit budget and offers are made without any evidence of how the client is going to be able to make the payments i.e., how they are to be funded. The detriment is not the client defaulting as such, but the consequences to the client of defaulting in terms of the creditor’s likely or potential response(s), which will obviously depend on the circumstances of the case * No evidence a **qualifying debt** was included in a **Debt Relief Order** application * Evidence a client was wrongly advised they were **liable for a debt** with the result that they made arrangements to pay it * A possible **defence to a possession order** was missed * There is no evidence of advice when a client has **rent or mortgage arrears** and there is **a threat of eviction** * Advice to **suspend a Possession Order** was not evidenced * Advice to **suspend a Warrant of Possession Order** was not evidenced * **Incorrect income** for a client on a **DRO application**. If the correct income was used, the client would not have been eligible for this solution. * No advice on the **powers of Enforcement Agents** where the client has a **CCJ being enforced** by the agent * There was no evidence of advice on **enforcement agents’** rights of entry, fees, goods they can take and process. It was noted that the recovery of client's CCJs was suspended, due to the COVID 19 Pandemic restrictions on enforcement, however the client needed to be advised on this for when the suspension of enforcement ends. | |
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| **Assessment Cycle** | A Triggered Technical Site Visit is intended to be a one-off risk-based intervention. Further visits will only be scheduled if additional examples of ‘actual’ client detriment are identified. | |
|  | | |
| **Multiple Offices** | A Triggered Technical Site Visit will take place at a single office location. Where a Participant or Lead/Funded Organisation has more than one office, the most appropriate location for the visit will be discussed and agreed during the Pre-Visit Introductory Telephone Call. | |
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| **What is being measured?** | The Triggered Technical Site Visit activity is a risk-based intervention, activated only when actual client detriment has been found in one or more case files assessed through the various MaPS quality initiatives.  A larger than normal sample of files will be selected for consideration during the Triggered Technical Site Visit to enable the DAPA Scheme to understand if the previously observed detriment was an isolated incidence, or if there is a greater underlying issue that requires immediate attention.  All case files will be assessed against the DAPA Scheme criteria, at a level appropriate to the channel and level of advice given i.e., Advice only or Casework. | |
|  | |
| **Overview of Activities - Before the Visit** | The Participant Organisation will receive communications from the DAPA Scheme Administrator, giving the Participant or Lead/Funded Organisation (as applicable) notice that an additional site visit has been triggered.  You will be required to provide a list of closed case files, closed within the preceding 3-month period, prior to the notice being issued. This information will be used as the basis for selecting and agreeing a sample of cases for the assessment and should be captured within the Case File Sampling Tool that will be provided with your notice of visit.  The site visit activity must take place within a maximum period of 20 working days from the instance of detriment being finalised by the Scheme or, reported to MaPS through the Monthly Commissioning Report (MCR). The Technical Debt Assessor will attempt to accommodate any specific requests e.g., a specific day or date. Where the Participant or Lead/Funded Organisation feels there is an appropriate reason as to why the visit needs to be delayed, a formal request should be made to the DAPA Scheme Administrator via peerreview@recognisingexcellence.co.uk. All requests will be considered; however, it should be noted that triggered site visits will only be delayed in extreme circumstances.  Following the receipt of the communication, the Participant or Lead/Funded Organisation will liaise with the Technical Debt Assessor and complete the activities listed in ‘Pre-Visit Work required by the Participant’. The Participant or Lead/Funded Organisation will need to respond to the communications within the timeframes set out in the Service Level Agreement, summarised below in ‘Approach’. | |
|  | | |
| **Case File Selection** | A sample of 10 case files will be chosen at random from the information provided within the Case File Sampling Tool. The sample of files selected for assessment will only include files closed in the three months prior to the visit with a preference for the most recently closed cases to be considered to ensure the end-to-end debt advice process can be considered. In addition, and where possible, all case files should have been subject to Technical Supervision.  Once the sample has been drawn, the Scheme Administrator will provide notification of the selection and seek confirmation of the appropriateness to proceed with the files chosen. The sample should be reviewed and confirmation of agreement to proceed provided within 3 working days. If one or more files within the initial selection are not deemed as eligible, Participants should contact the Scheme Administrator to discuss the concerns. Where it is considered appropriate to do so, a new sample will be drawn.  **Note:** Case files provided for assessment should not have been previously assessed via the MaPS programme of quality initiatives.  Case files should be submitted for assessment in electronic format. |
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| **Case File Eligibility** | The eligibility principles of the DAPA Scheme will apply for all cases to be assessed. i.e., each case file must:   1. Relate to a debt issue 2. Have resulted in completed advice being given to the client 3. Have opened no earlier than 1st April 2019 and closed within the last 3 months, and preferably more recently than this 4. Have not been subject to any prior assessment by the DAPA Scheme |
|  | | |
| **Case File Submission and Pre-Submission Checks** | The assessment process provides for electronic file submission only. This can be via a password protected email submission, via direct access into an appropriate case management system or via access to a secure portal provided by the Scheme Administrator. The Scheme will no longer accept physical files. Please note, where access is provided into a case management system, a minimum of two user accounts will be required for the Scheme Assessor and Moderator. Access should remain live throughout the duration of the assessment process and may be required out of office hours.  It is the responsibility of the Lead/Funded Organisation to ensure all cases submitted for assessment are a full and accurate record of the advice given. As per the DAPA Scheme principles, there will be no opportunity for supplementary documentation to be provided once the assessment process has commenced.  **File Contents:**  Each file should clearly identify:   * Name of Participating Organisation * The name of Adviser. * A unique file reference number. * Open and closure date. * Classification of Advice Only or Casework. * Identification of any relevant linked file submitted (where applicable). * A clear indication that Technical Supervision has/has not taken place on the file.   Documentation to be included within the case file should include as a minimum:   * Preliminary Client Profile, including Data Protection, Consent to store Special Category data, Authorisation to Act, Conflict of Interest Check, Complaint’s procedure, Equal Opportunities Monitoring, copy of the CIA or other tool, Client Agreement, Pre-Apt Debt Advice pack (where utilised). * Full set of Case Notes in a logical order and the supporting Information Sheet. * Proof of debt and Creditor correspondence – incoming and outgoing correspondence. * Budget Sheet and Standard Financial Statement. * Proof of Income / Income and Expenditure Review / Copy of the completed benefit check. * Confirmation of Advice (letter or factsheet) where applicable, including any advice that was given, any agreed action plan/next steps. * Copies of any applications made, including DRO Applications. * Copies of any credit reports obtained / valuation checks, or Individual Insolvency Register checks carried out. * Information Sources used (as appropriate) particularly in relation to ‘specialist level’ advice. * Evidence of Technical Supervision / IFR and remedial action requested from these * Case notes from any appropriate Linked File (these should be clearly marked). | |
|  | | |
| **Overview of Activities –**  **The Visit and Case File Reviews** | The Technical Debt Assessor will assess a sample of 10 case files, randomly selected from the list of closed files provided in advance of the visit. The random selection may result in files from the same adviser being selected.  The criteria for reviewing case files are based upon the MaPS DAPA Scheme. The Technical Debt Assessor will use the appropriate channel and level of criteria when reviewing files based on whether the files are casework or advice only.  All case files assessed will be scored using the DAPA Scheme percentage scoring approach. A formal write up will be prepared for each case file assessed.  Approximately half of the file sample will be assessed off site, with the remainder completed on the day of the visit. Where the schedule of activities allows, case file reviews can be conducted in the presence of the Adviser who managed the case. Participant or Lead/Funded Organisations should discuss this approach as part of the pre visit planning discussions.  In instances where an example of ‘actual’ client detriment (as defined by the DAPA Scheme) is identified during the assessment, the Scheme Quality Manager will immediately review the assessment finding and case file presented, to verify the outcome. In turn, the detriment finding (which will include a full copy of the assessment summary) will immediately be reported to the Recipient, the MaPS Quality Team, and the relevant MaPS Delivery Manager. The reporting of the detriment outcome is to enable the relevant organisation to determine whether action needs to be taken with the client to reverse the detriment from the client’s perspective i.e., to correct the issue and for this action to be taken as quickly possible. Follow up actions and ongoing management of the detriment reported, will be managed centrally by MaPS. This interim reporting will not impact on the overall assessment process and the SLA currently in place for moderation and post assessment activities will continue as normal. | |
|  | | |
| **Overview of Activities –**  **The Visit -**  **Feedback Session** | At the end of the Triggered Technical Site Visit, each Participant or Lead/Funded Organisation will be provided with an opportunity to give and receive feedback on the initial findings. The session provides an opportunity for examples of good practice to be highlighted, to discuss areas that have been identified as needing improvement and to ensure that all relevant information is recorded. Where further detriment has been identified, this will be discussed in detail. Where further examples of detriment are identified (actual) through the assessment findings, and the reason for the detriment is deemed as different to the original issue, a further Triggered Technical Site Visit (TTSV) intervention will be scheduled for the Participant Organisation concerned.  Where possible, comparisons will be drawn between previous DAPA Scheme findings, identified through Technical Site Visits, Recipient Level DAPA, Webchat DAPA or Telephone DAPA (as appropriate).  The feedback session should be attended by the representative of the Participant and/or Lead/Funded Organisation that is responsible for quality. An overview of the discussions during this meeting will be recorded by the Technical Debt Assessor and included in the report. If regarding a Participant Organisation, where possible, the Quality Manager from the Lead/Funded Organisation will also attend the feedback session. | |
|  | | |
| **Overview of Activities – Quality Assurance and Moderation** | All findings of the assessment process will be subject to full quality assurance and moderation activities. Upon conclusion of the assessment, both the assessment reports and the original case files submitted for assessment will be shared with the DAPA Scheme Quality Manager/Moderator to support the quality assurance activities. The moderation process will be two staged, focusing on both the technical findings and scores, as well as the overall summary and recommendations. Moderation activities may result in amendments to the assessment findings and therefore no outcomes will be shared until the final version of the assessment results are ready for release.  Moderation and quality assurance activities will conclude within a maximum period of 8 working days from completion of the site visit. | |
|  | | |
| **Pre-visit work required by the Participant Organisation – How to Prepare for a Triggered Technical Site Visit** | * Provide a list of case files closed within the proceeding 3-month period using the Excel Case File Sample Tool provided * Participate in a Pre-Visit Introductory Telephone Call with the Technical Debt Assessor to identify and agree an appropriate date for the visit * Confirm agreement of the sample of cases selected for assessment, ensuring that they are each ‘eligible’ for assessment by the DAPA Scheme. * Prepare the sample of 10 cases for electronic submission, with consideration to the requirements identified in the Case File Submission and Pre-Submission Checks section, to support this activity | |
|  | | |
| **Post-visit comms/follow up -**  **Reporting of Findings** | Within 10 working days of the Triggered Technical Site Visit the Participant Organisation (where applicable), the Lead/Funded Organisation and MaPS will receive a copy of the formal written report.  The formal report write-up will comprise:   * Summary report of activities completed during the visit and high-level findings * Detailed findings of client detriment identified (where appropriate) * Formal case write-up and score for each case file assessed   Where it is appropriate to do so, comparisons will be drawn between previous DAPA Scheme findings, identified through Technical Site Visits, Recipient Level DAPA, Webchat DAPA or Telephone DAPA  All written reports will identify examples of good practice where these were noted. In addition, the reports will summarise any Areas of Concern, Areas for Development and Areas for Improvement which have been identified.  Urgent remedial action may be requested as a result of the case file assessments. Urgent remedial actions are likely to arise due to the perceived risk of detriment/potential detriment, as well as the significance of a missed issue to the client’s situation. They are likely to relate to case files where an Area of Concern has been identified. **Note:** The assessment process will only require the Participant or Funded Organisation to re-engage with the client in those examples where it is felt that the client’s circumstances could be improved through further advice from the service.  Urgent remedial action reporting will be managed via the Lead/Funded Organisation and MaPS.  Participant Organisations will be provided with an opportunity for a follow up telephone call to discuss any clarifications required from the visit write up.  Where further examples of detriment have been identified (actual) through the assessment findings, these will be reported to MaPS. | |
|  | | |
| **Post-visit comms/follow up –**  **MaPS and Lead Organisations** | Where follow up actions have been identified, this will be reviewed at the following Quarterly Commissioning Report (QCR) / Monthly Commissioning Report (MCR) meetings.  Where the Technical Debt Assessor has identified that detriment to the client has occurred, the review will focus on how the action plan has addressed the detriment.  QCR/MCR meetings will also cover training needs, learning opportunities, and identified good practice.  Where client detriment has been identified, a further Triggered Technical Site Visit will be scheduled as appropriate. | |
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| **Supporting Documentation** |  | |
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# Appendix Four A Triggered Technical Site Visit Service Level Agreement

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|  | **Activity** | **Action to be Taken by** | **SLA Lead Time (Working Days)** |
| 1. | Detriment identified  (via either RE DAPA Assessment activity or MaPS MCR Reporting) | RE to MaPS  or  MaPS to RE |  |
| 1a. | Detriment occurrence verified with Lead/Funded Organisation  (where reported via MCR only) | RE | 1 day |
| 2. | Notification of *‘Triggered’* Technical Site Visit Activity sent to Lead/Funded Organisation and Participant Organisation (where applicable) | RE | 2 days  ***(Assessment SLA starts at this point onwards)*** |
| 3. | Case file list closed within last 3 months provided | Lead/Funded Organisation or where applicable, Participant | 5 days |
| 4. | Pre-Visit Introductory call with Participant | Technical Debt Assessor | Prior to file submission |
| 5. | Case File Sample Selected | RE | 2 days |
| 5a. | File Sample Agreed | Lead/Funded Organisation or where applicable, Participant | 3 days |
| 6. | Case File Submission | Lead/Funded Organisation or where applicable, Participant | 7 days |
| 6a. | Suitability for assessment checks completed and confirmed to all | Technical Debt Assessor | 5 days |
| 7. | *Triggered’* Technical Site Visit Assessment Completed  \*Detriment reporting (actual) to Participant and MaPS as appropriate |
| 8. | Moderation Activity   1. Technical findings and assessment score 2. Summary report findings 3. Urgent action identified as appropriate   \*Detriment reporting (actual) to Participant and MaPS as appropriate | RE | 3 days |
| 12. | Final Stage Moderation (Tone and Balance)  Assessment Findings Released | RE | 1 day |
| 12a. | Final detriment findings reported to MaPS as appropriate | RE |
| 13. | Optional Post Activity Feedback Discussion | Lead/Funded Organisation and where applicable, Participant | 5 days |
| 14. | Sign and return of Assessment Summary Report and Urgent Remedial Action Reporting as appropriate |
| 15. | Case Files Destroyed | RE | 3 days |

**Note:**

The SLA timescales as set out above reflect the current remote assessment approach in place due to the impact of the Covid-19 pandemic. Adjustments will be made to the SLA timings once site-based activities have resumed to ensure that assessment activities are completed within a maximum period of 20 working days from the detriment findings being finalised.

1. Assessment activity **must** be completed within 20 working days of detriment being identified.
2. The Service Level Agreement is likely to be more fluid than the approach taken by other MaPS quality initiatives. Progress through the various stages of the SLA will be activated as soon as the previous step has been completed.
3. Steps highlighted in grey are Participant/Lead Organisation activities and possible SLA failure points. The Scheme Administrator is under obligation to immediately report any service level failure directly to MaPS, as the failure occurs

# Appendix Five DAPA Telephone Scheme – Overview and Guidance Document v5 Sept 21

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| **Overview and Guidance Document**  **DAPA Telephone Scheme** | |
| **To be read in conjunction with** | * Telephone Scheme Pre-Assessment Questionnaire * Telephone Scheme Service Level Agreement * Case File Sampling Tool * Telephone Scheme Criteria (Advice only/Casework) * Telephone Scheme Assessment Submission Checklist * DAPA Scheme Representations and Appeals Process |
|  | |
| **Key Principles** | * The DAPA Telephone Scheme aims to consider the process of advice up to the point of solution. On-going case management for the chosen solution e.g., DMP, will not feature as part of the assessment approach. * The Scheme will consider the end-to-end debt advice process. Audio records provided for assessment should have resulted in full advice to the client, extending to include advice on options and agreed next steps (where applicable). Where a ‘triage’ function assists with identifying the extent of the debt problem and capturing initial client information, the findings of the triage process should also be provided as part of the assessment submission. * The assessment cycle will work on a yearly rotation. Assessment activities will be scheduled to take place during the second month of the quarter. Pre-assessment activities (completion of the pre-assessment questionnaire and preparation of the assessment documentation) will take place during the two-month period prior to that. * The assessment process will be completed remotely. A Pre-Assessment planning meeting facilitated by Microsoft Teams will provide a forum for both the Participant Organisation and the DAPA Scheme Assessor(s) and Moderator to meet and ensure that all team members fully understand the delivery model and client journey offered by the Participant Organisation. * The assessment sample has been determined by MaPS and is proportionate to the size of the advice and quality assurance teams and the number of internal quality assurance activities and file reviews undertaken. If there is a change (increase or decrease) in either the number of Advisers or the level of quality assurance activities, the sample size may be subject to change to ensure that the assessment process remains fluid and provides an accurate view on the quality of advice at that moment in time. * The sample of calls and case records to be assessed will be drawn from the pool of calls that have been subject to Technical Supervision/Quality Assurance during the preceding 2-month period, as per Grant Agreement Clause 2.3.1 in Schedule 1. Where there are an insufficient number of calls available within this pool, the sample will extend into a third month, and can also be extended to include records that have not been subject to quality assurance if necessary. * It is expected that the assessment submission will include not only the audio recording of the call itself, but also supporting documentation which may include but is not limited to, case records (including any notes used for internal communication/handover between Advisers), written information resources (confirmation of advice or factsheets), client action plan and next steps, a financial statement and budget sheet (where applicable). * Where the client is a returning client or has been subject to a channel shift (webchat), as a minimum call record relating to the previous enquiry and/or chat transcript should also be provided to assist with the assessment process. * All cases will be scored using the DAPA Scheme Percentage Score approach against the Telephone Scheme criteria relevant to the level of advice given (Advice only or Casework). * A KPI benchmark of 75% per file assessed has been set by MaPS which will run cumulatively for the grant year as a whole. During the first operational year of the Scheme, performance management will not be applied to the assessment findings, however the Scheme will continue to report against the performance framework. * Where client detriment is identified (actual) through the assessment findings, a Triggered Technical Site Visit intervention will be scheduled. * The assessment Service Level Agreement (SLA) will run to the hard deadlines determined, as per the principles of the DAPA Scheme. In instances where the Scheme is in a position to proceed earlier than the SLA, communications will be shared with the Participant as appropriate, without any adverse impact on the next stage of the assessment process. Engagement reporting to MaPS remains a feature of the SLA management. * Where remedial action has been identified as part of the Technical Supervision/quality assurance approach, this should be clear within the information provided for assessment to enable the Assessor to consider. The DAPA Scheme will not request the same action to be completed as a result of the assessment findings. * Assessment findings may identify ‘Urgent Remedial Action’ where it is felt that the client’s circumstances could be improved as a result of further advice. They are likely to arise due to the perceived risk of detriment/potential detriment, as well as the significance of a missed issue to the client’s situation and are highly likely to relate to case files where an Area of Concern has been identified. Remedial action may also be identified due to observations regarding adviser conduct, technical knowledge, and supervisory points. * The assessment findings will not look to make recommendations for future action. Instead, the written record of assessment findings will highlight the key themes that have been observed against the areas of Good Practice, Areas of Concern, Areas for Development and Areas for Improvement. Outside of reporting back to the Scheme on ‘Urgent Remedial Action’ taken, Participant Organisations will be responsible for developing their own Action Plan based upon the assessment findings, and for reporting back to their MaPS Delivery Manager. |
|  | |
| **Approach** | Participant Organisations will be invited to complete and return the DAPA Scheme Pre-Assessment Questionnaire for Telephone Scheme Participants, and in addition, provide a list of completed telephone advice activities that have taken place in the proceeding 2 -3-month period.  The DAPA Scheme Administrator will select and agree a sample of cases with the Participant Organisation, which should then be provided in electronic form to enable the assessment activity to commence. The agreed sample of cases should be submitted for assessment within a maximum period of 10 working days. During this preparation phase, the Scheme Administrator will facilitate a Pre-Assessment planning meeting with both the Participant Organisation and the DAPA Scheme Assessor(s) and Moderator. This meeting will provide an opportunity for all members of the assessment team to fully understand the delivery model and client journey offered by the Participant Organisation.  The audio call along with supporting case records will be assessed against the DAPA Scheme criteria, which has been specifically adapted for this channel. Assessment activity will be completed by an appointed representative(s) of the Scheme. All cases will be scored against the DAPA Scheme percentage scoring spectrum.  All assessment findings will be subject to full quality assurance and moderation activities prior to release which will involve the Moderator listening to the audio recording again as well as considering any case record provided. Once completed, assessment findings will be shared with the Participant Organisation, with MaPS as the funder, and where applicable, with the Lead Organisation.  To conclude the assessment activity, the DAPA Scheme Administrator will offer the opportunity for a post assessment discussion with the Recipient. This stage of the process is optional, and Participants can choose to opt out if they so wish. A Representations and Appeals process will be available for all case files scoring 74% or below. Please refer to the separates Representations and Appeals guidance documentation for further information.  Where it is considered appropriate, urgent remedial action may be requested as a result of the assessment findings. In addition, Participant Organisations should consider the detailed findings of the assessment to determine whether it is appropriate to make any changes to their delivery model/service structure. Urgent remedial action reporting will be managed by the Scheme Administrator. Longer term Action Plan reporting will be managed via MaPS and the relevant Delivery Manager.  All assessment activity activities will be delivered against the MaPS DAPA Service Level Agreement for Telephone. |
|  | |
| **Assessment Cycle** | The assessment cycle will work on a yearly rotation. Assessment activities will be scheduled to take place during the second month of the quarter. Pre-assessment activities (completion of the pre-assessment questionnaire and preparation of the assessment documentation) will take place during the two-month period prior to that. |
|  | | |
| **What is being measured?** | MaPS has clearly set out its expectation of the extent of advice expected via the DAPA Scheme criteria. The criteria have been developed with the nine steps of the debt advice process central to its requirements. Two versions of the DAPA Scheme criteria have been created – Advice Only and Casework. Quality of advice will be measured through these criteria.  A performance benchmark (KPI) of 75% has been set by MaPS with the expectation that all cases assessed will reach this level by the end of the grant year. During the first operational year of the Scheme, performance management will not be applied to the assessment findings, however where there are instances of ‘client detriment’ (actual) identified, a further assessment intervention will be scheduled. (See Triggered Technical Site Visit guidance). |
|  | |
| **Overview of Activities – Pre-Assessment** | The Participant Organisation will receive communications from the DAPA Scheme Administrator giving notice that an assessment has been scheduled. Notification of a scheduled assessment will be two staged:   * A 3-month notice will be issued to alert the Participant Organisation that an assessment is imminent. A copy of the Pre-Assessment Questionnaire and Case File Sampling Tool will be provided for information purposes only at this stage, to enable Participants to familiarise themselves with the content. * 8 weeks prior to the scheduled assessment a second notification will be released. At this stage, the Pre-Assessment Questionnaire will be re-issued, and the Participant will be invited to complete and return within a maximum period of 15 working days.   To support the completed Pre-Assessment Questionnaire, a list of completed telephone advice activities reflecting the previous 2 – 3 months should also be provided at this stage. This activity list should clearly identify all cases that have been subject to Technical Supervision/Quality Assurance activities. In addition, a list of current staff resources delivering the advice service should be identified. The Scheme Administrator will provide a Case Sampling Tool in the form of an Excel workbook which Participants will be required to populate. The workbook will facilitate an automated approach to identifying the assessment sample and therefore the Scheme will only be able to accept the information requested on this template. This information should be provided to the DAPA Scheme Administrator within a maximum period of 15 working days.  The Scheme Administrator will identify a sample of cases to be considered during the assessment. The Participant Organisation should consider the sample selected against the Scheme’s eligibility requirements and confirm acceptance of the assessment sample. Where it is considered necessary, reselections will take place as appropriate.  The Participant Organisation will need to respond to the communications within the timeframes as set out in the Service Level Agreement. |
|  | |
| **Case File Selection** | The case selection process is a randomised, fully automated process which is managed by the Scheme Administrator. Using the information provided within the Case Sampling Tool, a random sample of cases will be selected for assessment.  The assessment sample has been determined by MaPS and is proportionate to the size of the advice and quality assurance teams and the number of internal quality assurance activities undertaken.  The sample of cases to be assessed will be drawn from the pool of files that have been subject to Technical Supervision/quality assurance during the preceding 2-month period. Where there are an insufficient number of cases available within this pool, the sample will extend into a third month, and can also be extended to cases that have not been subject to quality assurance if necessary. Where casework is delivered, the sample drawn will be proportionate to the level of casework advice delivered. i.e., if 40% of advice delivery is at casework level, the sample will be reflective of this.  The assessment sample will be drawn from the pool of MaPS funded advice only.  **Note:** The sample size has been determined with consideration to funding value, the size of the advice and quality assurance teams and the level of quality assurance monitoring activities completed. If any of these element’s change, the sample size may be subject to an increase/decrease.  Once the sample has been drawn, the Scheme Administrator will provide notification to the Participant Organisation of the cases selected and seek confirmation of the appropriateness to proceed with the sample. Participants will be required to agree the sample is eligible to proceed with the assessment. **Note:** The agreed sample should not include any files previously assessed by the DAPA Scheme, through one or more of the MaPS quality initiatives.  In the event that a selected case is considered not to be appropriate to submit for assessment, the Participant should contact the Scheme Administrator to discuss the concerns. Where it is considered appropriate to do so, a new sample will be drawn.  All cases should be prepared and submitted for assessment within a maximum period of 20 working days from receipt of sample notification. |
|  | |
| **Case File Eligibility** | The eligibility principles of the DAPA Scheme will apply for all cases to be assessed. i.e., each case must:   1. Relate to a debt issue 2. Have resulted in full advice being given to the client 3. Have been subject to either Technical Supervision or Quality Assurance activities within the preceding 2-month period. 4. Either on their own, or with assistance from linked case records, or in the case of a channel shift, via the chat transcript, provide an overview of the complete end-to-end debt advice process. 5. Have not been subject to any prior assessment by the DAPA Scheme   **Note:** Where there are an insufficient number of cases available within this pool, the sample will extend into a third month, and can also be extended to cases that have not been subject to quality assurance if necessary.  Participants will be asked to verify and accept the sample of cases selected for assessment within a maximum period 10 working days of receiving the notification of the assessment sample.  Following submission, and if the assessment process identifies cases that are not eligible for assessment, a replacement case will be selected, and Participants will have a 48-hour window to prepare the case records and submit for assessment to enable the process to continue. |
|  | |
| **Case File Submission and Pre-Submission Checks** | The assessment process provides for electronic submission only. This can be via a password protected email submission, via direct access into an appropriate case management system or via access to a secure portal provided by the Scheme Administrator. The Scheme will no longer accept physical cases in hard copy format. Please note, where access is provided into a case management system, a minimum of five user accounts will be required for the Assessor and Moderator team. Access should remain live throughout the duration of the assessment process and may be required out of office hours.  Audio records should be provided either in MP3 or WAV format. It is expected that the assessment submission will include not only the audio recording of the call itself, but also all supporting case records.  Where a case comprises multiple documents, it is recommended that a folder/sub folder structure is applied to aid the assessment process. A suggested approach is as follows:   * Preliminary Information (Equal opportunities / Form of Authority/ Special Category data etc) * CIA / DAT Information * Financial Information (Budget sheet, SFS, MART, proof of income/expenditure * Creditors Correspondence * Client Correspondence * Confirmation of Advice (Letter, Factsheets, Information Leaflets * Application Forms (Benefit Checks, QBC, DRO, DHP, Trust Funds, Court Docs)   It is the responsibility of the Recipient to ensure all cases submitted for assessment are a full and accurate record of the advice given. As per the DAPA Scheme principles, there will be no opportunity for supplementary documentation to be provided once the assessment process has commenced. Where applicable, any relevant linked case record which **pre-dates** the case selected, should also be submitted for assessment. A linked case record will also include those examples where the client was called back. Linked records should be clearly identified.  Participants will have a maximum period of 20 working days from receiving notification of the file sample to prepare and submit cases for assessment. All cases should be submitted directly to the Scheme Administrator.  **Case Contents:**  Each case should clearly identify:   * Unique reference number that matches the DAPA Scheme assessment reference * Classification of Advice Only or Casework. * Clear identification of the sequence of any linked call recordings that apply.   Documentation to be included within the case record should include as a minimum:   * Preliminary Client Profile, including Data Protection, Consent to store Special Category data, Authorisation to Act, Conflict of Interest Check, Complaint’s procedure, Equal Opportunities Monitoring, copy of the initial debt assessment/CIA or other tool, Client Agreement, findings of the ‘Triage’ function (where utilised). * Full set of Case Notes in a logical order (including any notes used for internal communications/handover between Advisers). * Proof of debt and Creditor correspondence – incoming and outgoing correspondence (where applicable). * Budget Sheet and Standard Financial Statement (where applicable) * Proof of Income / Income and Expenditure Review / Copy of the completed benefit check. * Written information resources (Confirmation of Advice letter or tailored factsheet) where applicable * Client Action Plan / agreed next steps * Copies of any applications made, including DRO Applications. * Copies of any credit reports obtained / valuation checks, or Individual Insolvency Register checks carried out (where applicable) * Information Sources used (as appropriate) particularly in relation to ‘specialist level’ advice. * Evidence of Technical Supervision / IFR and remedial action requested from these * Case notes from any appropriate Linked File or in the case of a channel shift, a copy of the Webchat transcript. (These should be clearly marked). |
|  | |
| **Pre-Assessment work required by the Recipient –** | * Complete and return the DAPA Telephone Scheme Pre-Assessment Questionnaire * Provide a list of completed cases within the proceeding 2-3-month period using the Excel Case Sample Tool provided along with a list of current staff resources delivering the advice service. The list of completed activities should clearly identify where Technical Supervision/Quality Assurance activities has taken place * Confirm agreement of the sample of cases selected for assessment, ensuring that they are each ‘eligible’ for assessment by the DAPA Scheme * Participate in the Pre-Assessment planning meeting to ensure that your allocated Assessor(s) and Moderator resources have a full understanding of your service delivery model. Where direct access to an in-house CRM is being provided to the Scheme, this meeting should also extend to user training for the assessment team. * Prepare the agreed assessment sample for electronic submission, with consideration to the requirements identified in the Case File Submission and Pre-Submission Checks section, to support this activity. |
|  | |
| **Overview of Activities - Assessment – The Practicalities** | All cases provided will be assessed against the DAPA Scheme criteria appropriate to the level of advice contained. i.e., Advice or Casework.  The fundamental nature of Peer Assessment is it involves the judgement of an experienced practitioner. The DAPA Scheme Assessor will consider, by listening to the audio recording and from the evidence contained within the case records and any other documentation provided, whether the Adviser has demonstrated they have dealt with the case effectively against the DAPA Scheme principles of comprehensive, tailored and legally correct advice. The individual DAPA criteria will be assessed as either met, not met, detriment or not applicable.  All cases assessed will be scored using the DAPA Scheme percentage scoring approach. A formal written summary of the assessment findings will be prepared for each case assessed.  Assessment activity will conclude within a maximum period of 12 working days, as determined by the Scheme Service Level Agreement.  In instances where an example of ‘actual’ client detriment (as defined by the DAPA Scheme) is identified during the assessment, the Scheme Quality Manager will immediately review the assessment finding and case file presented, to verify the outcome. In turn, the detriment finding (which will include a full copy of the assessment summary) will immediately be reported to the Participant, the MaPS Quality Team, and the relevant MaPS Delivery Manager. The reporting of the detriment outcome is to enable the relevant organisation to determine whether action needs to be taken with the client to reverse the detriment from the client’s perspective i.e., to correct the issue and for this action to be taken as quickly possible. Follow up actions and ongoing management of the detriment reported, will be managed centrally by MaPS. This interim reporting will not impact on the overall assessment process and the SLA currently in place for moderation and post assessment activities and representations will continue as normal. |
|  | |
| **Overview of Activities –**  **Quality Assurance and Moderation** | All findings of the assessment process will be subject to full quality assurance and moderation activities. Moderation activities will be led by the DAPA Scheme Quality Manager and/or a Scheme Moderator  Moderation activities will be carried out in tandem with the assessment process and will involve listening to the audio records as well as considering the case records and supporting documentation provided for assessment. The moderation process will be two staged, focusing on both the technical findings and scores, as well as the overall summary and recommendations. Moderation activities may result in amendments to the assessment findings and therefore no outcomes will be shared until the final version of the assessment results are ready for release.  Moderation and quality assurance activities will conclude within a maximum time period of 8 working days from completion of the assessment. |
|  | |
| **Post Assessment – Reporting on Findings** | Within 20 working days of submission, the formal findings of the assessment process will be released. These will be shared electronically with an appropriate password encryption with both the Participating Organisation and with MaPS as the funder.  The formal written record of the assessment will comprise:   * Overarching summary report of assessment findings and high-level comparisons * Formal performance write-up against the DAPA Scheme criteria and resulting score, for each case assessed   All written reports will identify examples of good practice where these were noted. In addition, the reports will summarise Areas of Concern and Areas for Improvement/Development which have been identified. Assessment reports will not seek to make recommendations for future action.  Urgent remedial action may be requested as a result of the individual assessments. Urgent remedial actions are likely to arise due to the perceived risk of detriment/potential detriment, as well as the significance of a missed issue to the client’s situation. They are likely to relate to cases where an Area of Concern has been identified. **Note:** The assessment process will only require re-engagement with the client in those examples where it is felt that the client’s circumstances could be improved through further advice from the organisation.  Urgent remedial action reporting will be managed directly with the DAPA Scheme and reporting forms part of the Service Level Agreement.  Where detriment has been identified (actual) through the assessment findings, a Triggered Technical Site Visit intervention will be scheduled. To ensure the TTSV assessment can proceed in a timely manner, Participants will have a period of 72hrs (3 working days) from when assessment findings have been released to consider any actual detriment findings and confirm whether there is an intention to appeal the assessment outcome. Where the finding of actual detriment is agreed with, a TTSV will be triggered immediately. The TTSV process will then continue within the normal SLA timeframes. Where there is an intention to appeal, the normal SLA timescales and representations process will apply.  Recipients will be required to return signed acceptance of the assessment findings within a maximum period of 20 working days. |
|  | |
| **Post Assessment – Feedback Discussion** | Participants will have an opportunity to discuss assessment findings with both the DAPA Scheme Administrator and the DAPA Assessor(s) and Moderator who completed the assessment activities. This element of the assessment process is optional, and participants can choose to either engage with this element or opt out of it.  A conference call or Microsoft Teams meeting will be scheduled at a mutually convenient date and time, which must take place within 15 working days of the assessment findings being shared, as determined by the MaPS Service Level Agreement. The call will be limited to approximately 1.5 hours in duration.  Where there are queries relating to the technical findings of the assessment, Participants should submit their queries directly to the Scheme Administrator in advance of the meeting. Any file specific queries must be received at least 3-working days prior to the call taking place to provide both the Assessor(s) and Moderator with an opportunity to consider ahead of the meeting. Unfortunately, the Scheme will not be in a position to discuss specific technical points regarding assessment findings, unless these are received in advance. Assessment scores will not be changed as a result of this clarification process but will provide insight for organisations on specific queries. A stand-alone Representations and Appeals process is available to the Recipient should they wish to challenge the assessment findings. |
|  | |
| **Post Assessment – Representations and Appeals** | The DAPA Scheme provides an opportunity for organisations to make formal representation against the findings of the DAPA assessment report. This process is open for any case file assessed as achieving a score of **74% and below.**  An appeal may be made on the following grounds:   * The organisation disputes a score awarded to one or more case files within the assessment sample, scoring 74% or lower; and * The appeal relates to the technical findings and/or an Area of Concern of the assessment * The appeal content may not exceed a maximum word limit of 150 words per criteria for each case to be challenged. * Representations must be received by Recognising Excellence no later than 5pm on the submission deadline.   The Participant will have a maximum period of 20 working days from receipt of assessment findings to submit a formal appeal. Please see the DAPA Scheme Representations and Appeals process for further detail. |
|  | |
| **Useful Documents** |  |
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# Appendix Five A DAPA Telephone Scheme – Service Level Agreement

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| **Activity** | | **By Whom** | **SLA Lead Time**  **Up to Maximum**  **(Working Days)** |
| **Pre- assessment** | | | |
| 1. | Assessment notice and guidance issued to Participant | RE | Three months prior to assessment date |
| 2. | Pre-assessment questionnaire and Case Sampling Tool released to Participant | RE | 8 weeks prior to assessment date |
| 2a. | Participant completes and returns Pre-assessment questionnaire and Case Sampling Tool | Participant | 15 w/days |
| 3. | Assessor and Moderator resource allocated | RE | 6 w/days |
| 4. | Case sample selection |
| 5. | Case Sample Agreed | Participant | 10 w/days |
| 6. | Pre-Assessment Planning Meeting | ALL |  |
| 7. | Case Submission | Participant | 10 w/days |
| 7a. | Assessor Preliminary Sense Checks | RE | 1 w/day |
|  | **Assessment Activities** | | |
| 8. | Assessment Activities  \*Detriment reporting (actual) to Participant and MaPS as appropriate | RE | 12 w/days |
| 8a. | Case File Re selections as appropriate  (Participants will have a period of 48 hours to provide any replacement files identified) |
| 8b. | Moderation Activity   1. Technical findings and assessment score 2. Urgent action identified as appropriate   **Note**: Moderation will be completed in tandem with the assessment  \*Detriment reporting (actual) to Participant and MaPS as appropriate |
| 9. | Summary Report Prepared | RE | 5 w/days |
| 10. | Final Moderation and Preparation for Release  \*Detriment reporting (actual) to Participant and MaPS as appropriate | RE | 3 w/days |
| 11. | Assessment findings shared with Participating Organisation, Lead Organisation (where applicable) and MaPS |
|  | **Post Assessment Activities** | | |
| 11a. | Final Detriment reporting to MaPS as appropriate | RE | 1 w/day |
| 12. | Feedback Meeting (optional) | Participant | 15 w/days |
| 13. | Assessment report signed and returned to RE  Signed report shared with MaPS Delivery Manager and Lead Organisation  \***Deadline for submission of Representations and Appeal** | Participant | 5 w/days |
| 14. | Urgent Remedial Action Reporting (as appropriate |
| 15. | Assessment Process Conclusion. Case records destroyed as appropriate. | RE | 3 w/days |
| 16. | Action plan and response to recommendations (Non-Urgent Action) reported directly to MaPS and Lead Organisation (where applicable) | Participant | 60 w/days from Step 11 |
|  | **\*Representations and Appeals Process (where applicable)** | | |
| 13a. | Written Representations submitted | Participant | As per Step 13 |
| 13b. | Appeal considered by DAPS Scheme Technical Expert. Formal written response prepared | Technical Expert | 10 w/days |
| 13c. | Moderation of response  Final report and assessment findings (amended as appropriate) shared with Organisation, MaPS and Lead Organisation | RE | 5 w/days |
| 13d. | Assessment report signed and returned to RE  Signed report shared with MaPS Delivery Manager and Lead Organisation | Participant | 7 w/days |
| 13e. | Urgent Remedial Action Reporting (as appropriate |

# Appendix Six Data Protection and GDPR Compliance

Recognising Excellence is complying with current data protection legislation, the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 or any codes of practices issued by the Information Commissioner from time to time.

The confidential information and personal data processed during the peer review assessment is protected by the new GDPR legislation. The respective roles of the parties are you as ‘data sub-processor’, Recognising Excellence (‘RE’) as ‘data processor’ on behalf of the Money Advice Service as ‘data controller’.

The legal basis for Recognising Excellence for processing data is that of “contractual obligation” as set out in Article 6 (1) (b) of the GDPR.

The organisation being assessed will be made fully aware of its rights under GDPR by reference to the Money and Pension Service’s Privacy Policy <https://www.moneyadviceservice.org.uk/en/corporate/privacy> and the Recognising Excellence’s Privacy Policy [www.recognisingexcellence.co.uk/Privacy](http://www.recognisingexcellence.co.uk/Privacy). Most commonly these are:

* All information gathered during the assessment shall be held as absolutely confidential however obtained or learned from the organisation in pursuant to or in preparation of or obtained or learned during the term of this activity, whether relating to the organisation or to any of its officers, servants, agents, clients, suppliers, or subsidiaries or to the business of any of the foregoing persons or otherwise, and whether or not expressly designated confidential.

* Recognising Excellence shall not without the organisation’s prior written consent use or permit or cause the same to be used, save for the direct purpose of this assessment.

* Recognising Excellence shall not without the organisation’s prior written consent, disclose or permit or cause the same to be disclosed to any person other than to those of its full-time employees and/or its DAPA Assessors and/or Scheme Quality Managers and Moderators who need to be informed thereof to enable Recognising Excellence to perform its obligations.

* No case files or employee records will leave the organisation’s premises, except by GDPR compliant couriers (see below) and/or provided in electronic format with an appropriate password encryption. Recognising Excellence’s DAPA Assessor’s will destroy all notes/records on completion of the assessment process.

* Recognising Excellence, on behalf of the Money and Pensions Service, will securely retain any DAPA assessment related information for 6 years from the date of creation, for the period it holds the MaPS contract. At the end of the contract, all data will be transferred to MaPS.

6.2 IT Security

RE’s IT system, a generic Microsoft Office 365 system, Client Relationship Management (CRM) system and Sage accounting system is operated through an individualised password protected web based terminal server programme. Staff, contractors and DAPA Assessors are allocated access levels to the systems dependant on roles and responsibilities. This is set by a member of the Senior Management team with counter signatory from IT support.

Staff and contractors’ passwords are changed through automated prompting on a 40-day basis to the individual member of staff and known only to them.  These passwords are subject to complexity requirements around previous passwords, length, alphanumeric, case etc. All personal data transferred by email between RE personnel is password protected.

All PCs and laptops are further encrypted using Becrypt software which meets the FIPS 140-2 Standard. All databases and CRMs with client data and contracts are also encrypted with further pass wording, which is only viewable to those with the password. For example, details of the Microsoft encryption are available via the link

<https://support.office.com/en-us/article/data-encryption-in-onedrive-for-business-and-sharepoint-online-6501b5ef-6bf7-43df-b60d-f65781847d6c>

RE does not use any USBs which are not password protected or suitably encrypted.

Systems are securely backed up each evening with the latest back up taken off site to a secure storage facility in the local area. All personal data is stored in secure UK based data centres.  No personal data will be transferred or processed beyond the EEA unless adequately protected, as required by the GDPR.

Our systems suppliers provide automatic updates and patches as required by our SLA. Our anti-virus protection is supplied by ESET which provides anti-virus definition updates (patches) automatically via the internet to protect us against viruses, malware, malicious websites, etc.

Redundant media such as hard discs and USBs when no longer required are picked up and shredded by a local organisation fully certified to WEE Regulations to destroy media.

Users are subject to random internet monitoring and all activities are monitored.

All systems holding client data are secure. Server rooms, offices and filing systems have secure entry systems and staff are unable to enter without appropriate credentials.

6.3 Hard Copy/Document Security

From April 2020, there are limited instances of where hard copy documents will be shared with the DAPA Scheme, however where this does occur, RE will continue to use DHL International, who are GDPR compliant, for the transfer of any hard copy data. The fully tracked transfer collects from a nominated person and can only be signed for by the authorised recipient.

All hard copy data is stored within locked filing cabinets which are situated in non-public, locked, and alarmed offices.

We employ secure recycling paperwork services; our supplier collects on a weekly basis all information for secure destruction. The organisation we employ has gained the new standard in paper shredding: BS EN 15713:2009.

6.4 DAPA Assessor Confidentiality

DAPA Assessors are bound by RE’s Confidentiality policy.

**Confidentiality Requirements**

To protect all confidential information to which you have access, or otherwise acquire, from loss, misuse, alteration or unauthorized disclosure, modification, or access by:

* making sure paper records are not left unattended in areas where unauthorised people may view them.

* using password protection, screensavers, automatic time-outs, or other appropriate security measures to ensure no unauthorised person may access confidential information from your workstation or other device.

* appropriately disposing of confidential information in a manner that will prevent a breach of confidentiality and never discarding paper documents or other materials containing confidential information in the bin unless they have been shredded.

* safeguarding and protecting portable electronic devices containing confidential information including but not limited to computers, smartphones, PDAs, CDs, and USB drives.

* disclosing confidential information only to those individuals at RE who have a need to know in order to fulfil their job responsibilities and contract obligations.

**Data Protection Requirements**

Assessors must ensure they work in a secure and authorised manner as set out in the key principles below:

* DAPA assessment activity should not take place in an open plan office environment. An appropriate personal space should be provided to ensure you are able to concentrate on the assessment methodology whilst ensuring confidentiality is observed at all times.

* IT equipment should not be used where it can be overlooked by unauthorised persons.

* Under no circumstances should a DAPA assessment take place in an open public place.

* Computers should not be left unattended whilst still logged in. Assessors must shut down their PC if they leave the room/office or lock the screen if they are only away from the computer for a short period of time.

* When not in use, files should be stored in lockable filing cabinets or a suitably secure equivalent location.

* If assessments are being undertaken from home, care should be taken to ensure that data is kept secure from unexpected visitors and protected from accidental damage.

* Assessors are reminded of their obligations regarding the use of personal data including, but not limited to the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018 and any other codes of practice issued by the Information Commissioner from time to time.

# Appendix Seven DAPA Assessor Code of Conduct

Individuals who undertake DAPA assessment activity on behalf of RE should always adhere to the specific guidance, criteria and processes which underpin our delivery of the assessment process. In addition, the following good practice should be applied to all assessments:

**Objectivity, Impartiality, and Integrity**: this should be maintained throughout the assessment process, irrespective of the personal or professional experience of the DAPA Assessor. Assessors should not accept any gifts or inducement which could influence, compromise, or threaten their ability to act and to be seen as acting independently.

**Competence**: DAPA Assessors have a responsibility to inform RE in cases where they consider themselves to be insufficiently expert in the area for review i.e., where a case file involves Court Representation. If necessary, DAPA Assessors should decline the assessment and return the material to RE.

**Professionalism:** DAPA Assessors must commit to being honest, thorough, and providing straightforward communication in the performance of DAPA assessment activities. Assessors should be consistent and accurate in their evaluations of information received during the DAPA assessment process and strive to be complete in the assessment activity, avoiding any omissions. Facts should be separated from opinion and clearly and concisely conveyed within assessment reports. Fundamentally, all DAPA assessment activity should be undertaken in a conscientious, diligent, respectful, and efficient manner.

**Constructive critique**: while DAPA Assessors are required to critically evaluate case files, they should aim to do so in a balanced way, wherever possible identifying strengths and phrasing criticisms in a constructive way. Personal attacks or criticisms are unacceptable. The review and resulting report should provide guidance on how the advice, approach and case file management processes might be improved, providing supporting evidence drawn from the case files reviewed to substantiate the feedback.

**Organisational sensitivity**: DAPA Assessors should keep under consideration the sensitive nature of the work they are reviewing and should structure the assessment report summary and recommendations for improvement as appropriate. By the very nature of the assessment process, trends may emerge relating to either organisational practice, individual performance or both, and assessment findings should clearly differentiate between the two.

**Timeliness and responsiveness**: every effort should be made to complete assessment activities within the specified time period and DAPA Assessors should notify RE in cases where this is not possible. Full details are identified within the Service Level Agreement, tailored for the individual MaPS Quality Initiatives.

**Disclosure of Conflicts of Interest**: DAPA Assessors should identify and declare in advance of the assessment, any potential conflicting interests that could impinge on the effectiveness or objectivity of the assessment process. This could include, but is not limited to, any organisational, legal, ethical, financial, moral, or personal conflict of interest. This should be assessed in conjunction with RE’s guidance on conflict of interests. Where applicable, assessments should be declined.

**Confidentiality**: All information made available as part of the assessment process should be treated in the strictest confidence. DAPA Assessors should maintain confidentiality and protect the identity of any Organisation, individual Adviser or client identified within a case file, by not disclosing, retaining, or copying any information and by not discussing any aspect of the assessment process with colleagues. DAPA Assessors must not take advantage of any information obtained as a result of their role and must adhere to the Confidentiality and Data Security/Data Protection policies of RE. This relates to all information received during the DAPA assessment and the DAPA assessment results.

**Data Protection**: DAPA Assessors must store and dispose of documents in compliance with the Data Protection Act 2018, by storing documents in a secure place, not sharing, or making copies of documents and returning or destroying documents in accordance with the guidance provided by RE. When sharing data electronically, extra care and caution should be taken to ensure data is shared only to the intended recipients authorised by the DAPA Scheme.

**Misconduct:** DAPA Assessors should inform RE (in confidence) when they become aware of practice which is considered to fall below good conduct e.g., practice which raises ethical concerns or identifies misconduct on the part of an Adviser or Organisation including plagiarism, fabrication, or falsification.

**Engagement**: To ensure the success of the DAPA Scheme, Assessors should be engaged with the approach and assessment process throughout their involvement. This will involve, but is not limited to, participation in ongoing CPD, individual and group moderation and evaluation activities.

# Appendix Eight Conflict of Interest Policy

A Conflict of Interest is a conflict between a person’s duties and responsibilities with regard to the DAPA Scheme assessment process, and the person’s private, professional, business, or public interests. In general terms, there may be a conflict of interest (or the perception of a conflict of interest) where the DAPA Assessor has had an opportunity to form a view about the level of competence of the Organisation to be assessed and/or of advisers who work in it or to have their view of an Organisation and/or its advisers biased or affected in some way.

There may be a real, perceived, or potential conflict of interest when the DAPA Assessor:

* would receive professional or personal benefit resulting from the organisation being reviewed.
* has a professional or personal relationship with an organisation; or
* has a direct or indirect financial interest in a funding opportunity or organisation being reviewed

For the purposes of the DAPA Scheme, RE has determined the following examples would result in an Individual being ‘conflicted out’ from undertaking an assessment:

**Organisational Conflict:**

* If the individual works for the Organisation to be assessed
* If the Organisation is part of the same MaPS funded partnership or sub partnership
* If informal partnership arrangements exist between the individuals Employer Organisation and the Organisation to be assessed
* If the Organisation is located within the same local authority area as the Individuals employer organisation

**Individual Conflict:**

* If the Individual has previously worked for or had substantive dealings with the Organisation to be assessed
* If a spouse, partner, close friend, or family member works for the Organisation to be assessed
* If the Individual (or a colleague in the Individual’s Organisation) has previously advised or had substantive dealings with the client file to be assessed including where the Individual (or colleague) has advised the other party in a conflict-of-interest situation
* If the Individual has any knowledge that could affect their ability to remain impartial

RE will consider any apparent or perceived conflict of interest prior to allocating a DAP Assessor to complete the assessment. DAPA Assessors will have a duty to notify RE from the outset if there is any conflict or potential conflict of interest from their perspective. If they discover a conflict of interest during the conduct of an assessment that was not apparent at the outset, they are required to immediately speak to the RE Contract Manager who will provide further guidance.

If a DAPA Assessor is employed by a Citizens Advice partner, under the terms of managing conflict of interest, they will be able to assess another Citizens Advice partner only if they do not work within the same MASDAP sub region.

1. Based upon the Child Poverty Action Groups’ Debt Advice Handbook (13th Edition) [↑](#footnote-ref-2)
2. The diagram does not necessarily reflect the order in which steps are taken, as in practice a number can be carried out alongside each other and, in some cases, it may be appropriate not to carry out one or more steps at all [↑](#footnote-ref-3)