 

**AQS Self Assessment Guidance for Debt Advice Providers**

“Advice is provided by an adviser trained and /or qualified to the appropriate level of debt advice as detailed in the individual components of the Money and Pensions Service Quality Framework”

**Please read this document carefully it explains everything you need to know about debt advice providers who are accredited or wish to be accredited against the Advice Quality Standard (AQS)**

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**Introduction**

* Please read this document carefully it explains everything you need to know about debt advice providers who are accredited or wish to be accredited against the Advice Quality Standard (AQS)
* The Advice Quality Standard (AQS) has been accredited against the Money and Pension Service’s (MaPS) Quality Framework and as such, for any debt advice provider applying for accreditation against the AQS, **either at Advice Only or Casework level**, you will automatically be assessed against the requirements of the MaPS Quality Framework.
* Assessment against the MaPS framework will be made irrespective of any funding relationship that you may have with MaPS. However, holding a quality standard/code that is accredited to the MaPS Quality Framework is **one** of the funding criteria applied by the Money and Pension Service and is compulsory for those debt advice providers that are grant funded by MaPS.
* Alignment against the requirements of the MaPS Quality Framework is evidenced via:
* Self evaluation and evidence that individual advisers delivering front line debt advice, have undergone accredited MaPS training that is appropriate to the complexity of their role

**Glossary of Terms**

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| **Term** | **Definition** |
| **AQS** | Advice Quality Standard v4 |
| **GGDA** | Giving Good Debt Advice (no longer available although certificates still accepted) |
| **GGDA Knowledge Assessment** | The Giving Good Debt Advice online knowledge assessment was an online tool created by MaPS, to enable individuals that have provided debt advice for a number of years to evidence their knowledge of debt advice. The online tool was closed on 30th June 2017. Thereafter this date, individuals who need to evidence accredited learning will need to access training through the approved list of MaPS accredited learning providers. |
| **GGDA Pass Certificate** | Successfully completing the Giving Good Debt Advice online assessment will have generated a pass certificate. This certificate enables individual Advisers to evidence successful completion of an approved MaPS accredited learning route. |
| **Learning Pathways** | MaPS accredited learning. These courses/qualifications are often broken down into modules or pathways. Individuals need to complete all pathways and any relevant assessments before the course can be considered consider. A list of all MaPS accredited learning programmes can be found at <https://debtquality.org.uk/learning-pathway/> |
| **MaPS** | The Money and Pensions Service (formerly the Money Advice Service) |
| **Quality Framework** | The Money and Pensions Service Debt Advice Quality Framework |

**Background and Context**

The MaPS Debt Advice Quality Framework was introduced in 2013 in order to raise the quality and consistency of debt advice across the UK. Providing a single baseline mechanism to quality assurance, the framework enables Third Party Standards e.g. the AQS, Membership codes, and Training and Qualifications in use across the debt advice sector to become accredited by MaPS.

MaPS do not assess either an individual debt advice provider or an individual Adviser against the requirements of their framework.  Instead, third party owners e.g. AQS, were invited to submit their Standard/ Membership code or training programme/qualification for accreditation against the framework and an **individual debt advice provider** can evidence their alignment against the MaPS framework, by achieving and maintaining accreditation against the AQS.

The Debt Advice Quality Framework for Individuals enables the providers of debt advice training and qualifications to submit their learning content and processes for mapping and independent external assessment and subsequent accreditation against the MaPS Framework.

Six activity sets have been identified which reflect the different tasks undertaken during the debt advice process by advisers in various roles. **The AQS assessment process therefore extends to considering whether advisers have undertaken accredited learning at a level appropriate to their role.**

**Objective of this Self Assessment Guidance Document**

* This guidance document provides appropriate guidance to compile the evidence that will need to be presented to your AQS Assessor.
* When working through the guidance, please consider the objective of the process which is *“To ensure advice is provided by an adviser trained and /or qualified to the appropriate level of debt advice as detailed in the individual components of the Money and Pension Service Quality Framework”*
* On a practical level this means that all debt advisers in your organisation **must** have undertaken debt training or a debt advice qualification which enables your organisation to demonstrate that they have the appropriate knowledge for the debt advice related activities expected within their defined role.

**Completing Appendix One and Appendix Two**

* As a debt advice provider both at advice or casework level you must now complete Appendix One and Appendix Two of this document, in advance of your AQS assessment. The completed forms should be shared with your AQS Assessor ahead of their visit as part of your normal document submission
* The **Staff List and Debt Advice Role (Appendix One)** should identify all staff, paid and unpaid, working within the debt advice team within the organisation and indicate what type of debt activity they undertake:
* Initial Contact
* Support Work
* Advice
* Casework/Specialist
* Court Representation
* Supervision
* Your organisation must also complete the **Organisational Record of Individual Learning (Appendix Two)** to identify all debt advice training that has already been completed by the debt advice team

**Individual ‘Activity Sets’ for Debt Advice Staff**

The following activity sets have been identified which reflect the different tasks undertaken during the debt advice process by advisers in various roles:

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| **Activity set** | **Definition** |
| **Initial contact** | The member of staff will be the first point of contact in the service for the client, they may explain the remit of the service, may gather basic personal information, provide information and/or signpost the client if appropriate |
| **Support work** | The member of staff may provide information relating to the remit of the service, collect client information, identify the client’s problem, identify related issues, identify any immediate or urgent priority matters, agree appropriate next steps and signpost or arrange a referral for the client to other services where appropriate. |
| **Advice** | The adviser will diagnose 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. Advice can include some action such as referral to another organisation, identifying options and next steps, giving assistance such as form filling and contacting third parties for infomration.  There is no rule about the maximum number of client contacts. |
| **Casework/Specialist** | The adviser takes on responsibility for the conduct of a case and/or an adviser takes action on behalf of the client. The adviser drives and manages the case and maintains a continuing relationship with the client.  Negotiation, advocacy and representation where appropriate are common features of casework. |
| **Court representation** | The adviser makes preparation for proceedings on behalf of the client, prepares the client for formal proceedings, and/or represents the client in formal proceedings in relation to their debts within the rights of audience for these proceedings. |
| **Supervision** | The adviser provides technical debt advice support to other advisers within and/or outside their own organisation. Line management alone does not constitute supervision, without the provision of technical debt advice support. |

**Pre Requiste or ‘Pathways’ of Learning**

‘Pathways’ of learning are where a prescribed combination of learning modules or courses are to be completed collectively to meet a complete activity set. The MaPS activity sets described above follow a building block approach i.e. in order for an individual to complete training at Support Work Level, they must first have completed Initial Contact accredited training. This approach follows across each of the different activity sets and the entry point process for accessing a ‘pathway’ of learning is managed by the training and/or qualification provider.

In the content of a ‘pathway’ approach to evidencing learning, an Assessor will consider the pathway that has been followed and the duration of learning completed. A pathway will only be considered complete once each of the individual modeules have been completed. Training and or qualifications that have achieved accreditation on the basis of a pathway approach are clearly identified within the published list of providers. <https://debtquality.org.uk/learning-pathway/>

**Where to Find the Register of MaPS Accredited Training and Qualification Providers**

The following web address (<https://debtquality.org.uk/learning-pathway/> )

provides access the current list of MaPS accredited training and qualification providers. Each accredited programme identified, confirms the date of award of accreditation, the launch date of the accredited prgramme, and the activity set that it supports. Training and or qualifications that have achieved accreditation on the basis of a pathway approach are clearly identified within the published list of providers.

When considering whether individuals have completed a version of accredited learning, consideration should also extend to the launch date of the accredited programme, to ensure that the correct version of learning was completed.

**The AQS Assessment Process**

* Your assessor will review the **Staff List and Debt Advice Role (Appendix One)** and the **Organisational Record of Individual Learning (Appendix Two)** comparing learning completed against the register of MaPS accredited courses
* Corrective actions may arise in situations where it has not been possible to confirm MaPS accredited learning has been completed that is relevant to the level and complexity of individual roles. In this instance, corrective actions will be managed in line with the usual assessment parameters

**Corrective Actions**

* Corrective actions will arise in situations where it has not been possible to confirm that accredited learning has been completed that is relevant to the level and complexity of individual roles.
* Corrective action must take place within the timeframe as set out by the AQS assessment process i.e. 28 days from the date of the assessment. Examples of non-compliances include:
* accredited learning has not been completed
* learning that has been completed does not match the level and complexity of individual roles
* learning was completed prior to the learning programme receiving accreditation
* supervisors are unable to provide evidence of appropriate learning
* Where the assessor has found a corrective action a corrective action report must be completed. The debt advice provider must provide the assessor with the following forms of evidence as proof of the completed action:
* evidence of course attendance
* evidence of GGDA pass certificate (applicable when learning was completed prior to the learning programme receiving accreditation – please note the GGDA platform is no longer available however completed training through this route is still valid)
* where it is not possible to source and complete accredited training in the 28 day corrective action period your assessor will except evidence of your course booking e.g. copies of email correspondence from the training provider
* When accepting confirmation of a course booking as evidence of a corrective action, the next assessment will seek to confirm the adviser did complete and successfully pass the course as planned

**Additional Guidance**

**Debt Advisers**

* All debt advisers must be able to evidence that they have successfully completed MaPS accredited learning for the type of activity they undertake in their role. i.e Advice, Casework/Specialist or Court Representation.
* Supervisors and managers should be aware that debt advice staff must have successfully undertaken MAPS accredited training. They should be aware that prior to progression to a new debt advice related activity, they must have successfully completed the appropriate MaPS accredited learning e.g. a generalist adviser must complete the appropriate accredited learning prior to undertaking casework/specialist level work.
* The AQS Assessor will request to see evidenced of course certificates.

**Support Staff**

* Organisations that have staff working at support work level (generally considered to be triage/gateway/common initial assessment staff) will be required to run a refresher session, to identify urgent and emergency debt issues and to reiterate their local arrangements for internal/external referral or signposting as appropriate.
* Organsiations will be asked to confirm the date/s and names of those that attended any internal refresher training activity and it is an expectation that organisations will build this into existing staff updates/training/briefings.

**Supervisors**

* For any individual operating as Supervisor for the debt advice team, they will be required to evidence appropriate learning to this level through one of the MaPS accredited learning routes. Supervisors will also need to demonstrate competence to the level of which they supervise, and therefore if members of the team also provide Court Representation, the Supervisor will be required to evidence learning at this higher level also.
* The AQS Assessor will request to see course certificates for Supervisor courses.

**Forms of Evidence**

* You will be required to present your AQS Assessor with suitable evidence that MaPS accredited learning has been completed. This will take one of two forms:
* A certificate of completion of the MaPS accredited course/qualification
* Evidence of successful completion of Giving Good Debt Advice (GGDA) online knowledge assessment (although no longer available)

**Data Protection**

Recognising Excellence is complying with current data protection legislation, the UK 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.

For the purposes of this agreement to carry audits the Advice Services Alliance is the ‘Data Controller’, Recognising Excellence the ‘Data Processor’ and the Assessor the Sub Processor.

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 Client will be made fully aware of its rights under GDPR by reference to the Legal Aid Agency’s Privacy Policy <http://asauk.org.uk/about/advice-services-alliance-privacy-notice/> and the Recognising Excellence’s Privacy Policy [http://www.recognisingexcellence.co.uk](http://www.recognisingexcellence.co.uk/recognising-privacy-policy/). Most commonly these are:

* All information gathered during the Audit shall be held as absolutely confidential however obtained or learned from the Client in pursuant to or in preparation of, or obtained or learned during the term of this agreement, whether relating to the Practice or to its business 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 Client’s prior written consent use or permit or cause the same to be used save for the direct purpose of this agreement;
* Recognising Excellence shall not without the Client’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 Auditors and Verifiers who need to be informed thereof to enable Recognising Excellence to perform its obligations.
* No case files or employee records will leave the Client’s premises and Recognising Excellence’s Auditor will destroy all notes/records on completion of the Audit process;
* Recognising Excellence on behalf of the Advice Services Alliance will securely retain any AQS related audit information for 5 years from the date of creation, for the period it holds the AQS license.

**Additional Advice Quality Standard Debt Advice Evidence Requirements**

| **Evidence Criteria** | **Guidance** | **Evidence** |
| --- | --- | --- |
| **B1.4**  You must have access to a directory of alternative service providers, which is kept up to date, is accessible to all staff and is used to support effective signposting and referral | The list of providers you signpost or refer to should contain correct information about the organisations. You will have to demonstrate that you have access to current details for any service providers used that are not in the AQS Directory,  including telephone numbers, types of service offered, opening times, charging information, languages offered, and disabled access | Your assessor will ask to see your directory of alternative services including any money advice services and creditors that you work with in order to demonstrate an effective process for engagement with creditors and providers in the debt advice sector. This information should be stored centrally and be accessible to all staff and volunteers; it should also have been updated in the last 12 months. |
| **C1.3** Your organisation should be a member of recognised representative body | Most advice services are members of recognised national bodies such as Advice UK (www.adviceuk.org.uk), Citizens Advice (www.citizensadvice.org.uk) and Age UK (www.ageuk.org.uk). There are also practitioner networks such as NAWRA (www.nawra.org.uk) and **Money Advice Liaison Group (MALG)** (www.malg.org.uk). | Your assessor will ask to see evidence of membership of a recognised representative body e.g. Advice UK, NASMA (National Association of Students of Money Advisers) IMA (Institute of Money Advisers), and MALG (Money Advice Liaison Group) to demonstrate engagement in external forums/ workshops/meetings, where best practice is shared.  Engagement in external forums should also include evidence of involvement in peer to peer support and learning from colleagues in the sector. Local networking, advice forums and team meeting minutes may also be provided as evidence. Additional evidence may also include centrally stored forum/worksop minutes and learning materials and staff signed circulation lists. |
| **C1.4** Your organisation must be registered with appropriate regulatory bodies | If your organisation is providing debt advice you may be subject to regulation by the Financial Conduct Authority  <https://www.fca.org.uk/> | Your assessor will ask to see evidence of FCA authorisation - your six-digit Firm Reference Number (FRNs) to uniquely identify firms, and your most recent RegData Report which replaced Gabriel as the FCA's data collection platform.  Alternatively if the FCA believe you do not require authorisation your assessor will require a copy of the written confirmation from the FCA (email is acceptable). |
| **D2.4** Where you deliver advice as part of a regulated service you must ensure that you comply with relevant professional standards and professional development frameworks | For organisations providing debt advice, staff must be appraised against the Money and Pension Service Framework for Individuals. You also need to be aware of the role of the Financial Conduct Authority and the activities which fall within their regulation regime | Your assessor will require completed copies of the following documents and relevant certificates to meet this requirement:   * Appendix One Staff List and Debt Advice Role * Appendix Two Organisational Record of Individual Learning |
| **D3.4** Your staff should have easy access to relevant and up-to date legal reference material. You must have a process in place to provide timely information to staff about changes in the law pertinent to their service delivery | You must provide your staff with access to websites and other reference materials in order that they can easily check and record the advice they are giving. You should identify how you communicate with the advice team any changes in key areas of law | Your assessor will ask staff questions in relation to engagement in external forums, workshops and meetings where best practice is shared, for example local advice networks, MALG (Money Advice Liaison Group), and IMA (Institute of Money Advisers) quarterly meetings.  Your training records should also include records of engagement in external forums.  Engagement in external forums should also include evidence of involvement in peer to peer support and learning from colleagues in the sector. Local networking, advice forums and team meeting minutes may also be provided as evidence. Additional evidence may also include centrally stored forum/workshop minutes and learning materials and staff signed circulation lists.  Your assessor will ask to see evidence that staff and volunteers can access self-help and assisted self-help resources e.g. Turn2us Benefits Calculator, MaPS Budget Planner tools, Income Maximisation and Standard Financial Statement templates, and that these tools are promoted to clients and services users where considered appropriate. These resources are usually documented in Advice/Quality Manuals or your separate procedure for ‘Timely Information on Changes to the Law and Access to Resources’ |
| **D1.4** If you deliver advice as part of a regulated service, you must ensure that you comply with relevant professional standards and professional development frameworks for supervision | Supervisors managing the delivery of the service by advisers need experience of supervising staff, unless they were previously working as a sole provider and were self-supervising.  This experience may be supplemented by attendance on management and/or supervision courses and/or by mentoring from other individuals (possibly outside of the organisation). | Your assessor will require completed copies of the documents below and relevant certificates, paying particular attention to supervision staff and completed MaPS accredited Supervision training:   * Appendix One Staff List and Debt Advice Role * Appendix Two Organisational Record of Individual Learning |
| **D5** | A certain amount of experience in a specified range of cases will be just one of the measures used by the AQS assessor to assess the competence of individual caseworkers.  Supervisors will also need to have regard to the requirements set out in AQS Standard D2 that relate to training and development of individuals with regard to their casework skills. | Your assessor will require completed copies of the documents below and relevant certificates paying particular attention to supervision staff and completed MaPS accredited Supervision training:   * Appendix One Staff List and Debt Advice Role * Appendix Two Organisational Record of Individual Learning   Debt advice casework advice organisations/agencies are also required to complete the Casework Self Declaration Form  which includes the following requirements:  As part of the AQS Assessment your assessor will review a number of your debt advice files which will be selected at random on the day of your on-site assessment. As part of this review, in addition to the requirements of good case management and client care your assessor will be looking for:     * evidence of use of an effective process for engagement with creditors where appropriate * recorded evidence of self-help and assisted self-help resources accessed and provided where appropriate |

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# Appendix One: Staff List and Debt Advice Role

# Please complete the attached table, identifying the name and activity set level of each member of the team involved in delivering debt advice. This should include any volunteer support that is utislised. Consideration should extend to the activity set definitions identified on Page 5 of the AQS Self Assessment Guidance for Debt Advice Providers January 2023.

**The completed record should be shared with your AQS Assessor prior to the AQS assessment.**

**N.B**. Where a member of staff conducts supervision activity please indicate the activity sets of the staff they supervise by ticking the appropriate box.

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| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| *IC* | *Initial Contact* | *SW* | *Support Work* | *A* | *Advice* | *CS* | *Casework/Specialist* | *CR* | *Court Representation* |

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| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Name** | **Job role** | **Length of Service** | **Recently changed role**  **Yes/No**  **If Yes, include date** | **Employed / Volunteer** | **Select debt activity sets undertaken (please tick all that apply)** | | | | | | | | | |
| **Initial Contact (IC)** | **Support work (SW)** | **Advice (A)** | **Casework / Specialist (CS)** | **Court Representation (CR)** | **Supervision:**  **If Supervision ticked, please select activity sets that are supervised** | | | | |
| **IC** | **SW** | **A** | **CS** | **CR** |
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# Appendix Two: Organisational Record of Individual Learning

Please complete the following table ensuring all members of staff who offer debt advice and are identified in Appendix One are included. All training should be appropriate to their role and consider Money and Pensions Service accredited training courses or qualifications.

**The completed record should be shared with your AQS Assessor prior to the AQS assessment.**

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| --- | --- | --- | --- | --- | --- |
| **Name** | **Job role** | **Name of training course or qualification (use \* to indicate if a MaPS accredited learning pathway)** | **Organisation running course** | **Start date of training or qualification**  **(DD/MM/YYYY)** | **Has the course/ qualification been completed?**  **(Yes/No)** |
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| **Additional Information to Note:**  Please use this space to inform your Assessor of any information that they should be aware of as part of this self assessment. |