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Options for Developing Quality Standards for Information & Advice Providers in Wales

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MBARC

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Abbreviations

ASA	Advice Services Alliance
AQS	Advice Quality Standard
BME	Black and Minority Ethnic
CAB	Citizens Advice Bureau
LGBT	Lesbian, Gay, Bisexual and Transgender
MAS	Money Advice Service
NfP	Not-for-Profit
OISC	Office of the Immigration Services Commissioner
SNS	Scottish National Standards

Glossary of Terms

Peer Review	An evaluation of a service or work by others working in the same field.
Advice Services[1]	Services that diagnose the client's legal problem and any related legal matters; identify relevant legislation and decide how it applies to a client's particular circumstances, including identifying the implications and consequences of such action and grounds for taking action; providing information on matters relevant to the problem, such as advising on next steps; and identify dates by which action must be taken in order to secure a client's rights.
Information Services[2]	Services that give clients the information they need, for them to know and do more about their situation. It can include information about rights, policies and practices; and about national and local services and agencies. Responsibility for taking any further action rests with the client.
Legal advice[3]	Within the NfP sector, advice on matters of social welfare law is often given by advisers, paid or voluntary. These are not legally qualified people and may not consider that they are giving "legal" advice simply because they do not have detailed knowledge of, or training in, social welfare law or case law. However, any advice which involves interpreting how the law applies to a client's particular problem or set of circumstances is legal advice.
Generalist Advice	Describes services that diagnose the client's legal problem and any related legal matters; identify relevant legislation and decide how it applies to a client's particular circumstances; including identifying the implications and consequences of such action and grounds for taking action; providing information on matters relevant to the problem; such as advising on next

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[1] ASA (2011) 'Developing the Advice Quality Standards: Definitions to help you understand the advice sector' March 2011 ASA. London
[2] ASA (2011) *Ibid*
[3] ASA (2011) *Ibid*

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	steps; and identify dates by which action must be taken in order to secure the client's rights.[4]
Specialist Advice[5]	Services where the adviser or services as a whole undertakes advice and casework at a level where very detailed knowledge of the law and case law is required. Usually, this means it is delivered by advisers who have the necessary levels of knowledge and expertise to undertake representation for clients through the court or tribunal.
Independent advice[6]	An advice provider delivers independent advice where it is able to act fully independently in the client's sole interest.
Advice with Casework[7]	Services that include all the elements of an advice service listed above, and also involves taking action on behalf of the client to move the case on. It could include negotiating on behalf of the client with third parties on the telephone, by letter or face to face. It will involve the advice provider taking responsibility for follow-up work.
Advocacy[8]	Used within the advice sector to describe a level of service which the advice agency provides for its clients: i.e. negotiation with third parties and representation at tribunal and court proceedings. Agencies may often describe their activities as "advocacy" where they are supporting a client to access justice through taking action on their behalf in line with the definitions of 'advice', 'specialist advice' or 'specialist casework', e.g. representing a client at court or tribunal hearings.
Standard holders	Organisations managing or responsible for a quality assurance scheme.
A *Framework*	Refers to a set of minimum criteria against which other standards and assurance processes are assessed – e.g. the Money Advice Service Quality Framework.

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[4] Definition agreed by the National Advice Network for future use in Wales (circulated to stakeholders on 31st March)
[5] ASA (2011) *Ibid*
[6] ASA (2011) *Ibid*
[7] ASA (2011) *Ibid*
[8] ASA (2011) *Ibid*

A set of *Standards*	Refers to a distinct scheme - e.g. Citizens' Advice's Membership Code, Advice Quality Standards and Scottish National Standards etc. It may include some form of passporting for all or part of any assessment and assurance process.
Adviser Competence	Includes both the knowledge and the skill required by the adviser to undertake the work at the required level. For example, an adviser representing a client in a repossession case will require the knowledge of relevant legislation and the skills to represent the client in court.
Quality assurance	The maintenance and systematic process of checking to see whether a service being developed / delivered is meeting specified requirements of a desired level of quality in a service, especially by means of attention to every stage of the process of delivery.

1 Introduction

1.1 Background

The provision of information, advice and guidance services in Wales is a key component of both the Welsh Government's Tackling Poverty Action Plan 2012-2016, and the Strategic Equality Plan 2012-2016. Access to these services is seen as central in giving everyone a fair and equal chance in life. As such, the Welsh Government is committed to strengthening information, advice and guidance services, with the aim of helping people to understand and exercise their rights and make informed decisions about their lives.

As a funder of organisations providing free and independent information and advice services, the Welsh Government has a particular interest in ensuring that the organisations it funds are effectively managed; that the information and advice provided by them is up to date and that staff providing front-line advice services have the necessary skills and competencies to provide the best advice possible to clients.

The Welsh Government's Advice Services Review Report confirmed both the importance of advice and a growing need for services. This review found a rich range of services across Wales delivered by both statutory bodies and third sector organisations providing vital services within their communities. However, the review found there was a lack of consistency and understanding of what constitutes quality advice and information, within and between agencies that could facilitate better referral and clearer pathways for services users. To this end it recommended the development of "a Framework of Standards for Advice and Information".

This report is designed to inform future decisions in relation to embedding quality systems within advice and information in Wales. It is therefore primarily written for the advice sector, its funders and policy makers operating in the fields of social welfare, equalities and tackling poverty.

With the Welsh Government's commitment to supporting advice as a key lever in addressing wider social policy goals, this is an exciting time for the advice sector in Wales. Whilst it faces many of the same challenges as its counterparts in other parts of the UK in terms of increased demand, the context for the development of quality assurance is different. Unlike other parts of the UK, particularly England, most advice agencies and those providing advice as part of their service are not already covered by a quality assurance scheme. Both front-line agencies and a number of key standard holders representing the majority of agencies with a current scheme have indicated their willingness to work with the Welsh Government to develop a new approach to quality assurance for information and advice. In common with Scotland, the need for externally assured standards of service has been recognised and is widely supported by front-line agencies, as evidenced by the 2013 Advice Services Review and the consultative exercise underpinning this report. This provides a powerful platform on which to build an approach to quality assurance for advice services into the future.

1.2 Structure of the Report

The report is organised as follows:

- Section 2 outlines the methodology adopted including four phases of work - Assessing Current Practice, Scoping the Future, Setting the Standards and Getting it Right, to produce the final conclusions outlined in this report.
- Section 3 considers the findings from the consultation activities undertaken including the Literature Review, the online surveys with providers and funders of advice, interviews with standard holders and stakeholders, and consultation events. It presents the analysis and conclusions drawn from this research across three key areas - Establishing the Quality Metrics; Assessing Compliance and Quality; Beyond the Standards.
- Section 4 outlines the two proposed models for the Welsh Government's consideration and the final conclusions of this work across four areas - Building the Foundations, The Contents of the Standards, The Approach to Assurance and Beyond Advice and Information.

2   Methodology

The study was carried out in four interlinked phases:
- Phase One – Assessing Current Practice
- Phase Two – Scoping the Future
- Phase Three – Setting Standards
- Phase Four – Getting it Right

Successful delivery of the aims was dependent upon securing the engagement of the sector. The process was designed to be iterative, involving stakeholders in both determining the key lines of enquiry, alongside contributing their views and experiences. The phases were also designed to ensure consultation engaged with the diversity of the information and advice sector, funders of these services, existing standard holders, stakeholders with expertise around Quality Standards in advice and organisations, service user representatives, and with organisations beyond the scope of advice and information.

Phase One – Assessing Current Practice

This phase of the project was designed to deliver the initial mapping report. It consisted of the following key activities:

Inception Meeting: the Welsh Government hosted an inception meeting on 25 September 2014, to agree the detailed plan of work.

Literature Review: the literature review included a contextual analysis and a desktop assessment of the current standards and membership codes of practice. This was shared with standard holders to check the analysis. The desktop assessment included organisational standards assessed against:
- General Management Standards (including management structures, office procedures, financial management, communications, legislative compliance)
- Standards for Planning (including needs assessment, business planning, review processes and governance)
- Customer Care Standards (including ensuring accessibility, codes of behaviour, confidentiality, client record management, complaints, service user involvement, health and safety, safeguarding etc.)
- Service Provision Standards (including ensuring independence, networking and referral arrangements, service recording and case management, information and resources etc.)
- Standards to ensure Adviser Competence (including HR appraisal, planning and record keeping, training and development of staff, means of assuring staff competence etc.)
- Advisor Competence (knowledge and skills) as a means of assuring staff competence in terms of minimum requirements, professional development
- Mechanisms for internal or external assurance against the Standards (e.g. audit and/or accreditation).

The contextual analysis for the literature review included a review of key documents including:
- The Welsh Government's Advice Services Review[9]
- The Independent Advice Providers' Forum research report 'What the people of Wales expect of advice and information services and how to ensure accessibility for all'[10]
- The Low Commission report 'Tackling the Advice Deficit: A Strategy for access to advice and legal support on social welfare law in England and Wales[11]
- The rapid evidence assessment commissioned by the Welsh Government: 'The Effective Delivery of Information, Advice and Guidance'[12]
- The Welsh Government's Ten Year Homelessness Plan until 2019[13]
- The Welsh Government's Equality Objectives and Strategic Equality Plan[14]

Survey of Providers: building on the findings from the Literature Review, an online survey using Survey Monkey was designed for completion by front-line agencies.[15] This quantitative research method was used to develop a picture of the range of standards in operation across Wales and the extent of compliance and attitudes to the new Framework. An open question was also included to capture any additional comments and best practice examples. Key Lines of Enquiry were developed from the Literature Review and shared with the Welsh Government. Advice organisations were mapped with the assistance of existing advice networks and web searches based upon the mapping profile published in the 2013 Advice Review. A follow up email was sent to encourage responses where there were gaps. A total of 180 organisations were identified and 67 of these responded to the online provider survey. They represented the diversity of the sector in terms of size from volunteer only agencies to those employing more than 10 staff and from a range of advice topics covered.

Survey of Funders / Commissioners: building on the findings from the Literature Review, an online survey using Survey Monkey was designed for completion by funders and commissioners of advice and information service including the majority of Local Authorities and some additional funding bodies.[16] This quantitative research method sought to determine the extent to which funders require Standards, the range of Standards they require, the degree to which they require external assurance and their aspirations for any future Standards or Framework for quality. An open question was also included to capture any additional comments and best practice examples. Key Lines of Enquiry were developed from the Literature Review and shared with the Welsh Government. A follow up email was sent to encourage responses where there were gaps. A total of 30 organisations were identified and 21 responded to the

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[9] Welsh Government (2013) 'Advice Services Review: Final research Report'
[10] Independent Advice Providers' Forum (IAPF) (2013) 'What the people of Wales expect of Advice and Information Services'
[11] The Low Commission Report (2014) 'Tacking the Advice Deficit: a strategy for access to advice and legal support on social welfare law in England & Wales'
[12] Consilium Research and Consultancy (2013) 'Rapid Evidence Assessment: The Effective Delivery of Information, Advice and Guidance'
[13] Welsh Government (2009) '10 Year Homeless Plan 2009-2019'
[14] Welsh Government (2012) 'Strategic Equality Plan and Objectives 2012-2016'
[15] A list of provider respondents can be found in Annex A
[16] A list of funder/commissioner respondents can be found in Annex B

survey. The majority were Local Authorities, nearly all of whom responded with their views, as well as Charitable Trusts and Housing Associations.

Initial Report: the above work was incorporated into an initial emerging findings document and discussed at a management meeting with the Welsh Government on 27 November 2014.

Initial Stakeholder Event: an event was held on 13 November in Cardiff to discuss the key findings and existing approaches to Quality Standards with stakeholders.[17] Stakeholders were invited via email and followed up over the phone. Comments and questions made on the day were captured and fed into the findings and shared with the Welsh Government.

Phase Two - Scoping the Future

This phase of the report gathered intelligence and views from a wide range of stakeholders[18] through 49 qualitative in-depth interviews. The questions were drafted building on the findings from the Literature Review, online surveys and first stakeholder event. Stakeholders where identified under the following categories and invited to participate via email (standard holders, providers, funders, service user representatives and organisations beyond the scope). Interviews were set up according to their availability and conducted over the phone to increase reach. Interviews took place with 13 standard holders, 20 stakeholders including providers and funders, and 16 other organisations including service user representatives. Interviews were transcribed and analysed and informed the final conclusions.

Phase Three - Setting Standards

This phase of the project brought together the findings from the above activities to produce three detailed reports on the approaches to Quality Standards in Wales.

They included:
- **Report 1 Establishing the Quality Metrics:** identified the key quality metrics that are currently being employed and could comprise new Welsh National Standards or Framework. It included conclusions on preferred options where there has been a consensus in the consultation work and detailed where there is more contention to be explored further. This report outlined an assessment of how far the suggested metrics are currently in place and where there may be resource implications for agencies to attain some of these.
- **Report 2 Assessing Compliance:** examined the different approaches to assessing compliance including the role of self-assessment, external assurance and service user involvement in any assessment process. It included the extent to which current arrangements for assessing compliance with membership codes and Standards provide opportunities for full or partial compliance with a potential new national approach. It provided suggested ways to move forward and identified the likely resource implications for any

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[17] A list of attendees is available in Annex C
[18] A list of those interviewed can be found in Annex D

proposed changes. It also included areas where there was a need for further discussion with stakeholders.

- **Report 3: Beyond the Current Standards** – examined the scope for extending the proposed national Standards and/or quality metrics to other service areas funded by the Welsh Government and beyond. It included preferred options for further development.

Phase Four – Getting it Right

This phase included an iterative process to test and refine the findings and develop options that are practice based and viable. To this end the final phase consisted of:

- A Co-operative Enquiry Workshop which was held on 12 February 2015 in Llandudno and attended by 30 commissioners and providers of services, to consider the reports and to collectively consider and refine the final conclusions. This event was located in North Wales to secure the participation of those unable to attend the Cardiff event.[19]

- This final report (details of the structure can be found below) including the key findings from all stakeholder engagement and building on the options reports to develop conclusions for developing a proposed Quality Standard model for advice and information service in Wales.

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[19] A list of attendees can be found in Annex F

3 Analysis & Conclusions

3.1 Securing Quality in Advice and Information Services in Wales

Throughout the consultation process, both providers and funders emphasised the vital role of investing in quality advice and information services for prevention and early intervention across a number of social and economic areas, including saving costs in mental health, poverty and family problems. This was particularly important for organisations working with equality groups.

In interviews with stakeholders, the vast majority welcomed a new set of national Standards or a Framework for advice and information services in Wales as a means of addressing inconsistency in quality advice services on offer, providing reassurance to service users, improving access for equality groups, and improving understanding of 'who does what' to enable effective referrals.

3.1.1 Definitions of Quality in Advice

Building on the Welsh Government's definition of quality in information and advice services, quality should include:

- Factually accurate and up-to-date
- Impartial and in the best interest of the client (further work will be required to explore the role of "independence", for example, Local Authority provided services. An alternative phrase that should be explored in the development of the Standards is "to act in the best interest of the client")
- Delivered by a competent/appropriately trained or qualified adviser
- Appropriate and relevant to the client's needs and circumstances
- Provided in such a way as to enable the client to take positive/beneficial action where possible
- Followed-up to assess the impact of the advice on the individual or client.

3.1.2 Supporting Providers

The survey of providers[20] indicated that at present roughly half of respondents (48%) currently operate to external assured Quality Standards. Of those operating such a scheme the vast majority were covered by just four schemes: 10 respondents used AQS (53%), 5 used Lexcel (26%), 4 used CAB (21%), and 3 used the OISC (16%).

In the online surveys, interviews and at stakeholder events, a need to support smaller organisations was identified to ensure they are not disadvantaged by new Standards or Framework. This point was raised repeatedly in interviews and at events. Of those not operating to externally assured Standards the majority (85%) were relatively small organisations with less than 5 staff. Others not covered by Standards were housing associations and other organisations where advice was only a minor part of the service offered. It should be noted that Advice UK highlighted the needs of housing associations in their membership as being organisations that would benefit from support around quality systems.

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[20] Survey graphs and tables are available in Annex F (providers) and Annex G (funders/commissioners)

Stakeholders agreed that there would be a need to support providers in reaching a baseline of quality and this could be achieved through peer support by developing local, regional and national networks. This could allow providers to share good practice, information and training and improve referrals.

3.2 Establishing the Quality Metrics for Standards or Framework

This section identifies the key quality metrics that could comprise Welsh National Standards or would need to be reflected in the criteria for passporting other schemes as part of a Welsh Framework for quality advice.

The survey results, qualitative comments from stakeholders and engagement at the Co-operative Enquiry Workshop provide an indication of how far these metrics are currently in place and where there may be resource implications for agencies to attain the Standard.

The Advice Services Review identified the need for *"greater consistency of advice Standards and quality assurance across all providers to enable the development of greater partnership working…"*

Standard holders and stakeholders emphasised the importance of Standards for driving up the quality of a service, offering reassurance to service users and providing a common language for the sector and funders. They also stated that a new approach should include all aspects of quality including management/governance, planning, customer care, service delivery and advisor competence Standards.

3.2.1 Levels and Types of Advice

The 2013 Review noted the need to establish consistency in the categorisation of different levels of advice. Within the survey of providers, the four tier definitions applied by AQS were applied[21]:
- Information
- Advice
- Advice with Casework
- Representation in Courts and Tribunals

These types of advice appeared to be widely understood by providers and therefore could form the basis of definitions for a Welsh Framework or Standards. Guidance including a glossary of definitions with more detail was requested by both providers and funders to make sure boundaries are clear.

Of those that responded to the survey, there was a mixture in the type of service they self-defined as offering including information (96%, 59), advice (85%, 54), advice with casework (68%, 43) and representation in courts or tribunals (44%, 28). It was strongly emphasised that these different types of service should be included in any

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[21]   ASA (2011) 'Developing the Advice Quality Standard: Definitions to help you understand the Advice Sector'

new Standards or Framework, but that it would need to be proportionate to the service they deliver.

Stakeholders also agreed that there is a need to ensure that any Standards or Framework does not create a hierarchy of aspiration – that is, every agency aspiring to be a provider of representation level advice. All levels of advice have a vital role to play and together form a complex pattern of provision to meet different needs[22]. To avoid such a hierarchy of aspiration, each advice activity should not be referred to as "levels of advice" but use the Scottish National Standards terminology of "Types of Advice", e.g. Type 1 – Information.

3.2.2   General Management Standards

The vast majority of providers responding to the survey (85%, 56) felt they had comprehensive written policies covering general management standards; 12% (8) had good policies with some gaps. They include:
- Clear management structures
- Roles and responsibilities of post holders involved in planning, management and delivery of services
- Robust system of financial management
- Clear lines of internal communication
- Compliance with all relevant general legislation

All of the quality assurance schemes examined in the literature review include general management Standards within their requirements to lesser or greater extents (although in some cases these were poorly specified and articulated). Where they are specified there is a degree of commonality in these requirements which should ensure that passporting between Standards or within a Framework is possible.

3.2.3   Standards for Planning

Standards for planning are less widely reported amongst survey respondents with 70% (46) considering that they have comprehensive policies and 23% (15) saying that they have a good range of policies but that there are some gaps. Areas that should be included within Standards for planning are:
- Needs assessments
- Business planning
- Review processes
- Governance

All of the quality assurance schemes examined in the literature review include some element of planning within their requirements. There is a degree of commonality in these requirements which should ensure that passporting between Standards or within a Framework is possible.

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[22] Within Scotland roughly 20% of agencies are mainly Type 1, 30% Type 2, 30% Type 3 and 20% Type 4. The figures are not precise because agencies may opt to be accredited at different types in different areas of law. For example, Type 1 in debt (i.e. information only) and Type 4 in housing (i.e. providing court representation services in housing repossession cases).

3.2.4 Standards for Customer Care

Written procedures and policies for Standards for customer care were widely in place, including in small organisations highlighting the importance that all respondents attached to this area. 83% (55) had comprehensive policies, 14% (9) good policies and only one organisation reported that their policies were inadequate. Key metrics for customer care included:

- Accessibility (e.g. language)
- Codes of behaviour
- Confidentiality, client record management
- Complaints
- Service user involvement
- Health and safety
- Safeguarding

During the Co-operative Enquiry Workshop, stakeholders agreed that digital advice and information should be included in a new set of Standards or Framework but that offering an accessible and effective service would mean, for many service users, 'digital first' would not be appropriate.

All of the quality assurance schemes examined in the literature review include extensive requirements for customer care. There is substantial commonality in these requirements which should ensure that passporting between Standards or within a Framework is possible.

3.2.5 Standards for Service Provision

Along with Standards for Planning this was the area where survey respondents reported the lowest number of agencies with "comprehensive" policies and procedures (69%, 44). However, the numbers reporting inadequate policies remains low. Service provision Standards included:

- Ensuring independence
- Networking
- Referral arrangements
- Service recording and case management
- Information
- Resources

It should be noted that Advice UK highlighted the need for some organisations to receive additional support to develop their policies and procedures around "ensuring independence", particularly those where advice was a small component of the organisation's main work, such as housing associations where conflicts of interest could emerge. Other stakeholders reported that the issue of independence was not fully understood by other organisations and highlighted those agencies in the statutory sector as sometimes being less aware of potential conflicts of interest.

All of the quality assurance schemes examined in the literature review include extensive requirements for service provision. There is substantial commonality in these requirements which should ensure that passporting between Standards or within a Framework is possible.

3.2.6 Standards for Competence

Quality in competence requires that all staff providing a service must gain, maintain and develop skills and knowledge necessary to meet the needs of service users. Areas to ensure competence include:
- HR appraisal, planning and record keeping
- Training and development of staff
- Effective means of assuring staff competence

Survey respondents reported high levels of confidence in their systems with 72% (47) stating they had "comprehensive" policies and procedures and 20% (13) "good". Some stakeholders reported less confidence in this area, particularly in the absence of agreed competences for different types of advice and advice topics.

It should be noted that in the absence of peer review of case files, AQS places particular importance on supervision as the means by which agencies ensure and assure adviser competence and the quality of advice.

MAS have developed a rigorous approach to assuring the competence of individual advisers based upon National Occupational Standards and includes assessment of both training course content and the quality of training providers.

SNS have incorporated clear adviser competences as part of their Standards. This also addresses the particular issues for devolved administrations where UK wide competence assessment criteria may fail to reflect legislative and policy changes within the devolved nation. With increased legislative and policy making powers moving to the Welsh Government this may be an attractive option for the Welsh Government. Competence includes both the knowledge and the skill required to undertake the work at the required level (see glossary).

Stakeholders felt these should be prescribed and clearly defined to ensure consistency.

3.2.7 Standards for Advice Outcomes

There is currently no established scheme that could be adopted or adapted in terms of Standards for outcomes. This provides Welsh Government and its partners with an opportunity to build upon best practice and move forward in this area. The vast majority (81%) of providers responding to the survey already track some outcomes (such as the value of benefits claimed, housing repossessions averted). Many stakeholders stated in interviews and at the Co-operative Enquiry Workshop that this could provide useful evidence for the sector around its impact, as well as a baseline around what is already being delivered if this is captured consistently.

Some stakeholders also felt this could highlight issues of what is not working for service users and support social policy work to influence and advocate. The emphasis which the Welsh Government places on advice as a key player in the delivery of its strategic objectives provides the opportunity to ensure that a quality

assurance scheme for Wales captures appropriate information on outcomes. There is considerable merit in developing a standard to capture more systematically the outcomes from advice, particularly where these relate to Welsh Government's strategic objectives in relation to tackling poverty and promoting equality.

3.2.8   Standards for Welsh Language

There is currently no established scheme that could be adopted or adapted in terms of Standards for the Welsh language. This provides Welsh Government and its partners with an opportunity to move towards a fully bilingual service in Wales which goes beyond accessibility to one that embeds cultural change in organisations. As a separate standard, the Welsh language could be fully considered. This would mean moving beyond the existing inclusion of Welsh language in some schemes (e.g. CAB and Lexcel), as solely an access issue in the customer care Standard – instead this would be embedded across the service, taking into account how it is designed, delivered and planned for in the future.

In discussions with stakeholders during interviews and at the Co-operative Enquiry event, there was broad consensus that a new Standard or Framework offers an opportunity to embed the Welsh language across the sector. Given where providers are currently, this would need to be a staged 'working towards' to set realistic goals over time that would include workforce development as well as access. Stakeholders felt that there was considerable merit in developing a Standard for Welsh information and advice and that they should move to a fully bilingual service over the next 10 years.

3.3   Assessing Compliance

This section examines the approaches to assessing compliance including:
- The importance of common Standards
- Self-assessment, external assurance and service user involvement in any assurance process
- Approaches to the composition of assessment teams
- Resource implications of different approaches.

3.3.1   The Importance of Assuring Quality of Advice

Standard holders and stakeholders agreed that external audits are an important way to assure quality and that there needs to be a robust process of assessing quality to secure confidence in a new set of Standards or Framework. This should include looking at both organisational Standards and quality of advice Standards.

All respondents to the provider survey said quality assurance was important for ensuring individuals get the right advice at the right time. Nearly all respondents said external accreditation was important to ensure services are operating to the right Standards (90%, 59). Funders and commissioners responding to the survey reflected a similar consensus with 94% (18) rating quality assurance important or very important and almost three quarters thought external accreditation was important to ensure services are operating to the required Standards (73%, 13). The

majority agreed that a new Quality Standard for advice providers would provide additional assurance that services were of high quality (67%, 10).

3.3.2 The Purpose of Standards and Assurance

At a minimum, Standards should seek to ensure that advice provided is safe, responsive and effective. At its best, quality assurance should not only seek to ensure minimum Standards but also embed a culture of continuous improvement. The cycle below illustrates the approach to assurance and Standards from within the health sector[23]:

Figure 3.1 Approach to Assurance

3.3.3 Grades of Attainment

Most assessments of Standards within the advice sector are binary – that is, pass or fail, with a number making provision for "conditional" accreditation on the basis of undertaking remedial action on non-compliant areas in a specified period of time. A number of stakeholders raised the issue of Wales developing a more nuanced approach. This is common in other sectors such as health, education and social care.

For example, in Scotland the Care Inspectorate has six levels applied across four Quality Standard domains:
- 6 - excellent
- 5 - very good
- 4 - good
- 3 - adequate
- 2 - weak
- 1 - unsatisfactory

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[23] MBARC for NHS England January 2015. Not all stages of this cycle may be applicable in advice settings.

In England the Care Quality Commission offers four levels across five Quality Standard domains:

- Outstanding
- Good
- Requires improving
- Inadequate (Fail)

Each domain (Safe, Effective, Caring, Responsive, Well-led) is separately ranked and from these the organisation is given an overall ranking.

Stakeholders views were that the ranking system agreed should encourage continuous improvement and an aspiration to 'work towards' a high grade. The consequence of this approach is that agencies strive to improve their rating at each inspection. It can also be used by the agency to secure funds to address an area of weakness, particularly where this may be due to the level of resources available. As such it contributes to embedding a culture of continuous improvement. However some stakeholders did raise concern around the risk of funders' decisions being affected by a lower rating. Some stakeholders thought it would be good if service users understood the rating system too and that there should be an appeal process. In the Co-operative Enquiry Workshop, stakeholders thought 4 grades was the preferred option.

3.3.4 Methods of Assurance

Any common Standard needs to have an assurance process built in. This can be internal, for example an annual review against the Standards undertaken by the organisation's governing body, or externally assured by a third party.

Using a hierarchical model, the independent site visit considering both process and quality is the "gold service". However, the costs associated with this approach are considerably higher. The figure below demonstrates a method for assurance which includes internal and external assurance that considers both process and Quality Standards.
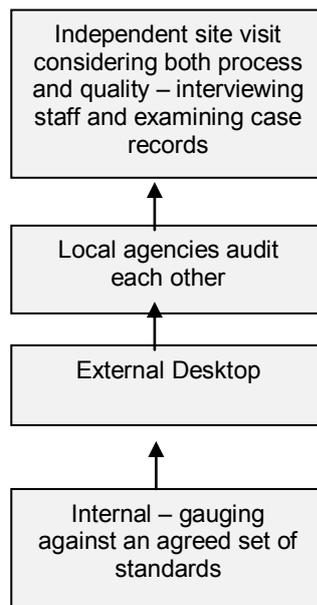
```
┌─────────────────────────┐
│  Independent site visit │
│  considering both process│
│  and quality – interviewing│
│  staff and examining case│
│        records          │
└─────────────────────────┘
            ▲
┌─────────────────────────┐
│   Local agencies audit  │
│       each other        │
└─────────────────────────┘
            ▲
┌─────────────────────────┐
│     External Desktop    │
└─────────────────────────┘
            ▲
┌─────────────────────────┐
│    Internal – gauging   │
│  against an agreed set of│
│        standards        │
└─────────────────────────┘
```

Figure 3.2 Methods of Assurance

Stakeholders stated that external assurance was the most appropriate means of assuring the quality of advice services in Wales. This was reflected in the stakeholder interviews as well as both the survey of providers and of funders:

- 90% of providers felt external assurance was important (54% very important)
- 73% of funders felt external assurance was important (53% very important)

3.3.5   Approaches to External Assurance

There are several options currently adopted in the assessment of quality in advice through current Standards assessed in the literature review:

- Process Audit - considering structures, procedures, finance and governance etc.[24]
- Quality Audit - considering the quality of advice such as the accuracy, the recording, the supervision of the work/worker, the training requirements of the individual etc.
- Process and Quality Audit - a combination of both

From discussions with stakeholders there was a strong preference that the approach should look at both process and quality. There were some concerns from some stakeholders that, whilst this was the preferred route, the cost may be disproportionate and that this would divert resource from the front-line.

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[24] Within AQS this includes a detailed assessment of case work supervision as the best process proxy for the quality of advice. There is an internal debate on whether the AQS would be enhanced by examination of case files.

3.3.6 Location of Assessment

One way to reduce the cost of external assessment, including case file review, is for this to be undertaken remotely. Of those external assurance processes undertaking both process audit and quality of advice assessments, there do not appear to be any that make sole use of desktop. In part this reflects concerns over risks to confidential data and also denies the auditors the opportunity to explore case files with advice workers and their supervisors face to face. However, in the spring 2015 MAS will be launching their Peer Review Scheme which is based upon desktop assessment and this may prove to be a valid and cost effective means of undertaking audits.

Stakeholders felt strongly that there should be some element of on-site inspection to test processes, policies and practice of the quality of service being delivered, and allow for a conversation between the auditor and provider.

3.3.7 Composition of Inspection Teams

Over the past two decades a number of models for assurance teams have been developed and implemented in a wide range of settings. These include:
- Professional auditors
- Local networks of peer reviewers
- Trained pools of peer reviewers
- Service user led or service user participation
- Combinations of the above

In all models the key issues are credibility, objectivity and consistency of assessments. Of lesser importance, but still significant, is the issue of logistics – getting the right assessors together at the right time to undertake and complete their assessment. Stakeholders agreed at the Co-operative Enquiry Workshop, that there is a role for both professional auditors and peer assessors as part of the inspection of a service to bring both professionalism and expertise to the process.

Stakeholders at the Co-operative Enquiry Workshop discussed a number of views as to how Peer Review could work, including an approach that recognises the different capacities of different organisations to participate.

There is increasing focus on ensuring service user voice. Both youth and disability services have tended towards assurance models that are service user led. Increasingly service users are utilised as part of wider teams in health and social care inspections as "experts by experience". However, stakeholders felt this did pose some challenges in relation to confidentiality and how representative they are. Many felt a competent auditor should be able to see from the client's perspective. However, including service user feedback and some level of involvement was important.

Following the financial crash of 2008 both self-regulation and unmediated peer review as the sole means of assurance are largely discredited. In other sectors the approach currently being developed and preferred is for combination approaches.

The majority of stakeholders at the Co-operative Enquiry Workshop felt that the Welsh Standards or Framework should include a move towards a combination

approach with peer assessors providing credibility but mediated by professional auditors. There was strong support to include mechanisms to ensure that service users' views are also captured in the assurance process.

3.3.8 Cycles of Assessment

The majority of schemes with external assessment used in the advice sector in Wales operate on three year cycles[25]. Scottish Government moved to a four year cycle, which reduced costs by 25%. However there is concern that this may not be frequent enough, especially at a time of great change in the advice sector.

Stakeholders during the Co-operative Enquiry Workshop agreed that a 3 year cycle was optimal, but that a risk-based assessment should be considered alongside cyclical assessments. This would ensure any problems or issues are monitored. There was concern about complacency between audits and it was suggested there should be other ways of having on-going engagement through self-assessments in between to avoid this.

3.4 Beyond the Current Standards

This section will examine the scope for extending the proposed national Standards and/or quality metrics to other service areas funded by the Welsh Government and beyond.

3.4.1 A Common Language

One of the benefits of having a common set of Standards cited by stakeholders was the need for a 'common language' in relation to advice and information provision. Having a common understanding of organisational Standards, technical expertise and level of work being undertaken would be very beneficial in discussions between strategic planners, funders, agencies and service users. It was felt that this 'common language' would promote:
- understanding of what each agency delivers
- trust and understanding between agencies which is of particular importance in relation to seamless referrals of service users
- confidence for the service user
- encouragement to individual advisers within agencies

A common understanding of what advice agencies deliver and the infrastructure supporting this delivery was also crucial for effective and targeted use of funding and the planning of advice provision in Wales.

Funders also benefit from the common understanding through Standards. Where an agency is accredited to a Standard, the funder has comfort that the agency has a sound infrastructure supporting advice provision. In addition, where the Standard contains provision for outcome reporting, the funder will be aware that robust monitoring of the required outcomes will be facilitated.

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[25] For more information, please see Appendix H

The view of respondents was that funders would play a crucial role in the promotion of any agreed Standards i.e. if funding preference was given to accredited agencies, this would help the Standard gain 'traction' very quickly in the advice sector and where funders and community planners liaised to identify gaps and duplication, this would ensure the more effective use of limited resources.

Stakeholders felt that the Welsh Standards or Framework should apply to all advice and information services in Wales, not just those funded by the Welsh Government and/or Welsh Local Authorities.

3.4.2 Beyond the Sector

The introduction of flexible Standards will also help protect smaller agencies, who may only provide limited specialist advice to a small target group e.g. carers groups. Stakeholders wanted Standards to be inclusive and not to drive small agencies out of business, but small agencies must also have a solid infrastructure to support advice provision.

From April 2016 the Social Services and Well-being (Wales) Act 2014, will require Local Authorities to provide an Information, Advice and Assistance Service to provide people with information and advice relating to care and support and assistance on accessing care and support. Ensuring that the Information, Advice and Assistance Service operates to the same Quality Standards or Framework for Wales would allow greater connectivity and collaboration between the Information, Advice and Assistance Service and other information and advice services operated by Third Sector organisations.

One example of an 'information level' tier within Standards can be seen in the Type I of the Scottish National Standards for Information & Advice Providers. Type I within the SNS relates to 'active information' e.g. (as opposed to a library for example who only retained stocks of leaflets) and key components of a Type I agency would be:

- The retention of an up to date directory of accredited service providers
- An ability to undertake effective triage to identify service user advice needs whilst being aware of the boundaries to the agency remit
- The ability to provide accurate reporting on referrals undertaken
- A good understanding of which agency was the appropriate one to refer/signpost to
- Good links within the community of advice providers.

Many social landlords in Scotland have achieved accreditation to Type I and have found this a beneficial experience. Some social landlords in Scotland have now received funding to provide support to their residents, aimed at mitigating welfare reform.

3.4.3 Applying the Standards

The approach outlined in 'Establishing Quality Metrics' above includes separate domains grouping Standards for:
1. General management
2. Planning
3. Customer care
4. Advice specific services
5. Adviser competence
6. Welsh language
7. Outcomes

In the light of stakeholders views on the desirability of an information level accreditation for those working with advice agencies and also the potential to roll-out these Standards more widely, a new set of Standards should contain generic Standards within domains 1-3 and 6-7 to allow for the Standards to be utilised by a wider range of organisations. This could potentially reduce the regulatory burden and facilitate more joined up working across sectors.

3.5 A Framework or Standards

There has been debate within the sector and with stakeholders on whether the assurance of quality for information and advice services in Wales can be better attained through the development of a Welsh Quality Framework or a Welsh set of Quality Standards. The definition we apply to a *Welsh Standards* or a *Framework* is:
- A set of **standards** refers to a distinct scheme – e.g. Citizens' Advice's Membership Code, AQS and SNS etc.
- A **Framework** refers to a set of minimum criteria against which other Standards and assurance processes are assessed – e.g. the MAS Quality Framework.

The assessment of these two options is based upon consideration of:
- the extent to which they capture the aspirations for the areas of practice to be covered by the quality scheme
- the levels of assurance provided
- the regulatory burden and the resource implications
- the barriers to implementation.

3.5.1 New Welsh Framework for Advice and Information Services

Under this model the Welsh Government, working with advice providers, would agree a Framework that identified the essential quality components for advice services in Wales. These would reflect the key Quality Indicator Domains identified in table 2.1. Welsh Government would need to set up a mechanism to assess all current Standards held by advice providers against this Framework. Where the Standards were seen as compliant the agency holding accreditation under that Standard would be deemed to meet the Welsh Quality Framework. However, if the current Standard was assessed by Welsh Government as not meeting the requirements of the

Framework the agency holding accreditation under that Standard would be deemed *not* to meet the Welsh Quality Framework or only partially meeting the Framework. In the example of the MAS Quality Framework where Standards or assurance are not fully compliant against aspects of their Framework, standard holders are permitted a period of time to make the necessary changes. If they agree to make these changes they may be granted a conditional "pass".

None of the current Standards operated by agencies in Wales meet the proposed new Welsh Language Quality Indicator Domain (beyond access) or Outcome Quality Indicator Domain and few include detailed assessment of adviser competence. On this basis all standard holders would be required to make substantial changes and/or include additional elements to their Standards and/or their assessment processes in order to meet the proposed Welsh Framework requirements. It should be noted that a number of current standard holders expressed a willingness to consider changes to their Standards to comply with a Framework.

With regards to assessment and accreditation, few of the current Standards include external peer review of case work which stakeholders identified as an important component of assurance. On this basis all standard holders would need to amend their current assessment procedures to incorporate this requirement or Welsh Government would need to establish an additional assurance process to undertake review, similar to the model developed by MAS, which will commence later this year. Similarly, stakeholders expressed an aspiration for the new Standards to be assessed against different levels of attainment - current external Standards would need to be modified to meet this requirement within a Welsh Framework.

Option Appraisal (see figure 3.2)
- This report suggests that the Standards used in Wales should have seven domains. Three of these domains (adviser competence, Welsh language and outcomes) are not included, or only partly included, in the external Standards most commonly used by Welsh agencies. This may require substantial re-writes of each of these separate Standards to comply with a Welsh Framework. Similarly assessment processes for external Standards may need to be amended to both include peer review of case files and different levels of attainment.
- There would be little difference for the public in a quality marked service relating to Standards or a Framework. There have been comments from stakeholders regarding the rigour of assessment in some of the current schemes - a centrally assured scheme may provide additional assurance to other organisations facilitating better referrals.
- For those agencies with existing externally assured Quality Standards (estimated at around half) there would be no need to reapply for accreditation under the new Standards or Framework. However, the survey indicated that half of agencies are not currently accredited and these would still need to select an appropriate scheme. This research project did not explore in detail why those without accreditation had not sought a current scheme, although Advice UK commented that it may be because the current schemes do not appear to be wholly relevant particularly to those organisations where advice was only one part of a wider suite of activities.

- The introduction of a new national Standard may impact adversely on the income stream of existing standard holders who charge for accreditation. However this may be mitigated by the standard holder adapting their scheme to provide for full passporting, thus maintaining a "market" in accreditation provision.
- There would be substantial costs to each standard holder to develop their schemes to meet the three new domains and the introduction of graded levels of attainment rather than pass/fail accreditation.
- The key barrier to implementation relates to the willingness of standard holders to adopt the additional domains and a new approach to assessment within their Standards to secure compliance with any Welsh Framework.

3.5.2 New Welsh Standards for Advice and Information Services

Under this model the Welsh Government, working with advice providers, would develop a distinct new set of Standards (possibly taking the best from existing schemes or adapting an existing set of Standards such as AQS or SNS).

A new set of Standards would include the seven distinct domains outlined in table 2.1. Compliance with existing Standards, where these are externally assured, could be used to fully *passport* agencies through theses stages (i.e. you would not test or scrutinise these areas further) or as *evidence* of compliance (i.e. examination of these areas would be light touch).

The table below provides a quick summary of how this might work for the most commonly used Standards in Wales.

Table 3.1 Passporting and Evidencing Standards

Domains within the Standards	Passport	Evidence
General management	CAB, AQS, Age UK, Lexcel	
Planning	CAB, AQS, Age Concern	
Customer care	CAB, AQS, Age Concern, Lexcel	
Advice specific services	CAB, AQS, Age Concern, Lexcel	
Adviser competence	New	CAB (partial)
Welsh language	New	Some elements may be partially covered (e.g. access requirements in CAB) but this requirement does not currently capture stakeholders' aspirations for the Standards to move organisations towards a fully bilingual service.
Outcome Standards	New	CAB (partial)

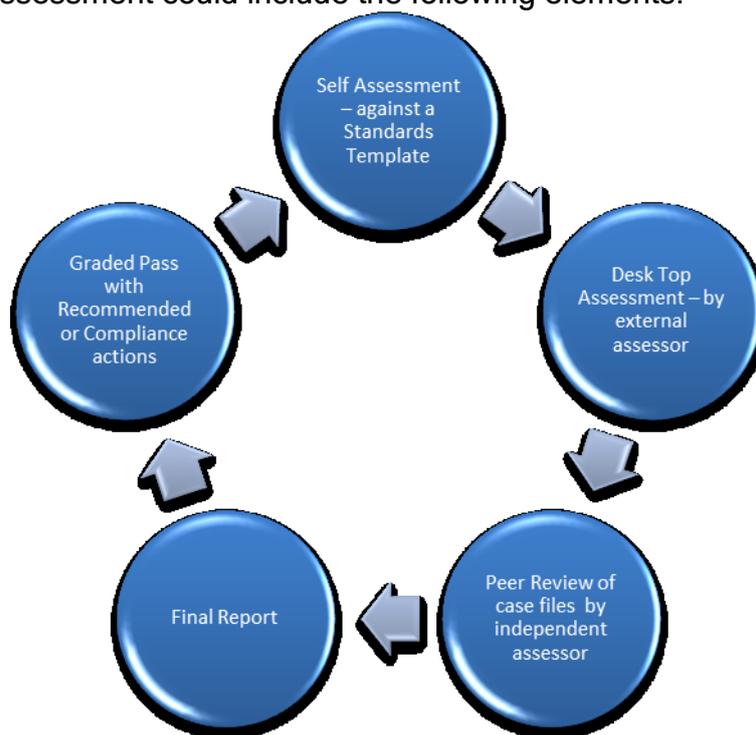The model for assessment could include the following elements:

Figure 3.3 Model of Assessment

Ongoing assessment models may be developed that include for example:
- Annual self-verification of continued compliance
- Risk based onward assessment where there is substantial change in an organisation notified in the annual self-verification exercise or through random spot checks of case files etc.

Option Appraisal (see figure 3.2)
- As a new scheme wholly controlled in Wales all aspirations for the content of the Standards such as the inclusion of domains relating to adviser competence, Welsh language and outcomes could be met in this option as it would not require other schemes adjusting theirs to meet a Framework.
- There would be little difference for the public in a quality marked service relating to Standards or a Framework. However, the model of assurance proposed has different levels of attainment for organisations being assessed against the Standards and this, if the level of attainment were placed in the public realm, would provide additional assurance to the public and others about the level of quality provided. In addition, a centrally assured scheme may provide additional assurance to other organisations facilitating better referrals. Within other schemes the means of raising public awareness of quality assurance with a service includes:
  - Public display of accreditation certificates or accreditation marks
  - Inclusion within publicly available directories of service providers
  - Full publication of audit reports of agencies seeking accreditation whether they pass or fail (Scottish Government)
- Concerns have been raised about the impact of public confidence in a service if it secures a low level of attainment and is the only local source of support.

This concern applies to all publicly available service quality reports such as care home ratings. Ultimately it is a political decision as to whether the public is better served by knowing the limitations of an agency and making an informed choice to use that service or not knowing and using a service that may not provide the highest quality of advice.

- For those agencies with existing externally assured Quality Standards (estimated at around half) there would be a need to reapply for accreditation under the new Standards. However, we have identified in the table above how currently accredited agencies could be either "passported" or "evidenced" against a new Standard should this be introduced. Three of the seven proposed domains are new or only partially included and would require assessment for all agencies under a separate Standard or Framework regime. Because of both the need to develop three new domains and the aspiration of stakeholders to introduce graded levels of attainment rather than pass/fail accreditation we do not consider that there would be significant cost savings in the development costs of a Framework rather than a distinct set of Standards.
- The key barriers to implementation relate to sector acceptance of new Standards. We consider that this acceptance and engagement could be further facilitated by both building upon existing good practice in alternative models and ensuring that there is passporting for those domains within the Standards that are common with the requirements in other externally assured schemes. As with a Framework, new Standards will require the provision of support to smaller organisations if they are to participate.

3.5.3 Issues to be Considered

Participants in the workshop were asked to consider which approach is most likely to generate the confidence of the public, providers and funders and which is the most viable and sustainable.

- There is limited public understanding of the assurance provided by the current range of Standards. Either a new set of Standards or a Welsh Framework linked to a public register of accredited services may raise public confidence.
- A Framework assumes that Standard holders would be willing to adapt their current Standards and assurance processes to meet the requirement of a new Welsh Framework. If they did not make these changes then agencies covered by that accreditation scheme would not be seen as meeting Welsh Government Quality Standards. It may also require a standalone peer review scheme to supplement the current accreditation process if current standard holders are unable to make this change.
- There is not universal confidence in the degree of rigour applied in assessment and assurance by some current Standards.
- The burden on front-line agencies of any new Standard may be reduced by ensuring that this builds upon existing good practice in Wales and current, commonly used schemes. There appears to be a broad consensus on the domains for the Standards and the assessment components required.

Some stakeholders raised questions as to how mapping of the existing Frameworks and schemes against a new Framework would work, and that this would only provide a baseline rather than continuous improvement. There was also some debate around

the challenges of working with existing Frameworks and schemes to include new aspects in Wales, in particular potential Welsh legislation.

The new legislative powers of the Welsh Assembly means that over time there will be a greater difference in the legal systems of Wales and England. It is anticipated that this will lead to a greater divergence in the knowledge required by an adviser in Wales compared to an adviser in England.

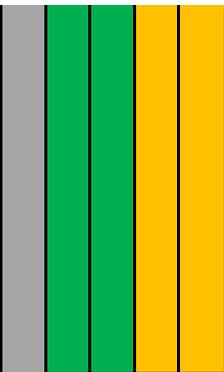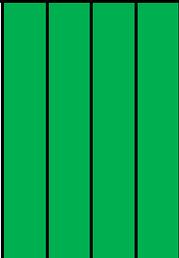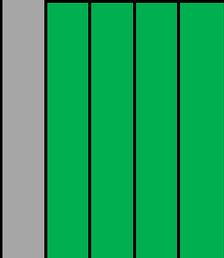Table 3.2 Options Appraisal for a Framework or set of Standards

Stakeholder	Framework				Standards				Notes
	Level of Assurance	Development Cost	Ongoing Cost	Development Time	Level of Assurance	Development Cost	Ongoing Cost	Development Time	
Welsh Government	Green	Amber	Amber	Green	Green	Red	Amber	Amber	There is no substantial difference for Welsh Government between either option in terms of the level of assurance and the ongoing cost. The development cost of a new set of Standards may be marginally more expensive to Welsh Government and this difference is estimated to be in the region of 15% above the cost of developing a Framework. The development time for a new set of Standards may take longer to produce than the establishment of a Framework and this is reflected in marginally higher management costs for Welsh Government. It should be possible to complete either approach within the indicative timetable suggested by this report.
Other Funders	Green	Green	Green	Green	Green	Green	Green	Green	There is no substantial difference for other funders between either option in terms of level of assurance, development cost, ongoing cost or the time required to develop the alternative options.
Standard Holders	Green	Red	Amber	Amber	Green	Green	Red	Green	There should be no substantial difference in the level of assurance provided by either option, however, standard holders would need to be fully engaged in the development of either option to ensure this assurance.

	Option 1					Option 2				Commentary
	🟢	🔴	🟡	🟡	⬜	🟢	🟢	🔴	🟢	Whilst standard holders would be expected to engage equally in the development of a new Standard or Framework, it is anticipated that there may be greater development costs for them in the development of a Framework as they would need to adjust their standards to meet the Welsh Government Framework. This additional cost could be mitigated by financial support from Welsh Government or by increased fees to audited agencies. There is potential risk to their ongoing income stream if their current standard is replaced by a wholly separate new set of Standards. This could be mitigated by development of their schemes for full passporting. The time required for standard holders to develop their Standards to fully comply with the Framework is likely to require more additional development time from standard holders than a new standard.
Organisations with current QA scheme	🟢	🟢	🟢		⬜	🟢	🟡			There should be no substantial difference in the level of assurance between each option, particularly if the standard holder is involved in the development of either option. There may be additional costs for those organisations with a current QA scheme in place if this were replaced by new Standards. This could be mitigated by funding being made available to cover the costs of a new scheme or by their current standard holder developing full passporting. Compliance with a new scheme may impact upon the development time of current standard holders as they adapt their systems to a new set of Standards.
Organisations without current QA scheme	🟢	🟢	🔴	🔴	⬜	🟢	🟢	🔴	🔴	There should be no substantial difference in the level of assurance between each option, however, those organisations without a current QA in place may not have identified sufficient value in the current schemes to participate and therefore may see either a new Standard or a Welsh Government approved Framework as having more value. There would be increased costs under either option for organisations without current QA in place if they opted into such a scheme. Under either option the costs they would incur in developing their organisations to meet the requirements and the costs of accreditation would need to be explored further. Either option would have an impact on the amount of development time required by agencies without current Standards to comply with Standards that are part of a Framework or a new set of Standards.

Other Providers									There should be no substantial difference in the level of assurance between each option provided they are written in such a way as to ensure relevance for a wider range of providers. The creation of a scheme that was seen as relevant by such providers may be better achieved by a new Standard. There would be increased costs under either option for other organisations if they opted into such a scheme. Under either option the costs they would incur in developing their organisations to meet the requirements and the costs of accreditation would need to be explored further. Either option would have an impact on the amount of development time required by other providers to comply with standards that are part of a Framework or a new set of Standards.
Service Users & the Public									There should be no substantial difference for service users in terms of level of assurance. A single standard may be easier to understand from a service user perspective and therefore provide greater assurance. There should be no cost implications for service users under either option. Neither option would have an impact on service users in terms of development time as both should be able to be completed within the indicative timetable suggested elsewhere in this report.

3.5.4 Ownership of the Framework or Standards

It will be important to agree who will own a new National Scheme. There are broadly three models of ownership:

- Ownership by the Welsh Government – as in Scotland where the Scottish Government is the owner of the Scottish National Standards. This does not exclude the sector from participation in the development of these Standards but potentially provides greater authority to the Standards and enhances the confidence of funders and the public in assurance provided by compliance.
- Ownership by the sector – as in the case of the Citizens' Advice Membership Scheme or the AQS owned by ASA. This may assist in ensuring that the Standards reflect current practice and are attainable. However, in other sectors, including financial services, health and social care, such approaches to self-regulation are regarded as inadequate.
- Ownership by a third party or arm's length body – as in the case of the MAS Framework and the Lexcel Standards. This addresses the concerns around the adequacy of self-regulation whilst not attaching liability directly to the state for service quality. Some stakeholders within the advice sector have commented that the role of third party regulation takes away the capacity of the sector to set Standards, for example the MAS Framework requires standard holders to amend their Standards and assurance processes to comply with the Framework.

Most stakeholders thought that the Welsh Government should own the Standards or Framework as this would give it more value, strength and independence. They agreed that its implementation should be in partnership with the advice sector and that this should be done by developing local, regional and national networks.

It should be noted that if the decision is to move to a Framework, current standard holders will continue to own their own schemes. However, ownership of the Framework with which they will be asked to comply will rest with the Welsh Government.

4 Conclusions

In addition to the options of a Framework or new set of Standards outlined in section 3, further details were considered with stakeholders and the following conclusions have been developed in relation to Quality Standards for Information and Advice Services. These are reported under four broad headings

- Building the Foundations
- The Contents of the Standards
- The Approach to Assurance
- Beyond Advice & Information

4.1 Building the Foundations

There was broad consensus in the Co-operative Enquiry Workshop that ownership of the new Standards by the Welsh Government would provide the public, other funders and the sector itself with greater assurance of quality, provided that Welsh Government worked in partnership with the advice sector and other stakeholders to implement any scheme and not substantially increase the regulatory burden on advice agencies. To this end governance arrangements should also include representatives from other funders of advice including the Welsh Local Government Association and potentially also the Association of Charitable Funders.

Conclusion 1
It would be advantageous for Welsh Government to develop a set of Advice and Information Standards or Framework for Wales in partnership with the advice sector and for these to be "owned" by Welsh Government. The development of new Standards or a Framework should engage a range of other funders and standard holders.

Conclusion 2
The implementation of the new Standards or Framework will need to consider the support needs of smaller agencies and those for whom advice is only part of their work. This could be achieved through the development of local, regional and national networks to foster peer support.

4.2 The Contents of the Standards

The starting point for any new set of Standards is common definitions. The following definition is based on stakeholder comments:

Conclusion 3
Good advice should be defined as:
- **Factually accurate and up-to-date**
- **Impartial and in the best interest of the client**
- **Delivered by a competent/appropriately trained or qualified adviser**
- **Appropriate and relevant to the client's needs and circumstances**
- **Provided in such a way as to enable the client to take positive/beneficial action where possible**
- **Followed-up to assess the impact of the advice on the individual or client**

This is delivered through four types of information and advice (with detailed definitions based upon ASA)[26]

> Type One - Information
> Type Two - Advice
> Type Three - Advice with casework
> Type Four - Specialist case work including representation in Courts and Tribunals

The research and consultative processes explored the detailed content of the Standards. For many of the domains below, existing schemes could have the potential to be adapted for use in Wales.

Conclusion 4
The new Standards should include 7 distinct domains:
- Domain 1 – General Management Standards
- Domain 2 – Standards for Planning
- Domain 3 – Standards for Customer Care
- Domain 4 – Standards for Service Provision
- Domain 5 – Standards for Adviser Competence
- Domain 6 – Standards to embed the Welsh language in service management and service delivery
- Domain 7 – Standards to capture and measure Outcomes from Advice

The body of report provides further details on the components of each of the above domains. It should be noted that:
- AQS, CAB Membership scheme and Scottish National Standards provide a largely consistent frame for domains 1-4
- Scottish National Standards provide a useful basis for Domain 5
- Additional work would be required to develop domains 6-7.

4.3   The Approach to Assurance

Nearly all those who responded to the surveys, interviews and attended the Co-operative Enquiry Workshop agreed that any Standards or Framework introduced should have an external assurance process that encourages continuous improvement.

Conclusion 5
The approach to assurance in Wales should not only seek to ensure that all providers meet minimum Standards in relation to safety, responsiveness and effectiveness, but should also seek to embed a culture of continuous improvement. This requires both self-assessment and external assurance. This culture would be supported by the assessment of compliance within the Welsh Standards or Framework providing for different levels of attainment instead of a binary pass/fail assessment.

An area which would merit further consideration in the development of new Standards or Framework is around making public the levels of attainment secured by

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[26] ASA (2011) 'Developing the Advice Quality Standard: Definitions to help you understand the Advice Sector' March 2011

individual agencies. Transparency should be a guiding principle for this quality assurance system. On this basis there would need to be compelling reasons for choosing not to make these assessments available to the public. For those agencies funded by statutory organisations such assessments may be subject to disclosure under a Freedom of Information request.

Conclusion 6
External assessment of an advice service against the Standards or Framework should be on a three yearly cycle of assessments with some element of risk-based assessments where there are particular concerns and self-assessment to avoid complacency between assessments. It should include assessment of the quality of advice as well as a process including some on-site element. External assurance teams should include a combination approach with peer assessors providing credibility but mediated by professional auditors. In addition, the assurance process needs to include mechanisms to ensure that service users' views are also captured.

4.4   Beyond Advice and Information

The adaptation of these new Standards or Framework for use by a wider range of organisations was seen by service user representatives and stakeholders as a useful next step that would:
- Increase public confidence in the quality of services
- Ease client pathways by facilitating better referrals
- Potentially reduce the regulatory burden

The introduction of the advice provisions within the Social Services and Well-being (Wales) Act 2014 from April 2016 provides an added impetus to the roll-out of these Standards to a wider range of organisations.

Conclusion 7
The development of the Standards or Framework with distinct domains will facilitate the roll-out to other sectors. Domains 1-3 and 6-7 (see conclusion 4 above) should be developed to be applicable to a wider range of organisations. Domain 4 and 5 relate specifically to the delivery of an advice service.

4.5   Moving forward with a New Framework or Standards

This section provides an outline of the conclusions above and the next steps needed to deliver this programme of work. This is presented under five broad headings:
- Governance – including ownership and oversight
- Standards/Framework Development – to ensure that the new Standards or Framework is developed with all relevant stakeholders
- Assurance Process – to ensure that the quality assurance regime is fit for purpose
- Support needs – to ensure that the sector, particularly smaller organisations, can meet the Standards
- Timelines – indicative timelines with milestones for delivery

4.5.1 Governance

Conclusion1 looks at the development of a new set of Standards or Framework which could be developed for information and advice services in Wales and "owned" by the Welsh Government but developed in partnership with the advice sector. In addition, Conclusion 4 explores how the Standards or Framework are produced using a modular form (see below) in order that generic Standards covering general management, planning and customer care can be applied to a wider range of agencies. Governance arrangements should reflect accountability to Government, partnership with the advice sector and involvement of a wider cohort of organisations for whom these Standards may be relevant (e.g. the wider voluntary sector and the social housing sector).

To oversee the development of the Standards or Framework and assurance process, the Welsh Government could consider establishing a Standards Advisory Group reporting to Welsh Government. This Advisory Group should include representatives from:

- Other funders, in particular local government but also charitable funding bodies and others
- The advice sector
- Current standard holders
- The wider voluntary sector, particularly those in the fields of housing and social care
- Other relevant regulatory bodies such as the Social Housing Regulator.

The terms of reference for this Advisory Group should include:
- Standards / Framework Development
- Assurance Process Development
- Identification of the support needs of front-line agencies.

4.5.2 Standard / Framework Development

There was substantial consensus from stakeholders as to the key domains that Welsh Standards or a Framework should include. These domains are:
1. General management
2. Planning
3. Customer care
4. Advice specific services
5. Adviser competence
6. Welsh language
7. Outcomes

Conclusion 4 suggests that the Standards should be modular, that is, divided into 7 key domains to allow those relevant domains (e.g. General Management, Planning and Customer Care) to be applied by a wider range of organisations beyond the traditional advice sector. It is important that any work developing the Standards for wider application includes consultation with those organisations to whom it may be applied and their funders.

Conclusion 3 suggests that advice should be defined by four "Types":

- Information
- Advice
- Advice with Casework
- Representation

Standards under domains 4 Advice specific services and domain 5 Adviser Competence should include differential requirements dependent on the "Type" of advice delivered.

Domain 6 "Welsh language" will require more resource for development. Whilst the work undertaken by the Legal Service Commission (LSC) in 2010 on ensuring access to Welsh language advice provides a template for client services the aspiration for this domain is that it supports an incremental approach to extending bilingualism across all aspects of advice organisations.

Domain 7 ("Outcomes") presents a greater challenge as there has been limited work on this within the advice sector in relation to Outcomes and Quality. However, the majority of providers said they already captured outcomes to some extent.

4.5.3 The Assurance Process

Conclusion 5 suggests that the approach to assurance in Wales should move beyond guaranteeing minimum Standards but seek to embed a culture of continuous improvement. Conclusion 6 provides the methods and approach to external assurance. In summary these provide for:

- A three year cycle of external assessments with interim validation provided on an annual or 18 month basis through reported self-assessment – where high risks are identified external assurance may be triggered (e.g. substantial changes in funding levels, very high staff turnover etc.)
- External assurance should include process and quality of advice with both off-site and on-site elements. It could be undertaken on behalf of Welsh Government by a mix of professional auditors and peer reviewers and should include arrangements for securing service user participation in the assessment.
- Agencies audited will be assessed against four levels of attainment:
  - Outstanding
  - Good
  - Requires Improvement
  - Inadequate / Fail
- The Advisory Group will be consulted on whether these levels of attainment should be placed in the public domain. The detailed operation of this scheme should be developed as part of the development of the assurance model in the next phase of this work (indicative timeline – Quarter 4 2015/16)
- Where other Standards meet the requirements as set out in each domain these will act as evidence or a passport for the agency holding this Standard.

The specification and procurement for the development and implementation of the Assurance Process could be commissioned as the detailed work on Standards development is completed.

4.5.4 Support Needs

Conclusion 2 gives further consideration to the support needs of smaller agencies in moving towards compliance with new Standards or Framework. Such support would ideally be provided through peer support as part of work of the local, regional and national advice networks.

The Advisory Group should be charged with mapping these support needs and identifying appropriate means of providing this support.

4.6 Timelines and Next steps

The findings presented in this report should be considered by Welsh Government and key stakeholders in determining the way forward in terms of bringing greater consistency and transparency around Quality Standards for information and advice in Wales.

The above work could be undertaken over the next 18 months and the table below provides an indicative timeline with milestones for this work.

Quarter 1 & 2 2015/16	Quarter 3 2015/16	Quarter 4 2015/16	Quarter 1 2016/17	Quarter 2 Onwards 2016/17
• Establish Advisory Group • Develop specification for "Standards or Framework Development" • Procure Development contractor	• Commence Standards or Framework Development work	• Conclude Standard or Framework Development • Develop specification for Assurance Model development and delivery • Commence Support Needs assessment for smaller organisations	• Conclude Assurance model design • Identify process for supporting needs of smaller organisations • Agree future role of Advisory Group	• "Go Live" • Standard or Framework Launched • Assurance Process commences • Support services to smaller organisations operational

Figure 4.1 Timeline and Next Steps

Appendix A: List of respondents to Provider Survey

- Action on Hearing Loss
- Advice Mid Wales
- AdviceUK
- Advocacy Matters (Wales)
- Age Connects Cardiff and the Vale
- Age Connects Morgannwg
- Age Connects Neath Port Talbot
- Age Connects North East Wales
- Age Cymru
- AVOW
- Benefit Advice Shop
- Blackwood Basement
- British Red Cross
- Canolfan Cynghori Ynys Mon CAB
- Cardiff and Vale CAB
- Cardiff Gypsy and Traveller Project
- Cardiff University Students' Union
- Care & Repair Cymru
- Careers Wales
- Carers Trust
- Church Army
- City and County of Swansea Council
- Community Housing Cymru
- Conwy Council (Welfare Rights department)
- CVS Conwy
- Denbighshire County Council (Welfare Rights)
- Disability Advice Project
- FNF Both Parents Matter Cymru
- Fosterline Wales (as provided by the Fostering Network)
- Grwp Cynefin
- Hafan Cymru
- Llamau
- Macmillan Cancer Support
- Melin Homes
- Mencap Cymru
- Men's Sheds Cardiff
- Merthyr Valleys Homes
- Mid Wales Housing Association
- Monmouthshire Housing
- National Association of Citizens Advice Bureaux trading as Citizens Advice
- Neath Port Talbot County Borough Council (Welfare Rights)
- Parkinson's UK
- Pembrokeshire Housing
- Penderels Trust
- Pennysmart CIC
- Race Equality First
- RCT Homes
- Relate Cymru
- Residential Landlords Association
- RNIB Cymru
- Shelter Cymru
- Shelter Cymru (Take Notice Project)
- SNAP Cymru
- Somali Progressive Association/Somali Advice & Information Centre
- South East Wales Energy Agency
- Stonewall Cymru
- Swansea & Neath Port Talbot CAB
- Tai Calon Community Housing
- Tan Y Maen Ltd
- Tenantiaid Cymru / Welsh Tenants Federation
- The Rowan Organisation
- The Speakeasy Advice Centre
- Ty Arian
- Welsh Refugee Council
- Working Links

Appendix B: List of respondents to funder / commissioner survey

- Advice Services Alliance
- AdviceUK
- Big Lottery Fund
- Blaenau Gwent County Borough Council
- Caerphilly County Borough Council
- Carmarthenshire County Council
- Ceredigion County Council
- Conwy County Borough Council
- Denbighshire County Council
- Flintshire County Council
- FoxSE Consultancy (on behalf of the Millennium Stadium Charitable Trust)
- Gwynedd Council
- Isle of Anglesey Council (Supporting People Programme)
- Powys County Council
- Merthyr Tydfil County Borough Council
- Monmouthshire County Council
- Torfaen County Borough Council
- Wrexham County Borough Council

Appendix C: Attendees at Initial Stakeholder Meeting (13.11.14)

Organisation

- Action on Hearing Loss Cymru
- Advice Services Alliance
- Age Connects Wales
- Big Lottery Fund Wales
- BSI (British Standards Institute)
- Cardiff University Students Union Advice & Representation Centre
- Care And Repair
- Carers Trust
- Citizens Advice Cymru
- Community and Voluntary Support Conwy
- Community Housing Cymru
- Families Need Fathers - Both Parents Matter Cymru
- Low Commission
- Mencap
- Men's Sheds
- Money Advice Service
- Neath Port Talbot Council
- South Wales University Legal & Financial Advice Centre
- The Money Advice Service
- Vale Centre for Voluntary Services
- Welfare Rights Advisors Cymru
- Welsh Government
- Welsh Refugee Council
- Welsh Women's Aid
- Working Links Wales

Appendix D: List of Interviewees

Standard Holders

13 standard holders were interviewed to gather the views of the organisations that develop and manage the implementation of Quality Standards. They included:

1. Advice Services Alliance (AQS)
2. Age Cymru (Age UK Standards)
3. British Standards Institute (BSI)
4. Cegnet (Education Standards)
5. Citizens Advice England and Wales (CAB Membership Scheme)
6. Citizens Advice Scotland (Scottish CAB Membership Scheme)
7. Law Society (Lexcel)
8. Legal Aid Agency (Specialist Quality Mark)
9. Money Advice Service (Quality Framework)
10. Office of the Immigration Standards Commissioner (OISC) (Code of Standards)
11. Promo (Quality standards for young peoples' information, advice and guidance)
12. Scottish Government (Scottish National Standards)
13. Skills for Justice (National Occupational Standards for Legal Advice)

Stakeholders

20 organisations were interviewed to gather the views of key stakeholders in advice services including:

1. AdviceUK
2. Association of Charitable Foundations
3. Big Lottery
4. CAB Caerphilly
5. CAB Cardiff and Vale
6. CAB Ceredigion
7. CAB Denbighshire
8. CAB Merthyr Tydfil
9. CAB Pembrokeshire
10. CAB Ynys Mon
11. Cardiff University Student Union
12. Children's Commissioner
13. Citizens Advice Cymru
14. Law Society
15. Low Commission
16. Money Advice Service
17. Neath Port Talbot Council
18. Older People's Commissioner
19. Welsh Language Commissioner
20. Welsh Local Government Association

**Service user representatives and extending the scope**

10 interviews with service user representative organisations were conducted to gather their views and understand what assurance their communities of interest and spoke to 6 organisations to understand the scope for extending the Framework or set of Standards to other sectors. They included:

1. Action on Hearing Loss
2. Cardiff Community Hosing Association
3. Cardiff University Students Union
4. Care Forum Wales
5. Carers Wales
6. Mid Wales Housing Association
7. Race Equality First
8. Residential Landlord Association
9. Save the Children
10. Shelter Cymru (Take Note project)
11. SNAP Cymru
12. South East Wales Regional Equality Council
13. Stonewall Cymru
14. Swansea Bay Regional Equality Council
15. Welsh Tenant's Federation
16. Welsh Women's Aid

Appendix E: List of attendees at Co-operative Enquiry Workshop

- Advice Services Alliance
- Big Lottery Fund Wales
- Carers Wales (Llandudno)
- Commissioner for the Welsh Language
- Community and Voluntary Support Conwy
- Community Housing Cymru
- Conwy CAB
- Denbighshire CAB
- Denbighshire Council / MacMillan
- Domestic Abuse Safety Unit
- Financial Inclusion Unit, Welsh Government
- Mantell Gwynedd
- Mencap
- Money Advice Service
- RNIB Cymru
- Shelter Cymru
- SNAP Cymru
- Tenovus
- Wales Co-operative
- Welfare Rights Advisors Cymru
- Welsh Government
- Welsh Refugee Council
- Wrexham Youth Service
- Ynys Môn CAB

Appendix F: Graphs and Tables from providers survey
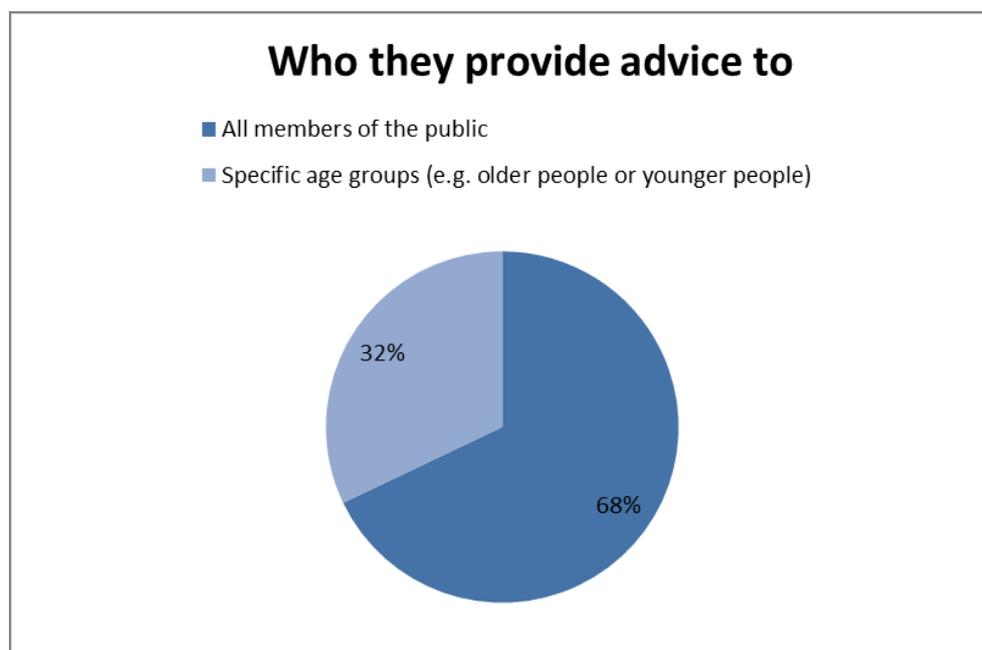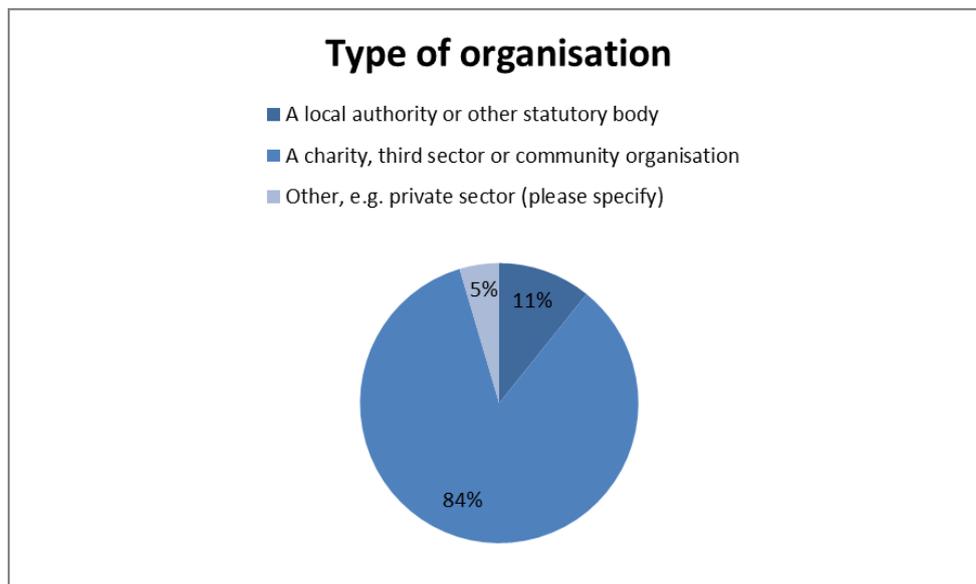
Main work of the organisation

- Mainly an information and advice provider
- Mainly the provider of other services but provide some advice and information
- We do not provide advice and information to the general public

3%
36%
61%

Level of information and advice provided

93.5%
85.5%
67.7%
43.5%

Information | Advice | Advice with casework | Representation in courts or tribunals

The Topics of Advice Provided

- Welfare benefits / income maximisation: 84.5%
- Debt and money advice: 67.2%
- Housing: 70.7%
- Employment: 53.4%
- Education: 44.8%
- Family law: 17.2%
- Immigration: 20.7%

The Number of full time staff or equivalent

- Volunteers only
- Less than 5 full time equivalent staff
- Between 5 and 10 full time equivalent staff
- More than 10 full time equivalent staff

- 2%
- 32%
- 26%
- 40%

Quality Standards Used

- Advice Services Alliance's Advice Quality Standard: 52.6%
- Age UK'S Advice Quality Standard: 5.3%
- Citizens Advice membership scheme: 21.1%
- Quality standards for young peoples' information, advice and guidance: 10.5%
- Quality standards for youth work organisations: 5.3%
- OISC for any immigration advice provision: 15.8%
- Lexcel: 26.3%

Standard	Comprehensive written policies and procedures (%)	Good range of policies and procedures but some gaps (%)	Inadequate policies and procedures (%)	No policies and procedures (%)	Don't know (%)
General Management	84.6	12.3	0	0	3.1
Planning	70.3	23.4	3.1	0	3.1
Customer Care	83.1	13.9	1.5	0	1..5
Service Provision	68.8	21.9	4.7	0	4.7
Advisor Competence	71.9	20.3	1.6	1.6	4.7

Do You Measure Outcomes
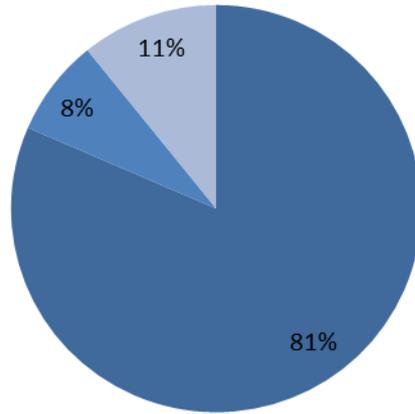
Legend: ■ Yes ■ No ■ Don't know / Not applicable

11%

8%

81%

Standard	Not important at all (%)	Not very important (%)	Neither important nor unimportant (%)	Quite important (%)	Very important (%)
Quality Assurance to get the right advice at the right time	0	1.6	1.6	22	75
External Accreditation of quality to ensure services are operating to the required standards	1.6	1.6	7.9	35	54

Should External Quality Assurance include Case File Examination to Ensure QoA is provided?

- 20%
- 11%
- 69%

Yes
No
Don't know / Not applicable
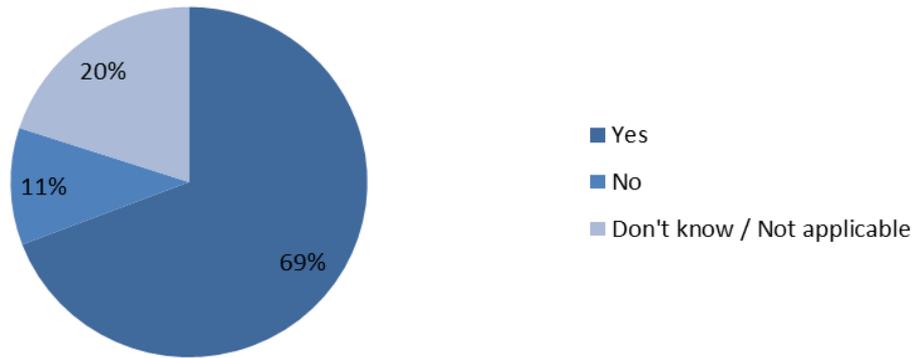
Appendix G: Graphs and Tables from funder commissioner survey

Corporate Objectives that Funding Seeks To Address

94.4%	100.0%	77.8%	88.9%	77.8%	50.0%
Tackling poverty	Tackling indebtedness	Tackling inequality	Tackling joblessness	Promoting community cohesion	Promoting access to justice

Advice Topics Funded

100.0%	88.2%	82.4%	88.2%	52.9%	35.3%	70.6%
Housing	Welfare benefits	Financial capability	Debt	Discrimination	Immigration	Family

48

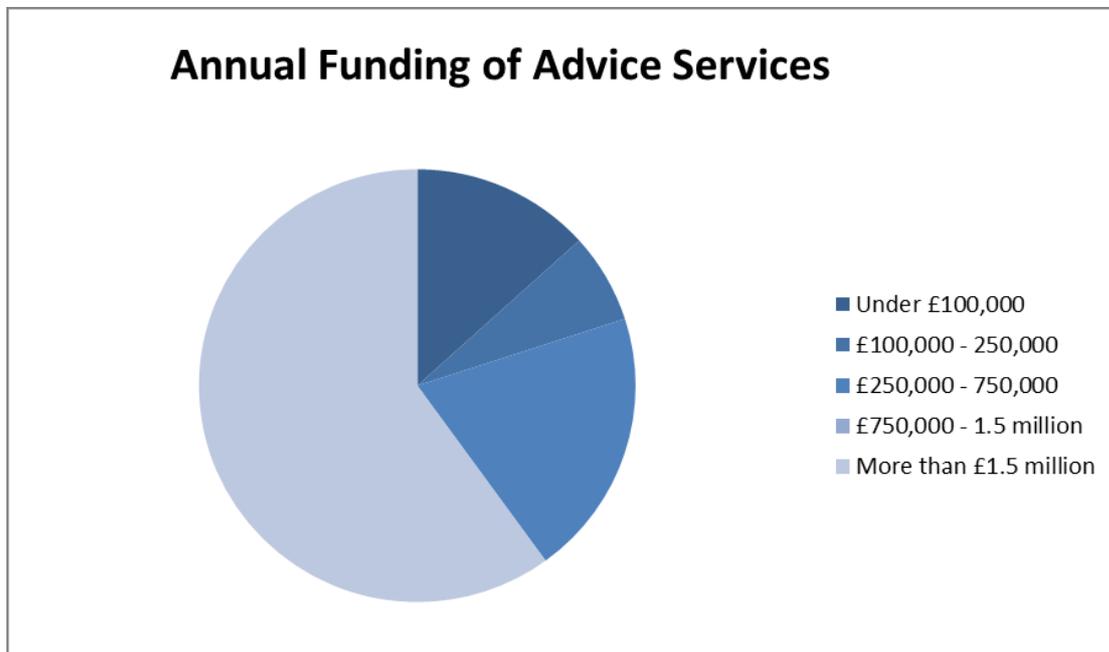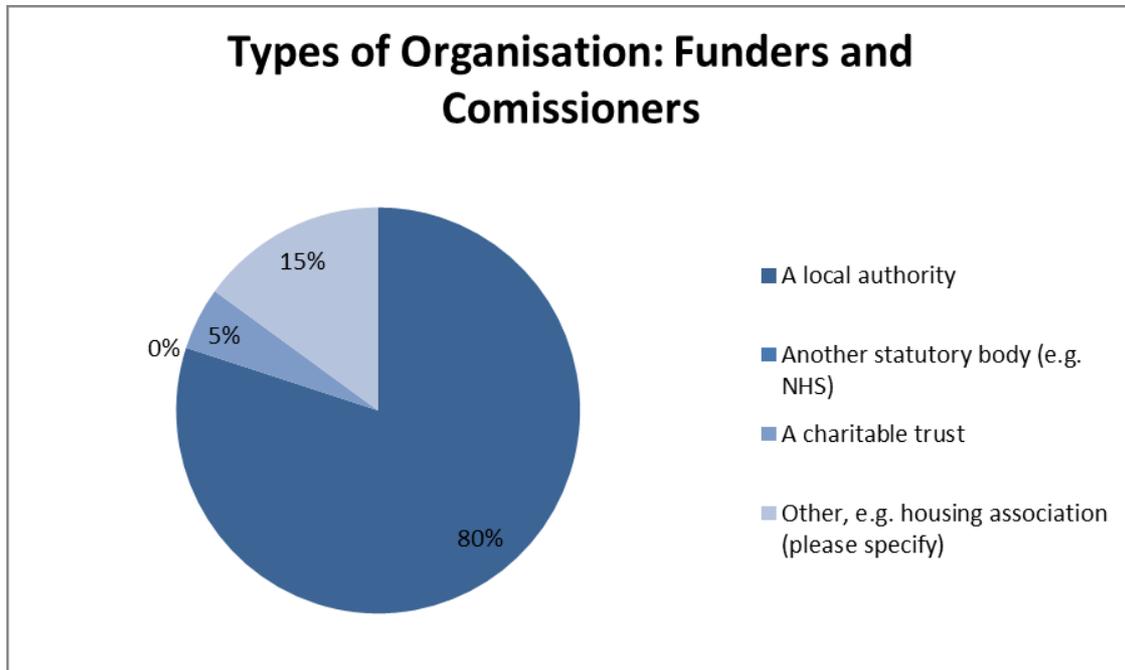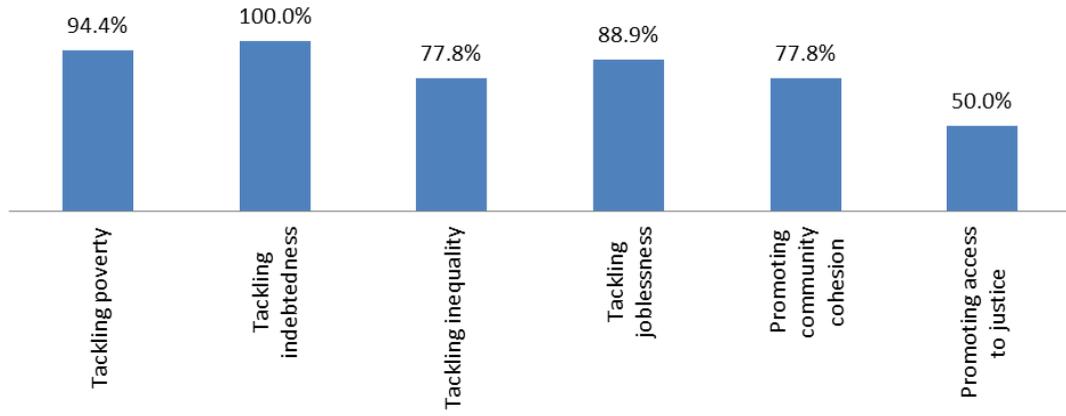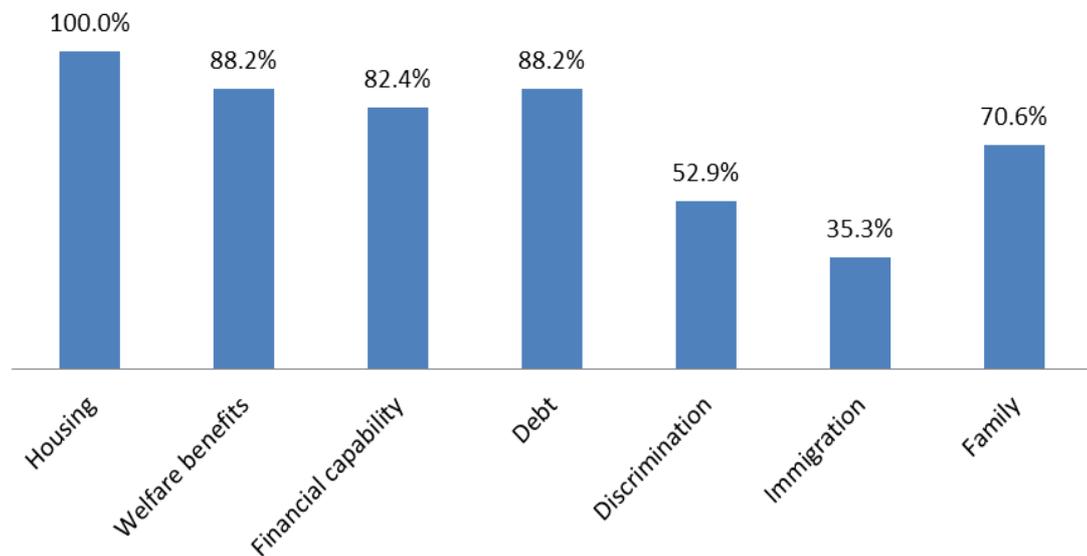| Standard	Yes (%)	No (%)	Don't Know / Not applicable (%)
General Management	82.4	5.9	11.7
Planning	93.8	0	6.3
Customer Care	86.7	0	13.3
Service Provision	88.2	5.9	5.9
Advisor Competence	76.4	11.8	11.8
Outcomes	88.2	5.9	5.9

Standard	Not important at all (%)	Not very important (%)	Neither important nor unimportant (%)	Quite important (%)	Very important (%)
Quality Assurance to get the right advice at the right time	0	0	5.3	21.1	73.7
External Accreditation of quality to ensure services are operating to the required standards	5.6	0	22.2	16.7	55.6

The difference a quality standard would make to funders

- It would allow us to reduce the amount of time we spend assessing / monitoring quality in services we fund
- It would provide additional assurance that services we fund are of high quality
- It would make no difference to us

7%
27%
66%
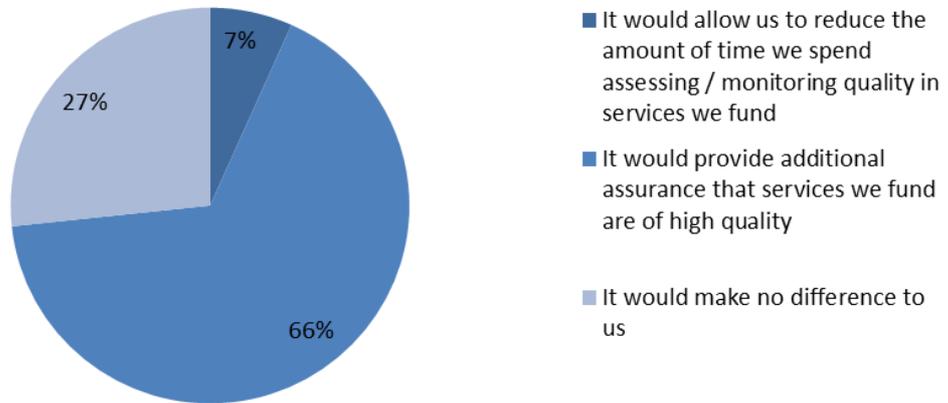
Appendix H: Literature Review Summary

The Literature Review forms part of the first phase of work. It included a desktop assessment of the current Standards and membership codes of practice and a contextual analysis.

Quality Standard	Standard Holder Organisation
Advice Quality Standard	Advice Services Alliance
Specialist Quality Mark	Legal Aid Agency
Citizens Advice Membership Code	Citizens Advice England & Wales
Citizens Advice Membership Code	Citizens Advice Scotland
Scottish National Standards for Advice a& Information Providers	Scottish Government
Organisational Quality Standards	Age UK
Lexcel V6	Law Society
OISC Code of Standards	Office of the Immigration Services Commissioner
MAS Quality Framework for Organisations	Money Advice Service
Quality Standards Framework	National Youth Agency
Quality Standards for Young People's Information advice and guidance	Promo Cymru

These Standards/membership codes were assessed against a number of key measures thought to be best practice in Quality Standard systems for advice providers:

- General management (including management structures, documented office procedures, financial management systems, communication systems, legislative compliance)

- Planning of Services (including needs assessment, business planning, service plans, review processes)

- Accessibility and Customer Care   (including ensuring accessibility, codes of behavior, confidentiality, client record management, complaints, service user involvement, health and safety, safeguarding etc.)

- Providing the Service (including ensuring independence, networking and referral arrangements, service recording and case management, information and resources etc.

- Staff and Agency Competencies (including measures to assure staff competencies, staff development, supervision and training plans, legislative compliance and equality of opportunity)

- Resources (accessible premises, appropriate staffing levels, annual budgets)

- Audit Process (including internal or external audit, quality of advice audit, frequency of audit)

Standard	General Management	Planning of Services	Customer Care	Service Provision	Adviser Competencies	Audit Process
Advice Quality Standard	✓	✓	✓	✓		Externally audited, bi-annually
The Legal Aid Agency's Specialist Quality Mark	✓	✓	✓	✓	✓	Externally audited
Age UK Information and Advice Quality Standard	–	Partially	Partially	✓	Partially	Internal review or peer-led review
Citizen Advice Membership Scheme – England & Wales	✓	✓	✓	✓	✓	Periodic auditing
The Law Society's Lexcel V6	✓	✓	✓	✓	✓	External auditing
Money Advice Service Quality Framework	✓	✓	✓	✓	✓	Reviewed every 5 years, except in cases of legislation changes
The National Youth Agency – Quality Mark for Youth Work Organisations	✓	✓	✓	✓	Partially	Self-assessment
OISC Code of Standards	✓	✓	✓	✓	–	Internal audit
Scottish CAB Membership Scheme	✓	✓	✓	✓	✓	External auditing
Scottish National Standards For Information & Advice Providers	✓	✓	✓	✓	✓	External audit
Quality Standards For Young People's IAG	✓	✓	✓	✓	✓	No formal audit process.

Contextual Analysis

1) 10 Year Homeless Plan[27]

- The Plan refers to the importance of the right housing advice at the right time which can prevent a situation deteriorating. The provision of advice in this context also empowers service users.

- The Plan seeks to change the perception of services so they are somewhere to go for advice with any housing related issue, rather than just somewhere to go when at immediate risk of, or already experiencing, homelessness.

- Emphasises a proactive approach to the provision of housing and all related advice services so that everyone can access the advice they need, when they need it. This will need to involve joint planning arrangements between Local Authorities, the Legal Aid Agency and the Welsh Assembly Government to deliver more efficient and coordinated provision.

2) Rapid Evidence Assessment: The Effective Delivery of Information, Advice and Guidance[28]

- Advice and information is required across all areas of the community and a needs assessment of different demographics is an important element in the strategic aspects of the quality of advice.

- It also looks at the importance of different delivery methods of advice and information - face to face, telephone and online support and the effectiveness of each depending on the demographic they are serving. This is of particular importance to Wales due to the isolated nature of many rural communities creating particular practical and financial issues.

- The quality of advice should relate to a combined measurement of how good the advice given to a client is, the effectiveness of the delivery and the degree to which the client acts upon the advice provided.

- There are currently no consistent Standards for advice providers to assess the quality of the advice being provided and there needs to be a Quality Framework that has consistency across all organisations while providers and funders need a quality measurement which has common definitions and measurement.

3) Independent Advice Providers' Forum (IAPF) – What the People of Wales Expect of Advice and Information Services[29]

- Service users stated the importance of independent advice beyond the Local Authority but many had a lack of awareness about where to go for

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[27] Welsh Government (2009) '10 Year Homeless Plan 2009-2019'
[28] Consilium Research and Consultancy (2013) 'Rapid Evidence Assessment: The Effective Delivery of Information, Advice and Guidance'
[29] Independent Advice Providers' Forum (IAPF) (2013) 'What the people of Wales expect of Advice and Information Services'

this. Advice provided by Local Authorities should be independent of decision makers and creditors

- There is a need for different types of advice delivery depending upon the different demographics

- Identify the barriers and enablers to ensuring hard to reach groups can access information and advice services to improve services (e.g. people with mental health problems) and an improved referral system. An accreditation Framework that would assess information and advice services would assist in a referral system.

- Peer support and peer educators would be beneficial in the delivery of services

4) Strategic Equality Plan and Objectives 2012 - 2016[30]

- The first Equality Objective is to 'Strengthen advice, information and advocacy services to help people with protected characteristics understand and exercise their rights and make informed choices' to challenge discrimination and providing financial and debt advice, and advice on housing and many other areas of potential inequality.

- Services providing information, advice and advocacy are 'uneven and not well joined- up'

- Not-for-profit providers of these services are facing an unprecedented challenge as a direct result of the welfare reform programme and cuts in Legal Aid.

- There is a lack of information about rights and sources of advice; weak infrastructure for delivering advice support and representation; lack of training and quality accreditation amongst major advice providers; poor systems for referrals and co-ordination between agencies and a lack of statistical information disaggregated for Wales

5) The Low Commission Report: Tackling the Advice Deficit[31]

- There are fewer resources to provide advice than in the past. In Wales, the Independent Advice Providers Forum had collected evidence of £4.1 million in cuts from April 2013, from the loss of Legal Aid contracts, reductions in funding from Welsh Assembly Government, Local Authority and other sources. An Advice Services Transition Fund will put just over £1 million back into Welsh advice services.

- Needs a fresh approach involving measures to reduce the need for advice and legal support in the first place whilst developing more cost-effective approaches to service provision - improvements could be made by early intervention and prevention; simplification of the legal and

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[30] Welsh Government (2012) 'Strategic Equality Plan and Objective 2012-2016'
[31] The Low Commission Report (2014) 'Tacking the Advice Deficit: a strategy for access to advice and legal support on social welfare law in England & Wales'

benefits systems; developing different services for different needs; using different methods of delivery.

- Quality can be improved through a Quality Standard - must not become excessively bureaucratic and they must benefit clients. This would provide the best quality assurance for customers, rather than general management Standards. There is currently not one Standard which would cover all the services included in their model of provision.

6) Welsh Government Advice Services Review[32]

- Across all social welfare issues, there is a high demand for specialist advice provision and there is a gap between supply and demand. There are a number of ways to address this including

- Developing Advice Networks to ensure strategic coordination of advice services, increase shared learning and make best use of available resources. Ensuring that developments in information, advice and advocacy services in health, social care, housing and equality are closely linked to social welfare advice providers to maximise the range of outcomes achieved for advice seekers.

- Develop a Framework of Standards for Advice and Information through the National Advice Network based on existing quality marks, Standards and assurance processes.   This process will require the involvement, consultation and engagement of key stakeholders. Passporting processes are suggested as a method of dealing with potential issues between existing systems and a new national Framework.

7) Money Advice Service (MAS) 'Indebted Lives: the complexities of life in debt'[33]

- Only 17% of the over indebted population (8.8 million in the UK) benefit from debt advice. A survey conducted by MAS showed that many people thought their situation was 'normal' whilst some others who did consider it, but didn't act. There is a need for a targeted, multi-channel advice journey, but there is still a requirement to keep face to face advice as 21% of the over-indebted population will only use face to face advice.

[32] Welsh Government (2013) 'Advice Services Review: Final research Report'
[33] Money Advice Service (MAS) (2013) 'Indebted Lives: the complexities of life in debt'

Annex I: Notes from the Co-operative Enquiry Workshop

Table Discussion 1: Definitions and Quality Metrics

Q1. Do you think this is the right definition of quality?

- Defining quality should include clear details of meeting the 'client's needs' including whatever their background or circumstance to ensure it is inclusive (e.g. more than just directions to a website which many users cannot access). Travel issues (rural) so must meet the needs of all the people of Wales.
- 'Support the client' should be central to quality
- Be clear about impartial and independent – they are separate things. For example, a Local Authority can provide impartial advice, but isn't independent. Needs clarity and more work.
- *'Provided in such a way as to enable the client to take positive/beneficial action'* and address *'subject to client capacity'* or *'Where possible'.*
- 'Followed-up...' need consistent measures of outcomes across sector

Q2. Do you agree that definitions of Advice should be referred to 'types' than levels'?

- Would like definitions of different types – glossary so everyone understands across the sector but also non-experts (e.g. funders)
- Types are helpful to demonstrate what organisations do, and that they do it well – also useful for funders
- Levels already exists so could build on this and have clear definitions of each one
- Should include all types of advice – including digital / different formats.

Q3. Support needs of smaller organisations?

- Absolute importance to support smaller agencies
- Resources for transitional support
- Peer support through local, regional and national networks and groups to share information and best practice – training to understand Standards
- Must be proportionate and consider what they are already doing – they can't be compared to larger organisations
- Support effective referrals
- Ensure organisations who provide information or advice, but this isn't the main part of their work, are included

- Funders should include any cost to meet a Standard as part of a wider project but shouldn't make funding decisions based on whether a service has the Standard – needs to be a broader decision.

Q4. Standards for service provision and an understanding of independence and the management of conflicts of interest to ensure that all services operate in the best interests of clients

- All agreed
- Impartial accurate advice must apply to all services and at all levels
- Need to be proportionate to include smaller organisations and provide resources as part of funding to meet Standards
- Need to deal with these situations appropriately when they arise and be clear to clients

Q5: Standards for ensuring adviser competence - Do you think the model for Wales should prescribe competences (as in Scotland) or infer these and ensure robust processes (as in the case of AQS) or model its approach on UK wide schemes (such as MAS)?

- Should be prescribed / clear
- Very important for quality – through continuous development. Should be checked
- Need to measure levels of competence – not just through training, but test it and also be able to credit prior knowledge. Also test advisors know where to refer to, how to escalate what they don't know / know their limitations
- Support offered to vulnerable groups included in competence

Q6: Capturing outcomes

- Need baseline. What the service is already doing
- Would benefit the sector
- There is commonality to outcomes so could help develop reporting systems
- Could highlight where clients have disengaged and any problems
- Better referrals could offload cases
- Include Welsh language

Table Discussion 2: Assurance Models

Q7. Do you think any assessment of compliance within the Welsh Standards or Framework should provide for different levels of attainment instead of a binary pass/fail assessment?

- Pass/fail not preferable
- Needs to encourage continuous improvement and aspiring to improve rather than complacency - link to action plans – and must 'move with the times'
- Concern was raised as to how grading might affect funder decisions
- Organisations with higher grading could share experience with other providers
- Need to be able to appeal decisions
- Concern that 1-6 might be too wide
- What do service users understand in relation to components/grading – they should be able to recognise it

Q8. Should it include an on-site element?

- Need to test processes and policies in practice to see if they work. Examine any financial or sustainability issues which needs to be on-site
- Some aspects can be done remotely (preparation for assessment)
- For some providers it is easier to have on-site inspections than try and send everything remotely (too time consuming).

Q9. Combination approach with peer assessors and professional auditors? Service users?

- Role for both peer assessors and professional auditors. They need to be able to challenge what they find. Should be anonymised and address issues of capacity – i.e. expected to participate in relation to size (e.g. put in same number of cases you can review). Managed by a central system.
- Peer review could provide confidence within the sector and provide the right expertise
- Many felt there was great value in getting peer feedback
- Talk to service users on-site - but can be difficult (confidentiality, who and how they are selected, must be representative) – a competent auditor should be able to see from the clients perspective. Should use feedback from service users.
- Need baseline and timeline to meet standards
- Do need dedicated staff to maintain quality and check measures / do self-assessments
- Some suggested that they wanted the evidence they collect around what is not working included in the audits to support their advocacy and campaigning work – this would recognise the work they do and why. Use

findings from audits to strategize ways forward through national networks and local networks to show how to gather evidence for smaller organisations

Q10. Cycles of audit?

- 3 years seems about right – concern was raised about long periods between audits
- If there is an area of concern, more frequent assessments (a mix of cyclical and risk-based)
- Different agencies may need different approach
- Need to have other activities in place to avoid complacency – submit on-going audits, self-assessments.

RESOURCES

- Some felt assurance shouldn't cost anything if you are providing a high quality service and have the right processes in place (just time) – however, there will be a need for time for providers to reach a baseline
- Costs for audits

Table Discussion 3: Standards or Framework

Q11: The Standards at 1-3 and 6-7 could be sufficiently generic to allow for the Standards to be utilised by a wider range of organisations which could potentially reduce the regulatory burden and facilitate more joined up working across sectors. Should Welsh Government develop the standards on these lines to ensure wider applicability?

- Standards listed should be generic and be adapted, but without diluting specifics/quality
- Clear definitions and criteria for each
- Applicable to smaller organisations
- Any passporting should be robust and at the right level to provide credibility - need maintenance quality bar

Q12: We welcome stakeholders' views on the desirability of moving towards either the development of a Welsh Framework or the development of Welsh National Standards.

- Really important that passporting is used well - inclusive/evidencing
- Whatever option must build on what is there and not create administrative burden on organisations (e.g. own mapping against a Framework) – since many are not part of a scheme, a new set of standards was preferred
- Individual organisations can't do the mapping work required - needs to be done centrally
- Framework for policies/Standards of advice

- Must be service user friendly
- Whatever provides best service to user
- Clear to providers – what bar is to be met – consistently
- Framework – challenges and time to work together
- Framework is harder for Wales to 'blaze a trial'
- Difficult where providers aren't part of an existing Framework
- Must be future proof

Q13: We would welcome the sector's views on ownership of the Standards or Framework.

- Most thought it should be owned by the WG which would strengthen it and ensure independence. However, WG should work in partnership with the sector (inspections, peer review)
- Must therefore develop local, regional and national networks to have strategic partnerships with the sector
- For some, they felt it should stay in the Advice sector (e.g. consortium), including Welsh language representatives – keep it free from political changes
- No one should make a profit from it

WELSH

- Opportunity not to be missed – core to providers
- Resources - staged and a working towards; need to be part of funding budgets
- Couldn't passport so would need to set goals over time
- Accessible and realistic – future generations
- Future work force
- Proportionate/localities (where high need compared to very little)
- Beyond just access

Bibliography

ASA (2011) 'Developing the Advice Quality Standard: Definitions to help you understand the Advice Sector' March 2011 [online]   http://asauk.org.uk/wp-content/uploads/2013/08/Definitions-to-help-you-understand-the-advice-sector.pdf

Consilium Research and Consultancy (2013) 'Rapid Evidence Assessment: The Effective Delivery of Information, Advice and Guidance'

Independent Advice Providers' Forum (IAPF) (2013) 'What the people of Wales expect of Advice and Information Services'

The Low Commission Report (2014) 'Tacking the Advice Deficit: a strategy for access to advice and legal support on social welfare law in England & Wales'

Money Advice Service (MAS) (2013) 'Indebted Lives: the complexities of life in debt' [online] https://www.moneyadviceservice.org.uk/en/corporate/indebted-lives-the-complexities-of-life-in-debt-press-office

Welsh Government (2009) '10 Year Homeless Plan 2009-2019' [online] http://gov.wales/topics/housing-and-regeneration/publications/homelessnessplan/?lang=en

Welsh Government (2012) 'Tackling Poverty Action Plan 2012- 2016' [online] http://www.rctcbc.gov.uk/en/relateddocuments/publications/communitiesfirst/tackling-poverty-action-plan.pdf

Welsh Government (2012) 'Strategic Equality Plan and Objectives 2012-2016' [online] http://gov.wales/docs/caecd/publications/120405sepfinal.pdf

Welsh Government (2013) 'Advice Services Review: Final research Report' [online] http://gov.wales/docs/caecd/research/130515-advice-services-review-en.pdf

Welsh Government (2014) 'Developing Quality Standards for Information and Advice Services in Wales: Specification for a research project'