



OPTIONS FOR DEVELOPING QUALITY STANDARDS FOR INFORMATION & ADVICE PROVIDERS IN WALES

Summary

Introduction

The provision of information, advice and guidance services in Wales is a key component of both the Welsh Government's Tackling Poverty Action Plan 2012-2016¹, and the Strategic Equality Plan 2012-2016². 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.

¹ Welsh Government (2012) 'Tackling Poverty Action Plan 2012- 2016'

² Welsh Government (2012) 'Strategic Equality Plan and Objectives 2012-2016'

The Welsh Government's Advice Services Review Report³ 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"*.

The main 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.

Aims and Objectives

The initial mapping phase of this work aimed to provide a comprehensive and detailed picture of Standards in use in Wales specifically but also examined others in use across the UK. The second phase sought to propose possible options for implementing a set of common Quality Standards relating to the provision of information and advice on welfare rights, debt, financial capability, discrimination and housing, both within Welsh Government-funded organisations and more generally across Wales.⁴

The work was undertaken in four phases, with all field work designed to be completed over a four month period:

- **Phase One - Assessing Current Practice**

Comprising inception meeting, literature review, survey of providers and commissioners, initial stakeholder event

- **Phase Two - Scoping the Future**

Comprising interviews with standard holders, providers, funders, wider stakeholders, service user representatives

- **Phase Three - Setting Standards**

Comprising preparation of reports on Establishing Quality Metrics, Assessing Compliance and Beyond the Current Standards

- **Phase Four - Getting it Right**

Comprising a co-operative enquiry workshop and production of the final report

³ Welsh Government (2013) 'Advice Services Review: Final Research Report'

⁴ Welsh Government (2014) 'Developing Quality Standards for Information and Advice Services in Wales: Specification for a research project'

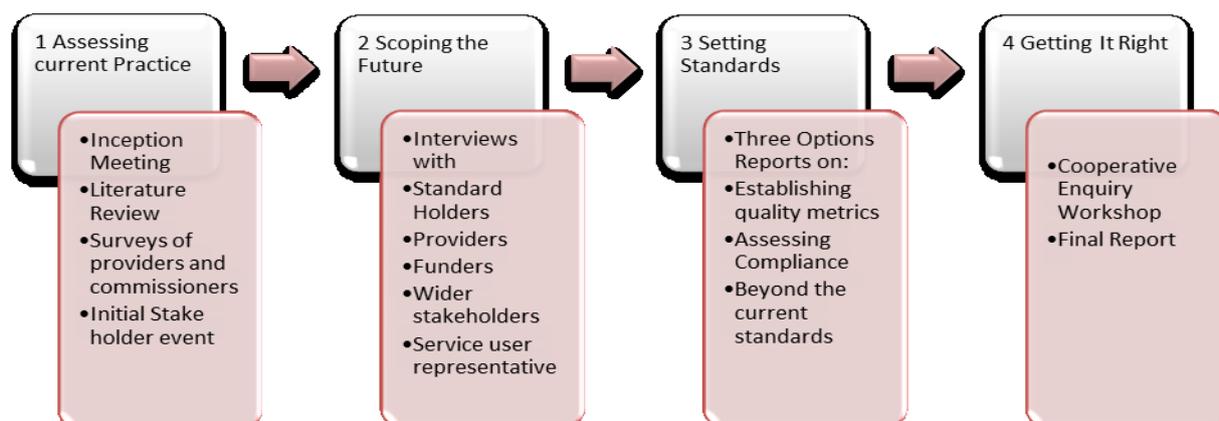


Figure 1 Project Phases

Key Findings⁵

In the first phase, a Literature Review was undertaken of the current Standards and membership codes used by information and advice services and the internal or external means of assuring compliance with the Standards. This exercise illustrated how Quality Standards provide a useful tool for agencies to provide assurance to the public that services are of a high standard, assurance to third parties that individuals they refer to such agencies are equipped to safely and appropriately meet their needs, assure themselves of the quality of service provided and assure their funders that services are safe, effective, well managed and value for money.

The Provider Survey

Building on the findings of the Literature Review and comments from participants in the first stakeholder engagement event, an online survey for providers of advice and information services was designed. 67 responded and the key findings included:

- Quality was seen as important in ensuring individuals get the right advice at the right time by nearly all agencies (75% very important, 22% quite important)
- Almost half (47%) operated within an externally assured quality scheme such as AQS, Lexcel, CAB, OISC and Age UK.
- The vast majority already had comprehensive policies in key areas, for example 84% said they had comprehensive policies for general management, 70% for planning, 83% for customer care, 68% for service delivery, and 72% for advisor competence. In addition, 81% measured outcomes of their service.
- Nearly all respondents said external accreditation was important to ensure services are operating to the right Standards (54% very important, 36% quite important).

⁵ For full details of the consultation activities, please see section 2 (Methodology) of the main report

The Funder/Commissioner Survey

An online survey for funders/commissioners was designed and advice networks assisted in identifying named individuals within funding organisations and 21 funders responded (80% of these were Local Authorities). Key findings in relation to quality assurance included:

- Nearly all respondents thought quality assurance was important for ensuring individuals get access to the right advice at the right time (95%)
- The majority thought external accreditation of quality was important to ensure services are operating to the required Standards (73%)
- Nearly all funders required organisations to have audited accounts (94%). However, only 25% required organisations to have an externally audited quality assurance scheme in place
- 67% thought a new Quality Standard for advice providers would provide additional assurance that services were of high quality.

Interviews

Findings from the surveys were supplemented by 49 interviews. These comprised 13 standard holders, 20 providers and funders and 16 other organisations including service user representatives.

There was a wide consensus between all interviewees on the importance of both Quality Standards and external assurance. Both standard holders and providers stressed the importance of ensuring that appropriate passporting was in place but emphasized that any passporting system needed to be robust. Additional points identified by interviewees included the opportunity to use this process:

- To develop appropriate measures of adviser competence, particularly in the light of further devolved powers to Wales
- To develop common metrics for the measurement of outcomes
- To embed the Welsh language into the Standards - not only to ensure accessibility in line with arrangements for other community languages but also to embed a bilingual culture across all aspects of the services.

There was concern that, whilst any scheme needed to be robust to provide assurance, this should be balanced against the need to be proportionate. The particular needs of small organisations and those, such as housing associations, where advice was only one small part of a wider service were also of concern.

Service user representatives were keen to ensure that any external assurance process considered service user involvement.

Options

Following on from the consultative process, a series of reports on options were developed. The two options below reflect conversations by stakeholders at the Co-operative Enquiry Workshop⁶ around development of a unique new set of Quality Standards for Wales and

⁶ Please see Annex I for the full discussions at the Co-operative Enquiry Workshop

developing a Framework for quality advice and information services. The majority of participants in the workshop felt that a new set of Standards should be established, however, a minority including standard holders, indicated a strong preference for a Framework scheme.

1. The Operation of a “Framework” Scheme

Stage One - Develop Framework

Working with the advice sector Welsh Government would develop a Framework to include the following components:

- Indicators of compliance against each of the seven quality domains⁷
- Evidence of compliance against the assessment process (e.g. peer review)
- Evidence of compliance against the assurance timetable (e.g. frequency of audit)

Stage Two - Compliance with the Framework

Welsh Government would need to establish a process for assessing current Standards against the Framework. Each Standard holder would be required to submit their Standards, Guidance and assessment process to ensure that it complied with the Framework and would be required to make changes to their Standards or assessment process to comply with the Framework if this indicated that it did not meet the requirements of the Framework. It is anticipated that in the case of a Welsh Framework all Standard holders would be expected to make changes to their Standards in relation to the new domains of adviser competence, Welsh language and outcomes. Most would need to make changes to their assurance process to include the requirement for peer review and the differential levels of attainment, if they wanted their Standard to represent full passporting.

Stage Three - Meeting the Framework

Once a Standard was assessed as fully compliant with the Framework, all organisations accredited against that Standard would also be accredited against the Welsh Framework. Those organisations without current accreditation would be required to select a Standard from the list of those fully compliant with the Framework and submit to audit against that Standard to be compliant with the Framework. No Standard holder could make changes to their Standard without reassessment against the Welsh Framework.

2. The Operation of a “Standards” Scheme

Stage One - Develop Standards

Working with the advice sector, Welsh Government would develop a set of Standards covering all seven domains based upon best practice in Wales. It would also need to develop an assessment process and guidance for assessors. Once completed, for those Standards most commonly used in Wales, the identification of current Standards and assessment processes that would qualify for passporting or evidence of compliance should be undertaken.

⁷ These quality domains are listed in conclusion 4 and explained in more detail in the main report

Stage Two - Assessing the Standards

For those organisations currently holding accreditation against a Standard with passporting they would need to be audited against those domains that were not subject to passporting (for example, if a Standard does not include advisor competence, the service would need to be audited against this domain in addition to being passported through other elements). Organisations not currently holding accreditation would be audited against the full set of Standards.

Standard holders could amend their current Standards and assessment processes to cover areas included in the new Welsh Standards to expand the elements subject to passporting. Ultimately this could include all elements within the Welsh Standards, making the scheme largely indistinguishable from the Framework arrangements.

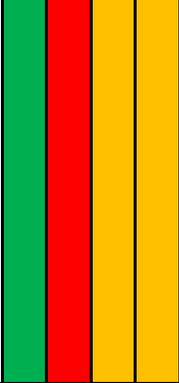
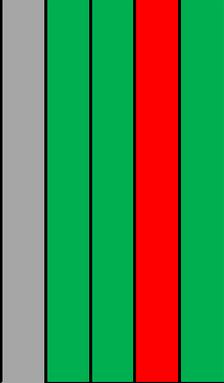
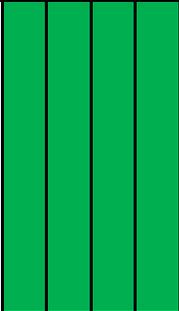
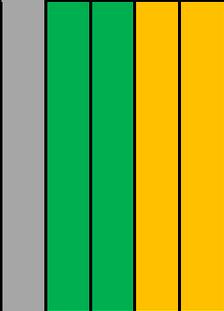
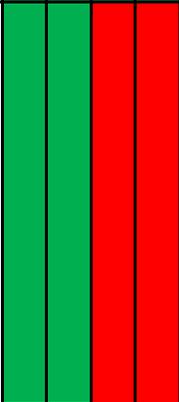
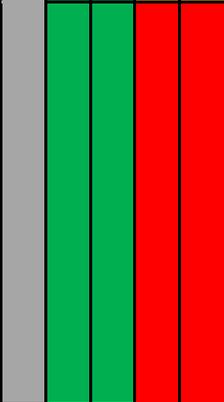
3 Comparing the Options

The table overleaf provides a “RAG” rated consideration of the impact of the two options on different stakeholder groups which is discussed in greater depth in the main report.

Assuming that the conclusions captured below are reflected in both the development of the Framework option and the Standards model the table illustrates that there is no substantial difference in the level of assurance potentially offered by either option. However, there is some difference for stakeholder groups in potential initial and ongoing costs.

Table 1 Options Appraisal for a Framework or set of Standards

	Framework				Standards				
Stakeholder	Level of Assurance	Development Cost	Ongoing Cost	Development Time	Level of Assurance	Development Cost	Ongoing Cost	Development Time	Notes
Welsh Government	Green	Yellow	Yellow	Green	Green	Red	Yellow	Yellow	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 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	Yellow	Yellow	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.

			<p>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.</p>
Organisations with current QA scheme			<p>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.</p> <p>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.</p>
Organisations without current QA scheme			<p>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.</p> <p>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.</p>

Other Providers				<p>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.</p> <p>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.</p>
Service Users & the Public				<p>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.</p> <p>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.</p>

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.

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.⁸

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.

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 quality 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

⁸ For further details, please see section 4 of the main report

This is delivered through four types of information and advice (with detailed definitions based upon AQS)

Type One - Information

Type Two - Advice

Type Three - Advice with casework

Type Four - Specialist case work including representation in Courts and Tribunals

There was some debate about whether the definition of quality advice should require a statement of “independence”. This issue is explored later in the report and is an area that will need to be revisited as the work is taken forward.

The research and consultative processes explored the detailed content of the Standards or Framework. 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 the report provides further details on the components of each of the above domains and those areas where existing schemes could be adopted or adapted.

3. The Approach to Assurance

Nearly all those who responded to the survey, 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 rather than a ‘tick box exercise’.

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 individual agencies. Transparency should be a guiding principle for this quality assurance system and on this basis, there would need to be compelling reasons for choosing not to make these assessments available to the public.

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 captured

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 or Framework to a wider range of organisations.

Conclusion 7

The development of Standards or Framework with distinct domains will facilitate the roll-out to other sectors, Domains 1-3 and 6-7 (see conclusion 4) 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.

The proposed model is described in more detail in the main report (Section 3).

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 main report provides an indicative timeline with milestones for this work.

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