

Consultation Response



StepChange Debt Charity response to the Money Advice Service consultation:

Achieving consistent and high quality Debt Advice. An approach to Standards and Quality Assurance for the debt advice sector

March 2013

StepChange Debt Charity London Office
6th Floor, Lynton House, 7-12 Tavistock Square, London WC1H 9LY
Policy Contact: Peter Tutton
Tel: 0207 391 4596
Email: peter.tutton@stepchange.org

We are an independent charity dedicated to overcoming problem debt. Our advice and solutions are effective, tailored and importantly, free. Foundation for Credit Counselling. 123 Albion Street, Leeds, LS2 8ER. Company No 2757055. Charity No 1016630. www.stepchange.org

Introduction

StepChange Debt Charity welcomes the opportunity to respond to this consultation from the Money Advice Service: *'Achieving consistent and high quality Debt Advice. An approach to Standards and Quality Assurance for the debt advice sector'*.

StepChange Debt Charity supports measures aimed at ensuring high standards in the free-to-client debt advice sector that help build on current trust in and awareness of the free debt advice brand.

StepChange Debt Charity is one of the largest free-to-client debt advice charities, operating across all four UK nations. In 2012 over 400,000 people contacted our free telephone helpline and on-line Debt Remedy tool for advice about problem debt. We are also the UK's largest charitable provider for free-to-client debt management plans (DMPs). Last year our debt management plans helped over 129,000 people to pay £327 million off their debts.

We believe that this experience makes us well placed to help the Money Advice Service to deliver an effective and proportionate standards framework for the free debt advice sector. StepChange Debt Charity places a high value on the quality and consistency of the services we provide and we are very happy to continue working with the Money Advice Service on these issues in addition to our responses to this consultation.

Since the Money Advice Service published this consultation in December, both the Government and the Financial Services Authority have consultation papers setting out a framework for the future regulation of debt advice/debt management under FSMA and the Financial Conduct Authority. These set out proposals that debt advice/debt management included that provided by not-for-profit organisations will become a regulated activity requiring authorisation by the FCA. The consultations propose that debt advice/debt management will be covered by a conduct rules book and this will be the same for commercial and not-for-profit providers. However not-for-profit providers will be covered by a bespoke low-cost authorisation regime.

This current Money Advice Service consultation does not discuss the relationship between the proposed approach to standards and the future FCA regime. It is not clear how the parts of the standards relating to organisational standards would integrate with any threshold conditions or systems and controls requirements for instance. It is not clear how the parts of the standard relating to competencies for particular roles would relate to any FCA training and competency requirements. It is also not clear how assessment, auditing and monitoring of this proposed standard would integrate to supervision of authorised persons by the FCA. We believe that these issues need to be bottomed out in more detail before further significant development of the approach to standards set out in this consultation.

Our responses to the specific consultation questions are set out below.

Question 1: Is there additional value in using a Money Advice Service logo linked to the relevant Quality Standard badge that is customer facing so that it is widely recognisable to the public?

It is now clear that debt advice and debt management services will be authorised by the FCA. We believe that as a key component (and outcome) of a successful consumer credit regime, consumers must be able to trust that firms authorised and regulated by the FCA are operating to high standards of conduct. From this perspective we would argue that the key need is to build an FCA authorised 'brand' for debt advice that rests on effective threshold conditions, rules and guidance, supervision and enforcement powers. This need to be consumer facing in the sense that being FCA authorised with the correct permissions is the 'primary badge' that consumers should be able to rely on.

The standards proposed in this consultation may integrate with the FCA not-for-profit regime as a set of professional standards, and there might be some value in a professional standards badge alongside FCA authorisation. However we do not see the value of a third Money Advice Service strapline alongside this. A third consumer facing badge is likely to confuse consumers as much as help.

Equally, the Money Advice Service is itself a consumer facing advice provider. As a result a Money Advice Service strapline attached to a quality standard mark could blur the necessary sense of distance between service providers and independent standards setting. The resulting mixed signal could also be confusing for consumers

In conclusion we are not convinced that this is the right time to develop consumer facing Money Advice Service badging of advice quality standards.

Question 2: Which standards or membership codes do you consider to fully meet our Framework? Please provide detailed evidence of how they can demonstrate this.

StepChange Debt Charity has no comment in response to this question at this time.

Question 3: Are there any quality requirements that should be included or excluded from the Framework? Please explain why.

As the framework is primarily aimed at organisational competence there is likely to be some cross over with the FCA regime. As such it will be important to avoid any duplication or mis-match with rules and requirements developed by the FCA for debt advice agencies. If the Money Advice Service standard is to play a role in the bespoke FCA regime for not-for-profit debt advice agencies, it will be important to ensure that the content of the standards are settled well before implementation date.

On the whole, the list of quality requirements looks to provide a fairly comprehensive blueprint for an organisation focused on quality assurance to maintain a high standard of debt advice provision. Perhaps the one omission is a clear requirement to consider how the range of services offered relate to possible client outcomes and have an organisation policy to deal with any gaps.

The individual requirements are drafted as high level principles and it is hard to see how they would be applied consistently by different standard providers unless underpinned by more detailed guidance. Indeed some of the requirements seem a little vague in terms of practical application. For instance - 'identify environmental changes and responds effectively'. How would a standards provider turn this requirement into a meaningful concrete standard and how would they assess compliance with the requirement to 'respond effectively'?

One specific point, should the list of legislation in 2.3 include reference to the Equality Act 2010?

Question 4: Are the role profiles identified correct and reflective of best practice across the sector?

StepChange Debt Charity agrees that the role profiles are broadly correct. However the roles most closely map onto the division of advice functions most likely found in a local advice agency. So for instance, the designation 'specialist' (with the implication of seniority) reflects staffing practices in such agencies that may not be found in debt advice organisations that operate in a different way. For instance in a more centralised and phone based service like StepChange Debt Charity, team leadership competencies may not be so closely linked to technical debt advice knowledge. As a result we would ask Money Advice Service to consider the way that these might be adopted and evidenced by different types of debt advice organisation.

We would also point out that that some of the NOS titles listed do not seem to map over to debt advice in an uncomplicated way. For instance, Trading Standards and Environmental Health in the debt support worker role; the reference to 'Financial advice and planning' in the Debt adviser role needs further clarification on the boundaries between debt advice and financial advice; 'Managing legal cases' in the specialist debt adviser role needs to be better defined in scope.

Question 5: Have the appropriate NOS been used within the role profiles? Please explain any suggested changes.

In our opinion the suggested units are not entirely relevant to the role profiles. Many of the suggested units are too general for the money and debt advice sector, with many knowledge statements being entirely irrelevant or with only tenuous links to the sector. The number of units identified means that there is substantial repetition across units and many are organisational requirements rather than standards or knowledge that an advisor would be expected to exhibit. In our opinion it would be very difficult to assess the breadth of knowledge identified via these NOS either using quality standards or via a formal qualification.

Question 6: Which debt qualifications and training courses have been developed using the NOS?

ICM Professional Qualifications in Money and Debt Advice The first of its kind

Our learning partnership with the Institute of Credit Management (ICM) has enabled us to realise our vision and to successfully pioneer the development of the first nationally recognised and regulated qualifications in money and debt advice. We gained final accreditation of Levels 2 and 3 Diplomas and Certificates in Money and Debt Advice on the Qualifications and Credit Framework (QCF) in October 2010.

These qualifications fill a gap in the industry as there is currently very little regulation or assessment of money advisors. StepChange Debt Charity designed QCF unit content and qualification rules of combination to fulfil the knowledge and skills requirements of different job roles (see Appendix A). As a result, the qualifications offer a relevant and flexible qualifications pathway which encourages career progression and continued professional development.

What makes it nationally regulated?

The ICM professional qualifications in Money and Debt Advice are accredited by Ofqual. Ofqual regulate qualifications, assessments and examinations in England. They are responsible for ensuring that qualifications and the assessment of these, meet high quality standards.

As ICM Money and Debt Advice qualifications are accredited on the National Qualifications and Credit Framework (QCF), the qualifications are credit based, and achievement of the qualifications is recognised by the accumulation of credits. The presence of the qualifications on the QCF ensures that they are comparable to other widely recognised qualifications such as GCSEs and A Levels. There is also the opportunity to add units or alter rules of combination to meet new skills and knowledge requirements.

How did we develop the qualifications?

Working closely alongside the ICM, we developed the unit content (see Appendix B). After assessing the National Occupational Standards (NOS) we decided that it was appropriate to align the qualification to 'SFJIB11 First Line Money and Debt Advice'. This NOS was comprehensive enough to cover the whole appropriate debt advice spectrum from a technical perspective. This alignment aided the accreditation process through Ofqual, as we were able to develop a new industry specific qualification, applicable to money and debt advisors across the sector. The Financial Services Skills Council (FSSC), now Financial Services Partnership (FSP), supported the accreditation application.

What's involved?

In order to complete the Diploma in Money and Debt Advice learners have to complete six written assignments, each of which covers a money and debt advice related topic:

1. General money and debt advice
2. Debt prioritisation and the collections process
3. County court procedures and enforcement action
4. Statutory debt solutions
5. Non statutory debt solutions and budgeting
6. Money and debt advice call handling

Each assignment requires learners to demonstrate theoretical and technical debt advice knowledge as well as their ability to put this into practice.

Learners studying towards a Certificate in Money and Debt Advice need to complete a minimum of three of the units.

There are no minimum credit values to achieve an Award in Money and Debt Advice – learners can complete just one assignment – whichever is appropriate to their role.

Learners can include some credit from other business related qualifications. Also learners can include up to 15 credits from money and debt advice QCF units towards ICM qualifications in credit management and debt collection.

There is open access to ICM money and debt advice qualifications and any learner, employer or learning provider could access these qualifications.

What we've achieved so far

Since the development of the qualification, we have 120 qualified advisors across StepChange Debt Charity with a further 45 advisors beginning their studies this year.

What other qualifications exist?

IMA Certificate in Money Advice Practice

- It is a 15 Higher Education credit accreditation qualification (Diploma in Money and Debt Advice is 37 QCF credits)

- 15 Higher Education credits (a degree is a minimum of 360 credits)

There are six sections in total:

- 1) Managing Legal Advice cases
- 2) Preparing for representation

- 3) Representing clients
- 4) Managing a personal caseload
- 5) Social Policy
- 6) Money and debt legal advice casework

- All six sections must be studied to complete the qualification
- Not accredited or regulated by Ofqual. It is also not a Qualifications Credit Framework (QCF) qualification.
- Primarily designed for money advice caseworkers

Debt Resolution Forum (DRF) BTEC in Debt Resolution

How it differs from the Diploma in Money and Debt Advice

- It is not a nationally recognised qualification
- It is not an 'Ofqual' accredited qualification and carries no 'credits' towards any other qualification
- 'Edexcel' are their awarding body and although the BTEC has accreditation from them, this is their internal accreditation
- Although this is classed as a BTEC, only the DRF are able to deliver this, hence why it is not nationally recognised

3 modules of online study, assessed via an online exam:

- Module 1 – UK Financial Services, debt resolution and ethics
- Module 2 – Debt Solutions in detail
- Module 3 – Case studies and practical application

Question 7: Are there other requirements that a sole debt adviser should evidence?

StepChange Debt Charity believes that the standards will need to pay particular attention to the problems that sole debt advisers might have guaranteeing continuity of service. The standards should require sole providers to have procedures in place to ensure transfer of cases or locum support in the event that the sole money adviser is not able to deliver an agreed service because of absence, illness or some other reason.

The standards might also consider putting restrictions on the number of clients that a sole provider can take on at any time as a quality assurance safeguard. This would have to take into account the time that the sole provider would need to spend

meeting the 'organisational' requirements that would also be relevant to assure the quality of service provided by a sole practitioner.

We might also expect the standards provider to audit the business model of a sole provider to ensure that the service they are providing is viable and not likely to leave clients in a vulnerable position. If the business model of a sole provider does not stand up to this scrutiny the standard should not be awarded.

Question 8: Do you agree that this is the appropriate approach to evidencing the quality of individuals delivering debt advice? Please provide details of any suggested alternative approaches

StepChange Debt Charity agrees that the standard needs to be supported by a robust process for evidencing the quality of individuals delivering debt advice. We agree that organisations should be able to demonstrate that their staff are trained to competencies that map against NOS role profiles relevant to the debt advice services that the organisations offer.

Paragraph 2.4 implies that organisations that fail to meet the requirements of an accredited quality standard risk losing funding. The Money Advice Service states that it will facilitate information sharing on organisations gaining, maintaining or losing their quality mark. Given that not-for-profit organisations require external funding to survive, this sounds very much like the Money Advice Service will be effectively operating as a market regulator. In which case the Money Advice Service will need to carefully consider two issues that follow from this.

Firstly how the standard it proposes and the thresholds for remedial action relate to the requirements and procedures of the FCA. Secondly, the Money Advice Service will need to set out much more detail on how the auditing and accreditation process set out by standard providers should work, what the risk tolerances should be and what range of sanctions should apply for non-compliance.

For instance what sort of breach of standards would trigger a report to the Money Advice Service that would result in a possible impact on funding, as opposed to remedial measures? How would the Money Advice Service ensure consistency between standard providers in this respect and transparency in general? Can the Money Advice Service guarantee that thresholds for failure / risk tolerances would be the same for all standards providers? We believe that the Money Advice Service needs to develop its thinking in this area. StepChange Debt Charity would welcome the opportunity to work with Money Advice Service on this.

Question 9: Currently different standards owners use a variety of accreditation processes. How often is it appropriate for standards owners to monitor and review compliance against their standard?

StepChange Debt Charity does not have a firm final view on this issue. However as a starting point we believe that full assessment every two to three years might be appropriate, with provision for more frequent assessment if necessary. Standards

providers might require organisations to provide a more regulatory compliance report, perhaps annually.

Question 10: How often should the Money Advice Service review standards against our Quality Framework?

StepChange Debt Charity suggests as a starting point reviewing standards every two years. However this would be contingent on changes to the FCA regime and other relevant legislation.

Question 11: Should the Money Advice Service appoint an independent third party to conduct a verification audit of organisations working to the standards that meet the Quality Framework?

StepChange Debt Charity believes that the Money Advice Service needs to ensure that any standard that it accredits is supported by robust monitoring and verification. The standards provider should be able to demonstrate that it has the capacity, experience, skill and independence to ensure that its monitoring processes and procedures meet this test of robustness. If the Money Advice Service is not confident that this will be the case, then it should not accredit the standard provider. In consequence, we do not believe that the Money Advice Service should appoint independent third parties to audit organisations other than perhaps on an occasional basis to test the procedures of the standard provider (rather than the organisation).

APPENDIX A

StepChange Debt Charity Professional Qualifications mapping to job roles – minimum qualification standard

Level 2 and Level 3 Certificates and Diplomas

| Unit code | Unit title | Credit | Debt Advisor ¹ | Helpline advisor | Customer Service Advisor | Data verifier | Appointment Coordinator | Administrator | Transaction Processing Associate | |
|---|--|--------|---------------------------|------------------|--------------------------|---------------|-------------------------|---------------|----------------------------------|---|
| | | | Diploma | | Cert | Unit awards | | | | |
| Unit 1a | Level 2 or Level 3 General Money and Debt Advice Principles | 3 | 3 | 3 | 3 | 3 | 3 | 3 | 3 | |
| Unit 2a | Level 2 or Level 3 Debt Prioritisation Advice Principles | 3 | 3 | 3 | 3 | 3 | | | | |
| Unit 3a | Level 2 or Level 3 County Court Procedures and Enforcement Advice Principles | 4 | 4 | 4 | | | | | | |
| Unit 4a | Level 2 or Level 3 Statutory Solutions Advice Principles | 4 | 4 | 4 | | | | | | |
| Unit 5a | Level 2 or Level 3 Non-statutory Debt Solutions and Budgeting Principles | 3 | 3 | 3 | | | | | | |
| Unit 6a | Level 2 or Level 3 Money and Debt Advice Call Handling Principles | 3 | 3 | 3 | 3 | 3 | 3 | | | |
| Minimum credit value Level 2 & 3 Diploma (37) | | 20 | Maximum credit value | 20 | 20 | 20 | 20 | | | |
| Minimum credit value Level 2 and 3 Certificate (19) | | 9 | Maximum credit value | 16 | | 9 | 9 | 6 | 3 | 3 |

¹ Roles include Debt Advisors who work in Debt Advice, Client Support and Advice Plus

| Unit code | Unit title | Credit | Debt Advisor ¹ | Helpline advisor | Customer Service Advisor | Data verifier | Appointment Coordinator | Administrator | Transaction Processing Associate | | | |
|---|--|--|----------------------------|------------------|--------------------------|---------------|-------------------------|---------------|----------------------------------|-----------|----------|----------|
| Mandatory Group B | | <i>Include units which provide additional and specialised knowledge and skills</i> | | | | | | | | | | |
| Unit code | Unit title | Credit | | | | | | | | | | |
| Unit 1b | Level 2 or Level 3 General Money and Debt Advice Practice | 4 | 4 | 4 | 4 | 4 | 4 | | | | | |
| Unit 2b | Level 2 or Level 3 Debt Prioritisation Advice Practice | 3 | 3 | 3 | 3 | | | | | | | |
| Unit 3b | Level 2 or Level 3 County Court Procedures and Enforcement Advice Practice | 3 | 3 | 3 | | | | | | | | |
| Unit 4b | Level 2 or Level 3 Statutory Solutions Advice Practice | 4 | 4 | | | | | | | | | |
| Unit 5b | Level 2 or Level 3 Non-statutory Debt Solutions and Budgeting Practice | 3 | 3 | | | | | | | | | |
| Unit 6b | Level 2 or Level 3 Money and Debt Advice Call Handling Practice | 3 | 3 | 3 | 3 | | 3 | | | | | |
| Minimum credit value Level 2 and 3 Diploma (19) | | 10 | Maximum credit value 20 | 20 | 20 | 13 | 10 | 4 | 7 | 0 | 0 | |
| Minimum credit value Level 2 and 3 Certificate (19) | | 10 | Maximum credit value 12 | | | | | | | | | |
| | | | Total | | 40 | 40 | 33 | 19 | 13 | 13 | 3 | 3 |

¹ Roles include Debt Advisors who work in Debt Advice, Client Support and Advice Plus

| Unit code | Unit title | | | Credit | Debt Advisor ¹ | Helpline advisor | Customer Service Advisor | Data verifier | Appointment Coordinator | Administrator | Transaction Processing Associate |
|--|---|------------------|---|-----------|---------------------------|--|--------------------------|--------------------|-------------------------|---------------|----------------------------------|
| Optional Group C | <i>If included this group could allow inclusion of credit from other relevant QCF qualifications, e.g. up to 15 credits from other Business, Administration and Finance qualifications.</i> | | | | | Various units in team working, comms. In workplace, team working, org. of time and customer service. | | | | | |
| Minimum credit value Level 2 & 3 Diploma (37) | 0 | Max credit value | 7 | | | 4 | | | | | |
| Minimum credit value Level 2 & 3 Certificate (37) | 0 | Max credit value | 0 | | | | N/A | N/A | N/A | N/A | N/A |
| Diploma size | ≥ 37 | Total | | 40 | 40 | 37 | 19 | 13 | 13 | 3 | 3 |
| Certificate size | ≥ 19 | | | | Diploma | | Cert | Unit awards | | | |

¹ 1 Roles include Debt Advisors who work in Debt Advice, Client Support and Advice Plus

Award demonstrates knowledge and competence in a specific area of money and debt advice (Other StepChange Debt Charity support roles)

Certificate demonstrates knowledge and competence in a range of areas of money and debt advice (Customer Service Advisor)

Diploma demonstrates expertise and detailed knowledge in money and debt advice (Debt Advisor and Helpline Advisor)

Level 3 achievement demonstrates in-depth knowledge and expertise.

Level 2 achievement demonstrates general knowledge and competence.

Appendix B

General Money and Debt Advice Principles

This assignment will help you demonstrate that you have achieved the learning outcomes below. You will gain a Level 2 or Level 3 pass depending on which assessment criteria you cover the best.

| | Learning outcomes | | Assessment criteria. | | |
|----|---|-----|--|-----|---|
| | The learner will: | | The learner can: | | |
| | | | Level 2 | | Level 3 |
| 1. | Understand how to establish the cause and extent of personal debt | 1.1 | Describe common causes of personal debt. | 1.1 | Assess common causes of personal debt. |
| | | 1.2 | Describe the importance of establishing the cause and extent of personal debt. | 1.2 | Explain why it is important to establish the cause and extent of personal debt. |
| 2. | Understand how to compile an effective budget. | 2.1 | Describe key components of an effective personal budget. | 2.1 | Explain key components of an effective personal budget. |
| | | 2.2 | Describe why household expenditure may be above or below average. | 2.2 | Assess reasons for household expenditure being above or below average. |
| | | 2.3 | Identify common priority and non-priority debts. | 2.3 | Assess the priority of common debts. |
| | | 2.4 | Identify ways that people could maximise their income. | 2.4 | Assess ways that people could maximise their income. |
| | | 2.5 | Identify ways that people could reduce their household expenditure. | 2.5 | Assess ways that people could reduce their household expenditure. |
| 3. | Understand emergency situations in relation to money and debt advice. | 3.1 | Identify emergency situations when specialist advice is required | 3.1 | Explain emergency situations in relation to debt and money advice. |
| 4. | Understand how to offer appropriate money and debt advice. | 4.1 | Describe techniques to ensure effective money and debt advice. | 4.1 | Assess techniques for effective money and debt advice. |
| | | 4.2 | Outline liability issues in relation to personal debt. | 4.2 | Explain liability issues in relation to personal debt. |
| | | 4.3 | Identify the main debt solutions. | 4.3 | Explain a variety of possible solutions for people in debt. |
| | | 4.4 | Outline the importance of maintaining contact with creditors. | 4.4 | Explain the importance of maintaining contact with creditors. |

General Money and Debt Advice Practice

| Learning outcomes | | Assessment criteria. | | | |
|-------------------|--|----------------------|--|---------|--|
| The learner will: | | The learner can: | | | |
| | | Level 2 | | Level 3 | |
| 1. | Be able to establish the cause and extent of personal debt. | 1.1 | Gather information from a person to establish current levels of income and expenditure | 1.1 | Gather information to establish current levels of income and expenditure in a range of circumstances. |
| | | 1.2 | Establish the nature and extent of personal debt. | 1.2 | Establish the nature and extent of personal debt in a range of circumstances |
| 2. | Be able to provide money and debt advice based on reflective practice. | 2.1 | Help a person identify potential ways of maximising income. | 2.1 | Help people with a range of personal debt problems to identify ways of maximising income. |
| | | 2.2 | Help a person identify potential ways of reducing expenditure. | 2.2 | Help identify ways of reducing expenditure in a range of personal circumstances. |
| | | 2.3 | Help a person prioritise their debt. | 2.3 | Help a range of people to prioritise their debt. |
| | | 2.4 | Provide general advice on how to deal with personal debt problems. | 2.4 | Advise a range of people on how to deal with their debt. |
| | | 2.5 | Outline how their approach and outcomes have evolved as their experience in money and debt advice has increased. | 2.5 | Explain how approaches and outcomes have evolved as experience in money and debt advice has increased. |

Debt Prioritisation and the Collections Process Principles

This assignment will help you demonstrate that you have achieved the learning outcomes below. You will gain a Level 2 or Level 3 pass depending on which assessment criteria you cover the best.

| | Learning outcomes The learner will: | | Assessment criteria. The learner can: | | |
|----|--|-----|---|-----|--|
| | | | Level 2 | | Level 3 |
| 1. | Understand how to help people prioritise their debt | 1.1 | Describe the key features of common priority debts. | 1.1 | Explain the key features of common priority debts. |
| | | 1.2 | Describe the sanctions for non-payment of common priority debts. | 1.2 | Explain sanctions for non-payment of common priority debts. |
| | | 1.3 | Describe advice in cases of priority arrears, including reference to specialist advice organisations. | 1.3 | Explain appropriate advice in relation to priority debt arrears, including reference to specialist advice organisations. |
| | | 1.4 | Identify common non-priority debts | 1.4 | Explain common non-priority debts |
| | | 1.5 | Describe appropriate general advice in cases of non-priority arrears | 1.5 | Explain how to deal with non-priority debt arrears. |
| 2. | Understand how to advise people on common debt collection processes. | 2.1 | Describe common debt collections processes used by non-priority creditors. | 2.1 | Explain common debt collections processes used by non-priority creditors. |
| | | 2.2 | Describe how debt collection activity is governed by regulatory guidelines | 2.2 | Explain how debt collection activity is governed by regulatory guidelines |
| | | 2.3 | Describe effective advice in cases of harassment in relation to the collection of debt | 2.3 | Explain how to advise in cases of harassment in relation to the collection of debt |

Debt Prioritisation and the Collections Process Practice

| Learning outcomes | | Assessment criteria. | | | |
|-------------------|---|----------------------|--|----------------|--|
| The learner will: | | The learner can: | | | |
| | | Level 2 | | Level 3 | |
| 1. | Be able to advise people on how to prioritise their debts | 1.1 | Help people to identify priority and non-priority debts | 1.1 | Help people to distinguish between priority and non-priority debts. |
| | | 1.2 | Provide general advice on how to deal with priority and non-priority debt arrears. | 1.2 | Advise on how to deal with priority and non-priority debt arrears in a range of circumstances. |
| | | 1.3 | Identify the need for additional specialist advice. | 1.3 | Refer people to appropriate specialist organisations for further support. |
| 2. | Be able to advise people on common debt collection processes. | 2.1 | Help people understand the impact of debt collections processes. | 2.1 | Provide tailored advice on the impact of debt collection processes. |
| 3. | Be able to reflect on their delivery of debt prioritisation and collections process advice. | 3.1 | Identify their strengths and weaknesses in relation to debt prioritisation and collections process advice. | 3.1 | Evaluate performance in relation to debt prioritisation and collections process advice. |

County Court Procedures & Enforcement Action Principles

This assignment will help you demonstrate that you have achieved the learning outcomes below. You will gain a Level 2 or Level 3 pass depending on which assessment criteria you cover the best.

| | Learning outcomes The learner will: | | Assessment criteria. The learner can: | | |
|----|--|-----|---|-----|--|
| | | | Level 2 | | Level 3 |
| 1 | Understand how to advise on County Court procedures for the collection of personal debt. | 1.1 | Outline the content of the County Court claim form and response pack. | 1.1 | Explain the County Court claim form and response pack |
| | | 1.2 | Outline the County Court claim procedure. | 1.2 | Explain the County Court claim procedure. |
| | | 1.3 | Outline how to complete a County Court claim form. | 1.3 | Explain how to provide detailed advice on the completion of a County Court claim form. |
| | | 1.4 | Outline the process for varying a County Court Judgment. | 1.4 | Explain how to advise on the process for varying a County Court Judgment. |
| 2. | Understand how to advise on the impact of enforcement methods. | 2.1 | Outline the main methods of enforcement. | 2.1 | Explain the main methods of enforcement. |
| | | 2.2 | Outline appropriate advice for each method of enforcement. | 2.2 | Explain how to provide appropriate advice for each method of enforcement |

County Court Procedures & Enforcement Action Practice

| Learning outcomes | | Assessment criteria. | | | |
|-------------------|--|----------------------|---|----------------|---|
| The learner will: | | The learner can: | | | |
| | | Level 2 | | Level 3 | |
| 1. | Be able to advise on County Court procedures for the collection of personal debt. | 1.1 | Deliver general advice on the County Court Claim procedure. | 1.1 | Deliver tailored advice on the County Court claim procedure |
| | | 1.2 | Provide general advice on the completion of a County Court claim form and response pack. | 1.2 | Assist in the completion of a County Court claim form and response pack in a range of circumstances. |
| | | 1.3 | Provide general advice on the process for varying a County Court Judgment | 1.3 | Provide tailored advice on the process for varying a County Court Judgment. |
| 2. | Be able to advise on the impact of enforcement methods. | 2.1 | Provide general advice on the main methods of enforcement. | 2.1 | Provide tailored advice on the main methods of enforcement in a range of circumstances. |
| 3 | Be able to reflect on performance in relation to the delivery of advice on county court procedures and enforcement | 3.1 | Identify their strengths and weaknesses in relation to the delivery of advice on county court procedures and enforcement. | 3.1 | Evaluate performance in relation to the delivery of advice on county court procedures and methods of enforcement. |

Statutory Debt Solutions Principles

This assignment will help you demonstrate that you have achieved the learning outcomes below. You will gain a Level 2 or Level 3 pass depending on which assessment criteria you cover the best.

| | Learning outcomes | | Assessment criteria. | | |
|----|--|-----|--|-----|--|
| | The learner will: | | The learner can: | | |
| | | | Level 2 | | Level 3 |
| 1. | Understand how to advise on statutory debt solutions | 1.1 | Describe the key features and principles of statutory debt solutions. | 1.1 | Explain the key features and principles of statutory debt solutions. |
| | | 1.2 | Describe the potential impact of statutory debt solutions. | 1.2 | Explain the potential impact of statutory debt solutions. |
| | | 1.3 | Describe the application and court process involved in each statutory debt solution. | 1.3 | Explain the application and court process involved for each statutory debt solution. |

Statutory Debt Solutions Practice

| | Learning outcomes The learner will: | | Assessment criteria. The learner can: | | |
|----|--|-----|---|-----|--|
| | | | Level 2 | | Level 3 |
| 1. | Be able to provide appropriate advice on statutory debt solutions. | 1.1 | Help people understand the key features and principles of statutory debt solutions | 1.1 | Help people to understand the key features and principles of statutory debt solutions in a range of circumstances. |
| | | 1.2 | Help people understand the potential impact of statutory debt solutions. | 1.2 | Help people to understand the potential impact of statutory debt solutions in a range of circumstances. |
| | | 1.3 | Deliver general advice on the application and court processes involved in statutory debt solutions. | 1.3 | Deliver detailed advice on the application and court process involved in statutory debt solutions. |
| | | | | 1.4 | Provide tailored recommendations on statutory debt solutions, in a range of circumstances. |
| 2. | Be able to reflect on performance in relation to the delivery of advice on statutory debt solutions. | 2.1 | Identify their own strengths and weaknesses when delivering general advice on statutory debt solutions. | 2.1 | Evaluate performance when delivering advice on statutory debt solutions. |

Non-Statutory Debt Solutions and Budgeting Advice Principles

This assignment will help you demonstrate that you have achieved the learning outcomes below. You will gain a Level 2 or Level 3 pass depending on which assessment criteria you cover the best.

| | Learning outcomes | | Assessment criteria. | | |
|----|--|-----|---|-----|--|
| | The learner will: | | The learner can: | | |
| | | | Level 2 | | Level 3 |
| 1. | Understand how to provide advice on non-statutory debt solutions. | 1.1 | Describe the key features and principles of non-statutory debt solutions. | 1.1 | Explain the key features and principles of non-statutory debt solutions. |
| | | 1.2 | Describe the potential impact of non-statutory debt solutions. | 1.2 | Explain the potential impact of non-statutory debt solutions. |
| | | 1.3 | Describe the process involved for each non-statutory debt solution. | 1.3 | Explain the process involved for each non-statutory debt solution. |
| | | | | 1.4 | Identify when to recommend each non-statutory debt solution. |
| 2. | Understand how to provide appropriate and tailored budgeting advice. | 2.1 | Explain why a personal budget is a key tool in the delivery of effective money and debt advice. | 2.1 | Assess reasons why a personal budget is a key tool in the delivery of effective money and debt advice. |
| | | 2.2 | Describe how to gather information for a budget based on personal circumstances. | 2.2 | Explain how to compile a budget based on personal circumstances. |
| | | 2.3 | Explain how to provide appropriate and tailored budgeting advice. | 2.3 | Explain how to review and agree an effective personal budget. |

Non-Statutory Debt Solutions and Budgeting Advice Practice

| | Learning outcomes The learner will: | | Assessment criteria. The learner can: | | |
|----|---|-----|--|-----|---|
| | | | Level 2 | | Level 3 |
| 1. | Be able to provide appropriate advice on non-statutory debt solutions. | 1.1 | Help people understand the key features and principles of non-statutory debt solutions. | 1.1 | Help people to understand the key features and principles of non-statutory debt solutions in a range of personal circumstances. |
| | | 1.2 | Help people understand the potential impact of non-statutory debt solutions. | 1.2 | Help people to understand the potential impact of non-statutory debt solutions in a range of personal circumstances. |
| | | 1.3 | Deliver general advice on the process involved in non-statutory debt solutions. | 1.3 | Deliver specific advice to a range of people on the process involved in non-statutory debt solutions. |
| | | | | 1.4 | Deliver tailored recommendations on non-statutory debt solutions, in a range of personal circumstances |
| 2. | Be able to provide appropriate and tailored budgeting advice. | 2.1 | Help people to understand the importance of creating a personal budget. | 2.1 | Help people to understand the importance of creating a personal budget. |
| | | 2.2 | Gather relevant information for a personal budget. | 2.2 | Compile personal budgets in a range of circumstances. |
| | | 2.3 | Provide appropriate and tailored budgeting advice | 2.3 | Review and agree personal budgets in a range of circumstances. |
| 3. | Be able to reflect on performance in relation to the delivery of non-statutory debt solutions and budgeting advice. | 3.1 | Identify their own strengths and weaknesses when delivering non-statutory debt solutions and budgeting advice. | 3.1 | Evaluate performance when delivering non-statutory debt solutions and budgeting advice. |

Money and Debt Advice Call Handling Principles

This assignment will help you demonstrate that you have achieved the learning outcomes below. You will gain a Level 2 or Level 3 pass depending on which assessment criteria you cover the best.

| | Learning outcomes The learner will: | | Assessment criteria. The learner can: | | |
|----|---|-----|---|-----|--|
| | | | Level 2 | | Level 3 |
| 1. | Understand how to control money and debt advice calls. | 1.1 | Describe techniques for effective call control | 1.1 | Assess techniques for effective call control. |
| 2. | Understand the legal requirements which relate to money and debt advice call handling | 2.1 | Describe how to conduct caller identity checks in accordance with the Data Protection Act. | 2.1 | Explain how to conduct caller identity checks in accordance with the Data Protection Act. |
| | | 2.2 | Identify personal and sensitive data. | 2.2 | Explain personal and sensitive data. |
| | | 2.3 | Describe how to conduct calls with third parties in accordance with the Data Protection Act. | 2.3 | Describe how to conduct calls with third parties in accordance with the Data Protection Act. |
| | | 2.4 | Describe how to deal with illegal activity in accordance with legal and organisational requirements. | 2.4 | Describe how to deal with illegal activity in accordance with legal and organisational requirements. |
| 3. | Understand how to handle a variety of difficult money and debt advice calls. | 3.1 | Describe techniques to handle difficult calls, including calls from people who are distressed, angry or suicidal. | 3.1 | Explain techniques to handle difficult calls, including calls from people who are distressed, angry or suicidal. |
| 4. | Understand how to handle caller complaints in relation to money and debt advice | 4.1 | Describe techniques to handle caller complaints. | 4.1 | Assess techniques to handle caller complaints. |
| | | 4.2 | Describe how to report a complaint in accordance with organisational requirements. | 4.2 | Explain how to report a complaint in accordance with organisational requirements. |
| 5. | Understand how to negotiate when providing money and debt advice. | 5.1 | | 5.1 | Assess techniques for effective negotiation. |

Money and Debt Advice Call Handling Practice

| | Learning outcomes The learner will: | | Assessment criteria. The learner can: | | |
|----|--|-----|---|-----|---|
| | | | Level 2 | | Level 3 |
| 1. | Be able to handle money and debt advice calls in a professional manner. | 1.1 | Provide money and debt advice using call control techniques. | 1.1 | Provide money and debt advice using a range of call control techniques. |
| | | 1.2 | Provide money and debt advice in accordance with Data Protection Act guidelines. | 1.2 | Provide money and debt advice in accordance with Data Protection Act guidelines. |
| | | 1.3 | Handle calls with clients who may be involved in illegal activity in accordance with the Proceeds of Crime Act. | 1.3 | Handle calls with clients who may be involved in illegal activity in accordance with the Proceeds of Crime Act. |
| | | 1.4 | Handle calls from people who are distressed, angry or suicidal | 1.4 | Handle a range of calls from people who are distressed, angry or suicidal |
| | | 1.5 | Handle caller complaints. | 1.5 | Handle a range of caller complaints. |
| 2. | Be able to reflect on call handling skills in relation to the delivery of money and debt advice. | 2.1 | Identify strengths and weaknesses in relation to call handling skills. | 2.1 | Evaluate performance in relation to call handling skills. |