

# Review of Advice Services in Wales

Response produced by the Independent Advice Providers Forum

October 2013

**“Advice services are facing a double squeeze caused by the impacts of the recession and changes to the structure and amount of funding.”**

***New Economics Foundation 2011***

**“Legal advocacy and advice is an effective engine of social inclusion and fighting poverty through insuring and expanding rights to critical benefits and services, and giving a voice to grievances and empowering people and communities “. Stein (2001)**

<b>Contents Sheet</b>	<b>Page 2</b>
<b>Introduction</b>	<b>Page 3 – 4</b>
<b>Vision, Mission &amp; Values</b>	<b>Page 5</b>
<b>Background to our response</b>	<b>Page 6</b>
<b>Chapter 1</b> <b>Overview of Advice Services in Wales</b>	<b>Page 7 – 14</b>
<b>Chapter 2</b> <b>Advice Networks and Collective Working</b>	<b>Page 15 – 19</b>
<b>Chapter 3</b> <b>Funding and Commissioning</b>	<b>Page 20 – 21</b>
<b>Chapter 4</b> <b>Quality Assuring Service Standards</b>	<b>Page 22 – 26</b>
<b>Chapter 5</b> <b>Delivering Advice: Levels of Advice</b>	<b>Page 27 – 28</b>
<b>Chapter 6</b> <b>Delivering Advice: Delivering Channels</b>	<b>Page 29 – 34</b>
<b>Chapter 7</b> <b>Understanding Demand</b>	<b>Page 35 – 37</b>
<b>Chapter 8</b> <b>Welfare Reform</b>	<b>Page 38 – 39</b>
<b>Chapter 9</b> <b>Policy and Campaign Prevention</b>	<b>Page 40 – 42</b>
<b>Appendix A : Members of the IAPF</b>	<b>Page 43 – 46</b>
<b>Appendix B : Welsh Government Funding</b>	<b>Page 47</b>
<b>Appendix C : Definitions of Advice</b>	<b>Page 48 – 50</b>
<b>Appendix D : Recommendations, Costings and Timelines</b>	<b>Page 51 – 54</b>

## Introduction

It gives me great pleasure to introduce the response of the Independent Advice Provider's Forum (IAPF) to the review of advice provision by Welsh Government. We are grateful for their continued support in providing grants for a range of advice providers in Wales following significant cuts in funding from other sources. We share Welsh Government's vision of quality advice services in Wales, which cover key areas of social welfare provision. Key to this vision is broad social policy objectives of supporting the most vulnerable<sup>1</sup> and economically disadvantaged, and ensuring equity of provision across Wales.

At the heart of all we do as advice agencies is the focus on improving the quality of life for the citizens of Wales. Welsh Government has been supportive of this approach for many years. All of the members of the Network, shown in Appendix A, are committed to the further development of their services to ensure the development of a comprehensive network of provision locally, regionally and nationally in Wales. This will ensure best fit with client need and service provision. We hope that as a result of our strategy, and release of the necessary funding, that commissioners, and service users will see a number of positive outcomes. In terms of advice provision these would include, over the medium, term greater collaboration and the development of new innovative services, which become more joined up, and client and outcome focussed.

The IAPF will continue its engagement with local and national funders to ensure that there is high quality advice on a range of social welfare issues across Wales. We will work with all relevant stakeholders to improve advice provision in Wales. A network approach will ensure continuous improvement for all provision, with a focus on quality as central to all work undertaken.

This response focuses on each of the key areas that are identified as crucial within the advice review. We introduce our vision, values and mission prior to the narrative, and their further exposition is discussed within the document. Values are demonstrated to be the factors that underpin our work collectively, and individually. We will demonstrate this in a number of ways throughout the response. We will also demonstrate how good policy work, and quality advice provisions, are mutually complimentary in how they move advice providers' shared agenda forward.

Any meaningful advice strategy for Wales must address the twin evils of poverty and social exclusion. We believe we demonstrate how the advice strategy will meaningfully address these two challenges. The advice strategy will not end these two processes. We believe that a well-funded advice service in Wales can make a real, and meaningful difference in many peoples' lives. It will help build an inclusive, and vibrant Wales, which supports its most vulnerable citizens in a positive and effective way. We assume that many of

---

<sup>1</sup> These terms are broadly defined and will include those with a protected characteristic, or who face exclusion or are economically disadvantaged in some way.

the arguments made within the review of advice provision are accepted and we will not go over the same evidence again. Both Welsh Government and the Advice Providers share the objectives of tackling poverty and the root causes of advice demand. This response outlines the direction of travel of the advice providers in Wales over the next few years.

In improving advice provision in Wales the advice network has agreed, following its meeting with the Minister in May 2013 to focus on a number of activities. These are to lead on work to develop longer term, sustainable approaches for the advice sector within a locality, regionally or nationally, including developing:

- advice networks, and any associated infrastructure they require to be functioning active bodies
- service delivery including training, information or advice initiatives to up-skill generalist advisors and local people to increase awareness, understanding and resilience within our communities
- telephone or online advice delivery capability and capacity to enable those who are able to access advice and information in this way to be able to do this with confidence, seeking to reduce face to face advice demand
- specialist advice provision on a wide geographical basis
- developing national standards for information and advice through the undertaking project work to develop, consult on and gain approval of a national framework for advice services.

We have not been able to come to a clear agreement on some of these issues in the short term because of their complexity, or because resources are not immediately available to resolve them. Our response explores different themes which are included in the review. It outlines key issues from the perspective of the Advice Services Review, then the IAPF outlines its responses, followed where possible, by costing and a proposed timeframe agreed within the IAPF. The response of the IAPF does not repeat, unless necessary, much of the narrative from the main report. Many of the outputs and outcomes from the work of the IAPF will be supported and developed through the Network approach, which is supported within the Advice Services Review. For reasons of comprehensiveness, all recommendations/ideas from the Advice Services Review are included within the overview of recommendations.

I would like to thank all of the members of the IAPF who contributed to this report, and to Mike Lewis of Hawliau Consultancy who wrote this report on behalf of the network. We look forward to working with all our partners in taking this work forward.

**Fran Targett**

**Chair of the Independent Advice Providers Forum**

**October 2013**

## **Vision, Mission and Values**

### **Vision**

Advice providers will work together to ensure that everyone in Wales knows their rights, and uses advice services effectively to achieve those rights.

### **Mission**

Our mission is to deliver highly effective advice services that make a positive difference to all people of Wales who require our services.

### **Values**

Our vision and mission are based on the following values, which will be further explored in terms of impact and effect within the body of this response.

Advice providers will demonstrate their commitment to ensuring that services are developed across Wales, and develop multi-channel approaches to service provision. It is accepted by advice providers that a strategic approach to funding will need to focus on addressing advice gaps in Wales.

In developing our work in Wales we will integrate the following values within our work:

- Advice providers can demonstrate their commitment to good practice in quality measurement
- Advice providers can demonstrate their independence, commitment to partnership working and inclusivity
- All advice services promote social justice and the prevention of social injustice by tackling poverty and discrimination including the use of effective policy engagement
- Advice services are friendly and accessible services that provide information in a range of formats
- Advice services are accessible and free of charge to all individuals and communities within Wales

The full membership and description of members of the IAPF are shown in Appendix A

## Background to our Response

Following the publication of the Welsh Government Advice Services Review in May 2013 a Ministerial meeting took place with IAPF members, funders and organisations with an interest in advice provision on the 23<sup>rd</sup> May 2013. This meeting resulted in an additional £1.827<sup>2</sup> million being available for Non For Profit advice in 2013/14. At the same meeting it was agreed that the IAPF would work with Welsh Government to develop the eligibility funding criteria, application and distribution process as quickly as possible.

The Welsh Government produced a Framework for funding advice services relating to the £967,000 to be made available to a mixture of frontline services and service developments that will support the implementation of the Advice Services Review in the longer term.

Current criteria for advice providers using this grant in 2013/14

- independent
- not for profit
- quality assured

It was clarified that the Welsh Government will not be able to take on the burden of funding all services. The aim of making the funding available for 2013/14 is to make sure people do not fall through the cracks given the changes occurring as a result of UK Government policy and funding decisions (in particular the withdrawal of the Ministry of Justice from provision of funding for much of social welfare law provision through Legal Aid).

It was agreed at the Ministerial Meeting that from April 2014 onwards, the Welsh Government will consider the IAPF's response and costed implementation plan, which should provide a sector-wide response to the recommendations made within the Advice Services Review.

There seems to be a clear direction of travel for the advice sector in Wales over the last ten years. Members have worked hard to improve their working relationships but also to add value to each other's work. Although the challenges for the network and its members remain huge, as they do for people who use the service, it is clear that the preferred direction of travel within the IAPF is to coordinate activity where possible whilst organisations maintaining their strategic independence. However, we need to be realistic about the pressure on funding from the public purse and explore any opportunities to deliver more effective services. In addition, this will help to address the type of advice that is not available, the lack of adequate depth of advice, and the areas of Wales where advice provision is not available at all.

---

<sup>2</sup> A breakdown of the funding is shown at Appendix B

# 1 Overview of Advice Services in Wales

## The Advice Service Review made the following points:

- it proposed that Welsh government has the national strategic lead in developing Advice Services in Wales at a time of rapid change and reform of the benefits system and a range of other systemic changes
- it identified that Local Authorities, and Health Boards together with Welsh Government are the key local commissioners of advice provision
- it identified the need to build on the current work of mitigating against the impact of Welfare Reform by delivering a coordinated local, regional and national response
- it proposed that local, regional and national advice networks are key drivers of change and envisages networks as the key tool in ensuring equity of provision and driving up the quality and availability of advice provision across Wales
- it accepted that a 'one size fits all' approach does not meet the needs of advice users across Wales, and that a multi-channel approach to advice provision is needed
- it identified a lack of trust amongst some providers and identified that more work is needed to build partnerships within the sector. The review identified some concerns about small providers by larger providers, and vice versa.
- issues of consistency in approaches to the updating of advice information, supervision and training were identified
- it proposed developing a sector-wide agreed National Standards Framework for Advice and Information
- it proposed developing a national register of providers who meet the Standards Framework
- it proposed developing standard information, from registered providers, for use in all materials, to ensure consistent messaging and best use of resources

## Response by the IAPF

We concur with the issues raised within the Advice Services Review and welcome the approaches taken by Welsh Government, members of the IAPF, and other funders to develop a more strategic approach across Wales. We do not explore this response the benefits of advice provision as they are well articulated within the Advice Service Review itself and in many research publications. The variety and funding of advice providers is explored within the Advice Service Review. The review shows how advice services have developed in a piecemeal fashion within Wales. We agree that IAPF members will need to demonstrate implementation of a shared understanding of types, levels and channels of advice provision in moving their work forward in Wales<sup>3</sup>.

---

<sup>3</sup> Definitions taken from the Advice Service Review are shown in Appendix C

In responding to the Low Commission, the IAPF believes that Welsh Government should explore with its partners how the National Advice and Legal Support Fund, proposed by the Low Commission, should work in Wales in terms of distribution of funds and oversight if it is introduced. The Low Commission Report makes a number of interesting suggestions including charging for services which all IAPF members are opposed to. Whilst this could generate income, the downside would be that many people would not use advice services when they needed to, as they would assume that they would be charged. The view of the IAPF is that charging would mean that those who needed advice more would not access independent advice.

The review reminds us how good advice works for clients in a number of ways:

- addressing problems in the short or longer term
- improving future decision-making
- reducing future and current 'harm'
- providing preventative services
- integrating policy work to improve issues for broader society
- changing the way public services work so that they are improved

As providers, we see no evidence of over-capacity or duplication in the sector as raised in the Advice Service Review. Whilst a superficial analysis could show that there were similar services in the same locality the services could be meeting different clients needs in different ways. Our view is that different clients choose to approach different providers, and may be referred appropriately for expert advice. We also believe that having more than one advice agency in a locality can also deal with conflict of interest effectively. Even if there are similar agencies all organisations involved within IAPF are working at over capacity. There is no evidence that clients routinely 'shop around' and approach different providers for the same advice. Our view is that there continues to be under-capacity in most parts of Wales in terms of both generalist and specialist advice. Indeed, one of the priorities of the advice sector in Wales, is to explore how an all Wales Discrimination Advice Service can be developed and delivered. It is also important to differentiate between services whose core activity is information and advice and where it is one of a number of activities undertaken by that organisation.

However, we do see in some parts of Wales more choice than in others, in terms of general advice providers, but we consider this increased choice to be in service users best interest. Even currently this choice does not mean over capacity within the sector in Wales and as demand increases, we expect increased advice deserts to emerge across Wales if a strategic approach to funding is not developed. Similarly, for specialist advice, there are some parts of Wales where it is easier to get access to specialist advice than others.

An example of a targeted approach that we welcome can be seen in the Better Advice, Better Health programme. Citizens Advice Cymru under its Better Advice, Better Health work receives £650,000 p.a. from Welsh Government to work with 11,000 people and it generated confirmed gains of

£8.8 million. Combining this with work on council tax and housing benefit, and families with disabled children meant that funding of £2.2 million allowed bureaux to work with 21,000 individual claimants and generated returns of £16 million. This is a positive example of how strategic funding can address people's needs and achieve a number of positive outcomes. Similarly Community Housing's Cymru Advice Network coordinates an advice workers network across Wales and have worked together to target their resources.

In reviewing discrimination advice in Wales IAPF members are of a view that, following changes to recent changes in Legal Aid and the withdrawal of the EHRC from directly funding advice, there are inconsistencies in the way that discrimination advice is provided in Wales. Whilst Welsh Government has attempted to address these variations with short term grant income through the Advice Services Fund in the last two years, which is obviously very welcome, there remain inconsistencies availability of discrimination advice across Wales. This has been partly addressed by the Welsh Government grant but also by some non governmental organisations providing direct advice including some advice organisations.

This has meant that advice on some protected characteristics under the Equality Act 2010 is easier to obtain than on others. Some of this work is supported by advice agencies but some work is also supported in an ad hoc fashion by various non governmental organisations in the diversity field, such as the Older People's Commissioner. This has a differential impact on access by geography including rurality and by protected characteristics in different parts of Wales.

In addition the recent hate crime strategy recently launched by Welsh Government also suggests some differences in reporting across Wales sometimes influenced by whether a hate crime reporting centre exists locally. It might therefore be helpful that the Welsh Government review of the hate crime reporting centre strategy is linked to its advice strategy to see what solutions can be explored to identified gaps in provision.

In conclusion the IAPF network proposals will support an exploration of the relationship between local and regional advice provision for discrimination advice. Whilst there have been some strategic approaches to development, it has been different in terms of priority setting within each local authority. Within each local network there are opportunities to respond to changing demand.

IAPF propose developing strategic national funding for regionally based specialist discrimination advice services which will provide direct advice to clients, work with the EHRC transfer of expertise programme to ensure other advice organisations can identify and refer cases. This will inevitably be more consistent and fair systems developed for access to discrimination advice across Wales.

Key outcomes for all stakeholders over the next few years will include:

- services are planned and delivered in response to the evidence-based needs of service users and potential users
- services are delivered in a variety of ways, balancing the particular needs of service users and the need to maintain agreed quality standards. The quality standard applied should focus on quality measured from the perspective of the person using the service
- users are directed effectively and efficiently to the most appropriate source of quality assured information and advice to address their particular problem
- information and advice providers wishing to become Quality Marked at the relevant level are able to access help and support to reach the required standard within agreed time frames
- there is continuity and development of service provision during the life of the strategy
- an increased awareness that people in their everyday lives have enforceable legal rights and obligations
- recognition that information and/or advice is available to assist and support people in resolving the full range of legal problems
- advice needs to integrate more effectively with other forms of support both in terms of crisis management and crucially in terms of further prevention.

The UK government, in reviewing advice provision in England, found some key characteristics of advice provision and demonstrate some key objectives of advice services. These are shown below.

- collaboration
- focussing on early intervention, prevention and education
- outcome based delivery
- using multiple advice channels
- advice services promoting resilience and innovation

As a sector, advice network members, can do positive and beneficial things for people in Wales, as long as adequate funding is available. There is a continued focus on those who need services most, and on quality and continuous improvement in the work of the IAPF. Our message to Government is clear in that we welcome a strategic approach to the development of service provision as it benefits people, and their communities, and benefits Wales. For many members of the IAPF the time spent on fundraising detracts from their focus on meeting service users advice need and committed, medium term funding would address this issue. It could be argued that the demands of servicing many short term projects can detract from programmes which are more medium term, 3 to 5 years .

The independence of the advice is valued by people who use our services. Often service users see Advice Providers as 'being on their side'.

The IAPF also sees clear benefits for volunteers who offer their free-time to advice services. These can include benefits to health and well-being; gaining

new skills and becoming more 'work ready'. In addition volunteers who are volunteering following retirement can bring their work-based skills into the world of volunteering. SNAP Cymru sees a high correlation between educational advocacy services and pockets of high economic deprivation in Wales, in line with the need for other social welfare advice services.

As well as a strategic approach from Welsh Government, we hope that as the IAPF network develops, we can regularly bring all key funders to the table. This will enable us to work together and increase the availability and quality of advice provision in Wales. We see over the medium term a more focussed relationship developing between all stakeholders including Government, funders, advice providers, citizens and key statutory agencies, to jointly drive this agenda forward. Advice providers need to work in a funding system that is focussed on quality and benefits for the end user. Advice providers are not only interested in the system from the top-down, but also from the perspective of people who use the service.

Customer experiences have been explored within the Customer expectations Group. Shelter Cymru on behalf of the IAPF have been engaged in exploring peoples expectations of advice provision in Wales. The report explores some specific issues relevant to this response, including people's expectations of services, advice channels, engagement and next steps.

A copy of the report is available from IAPF members or Shelter Cymru .

Its conclusions are extremely important in terms of this review and are shown below

- i. Ensuring a wide range of methods, which need to be planned according to a robust analysis of services' client base – face-to-face is always most important, especially for disadvantaged and/or vulnerable people, but some people do prefer telephone or online access. The analysis of the client base needs to include identification of potential barriers; for example, language, literacy and physical barriers, and measures should be put in place to overcome any barriers found.
- ii. Local services should understand their services in light of the delivery in the 'system of services'. Local services need to understand what other services in the sector (and beyond) are doing in order to provide a streamlined approach, correct signposting and referral and effective joined-up working for information and advice seekers. Services need to understand how their service operates in the 'system of services' available
- iii. Joint-working is required between services including with non-advice support services in order to enable more disadvantaged and/or vulnerable clients to access services and ensure they are adequately supported to do so
- iv. Services that work with disadvantaged and/or vulnerable people should form strong working relationships with relevant support services, which may include co-location and co-delivery of specific projects

- v. Ensuring a streamlined referral and signposting system is in place including, if necessary, support to help people to attend referral meetings
- vi. Ensuring that services are supported to develop service user led ways of designing and delivering services with service users at the heart of their service
- vii. It is important that services are delivered right the first time in order to avoid deterring disadvantaged and/or vulnerable people attending. Services need to ensure that there are sufficient frontline staff to deal with the volume of enquiries. There may be potential for strengthening frontline services to provide a 'triage' function so that people's needs can be identified effectively
- viii. There needs to be increased awareness raising amongst the public about the information and advice services in Wales, including information on how to access the service. People should be informed of their rights
- ix. Services should be supported to develop the 'Peer Mentor' method to help raise awareness of the service amongst communities as well as assist in designing and delivering the service ensuring that services are based on people's needs.
- x. Due regard needs to be paid to the impact of changes to Welfare Benefit that have had, and will continue to have, an impact on people's need for information and advice services
- xi. Further research is required using a user-led Peer Researcher method to explore the feasibility of these Calls for Action.

There has been an on-going synergy between the networks of advice providers and the other organisations that are members of the IAPF, and the various funders. The opportunities provided by the possible funding will allow support for the Welsh network to drive change, which will be mirrored by regional and local networks. If a values framework, as outlined earlier, is adopted by all stakeholders, there will be an inevitable improvement of delivery and improvement of standards of advice providers. A consistent approach to commissioning is explored later in this paper. We refer to the Welsh network whether we mean the IAPF network. When we explore networks later in the report we suggest that network joining with Welsh government members to become a new strategic network for Wales .

A demonstrable success of the advice strategy within the medium term will be an increase provision of specialist advice. At present, the number of clients needing specialist advice outstrips the supply of this advice. However, we would note that

- a) often what is needed is capacity to undertake on-going casework on behalf of a client (and often casework that is combined with other support that the client will need to act on the advice)
- b) a significant driver of demand for specialist advice is the failure of public services and others to get things right first time.

In developing the approach of the IAPF in providing costing, there are some challenges. As an example, if a funder pays an advice agency to work with

1,000 service user on an issue, there will be many ways of costing that service. The variables could be:

- full cost recovery v marginal cost –v- subsidizing a service from other funds
- issues of geography including recognition that rural services cost more per head
- own premises –v- outreach
- volunteer –v- paid staff
- availability of volunteers and levels of support available to them
- advice worker –v- specialist
- ongoing costs such as training, supervision and management
- quality and depth of the service provided
- capacity of the client to act on the advice received
- is the advice provider prepared to take a short term loss to get access to a market
- delivery channel of advice
- ratio of paid staff to volunteers
- whether models exist which explore cost savings for statutory bodies or increased capability for the person using the service
- value created by every £ of spend
- is the service funded on outputs or outcomes (if outcomes who defines these)
- the wide range of funders already involved

In financial terms this will mean that, whilst we will provide indicative costs of advice work in its broadest sense, there are problems when it comes to comparing two advice services as there is not usually a like with like comparison. Depending on the type of advice session and how the impact is measured, there could be very different outcomes for the person using the service. We should consider how advice services create value, then after understanding that, consider how costs can be reduced without impacting on value.

In exploring the direct costs of advice provision the average cost of a generalist advice worker is £32,000 and for specialist advice is £52,000. These costs include back office costs, on costs, training, travel and admin support. These figures are viewed as averages by the IAPF and indicative of the level of funding needed to deliver quality services. This sort of cost can 'generally' be said to be for large franchised UK organisations. Some smaller advice agencies have indicated a lower salary band.

In addition welfare benefits specialist cases incur disbursements to the average amount of £42.50 per case (exclusive of VAT) and housing cases where the average disbursement per case over this period was £7.29 (exclusive of VAT) and this cost needs to be factored into the funding formula.

The costs of recruiting, training and supporting volunteers should also be considered these will increase if there is a large turn over in volunteers which

may be because of short term placements on offer. Volunteering costs should not be underestimated as for some smaller organisations they will be a significant part of their cost base. Volunteers will of course need supervision and support and this will need to be provided by paid staff.

The next sections explore in more detail the Advice review and the response of the IAPF to its conclusions.

## **2 Advice Networks and collaborative working**

### **The Advice Service Review found:**

- networks were to be explored as a key driver of change for advice provision in Wales
- strong local, regional and a national network would support better partnership working; a more strategic approach; better use of available resources and improved outcomes for service users
- a network approach would be a positive response to the challenge of Legal aid and Welfare reforms in terms of increased demand and reduced provision
- the proposals allowed Wales to build on the many advice networks which existed
- local networks would establish clear pathways between local and regional services and eliminate waste from the system including the development of shared referral systems or help to coordinate funding applications.
- local and regional networks would help use resources more effectively and support effective joint commissioning
- welsh Government would issue some guidance on how networks operate
- the National network would ensure strategic oversight of provision in Wales and would support a shared approach if relevant to some key issues such as quality, shared learning and training and addressing inequity in provision.
- networks should maximise the range of outcomes for advice seekers
- welsh Government will engage with the Public Services Leadership group to ensure effective engagement and development of the local and regional networks
- there should be iterative links between the local, regional and national advice networks to ensure effective information flow between all the Networks to address delivery-focussed issues in an effective way. These could include gaps, mapping of service provision and developing an effective mix of generalist and specialist advice.
- the networks should explore the impact of new technologies upon advice provision.

### **Response by the IAPF**

Whereas the IAPF agrees with the proposed footprint for advice networks locally, regionally and nationally, the outcomes of the Public Service Commission, which is due to report in December 2013, may have an impact upon definitions and boundaries of local and regional networks. Networks do not of themselves answer the challenge of increased demand and reduced provision. They do however enable our response to these challenges to be strategic and coordinated.

Many local networks have arisen as a result of joint work to mitigate against the impact of welfare reform. The IAPF believes that any guidance issued by Welsh Government on the role of networks, their purpose and function, should respect different approaches. If the guidance is too prescriptive, it will take away from agencies' opportunities to develop local solutions using their networks as a driver for change.

In terms of networks the IAPF concurs with the focus of the Advice Review in designating networks as local, regional and a national network. We explore each type of network separately though there will be some shared characteristics. The costings for networks will focus on three levels; local, regional and national. Interestingly, the national network is the most well developed concept. The regional and local networks are the least developed because local and regional networks are (if they exist) focussed on different outcomes and engage in different activities currently.

The IAPF believes that Welsh Government should support and promote the networks through formal recognition and, requiring, as far as possible, public sector engagement from local authority and health bodies.

### **Local Networks**

Based on AdviceUK guidance, a local network works best when it operates to the following principles:

- clear, shared purpose, with agreed aims and objectives
- inclusivity (i.e. involves all independent and free social welfare advice services, and accessible to all such services)
- responsiveness to local circumstances and needs
- direct benefits to members (i.e. business case for involvement)
- activities that are complementary (not duplicating others locally)

Developing clear, consistent and more developed pathways between services should be one of the foci of the local advice networks, including pathways to regional and national suppliers. In the past, the Legal Services Commission Wales Committee proposed that, while social welfare advice provision for welfare rights and debt (for example) needed to be universally and locally provided, provision relating to subjects such as employment, discrimination and education should be planned regionally or nationally because of the potential volume of work. It identified, however that the pathways between local generalist and specialist suppliers, and these regional or national suppliers needed to be strong.

Local networks involving advice providers can contribute significantly towards the quality of advice and development of provision. As with any partnership or joint venture, the key to success is identifying common interests, shared resources, shared responsibilities and shared benefits amongst network members. The IAPF is of a view that each network needs an independent Chair and should be linked to the DWP local support forum and the local

authority Poverty Champion. Sometimes a given network may not focus on advice alone, and some level of engagement also seems essential.

One of the main barriers, particularly significant for smaller organisations, is capacity to participate in networks, for example attending meetings. One suggestion is a local advice pool that can provide locum cover and constructed to ensure quality standards. If agreed this approach will need to be adequately resourced and managed. The IAPF want to foster networks that create value for the client, funder and service provider. The IAPF is suggesting that each local Network has a development pool of between £4,000 to £10,000 which should be spent on local priorities as identified by the local network . The IAPF is of a view that the support and facilitation of local networks should be located within local authority departments who have the responsibility for anti poverty or social exclusion . We estimate the equivalent of half a day a week on this role .

Providing local networks operate to the principles set out, they will be serving a useful function, and people will be more likely to engage with them. Effective networks are well placed to provide a clear point of engagement between other stakeholders and advice providers, whatever that engagement needs to be.

In reviewing the functions of local networks some clear questions will need to be considered:

- are they referral networks only.
- or information gathering and dissemination.
- are local networks strategic.
- does the active membership include commissioners and providers.
- How they support signposting locally .
- How referrals become streamlined locally

In reviewing the networks across Welsh local authority areas there are a number of examples of strategic and operational networks which are combined within one local authority area. There may be examples in Wales of where locally networks which focus on advice and poverty combine. In other areas there may be a different decision.

Local networks, if they do not already exist, will map gaps in service provision and work with our funding partners and statutory agencies such as health and Local Government. Energised local networks made up of statutory services and advice providers need to agree pathways and map local and regional networks. The role of local networks suggests that these become more formalised with core sets of principles. This will mean that advice provision will become more systematised across Wales.

Some local networks for example are well connected with other local (non-advice) networks and work closely within the Local Service Board framework. Whilst others are stand-alone organisations with a mixture of real time and virtual functioning. Some are based within local authorities and some are not.

This is why we are suggesting that as local networks are starting from different starting places, the focus should be on outcomes, not on process and structure. Local networks may wish to consider mapping of local provision and networks as part of their core work .

### **Regional Networks**

There are already examples of regional networks within Wales based on topic, for example the North Wales Vision Alliance, of which RNIB Cymru is a member, which has been looking at the development and delivery of advice and welfare rights services . There are also geography based networks such as the North Wales CAB network .

The IAPF would like to see the principles adopted for networks being broad enough not to exclude current advice networks if they meet local or regional need currently. The same can be said for the starting position of regional networks as some of these are topic based and some are general advice based so again an outcomes framework is preferred to a focus on structure.

### **National Network**

The IAPF not suggest that the overarching network should take on the role of managing the member networks but act as a coordinating mechanism for cross boundary issues between networks. In terms of the National network, this needs to work at two levels. Firstly independent advice providers need to ensure partnership working where appropriate and possible and secondly they need to join wider key stakeholders together for planning purposes. Welsh Government will have a key strategic role in facilitating this network.

The work of the IAPF has grown out of the work of the CLS Wales Committee and is linked to the Third Sector Partnership Council. It could be argued that the work of the IAPF has increased and, whilst it has been subsidised by Citizens Advice Cymru, this is not and should not be a sustainable solution in the long term. It may be that in supporting networks to support the work of the IAPF that some grants are available to support the work of engagement and representation for the IAPF and the networks that make it up. A development pool would also support this work so that it could support key developments .

One of the strengths of a networks such as the IAPF which covers all the key advice areas is that it is able to horizon scan and develop, through policy work, key cross-sector responses.

### **Funding**

There is also the challenge of funding these networks. Obviously the more that is spent on funding networks, the less there is for direct advice. It could be argued that the local and regional networks will have a significant operational focus whilst the national network will not. However if this becomes a planning and commissioning body, then the funding needs to be revisited in detail. In any solution which is proposed, the implications of directly funding

advice networks, need to be thought through. Whilst if funding becomes available, from Welsh Government using a calculation based on geography as an example may not be the most effective use of resources. Similarly for regional networks, as often some will have included funding within bids. Over time, at the local and regional level, members could include network costs within funding applications. As the Advice Service Review makes clear regional networks need to work across current local authority boundaries. We would propose no further work until the future of local and regional structures are agreed.

Local and regional networks need to ensure that funders include this in full cost recovery so that organisations are not subsidising networking at the cost of advice provision within their region. The costs of members engaging in the work of the network also needs to be considered and funded appropriately. If networks are agreed as a key driver of positive change within the advice sector in Wales, then these would require funding, and indeed the 'buy in ' of current funders, to support them. It is assumed that there will be Full Cost Recovery for management and networking time for network members .

### **3 Funding and commissioning**

#### **The Advice Service Review found:**

- short term and output focussed funding was damaging to advice providers and led to inconsistencies in service provision
- output focussed targets did not deliver better outcomes for service users
- funding levels for advice is varied across Wales
- funding available within a community (geographic or community of interest) or economic deprivation does not reflect 'need', including the sharing of locations
- following funding cuts specialist discrimination and employment advice is 'weak' across Wales
- Welsh Government and all Statutory funders cannot fund all the funding that has been cut across Wales
- timely advice is a preventative measure review
- timely advice reduces cost for housing, health and social care budgets
- Welsh Government needs to adopt a more consistent approach across its departments to the operational and strategic relationship with advice providers. This is especially so when it is developing new policies, approaches etc. This should ensure consistent outcomes for commissioned advice
- regional contracts may offer greater value for money
- smaller providers need to be able to compete equally for service delivery
- designing service delivery systematically may offer new local and regional commissioning models
- effective local commissioning needs to respond to locally created advice demand pressures
- effective commissioning should be focussed on outcomes for service users and could lead to cost savings
- commissioners should commission for three years, using outcome focussed approaches which promote partnership between advice providers and collaboration between providers and funders
- commissioning needs to ensure that discrimination and employment advice is available across Wales.

#### **Response by the IAPF**

We concur with the findings of the Advice Service Review. The Welsh Government Code of Practice for Funding the Third Sector, recommends longer-term commitments, subject to performance to support a sustainable approach to funding. This includes up to 5-7 years for strategic core funding, and commitment for the life of any specific projects, which are funded, providing firm year one funding and clear baselines for subsequent years. The IAPF would recommend adoption of this principle.

It may be helpful for Welsh Government and the IAPF to work up some proposals for commissioning, which could be consulted on with stakeholders in Wales. It may also be helpful to organise an event ( which need to be costed ) between all commissioners in Wales and advice providers to explore this in more detail. As the settlement has been recently announced for local government we need to ensure that where possible a consistent approach is developed for funding of advice services across Wales. A scenario could be imagined where core funding is reduced, demand increases, and agencies quality will be impacted upon just as the impact increases and the cost of non-intervention will impact on other parts of the public service provision.

A lot of the issues involved within this are of commissioning and funding will also be explored within the networks as they are set up. Welsh Government at this difficult time, may wish to remind local government of the impact of decisions made on advice provision in the medium term.

Contracting should only be seen as part of a wider process of understanding the purpose of services, understanding current demand, and understanding what matters from the client's perspective as well as the funders. Commissioning should not disadvantage small advice providers within the commissioning process.

Smaller advice providers are often excluded from contracts or grant funding that requires national or regional coverage . It is particularly important to balance geographical coverage and standard methods of service delivery with the ability to develop new services, responding flexibly to diverse client need .

Given the non-statutory nature of advice services and the fact that local government are currently the majority funders of most local advice providers it is vital that the Welsh Government clarifies with local government the strategic importance of advice in tackling poverty and in public sector demand reduction. It needs to be understood that current funding is a risk as well as addressing the reductions already imposed by the Ministry of Justice changes to Legal Aid funding.

## 4 Quality Assuring Service Standards

### The Advice Service Review found:

- there is a need for greater consistency of advice standards and quality assurance across all providers
- there needs to be common understanding across the sector of key terminology e.g. advice and what is generalist advice and what is specialist advice
- need to improve understanding within the sector of different quality approaches
- providers need to demonstrate quality within the organisation and within advisors
- quality mechanisms if additional costs are necessary, need to be including in funding applications
- the work of the Advice Services Alliance on quality mark, and the quality of advice, needs to be further developed within Wales
- peer review needs to be included in implementing quality systems
- stakeholders should explore the passporting process from a range of quality marks to one (if one quality mark is adopted in Wales for all Welsh Government funded advice providers)
- the standards should be developed for each advice channel
- guidance on the impact of national standards of advice should be developed
- Advice providers should engage with developing systems so as to understand better the impact of demand, delivery and outcomes of advice giving in Wales

### Response by the IAPF

In exploring quality, members in Wales use a range of approaches including:

- Define Measure Analyze Improve Control DMAIC
- Systems thinking
- The Lean Principles
- Theory of Constraints Analysis
- Value Stream Mapping
- Waste (primarily the waste of 'waiting')

Key to the values of the members of the IAPF is a commitment to quality and continuous improvement. In terms of funding for 2014/15, the IAPF is not suggesting the development of a quality mark in Wales by March 14. However we are suggesting that any organisation receiving funding from Welsh Government needs to have at least one of the following quality marks in place to receive funding or is on its way to achieving it within a reasonable period .

These are:

- Advice Quality Standard
- Age UK Advice Quality Standard
- LSC Specialist Quality Mark standard
- National occupational standards for legal advice
- Citizens Advice membership
- Quality standards for young peoples information advice and guidance
- Debt advice standards being developed by Money Advice Service
- OISC for any immigration advice provision
- Lexel

Our approach to quality is underpinned by key components shown below which all of the above frameworks have. These include:

- a whole system approach to quality
- ensuring that all our advice services work with all members of the community
- a formal process of review of advice provision with an external component such as audit or peer review
- a focus on continuous improvement and relevant KPI's in quality measurement when asked for by funders

The IAPF suggestion to Welsh Government is not to develop a common one-size fits all approach to quality at this time. This is because there are already quality systems in place and a move to a new system would use up valuable resources without achieving a clear outcome for advice providers or service users at this time .

As well as advice-specific quality marks, there are also broader quality marks, which will demonstrate quality in that organisation. These will include:

- Investing in People
- Investing in Volunteering
- PQASSO

Within our approach to quality, we have already identified a focus on continuous improvement. This will mean that although we will start with a common approach to measuring and demonstrating quality, we will also trial new methods and approaches, thus ensuring that continuous improvement is at the heart of what we do. We see a clear relationship between quality, outcomes and costing. This would mean that funders that did not include adequate resources for funding for measurement of quality outcomes, would see reduced impact for their funding. This is especially so if the focus was on the measure of outputs, rather than outcomes, within the process. The aim is to provide clarity for clients and for funders, as to what level of expertise, and, what type of service is being offered. The measure must include the ability to verify accuracy and effectiveness as well as satisfaction since whilst individuals may be happy with immediate outcomes, this may be because

they are not aware that these are poor compared to what another advice provider may have achieved.

Outcomes from high quality advice series may include:

- consistent advice for advice seekers, of a high standard, and to an agreed quality
- help service users to ensure that they have understood the advice given, and can understand the consequences of taking that advice
- have options explained in a consistent way, and access the same advice pathway whatever agency they use. Providers aim to ensure that service users understand their advice pathway, and that this is best suited to their needs
- receive advice from agencies who all use the same words to describe their service offering advice, advice with casework and specialist advice and so on. These definitions as shown in Appendix C are accepted by all members of the IAPF .
- for advice seekers to receive advice in the best way that suits them including face to face, online, or by telephone, or by home visits for clients with specific needs.
- a clear process for organisations development who are not quality marked so that they can demonstrate this sooner rather than later

Issues of quality in information provision also need to be considered, as well as the quality of advice in terms of approaches to quality, but this has not been addressed in the current proposal. This can only be meaningfully assessed in technical terms by someone who has the same or greater expertise in the areas relevant to the advice given . Realistically this could only be achieved by peer review and even this approach presents many problems in terms of costs. Ultimately the views that matter in terms of judging quality are the clients and the funders which highlights the need to understand better what clients are currently asking advice services to do and what matters to them.

A required outcome identified by the Advice Service Review and by the IAPF is to be clearer about the importance of quality. This will increase understanding of each provider's role, and increase trust between organisations, forming a positive basis for further collaboration and partnership working.

Systemically this would allow the agencies to develop increased within-county collaboration at a practice and policy level via local networks. If Welsh Government decides to introduce a quality mark, or to adopt the recommendation above, then there will need to be a lead in time, and this approach will need additional resourcing.

## **Training**

All members of the network encourage training within their organisations, which will include a wide range of approaches to continuous professional

development. Members with advisors with recognised professional qualifications will need to ensure on-going CPD. However, all advisors will need to ensure updating of skills and knowledge, whether via an accredited or a non-accredited route. Training will support advisors on generalist and specialist knowledge. Approaches will range from RNIB Cymru and Citizens Advice who have the skills and experience to provide in-house updating and accreditation, to smaller organisations that will have bespoke systems in place and/or buy in external training provision. The costing of advice provision will need to include an element for training and development of all roles with the organisation. This will support individual advisors up-skilling and development.

All the various quality marks will have their own individual approach to the amount of CPD and levels of training required. In terms of delivery, organisations vary in the channels of up-skilling ranging from briefings to formal training and online systems. Organisations also vary the time demands of on-going training. Some of the advice providers who deliver to a specialist client group, such as those that provide carers or mental health advice, will also focus on the engagement needs of the community they work with, as well as the specific knowledge update required.

For some of the advice providers, a key focus is to engage with the needs to up skill other agencies as much as their own. Shelter Cymru for example have developed a training pack, 'Information Matters', which compliments the skills and knowledge of key professionals such as social workers and midwives. Citizens Advice and Shelter Cymru provide paid for specialist training available to all advice providers. Organisations such as the EHRC have provided 'Transfer of expertise' training to over 300 advisors providing training to participants from Trade Unions, CABx and other organisations.

The Forum has started to map the training provided and commissioned across Wales for the advice sector, but this work has not been completed due to capacity. It will best be described as a patchwork of local, regional and national training, with training deserts in some parts of Wales. IAPF is interested in exploring members approach to training so that consistency can be developed and best practice shared.

Obviously, whilst there will be a wide range of training provided across Wales, the travel costs make some training prohibitive, especially for smaller providers. It can safely be said that there is no consistent approach to training in terms of expectations and what is carried out. Training for advisors needs to be included in service providers budgets under Full Cost Recovery. We recommend that the work on commissioning and costing includes an element for training as part of the core expectation of cost for providing an advice service. Some agencies within the IAPF are more able to share resources than others but there is a cost involved in the provision of training that either has to be met centrally or through paid-for provision under FCR.

Organisations are also often hampered not only by travel costs, but also by issues of service capacity. A minimum training expectation should be costed into the time of advisors. Organisations are developing a dual track approach

to training, including webinars and online e learning, combined with face-to-face training. Training should be integrated with development support for the wider organisation wherever possible. Managers, advice supervisors, Trustees and other roles also need to be provided with training, not just advisers. Whereas some training will be suitable for online training, issues that are complex may still need to be provided by face-to-face training.

An approach which has worked in England is the introduction of qualifications and apprenticeships in legal advice. This scheme has not yet been implemented in Wales, but Citizens Advice Cymru are now in discussions with Skills for Justice about using this approach. It may of course have broader interest for other IAPF members. Citizens Advice have found a number of proxy outcomes from introducing these apprenticeships including

- increasing the number of younger people who want to work in bureaux
- volunteering numbers increase

At this stage advice providers in Wales would not have the resources available to compare advice frameworks and agree the direction of travel for advice services in Wales. However, the IAPF would like to explore this further with Welsh Government so that all relevant stakeholders could understand the implications of what one quality mark, or ensuring passporting between the recommended marks, would mean for stakeholders. Some scoping is needed to ascertain how much work is needed to develop these proposals, which will include a small-scale study with all providers. Until funding is available and agreement is reached across the sector, the IAPF is suggesting that Welsh Government only funds advice providers who have or are working towards a recognised quality system including on-going training in place. As part of this work Wales could explore the impact and benefit of a whole system approach such as the Scottish quality measurement system. We recommend that further work be undertaken to take this forward including identifying costs by April 2015.

## 5 Delivering Advice: Levels of Advice

### The Advice Service Review found:

- specialist advice where advisors have relevant knowledge, training, skills and access to appropriate resources, is essential to address complex problems
- the interplay between general and specialist advice is crucial to good outcomes for advice users
- the definition of specialist needs to be addressed so that there is consistency between providers
- the lack of availability and accessibility of specialist housing, employment and discrimination advice needs to be addressed within future service design
- the reductions in availability of family law advice need to be addressed
- the impact upon pro bono advice as a result of these changes needs to be addressed
- the variability of generalist advice across Wales needs to be addressed
- the pathway between generalist and specialist advice needs to be improved and become more consistent
- preventative interventions need to be promoted so that service users can increase their capability to deal with future problems

### Response by the IAPF

There is a debate within the network about whether consistency of approach is necessary or beneficial. It could be argued that advice services need to be flexible and diverse to respond to service user demand. The recommended outcomes approach to commissioning, based on client need will help to address this issue. Flexibility of response by advice providers has most often depended upon available resources. Some advice providers have good liaison with support agencies who refer their clients to them as a matter of course. Some Advice UK members are using a systems thinking approach to understand these referral pathways in more detail so that they understand better how advice can be more effectively linked to other services .

There are a number of ways to provide advice services such as face-to-face, phone, online and by group. These can change during the advice process and depending upon the needs of the person at that time. It is clear that a one size fits all approach is neither feasible or desirable because people using services have different needs at different times in their lives. Some will have a preference for one approach, and the IAPF would not concur with a view that advice services are only delivered in one way. In the view of the IAPF, advice services must always be multi-channel. Many agencies provide bilingual and multilingual services and again the linguistic issues must be linked to the issue of advice channels and adequately resourced.

The location of delivery of face-to-face advice is also important as the more local the service is, the more accessible the service will be. There are already

positive examples from across Wales of where advice is localised, especially in Community First areas such as SNAP Cymru and CABx. This is viewed as an area of growth in any future development within Wales. In developing services as the Advice Service Review makes clear.

How home visiting can be resourced however is a real challenge within the discussion and debate. Again, the IAPF would argue that home visiting is an important part of the process for some specific clients, but it can be supported by other forms of advice. Home visiting may be important when people have no other option and are in need of face to face services. In particular, when they are new to a service, but they may be of less importance when relationships with advice providers are established. Home visiting can also be linked to broader work by a range of agencies and can contribute to holistic assessments.

As already discussed we, as a network, are committed to a common understanding of what the levels of advice provision are and these definitions are shown in Appendix C. These definitions taken from the Advice Service Review have been adopted by members of the IAPF.

## 6 Delivering Advice: Delivery Channels

### The Advice Service Review found:

- the need to maintain multiple channels of advice delivery
- all channels face to face, online, phone can be developed within Wales though all have their own strengths and weaknesses
- that there is no single solution or delivery method
- the geographical variation in face to face advice needs to be addressed
- services which are provided in accessible community venues need to be maintained and developed
- home visiting for some people needs to be maintained
- the advice sector needs to explore how accessibility and consistency of telephone and online advice can be improved
- the advice sector needs to explore how online advice provision for advice providers can be developed.

### Response by the IAPF

A number of advice channels are explored within the Advice Service Review. IAPF members are committed to developing the range of advice channels and developing systems, which support people to move between advice channels. Whilst face to face advice may be the most expensive, for some people it is the only method that works. In rural communities phone advice, because of practicality and cost, becomes a more used option and consideration needs to be given the development of this advice channel in terms of resourcing it . The relative value of different advice channels can only be meaningfully assessed by considering their place within the wider journey taken by people seeking advice .

Initial diagnostic and simple advice services are mainly funded currently by local authority or short-term funders and all providers say that it is over-stretched. It is often delivered by trained volunteers who require training, management and supervision to ensure quality control. A number of ways of funding can be considered including distance, population and deprivation indicators and joint-commissioning by funders and advice providers.

Funders will often make decisions based on historical data which uses different indicators as the basis of funding such as index of multiple deprivation, proxy indicators on one aspect of poverty, or data relating to protected characteristics. As locally based commissioning develops this should address some of these inconsistencies and provide services based upon locally determined need. Guidance from Welsh Government and the national network may help to suggest a way forward.

### Face to face generalist advice service

It is mainly funded currently by local authority or short-term funders and is already overstretched. It is often delivered by trained volunteers or some paid

advisers and needs training, management and supervision to ensure quality control. It needs consistent funding patterns across Wales to ensure access. In the view of the IAPF distance to the service, population and deprivation indicators should be taken into account in funding these services.

People using this service often value it for a number of reasons. These include:

- exchanging written information
- building a relationship and rapport with an advisor
- effective use of interpretation services
- ability to explain the process in more detail

### **Face to face casework and specialist advice**

Casework and specialist advice is provided by both generalist advice providers and specialist organisations. All show increased demand and reduced resource. Drivers such as unemployment, increased older people and lack of local services in some parts of Wales will continue to have an impact upon advice provision in Wales. We are also seeing a trend of new providers coming into service delivery such as housing associations though the IAPF is clear that independence is a key requirement of the client research and must be carefully considered.

Key demands in Wales will focus on

- Debt
- Discrimination
- Education
- Employment
- Housing
- Immigration and asylum
- Welfare benefits

It is important that the situation relating to advice on family and relationship issues is considered in future and that the changes to the availability of advice funded through Legal Aid on this issue is monitored. Citizens Advice is already seeing an increase of in family-related enquiries.

### **Specialist Support to Advisers**

One challenge for the advice providers that the review identifies is generalist advice providers potentially providing inaccurate specialist advice and this is obviously a problem that must be addressed. Citizens Advice provide specific information resources to advisers through Advisernet (available by subscription to all providers) alongside a number of quality assured subject specialist websites.

To enable volunteer and paid caseworkers to work at a higher level than currently, a system of specialist support workers is required. This is partly in

place for CABx, though, apart from debt advice, funded through the Money Advice Service, the current funding streams are short-term and may be insecure, and the housing specialist support function is not available in Wales and is unfunded. These specialist support advisers also take test cases where needed.

The service of specialist support to caseworker, generalist and volunteer advisers gives them access to subject specialists at third tier to enable them to advise clients accurately and in depth. The Specialist Support officers provide a service of consultancy, training, subject network groups and a bi-monthly newsletter. This service is available to CABx and has been funded in the past by the LSC to enable it to be available to the wider advice network. The Money Advice Service is now funding the debt and money advice consultancy although the service of specialist advice is only funded through short term funding at present.

In particular the specialist provision for back-up on housing issues is run jointly by Citizens Advice and Shelter (England) is only funded for England, the gap needs to be addressed as the legislative framework between England and Wales widens. The cost for a consultant to provide training and consultancy for advisors inclusive of salary, on costs, travel and organisational costs is approximately £87,000.

### **Preventative work**

Many agencies are engaging with prevention more than they have done historically, agencies that offer money advice for example are now working to improve the financial capability of people who use their service.

Preventative work can be done in a number of subject areas, the most common currently is financial education of various types. This work aims to be proactive and preventative. It is about giving people the skills, knowledge and confidence to make choices that are right for them and help them avoid crises. Preventative work also includes using the media or web-based information.

For example financial capability usually involves sessions on money management, understanding credit, banking, savings and how to deal with debt. Depending on the group, the session will cover finding good deals and bargains, customer rights, value in contracts for mobiles and utilities, dealing with bailiffs, or pensions and insurance. Learning sessions could be in groups, one-to-one or involve training frontline workers from other organisations.

Since January 2007 Citizens Advice has supported 2 regional financial capability forums in Wales through its Financial Skills for Life programme.

The Money Advice Service provide a comprehensive, bilingual public website, email and telephone services of Money Advice. SNAP Cymru have developed Rights and Responsibilities training for families and professionals and programmes for young people related to rights, respect

and diversity. They have engaged with young people using a participation and empowerment model which develops ability in planning and decision making affecting themselves and others.

Citizens Advice Cymru is delivering Money Advice face to face services in Wales funded by the Money Advice Service. The service offers clients one to one guidance and support in sessions lasting approximately 45 minutes. This advice is aimed at empowering people, enabling them to take control of their finances and make the financial decisions that are right for them, including about budgeting, mortgages, savings options, planning for retirement, understanding credit and insurance. The Money Advice Service generic face to face appointments are particularly suitable for people who have had a change in circumstances.

Almost all of the preventative work apart from the Money Advice Service work is funded on a short-term basis through a variety of funders. It would be appropriate to ask the Financial Capability Forums to undertake a survey to fully establish the current position.

## **Technology**

This section explores how technology will influence and, some might argue, underpin advice delivery over the medium term. This needs to be explored within a paradigm of influence upon the advice process in terms of the advisor, and advisor's organisations, and, also and perhaps more importantly, in terms of the person and / or community getting advice. Technology can be utilised to both provide advice and also to support advice providers. It can also help with practical activities such as making appointments and follow up.

## **Public advice websites**

Public websites must be accurate, quality assured and constantly updated and available bilingually. There is debate within IAPF about whether one advice portal is appropriate for use within Wales. Adviceguide is the bilingual public website of Citizens Advice and is constantly updated for new guidance and legislation and correct for both UK and Wales information. Shelter Cymru has Advice Online, detailed information on a range of housing problems available through its website. The costs of maintaining and updating a website and translation costs also need to be factored in.

## **Advice provider technology**

The IAPF believe there is significant scope here to use ICT in areas such as case management, local information resources (a local version of Advisernet/Shelter legal for example) and networking. However, the key here is understanding current demand for services, and what matters to clients, before developing ICT solutions and using technology to solve the wrong problem.

Advisernet is the only generic universal advice tool, however there are specialist websites for professionals for specific issues such as Shelter legal website or by specific client group such as McMillan online . These specialist advice sites will complement the more generic advice available on Advisernet.

In terms of the sheer mechanics of advice it could be envisaged that electronic files and appointment booking will become more freely available. These will need to be costed as they develop and on the basis of the advice provision though there are already a range of products and they need to be costed as part of the agreed commissioning processes for service delivery.

Broadly speaking the more complex the case is or the more vulnerable the person is the more the service will be face to face. As organisations move away from fixed offices, the needs for mobile provision will increase which will mean that data security will need to take account of a range of data protection issues and agencies will need to adhere to ISO 27001.

### **E-mail advice**

E-mail advice is a relatively recent phenomena provided by some CABx, Shelter England and Gingerbread. It is therefore a small-scale service but if advisors are well trained it is an efficient service to be properly accessible needs considerable design thought and investment. It has huge potential in terms of advice provided within specific languages.

This has some clear advantages

- For making initial contact
- For resolving minor issues
- For obtaining clarification or progress chasing

Whilst e-mail may not be suitable for some older people, for people with poor broadband or do not have computers. for some, including younger people it may be their preferred model of engagement. Developments in electronic advice provision are at an early stage and will need to be costed in future. Where they have been trialled, email advice has been roughly equivalent to the provision of in depth telephone advice but needs to be centrally administered to cope with the expectations of clients using this medium especially in terms of speed of response. The disadvantage of e mail systems is that users often expect immediate responses which is costly to resource and often impractical for advice agencies .

### **Smart App**

There are very few examples of how Apps are used within the non for profit advice sector. However this is not a priority for the IAPF because of digital exclusion and lack of reliable broadband in parts of Wales . One Example taken from the Cabinet Office Review of Advice services in England notes. 'In Manchester the 'one stop shop' project has launched a SmartApp. This provides the growing number of Smartphone users with access to advice

information, a nearest provider search, e-mail an advisor function and telephone advice [www.onestopadvice.org.uk](http://www.onestopadvice.org.uk).

In Wales SNAP Cymru also have a SmartApp? However additional investment is needed to extend the role out throughout Wales in terms of extending the advice platform through the App.

### **Telephone advice**

Many advice providers within Wales have increased their engagement with telephone and online advice systems, investing in free to use and low cost services. Telephone advice has huge potential but, apart from Adviceline Cymru, is relatively rare in Wales and does not have sufficient resources to answer all calls.

Adviceline Cymru is currently funded via local authority core funding to CABx, the infrastructure is funded through UK Government funding and Welsh Government funding, funds the Welsh language provision, and quality control which is due to end in 2014 . Dependent on the organisation and funding base, some call back services are available following an initial diagnostic. However as with initial telephone advice this has developed in an organic way and we need an all Wales solution to move this forward.

Call back specialist advice services (range of subject specialisms) – have been successfully undertaken as an alternative to face to face for those clients who prefer this, and, as an alternative good service for remote clients and rural areas. It is not currently undertaken to any extent and needs funding.

Many AdviceUK members will also provide advice via telephone, and some provide advice via e-mail and online. However, we would note that it is important to understand not just individual transactions using a particular advice channel, but the value of those transactions in terms of what is achieved for the client overall. Having low unit costs for phone calls. This needs to be balanced against what those phone calls achieve in terms of initial advice or signposting . Telephone advice is welcomed for a number of reasons especially by people who find it difficult to leave the house on account of mobility issues or illness. Face to face advisors obviously also use it for follow up advice from face to face sessions. Citizens Advice have undertaken an in depth evaluation and costing of developing phone advice services which can be shared separately.

### **New Technology**

Developing new technology-based services can be expensive and agencies need to ensure that the commissioning skill is available to organisations if this is pursued. This will need further discussion within the network so that cost-effective, and realistic solutions, are explored for delivery in the short, medium and long term. Whilst a common platform is an aspiration to develop thinking around what would take scoping within the network .

## 7 Understanding Demand

### The Advice Service Review found:

- demand for advice will continue to increase as there is less supply
- more work needs to be undertaken on understanding the advice seeker's journey
- more work needs to be undertaken on what advice users want from advice services
- how services can be developed to ensure better outcome for the individual
- how the need for advice can be prevented in the first place
- Welsh Government should support the development of a robust evidence-base to support funders, commissioners and advice providers
- Welsh Government and advice providers should undertake research to better understand the impact of advice and which delivery channels are cost effective for which advice users.

### Response by the IAPF

#### Demand

Demand can increase for predictable reasons such as changes in benefit systems, and unpredictable reasons, like the Farepak experience. Ensuring a good fit between supply and demand is a key challenge for the advice sector. The Advice Service Review explores the percentage increase in demand.

How the sector engages with the DWP local support funding may/may not help us deal with some of this demand. There is limited information about these proposals. However a review by the Cabinet Office of Advice Services wrote that;

*'DWP recognises that the welfare reform programme may place additional challenges on the sector during the transitional period, as the changes bed. DWP will work with the sector representative bodies to identify opportunities to reduce demands placed on the advice sector and to examine the options for meeting that demand using a mixture of nationality and locally available resources, alongside the advice sectors own work to improve efficiency and collaborative working'.*

A recent report by Citizens Advice for example found that 78% of people needed help in filling in the online form for Universal Credit. Although this was in a pilot area, it does show the potential increase in demand for advice services<sup>4</sup>. Whilst the aspiration of the Advice Service Review is to reduce face-to-face demand, this may be challenging in the short term because of welfare reform or in the longer term because of client choice.

---

<sup>4</sup> [http://www.citizensadvice.org.uk/index/pressoffice/press\\_index/press\\_office-20131010.htm](http://www.citizensadvice.org.uk/index/pressoffice/press_index/press_office-20131010.htm)

It may be that as the sector develops it can work as already argued to attract new funding to Wales especially around legal advice. However, the more effort advice providers put into attracting funding, the less they have to focus on service development and improvement.

We would argue strongly that a major part of the value of social welfare advice services is the role they can play in identifying systemic, preventable demand. Often this is caused by the failure of public services (such as poor decision making by the DWP); sometimes the causes are much more deeply rooted in the deprivation experienced by local communities. Another key part of their value is their independence and ability to challenge others on behalf of clients. Changing the way public services work should be a key priority for advice services (see Chapter 8)

To have lasting impact (i.e. if it is to be more than a sticking plaster that we keep applying to the same old problems), advice needs to be part of a wider, and longer-term response to the needs of individuals and communities. It needs to be coordinated with action to address the root causes of the problems people face.

The IAPF welcomes the direction of travel in Wales by Welsh Government in terms of its focus on citizens and the protection of their rights. However, the proposals shown below may increase demand for advice services. Many of the proposals will impact upon the sort of advice that is required and how advice provision in Wales is delivered. These changes at time of writing will include:

- Framework for Action on Independent living
- Strategic Equality Plan
- Social Services Bill<sup>5</sup>
- Tackling Poverty Action Plan
- Housing Bill
- 111 Service

Advice providers also provide input into a range of policy frameworks, which have been implemented such as the Welsh Government Fuel Strategy or the Child and Families Measure 2010.

### **Why people do not use advice services**

People will not use advice services for many reasons. These can include:

- they are not aware of their existence
- people assume that services are not free
- they assume customer experience will be poor
- that advice would not help with their issue
- the advice channel offered does not meet their needs
- some service users will question the quality of advice services per se

---

<sup>5</sup> What are statutory advice duties in English social care bill

If people use a service they can of course 'drop out ' for a number of reasons. Some people are more likely than others to drop out including those with a 'chaotic lifestyle ' or with mental health issues which result in disengagement. All providers are agreed that more can be done about this issue especially around monitoring and follow-up. Whilst some agencies do offer a formal follow up a few months after the last contact, this will often be when agencies assume problems have been resolved. As part of developing standards in Wales, it may be that a unified process needs to be developed for follow up/review, but also for monitoring and evaluation.

## 8 Welfare Reform

### The Advice Service Review found:

- how the DWP's digital by default agenda will impact upon people who use advice services
- how the advice sector responds to making people aware of the impact upon welfare reform
- how Welsh Government develops its strategic response to welfare reform
- how specialist welfare benefit services mitigates against welfare reform
- how advice providers work with DWP to identify pathways for individual case resolution
- the need to develop consistent messages for the public and frontline staff
- Welsh Government should prioritise supporting the Non For Profit sector in its efforts to mitigate the impact of welfare reform

### Response by the IAPF

The welfare benefit system is undergoing the most fundamental changes in its history - up to March 2016. It is a complex subject with many interactions with other advice topics. The Government's welfare reform agenda aims to simplify the benefits system, save money (£18 billion by 2014), lessen welfare dependency and make work pay. Every area of the benefit system is set to change and will affect different groups of people in various ways.

For existing claimants, some of these changes may mean they will no longer meet the more restricted eligibility criteria, so they will have to adjust to a change in income or monthly benefit payments.

The implementation of welfare reform will bring challenges for the advice sector, Welsh Government and local authorities in how we work together to support clients and residents. Welsh Government have published a series of research documents into the impact of welfare reform in Wales

<http://wales.gov.uk/topics/socialjustice/publications/analysingreforms/?lang=en> .

Citizens Advice have done some basic demand modelling as part of it's Welfare Reform Programme on Universal Credit. We expect demand to rise significantly in short to medium term and flatten out at the new level as new legislation beds in (around 2015/16). Statistics for 2012/13 compared to 2010/11 have increased by 14% on Adviceguide and face to face enquiries in Wales have increased by 30%. We predict further and higher face to face demand due to complexity of topic and vulnerability of clients.

In conjunction with this trend debt and money advice is the other side of the benefit "coin" and any rise in demand in welfare benefits generates a similar rise in demand for money advice. This is at a time when the impact of the

economic downturn is still being felt by many families due to loss of work, increasing fuel costs etc. The availability of poorly controlled lending in the form of pay day loans and loan sharking supports the assumption that demand in this topic area will rise. The statistics for 2012/13 compared to 2010/11 show a 78% increase on Adviceguide while the current face to face has remained relatively stable. We predict that demand will rise significantly in short to medium term running a few months behind the welfare benefits curve in terms of numbers.

Age Cymru have undertaken work on awareness in relation to welfare reform . It has seen a significant increase in workload for those between 50 and state retirement age . Feedback from the Age Cymru Partnership is that amongst a variety of concerns older people are expressing fears about not being able to remain in their rented home .

The impact of welfare reform changes will also have an impact on homelessness and housing advice as people struggle with housing costs and feel the impact of under occupancy rules, the benefit cap and other changes. The statistics for 2012/13 compared to 2010/11 show a 36% increase on Adviceguide and face to face enquiries in Wales have increased by 10%. We expect demand to rise significantly in short to medium term alongside welfare curve.

In line with the recommendations of this review the sector will need to respond to welfare reform by:

- securing funding developing the capacity to meet the additional demand
- influencing policy to achieve the best results for the public
- updating information sources and provide additional tools to support the advice process
- producing training to meet the needs of providers
- developing partnerships to reduce duplication and costs

The 'asks' by IAPF members are for Welsh Government to continue its direction of travel and continue to adequately support advice services within Wales as this will ensure that as many people as possible get accurate and effective information about their welfare rights . Many IAPF members are involved in preventative projects and we would see this work increasing over the next few years .

## 9 Policy, campaigns and prevention

### The Advice Service Review found:

- The evidence gathered as part of informing and advising is used to feed back to policy makers locally and nationally
- The evidence gathered is used to seek to prevent problems and reduce demand for public services

### Response by the IAPF

Our goal is to ensure that our policy work is client-focussed, backed up by effective research and campaigning and responds to local, regional and national needs within Wales. Ideally it would be helpful to have a policy post in every Local Government area to support local developments and support demand reduction. This could support a feedback loop between local, regional and the national network. The customer experience group has recommended the use of peer led research to move some of its conclusions forward.

Much of the work of advice providers is responding to failures in other systems either in terms of delay for citizens or in terms of poor processes. Network members have a long history of using policy, campaigning and advocacy to identify potential issues prior to policies being implemented or after implementation which agencies have a strong role in monitoring impact etc. As an example there has been co-ordinated effort on the changes in ESA and the disability assessment taking part as a result of these changes. As badly thought through changes (from the perspective of the IAPF) have been implemented, the challenge for the advice sector is to support appeals processes for vulnerable people when they have lost their funding to do so.

A number of members of the IAPF engage in significant policy activity and a number of examples are shown below

**Shelter Cymru** have a dedicated policy team who work with local housing providers and Welsh Government to assist in the development of good practice and new law. Recent work has included:

- consultation responses to the Housing Bill and Renting Homes White Paper
- membership of a range of Welsh Government strategy development groups
- research into unreasonable letting agency fees
- research into the impact of the bedroom tax in Wales.

**Care and Repair Cymru** have engaged in recent policy work on

- tackling poverty
- fuel poverty
- digital inclusion
- housing bill
- social services bill

- strategy for older people ( Phase 3 )

**Age UK** have undertaken a range of policy work in Wales over the last few years including

- scams awareness
- transport
- public toilet closures
- welfare reform consequences
- equality and human rights
- change to council tax support
- social services and well being bill

**Community Housing Cymru** have set up ‘ your benefits are changing ’ campaign designed to raise awareness of upcoming benefit changes with a particular focus on awareness of upcoming benefit changes Costings .

**Advice UK** systems thinking work in Cardiff has generated a number of policy outcomes at a local level. Analysis of current advice services has identified a set of predictable drivers of demand . This in turn has opened up opportunities to talk to organisations that can ‘turn off’ this demand at source by improving the way in which they collect debts or signpost clients .

**Citizens Advice Cymru** have undertaken recent policy work in Wales ranging from public awareness campaigns, through responses to Welsh Government and National Assembly consultations, to active engagement in working groups assisting the government, and local government, to make changes to their implementation plans for new ‘benefits’. In addition to contributing to UK focussed work, and joint work with Shelter Cymru on retaliatory evictions and paying for rent and mortgages, the work related to a series of issues including:

- scams awareness
- transport Poverty
- welfare reform campaign focussing on changes to housing benefit and impact of welfare reform including evidence to the Welsh Affairs Select Committee
- improving letting agents practice
- equality and Human Rights
- development of the Discretionary Assistance Fund
- changes to Council Tax Support
- impact of the assessment practices for Employment Support Allowance
- effectiveness of Work Programme and the practices relating to the sanctions regime.

Local CABx also engage in local policy campaigns, examples include:

- Work on local readiness for the DWP's 'digital by default' plans
- Establishing ‘Fair Debt’ policies and practices by the local authority and the bailiffs they use
- Work on the establishment of local Food Banks

The network is aware that it has huge amounts of data, which is often unused in terms of campaigning simply because of capacity. CAB is funded by UK government to undertake policy work on behalf of citizens and clients in Wales. Partnership working by CAB and Shelter Cymru<sup>6</sup> shows what can be achieved through joint policy work and the drawing together of data is extremely helpful. The analysis of data needs to be fully costed especially when it is across agencies.

Research needs to clearly set out how advice contributes to wider efforts to combat poverty and disadvantage. To do this, we need a better understanding of the long-term impact of advice and how it fits into a long-term prevention / reduce failure agenda. The IAPF think this would best be achieved by genuine partnerships between policy makers, commissioners/funders and service providers. Given the likely limited capacity of agencies on the ground, and similar pressures on funders/commissioners, we think that policy work can best be prioritised with reference to current demand.

Different IAPF members are at different stages in terms of contributing to professional training in Wales to reduce the demands on advice services for generalist advice.

Policy and campaigns can focus on a number of approaches including:

- Statistical analysis
- Capturing the client voice
- Preventing problems and demand reduction
- Policy expertise and feedback
- Developing approaches such as AdviceUK work on systems thinking<sup>7</sup>

Whilst estimating the costing of policy and research activity its impact is significant. There are many variables to consider in costing policy work but a main grade policy posts costs about £50,000. Producing a research report can vary significantly dependent on for example how much new resource is required but an average of £10,000 per output should not be thought of as extravagant.

Policy analysis and campaigning needs to be undertaken on a local, regional and national level. Whilst Citizens Advice receives some funding from BIS, a range of other members of the IAPF receive grants from a wide range of funders. It could be argued that the direction of travel should be to develop systems which allow comparable data to be collected across Wales and analysed collectively. This of course would need adequate resourcing. This is currently unfunded except in very occasional examples where either one-off funding, or a small amount of local authority resource is used.

---

<sup>6</sup> Wales on a financial knife edge, (2013), Citizens Advice Cymru and Shelter Cymru

<sup>7</sup> <http://www.adviceuk.org.uk/systems-thinking/>

## Appendix A

### Members of the IAPF

- Advice Services Alliance – [www.asauk.org.uk](http://www.asauk.org.uk)
- AdviceUK - [www.adviceuk.org.uk](http://www.adviceuk.org.uk)
- Age Connects Wales - <http://www.ageconnectswales.org.uk>
- Age Cymru - [www.ageuk.org.uk/cymru](http://www.ageuk.org.uk/cymru)
- Care and Repair - [www.careandrepair.org.uk](http://www.careandrepair.org.uk)
- Citizens Advice Cymru – [www.adviceguide.org.uk/wales](http://www.adviceguide.org.uk/wales)
- Community Housing Cymru - [www.chcymru.org.uk](http://www.chcymru.org.uk)
- Law Centres Federation - [www.lawcentres.org.uk](http://www.lawcentres.org.uk)
- Law Society in Wales - [www.lawsociety.org.uk](http://www.lawsociety.org.uk)
- Macmillan - [www.macmillan.org.uk](http://www.macmillan.org.uk)
- Legal Aid Practitioners Group - [www.lapg.co.uk](http://www.lapg.co.uk)
- RNIB - [www.rnib.org.uk](http://www.rnib.org.uk)
- Shelter Cymru - [www.sheltercymru.org.uk](http://www.sheltercymru.org.uk)
- SNAP Cymru - [www.snapcymru.org](http://www.snapcymru.org)
- Ty Arian – [www.tyarian.co.uk](http://www.tyarian.co.uk)
- Welfare Rights Advisers Cymru - [www.nawra.org.uk](http://www.nawra.org.uk)
- Welsh Refugee Council - [www.welshrefugeecouncil.org](http://www.welshrefugeecouncil.org)

### Observers

- Disability Wales - [www.disabilitywales.org](http://www.disabilitywales.org)
- Money Advice Service - [www.moneyadviceservice.org.uk](http://www.moneyadviceservice.org.uk)
- Older People's Commissioner - [www.olderpeoplewales.com](http://www.olderpeoplewales.com)
- The Big Lottery Fund - [www.biglotteryfund.org.uk](http://www.biglotteryfund.org.uk)
- The Equality and Human Rights Commission - [www.equalityhumanrights.com](http://www.equalityhumanrights.com)
- WLGA - [www.wlga.gov.uk](http://www.wlga.gov.uk)

### Descriptions of Members Representing Networks

#### Advice Services Alliance

The Advice Services Alliance is the umbrella body for independent advice services in the UK. Our national networks of not-for-profit organizations providing advice and help on the law, access to services and related issues.

ASA promotes the development of high quality advice services and co-operation between advice organizations. We provide a forum for members and undertake policy work on their behalf, including responding to government initiatives relating to advice. ASA is committed to maintaining and developing the **Advice Quality Standard** .

#### Citizens Advice (Citizens Advice Cymru)

The Citizens Advice service helps people to resolve their problems. As the UK's largest advice provider we are equipped to deal with any issue, from

anyone, spanning debt and employment to consumer and housing plus everything in between.

Citizens Advice Bureaux deliver advice services from over 3,300 community locations in England and Wales, run by 338 individual charities. Citizens Advice is the national body for bureaux and is a registered charity in its own right. Together we make up the Citizens Advice service. Of the 28,500 people who work for the service, over 22,000 of them are volunteers and nearly 6,500 are paid staff.

Through the training, information systems and operational support it provides, Citizens Advice equips bureaux to deliver the highest quality advice to their local residents. In turn, client evidence submitted by bureaux alerts Citizens Advice to widespread problems that require action at a national level.

The Citizens Advice service offers information and advice through face-to-face, phone and email services, and online via [Adviceguide.org.uk](http://Adviceguide.org.uk). As well as from their high street premises, Citizens Advice Bureaux make face-to-face advice available from other locations including community centres, doctors' surgeries, courts and prisons to make sure that people can access advice where they need it most.

We aim to provide the advice people need for the problems they face and improve the policies and practices that affect people's lives.

We provide free, independent, confidential and impartial advice to everyone on their rights and responsibilities. We value diversity, promote equality and challenge discrimination.

### **AdviceUK**

AdviceUK is the UK's largest support network for free and independent advice centres. AdviceUK was formed in 1979 as the Federation of Independent Advice Centres (FIAC). We currently have 24 member organisations in Wales, ranging from organisations that solely provide social welfare advice services, through to organisations that provide advice services alongside other support to particular communities and client groups. All our members share a common commitment to free and independent advice, and the value of that advice in creating a strong and vibrant civil society, where rights are respected and people can realise their full potential.

### **Age Cymru**

Age Cymru is the national charity for older people in Wales, and our vision is for a world in which older people flourish. This work involves championing older peoples rights and needs, and in partnership with Age UK ,providing Age UK Advice. Age UK Advice is a free, confidential, national phone service for older people, their family, friends, carers and professionals. The service offers a comprehensive range of free information guides and factsheets that are available by order or via the internet, which provide answers to many questions on issues affecting the over 50's.

We support and assist a network of local Age Cymru partners that provide valued, local services throughout Wales, including the provision of face to face information and advice delivered in local offices or during home visits.

Age Cymru is part of the Age UK Network, which includes Age NI and Age Scotland. Together, the network and Age UK Advice is the UK's largest provider of information designed specifically to meet the needs of older people and in 2012 reached over five million people.

### **Age Connects Wales**

Age Connects Wales is made up of 5 independently constituted organisations whose areas of benefit are:

- Age Connects Cardiff and the Vale of Glamorgan
- Age Concern Connects Morgannwg (Rhondda Cynon Taff, Bridgend and Merthyr Tydfil)
- Age Connects Torfaen
- Age Connects North Wales Central (Conwy and Denbighshire)
- Age Connects North East Wales (Wrexham and Flintshire)

Age Connects Wales exists to change attitudes to ageing and thereby improve people's lives. This will be achieved by listening to the views of older people and using these to help shift society's view of age, where older old is regarded as a stage in the life course as valuable as any other.

### **Law Centres Network**

The Law Centres Network (LCN) is the membership body, established in 1978, to support, develop and represent the network of over 50 Law Centres in England, Wales and Northern Ireland. Law Centres are not-for-profit legal practices, embedded in their communities, which provide independent, expert legal advice and representation in areas of social welfare law including housing, employment, community care, debt, welfare rights, discrimination, education, immigration and asylum law. Staffed by experienced lawyers and caseworkers, Law Centres are committed to combating deprivation and discrimination. They target their services to the most vulnerable and disadvantaged and last year assisted more than 120,000 people. The Law Centres Network, through the work of its member Law Centres, strives for a just and equal society where everyone's rights are valued, defended and protected.

### **WRAC**

Welfare Rights Advisers Cymru is the body representing those in Wales who are working within the welfare rights and benefits advice sector. The aims of WRAC are to:

- challenge, influence and improve welfare rights policy and legislation;
- ensure awareness of WRAC as the national Wales-wide voice of those working within the welfare rights and benefits advice sector.

To this end WRAC's objectives are to:

- build a strong national Wales-wide network of welfare rights advisers from all sectors

- seek to influence government proposals and existing legislation by utilizing the expertise of our members;
- identify and share good practice and to promote anti-discriminatory practice;
- offer mutual support and provide a forum for discussion;
- facilitate learning workshops and distribute information;
- recognize and challenge discriminatory legislation
- promote welfare rights issues and encourage effective partnership working.
- establish links with the Welsh Assembly Government and other bodies to promote awareness of advice sector issues and influence social policy development

WRAC holds quarterly all-Wales meetings with speakers, workshops and information exchange sessions and now records and awards CPD for attendees. It responds to consultations in Wales and in the UK and raises points of concern with appropriate bodies. WRAC is represented on a number of local and national bodies in Wales. It has an electronic forum for members, which acts as a discussion center and as a repository of material.

## **Appendix B**

### **Welsh Government funding**

The £1.8 million of extra funding is from different funding streams of:

- £800,000 from Communities First and Financial Inclusion programme funding for the development of resilient communities through the provision of generic and specialist advice meeting locally identified advice needs
- £105,000 from Equalities, Diversity and Inclusion Department (EDID) to support specialist discrimination advice in Wales
- £967,000 from the Communities and Tackling Poverty over-arching budget to be made available to a mixture of frontline services, and the development of the longer term response to the review.

## Appendix C

### Definitions of advice<sup>8</sup>

This review<sup>9</sup> uses agreed terminology for the advice sector as outlined within the 'Definitions to help you understand the advice sector' produced as part of the Advice Services Alliance's Working Together for Advice Big Lottery funded project. The agreed definitions relevant to the review are below.

#### **Social Welfare Law**

Social Welfare Law refers to those categories of law which govern entitlement to state benefits and housing; the management of personal and business debt; an employee's rights at work and access to redress for unfair treatment; and access to appropriate care and support for people with particular health problems. Within the not-for-profit advice sector, advice is often given to members of the public on the following types or 'categories' of social welfare law:

- Welfare benefit
- Debt
- Housing
- Employment
- Community care

Some advice services also give advice on issues such as education, family and consumer. Immigration and asylum law may also be considered as social welfare law.

#### **Independent advice**

An advice provider delivers independent advice where it is able to act fully independently in the client's sole interest.

#### **Legal advice**

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.

#### **Information Services**

Describes services that give clients the information they need, for them to know more 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.

---

<sup>8</sup> Advice Services Alliance, Definitions to help you understand the advice sector, March 2011, available to  
Download from  
[http://www.asauk.org.uk/fileLibrary/pdf/Common\\_Definitions\\_Guidance\\_Mar2011.pdf](http://www.asauk.org.uk/fileLibrary/pdf/Common_Definitions_Guidance_Mar2011.pdf).

<sup>9</sup> P5 , Advice Review May 2013

**Advice Services (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 steps; and identify dates by which action must be taken in order to secure a client's rights.

**Advice with Casework**

Describes services that include all the elements of an advice service previously listed, 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.

**Specialist Advice**

It describes services where the adviser or service 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.

It may include:

- representation and litigation: acting for and representing a client at court and tribunal hearings: e.g. preparing and presenting written and oral submissions at hearings at Employment Tribunals, Social Security Appeal Tribunals, County Court, High Court
- application to a higher court or tribunal (for example, for Judicial Review), and instructing experts – such as barristers – for representation at hearings at the High Court, Court of Appeal, Employment Appeal Tribunal
- Negotiation with the other side to a dispute or with relevant third parties: e.g. negotiation with the employer and ACAS in an employment matter; with a creditor in a complex debt matter.

**Advocacy**

This is 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. It has also started to be used by UK funders to describe social policy work. Agencies providing advice 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. It should be noted that we are using a different definition of advocacy to that used within mental health, learning disability and children's services.

Advocacy is taking action to help people say what they want, secure their rights, represent their interests and obtain services they need. Advocates and advocacy schemes work in partnership with the people they support and take their side. Advocacy promotes social inclusion, equality and social justice<sup>10</sup>.

---

<sup>10</sup> This has been taken from the Advocacy Charter adopted by most advocacy agencies.

## Appendix D

### Recommendations, Costings and timelines

#### Advice delivery

The following costings are based on an assumption that current funding streams will remain at least static into 2014/15, clearly if this is not the case then these proposals will need to be revisited. These are therefore based on the expectation that currently agreed awards from Welsh Government, local government and other funders will be carried forward into 2014/15. There will be a need to monitor this and we propose that the new national network takes responsibility for drawing this information together.

While it has not been possible to undertake, in the timescale a complete analysis of the current funding received by all agencies, an analysis of the known funding losses between 2012/13 and 2013/14 of £4.2m have been used to inform the proposals.

#### Publicly accessible information and advice

##### Web Information

Those producing current websites are expected to have continued base funding for these to continue. The pace of change of Wales specific legislation and regulation, alongside the need for increased volume of translation into Welsh means that there is an estimated additional cost made up of contribution to ongoing translation and additional cost of 0.5 Information Officer time to ensure Wales specific information remains accurate and up-to date.

Immediate Up to £100,000 p.a.

Future aspirations to ensure a common web-portal will need to be further considered in future.

During 2014/15 Unknown

##### Email advice/apps

We propose that the work that Citizens Advice is about to undertake to investigate the means of delivery and the costs of effective and universal email access is awaited before taking further action on this.

During 2015/16 Unknown

##### Telephone

###### • Access and initial information

Much of the delivery is already funded under current agreements but the volume does not meet the demand. Adviceline Cymru requires additional funding to put in place the equivalent of 5 paid assessors to meet the current demand and replace the funding for the small physical call centre where the funding from the private sector ends in March 2014.

Immediate Up to £200,000 p.a.

Further work needs to be undertaken to investigate whether there should be a single telephone portal for the wider advice sector for the future.

During 2015/16      Unknown

- **Casework and specialist advice**

Delivery is at present small-scale and patchy, some organisations are able to respond to this more than others. The research undertaken by Citizens Advice indicates that approximately 30% of work initiated by telephone could be dealt with by advice with casework call-back. The volume of this work across Wales could amount to approximately 36,000 cases and is needed to relieve the burgeoning face to face demand.

During 2014/15      Up to £500,000 p.a.

### **Face to face**

- **Access and initial information**

This provision is currently funded under the core grants to the sector and although we are aware of unmet need we are not costing this separately to the generalist advice services.

- **Generalist advice**

This provision is currently funded under the core grants to the sector. On the assumption that these remain in place the loss of funding from external funders for generalist advice identified this year was a total of £140,000.

To retain the current volume of supply - £140,000 p.a.

- **Advice with casework**

This provision is currently mainly funded under core and other grants to the sector. On the assumption that these remain in place the loss of funding from external funders for advice with casework identified this year was a total of £417,000.

To retain the current volume of supply - £417,000 p.a.

- **Specialist advice**

This provision has been funded in the past by Welsh Government, local government and to a great extent through the Legal Services Commission. On the assumption that, apart from the LSC whose contribution into the future is substantially reduced, these remain in place the loss of funding from external funders for specialist advice identified this year was a total of £2,800,000, of which the following is the breakdown by subject: £213,000 discrimination; £312,000 housing, £358,000 education, immigration and asylum £168,000 and £1,749,000 debt and welfare benefit.

To retain the current volume of supply (excluding discrimination) - £2,587,000 p.a.

Access to discrimination advice is identified as a particular and essential service which has no core or casework funding identified into the next year. It is proposed that additional investment is required to meet increased need and to develop a regionally based and nationally co-ordinated delivery in line with the current subject expertise in North and South Wales.

Immediate      £400,000 p.a.

- **Home visiting**

This provision is currently funded under the current grants to the sector but is almost certainly not specifically identified within these grants. A sum of £82,000 was identified as lost for home visiting services by the RNIB and this has been subject to bid for 3 year funding, the outcome of which is as yet unknown.

**N.B.** A number of organisations identified funding losses where the provision ranged across all levels of advice delivery and this amounted to losses of funding to the sector of approximately £718,000

To retain the current volume of supply - £718,000 p.a.

**Policy campaigns**

Policy analysis on a local level is currently mainly unfunded except by use of core resources. To bring comparable data together and allow for effective local influence it is estimated that additional local resource need is identified by the local networks.

During 2014/15      Unknown

**Preventative work**

The financial capability work is currently funded by a range of short-term, often private sector or trust funders. It is proposed that the Financial Capability Forum be engaged to undertake a survey of the current and future situation.

During 2014/15      Unknown

**Support to advisers**

**Web access to accurate updated information**

Organisations currently are funded through their core funding to deliver this. The pace of change of Wales specific legislation and regulation means that there is an estimated additional cost made up of contribution to ongoing translation and additional cost of 0.5 Information Officer time to ensure Wales specific information remains accurate and up-to date.

Immediate      £44,000 p.a.

**Specialist support**

To enable volunteers and generalist and casework level advice workers to provide accurate and effective support to clients a service of specialist support and training is required. Although there may be other gaps in supply the immediate gap is for a service of specialist housing support to advisers.

Immediate      £130,000 p.a

## Other Recommendations

### Customer experience

The research into the customer experience identified that further research is required using a user-led Peer Researcher method to explore the feasibility of these Calls for Action.

During 2014/15      Unknown

### Support and promotion of advice networks

To ensure that networks are effective the Welsh Government should promote and support them through formal recognition and public sector engagement.

Immediate      None

To enable local and national networks to take forward joint priority work and support engagement locally a development pool of funding is established.

Immediate      Up to £250,000 p.a.

That local government provides facilitation for the local networks and Welsh Government provides or funds facilitation the national network.

Immediate      Unknown

### Quality assurance

Mapping the training approaches and provision across the sector to share best practice.

During 2014/15      £10,000

Mapping and cross referencing the current quality assurance methods and investigating the impact and benefit of a whole system approach.

During 2014/15      £20,000