

**Advice NI response to DSD consultation document**  
**‘A Strategy for Supporting Delivery of Voluntary Advice Services to the**  
**Community’**

**Introduction**

1. Advice NI is a membership organisation that exists to provide leadership, representation and support for independent advice organisations to facilitate the delivery of high quality, sustainable advice services. Advice NI exists to provide its members with the capacity and tools to ensure effective advice services delivery. This includes: advice and information management systems, funding and planning, quality assurance support, NVQs in advice and guidance, social policy co-ordination and ICT development.

2. Membership of Advice NI is normally for organisations that provide significant advice and information services to the public. Advice NI has over 70 member organisations operating throughout Northern Ireland and providing information and advocacy services to over 100,000 people each year handling over 225, 000 enquiries on an extensive range of matters including: social security, housing, debt, consumer and employment issues. For further information, please visit [www.adviceni.net](http://www.adviceni.net).

**General**

3. Advice NI welcomes the opportunity to respond to the Department for Social Development’s (DSD) consultation document: ‘A Strategy for Supporting Delivery of Voluntary Advice Services to the Community’. We acknowledge the lead taken by DSD and agree that there is a need for a strategic approach to the development and delivery of voluntary information, advice and representation services in Northern Ireland.

4. Advice NI has conducted comprehensive consultation exercises with our membership in relation to the Strategy document (see Appendix 1) and this response strives to reflect the views and opinions of members as expressed during these exercises

5. Before getting into the substantive content of this response addressing the points under consultation, we would like to make some preliminary remarks as regards how ‘fit for purpose’ the strategy is in terms of taking forward the advice sector in Northern Ireland. We are disappointed that an opportunity has been missed in terms of developing a strategy which could have the buy-in of all voluntary advice providers in Northern Ireland. Whilst the strategy in its current draft form seeks to put in place “an integrated strategy” to deliver advice services it is:

- based on incomplete information in that the research conducted was far from being complete and all-inclusive;
- disjointed in that whilst it attempts to profile current advice services it does not map these services into the proposed infra-structure; it does not map current workload into the proposed infra-structure and it does not map services to need;

6. Also there is such a lack of detail that it is difficult for advice providers to ‘buy in’ to, or even visualise where the strategy may lead the sector.

7. Current independent information, advice and representation service provision has developed over time to meet identified need – whether that need be in respect of local geographical areas; or in respect of particular disadvantaged social groups. Advice NI would have concerns that the radical shift in delivery mechanisms as could be envisaged under the draft strategy would (i) damage current voluntary information, advice and representation provision and (ii) prevent organic entry into the sector of provision both at local and specialist level to meet unmet need – with such a situation being to the ultimate detriment of service users.

8. Advice NI believes that the language of hubs and satellites is unfortunate, implies a 2 tier advice service and does nothing to foster a vision of improved partnership working.

9. It is also our clear view that the timetable outlined in Annex 1 needs to be revisited not only in respect of the number of pilots (discussed below) but perhaps more fundamentally because this strategy is explicitly predicated upon Review of Public Administration developments. As such any timetable in respect of implementation of this strategy must be (1) consistent with and aligned with RPA in terms of timing and geographical coverage & (2) inclusive as regards the involvement of advice providers within the proposed geographical area.

**QUESTION 1:- The development of an area hubs model is at the centre of this proposed strategy. Do you consider this is the best model for the future delivery of advice and information services? If not, what alternative model would you suggest?**

10. Advice NI believes that the thinking behind the idea of Area Hubs is sound but the model proposed is flawed. There is merit in defining who is doing what, where and why in the voluntary advice sector in Northern Ireland. Only by having this clear picture of what current provision exists (and very importantly why it exists) can decisions be taken as to the future delivery of services.

11. There is merit in acknowledging and valuing the role of voluntary information, advice and representation providers in targeting need, in building on proven track records, expertise, skills and local / specialist knowledge. In our view it would be fool-hardy and ultimately to the direct detriment of service users to take an approach which is not grounded in developing what currently exists.

12. There is merit in promoting joined up working between advice providers in order to maximise the effectiveness of advice provision and use resources efficiently. Real partnership and joined up working would help to bring about a situation where service provision is tailored more closely to client need – for example staggered opening hours,

referral mechanisms in place to balance workloads, sharing resources for example money advice specialisms. Partnership on this kind of agreed basis can have the buy-in of all involved, takes an inclusive approach and ultimately places service users at the centre of developments.

13. It is the view of Advice NI that the proposed Area Hub model as presented in the draft strategy document may well not be fit for purpose and more detailed thought needs to be given to ensuring that a future advice infra-structure is one which builds on current strengths and effectively meets the needs of service users. Despite the lack of detail contained in the document about the Area Hub model, it is apparent that the strategy presents an infra-structure premised on Review of Public Administration arrangements with one (maybe more, maybe not) lead advice agency per 'super-council' area.

14. In our view this model:

- may impinge on the accessibility of advice services;
- could diminish the vital role played by local and specialist providers;
- takes for granted a questionable vision of partnership working;
- takes an exclusive rather than inclusive approach and as such has the potential to create a 2-tier advice sector;
- could be seen as a rigid, restricting framework rather than a flexible, responsive network of providers;

15. The accessibility issue is central to the successful implementation of the strategy. Based on the proposals within the strategy Advice NI believes that accessibility to voluntary advice services may be seriously compromised. This view is partly based on the lack of attention given to the service provision of local and specialist service providers. It is also based on what Advice NI believe is an unrealistic assertion that 80% of the population should live within five miles of the hub (and by implication that the hub will directly service this population). This assertion does nothing to put people and need at the centre of the process and does not take account of the realities of everyday life in Northern Ireland. In an urban context it does not reflect sectarian division, often

symbolised by dereliction, interfaces and peace walls. In a rural context it does not reflect the dispersed / isolated nature of the population, hidden sectarian barriers and lack of access to essential services.

16. The role of local and specialist providers requires reconsideration within the context of the strategy. Specialist providers assert that they are excluded from the strategy document, with their services, which are targeted towards disadvantaged social groups including people who fall within Section 75 of the Northern Ireland Act 1998, devalued and degraded. Local generalist providers highlight that they cannot understand how the proposed model will operate in practice given that providers currently operate within different networks. Indeed there is a real sense among providers that advice services are under threat under the exclusive top-down model proposed within the strategy.

17. Within the context of Advice NI's consultation with members it has emerged that at least the following two models of joined up working are in operation. The North Belfast Advice Partnership now represents the interests of all providers (independents and CAB) in North Belfast. The independence of providers is recognised and valued, whilst at the same time the providers come together under the NBAP to plan an integrated network of advice service provision for the North Belfast area.

18. A second model of joined up working integrates local independents, CAB and a specialist provider (Housing Rights Service) under the Community Housing Advice Project. The CHAP Project aims to contribute towards the prevention of homelessness and the improvement of housing conditions in Northern Ireland by enhancing the standard of housing advice, advocacy and representation provided by frontline agencies to disadvantaged people living within their local community. Again the 24 agencies involved to date have come together to develop their housing advice service with tangible benefits for providers and ultimately service users. The CHAP model seeks to build housing advice capacity amongst frontline providers, with referral mechanisms in place to Housing Rights Service, and with Housing Rights Service continuing to operate a housing advice service direct to the public.

19. The Community Legal Service developments in England & Wales provide another alternative approach. Advice providers self-include themselves in the process by undertaking the Quality Mark, with providers who achieve the Quality Mark being deemed able to bid for funding via the legal services contracting mechanism.

20. These models highlight similar approaches in that they seek to be inclusive and build on the current network of advice provision. Advice NI advocate this inclusive approach to DSD in terms of an advice strategy for the future delivery of voluntary information, advice and representation service provision. In particular Advice NI propose that a number of different models of service delivery be piloted so as to ensure that any long term decisions regarding infra-structure are taken on a sound basis of a proven track record. These pilots should involve advice providers from within the Advice NI membership and CAB network on an equitable basis, in terms of involvement and lead responsibility.

**QUESTION 2:- Will the Area Hubs model deliver high quality advice to our most disadvantaged communities?**

21. Arguably seven well resourced Area Hubs (maybe more, maybe not) will deliver a quality advice service. However it is Advice NI's contention that the Area Hub model as proposed in the strategy will not be effective in delivering advice to our most disadvantaged communities / communities of interest. This is because there is a lack of detail (and by implication a lack of recognition) of the targeted services provided by local community-based providers and specialist providers whose services are aimed at particular disadvantaged social groups.

22. As highlighted above current independent information, advice and representation service provision has developed over time to meet identified need – whether that need be in respect of local geographical areas; or in respect of particular disadvantaged social groups. To apply a top-down Area Hub model rather than a bottom-up integrated network

of provision introduces a real risk of losing what is good and effective about what currently exists.

23. There should be a focus on issues such as meeting unmet need; identifying and addressing gaps in provision; fostering joint working:

- between local providers;
- between generalists and specialists;
- between regional support organisations;

24. Without an explicit commitment and resource package for comprehensive information, advice and representation provision targeted towards disadvantaged areas and social groups, the strategy will demotivate these providers, create uncertainty and may lead to a situation where funders look towards funding an Area Hub to the detriment of other provision.

**QUESTION 3:- What arrangements should be put in place to ensure the effective utilisation of current resources to support the strategy? What additional resources should be considered to support this Strategy? Are the proposed monitoring arrangements sufficient and appropriate?**

25. There are certainly aspects of the utilisation of current resources that could be more effective for example the resources expended in continually seeking new / renewal funding rather than expended in direct service provision; completing funding applications; completing different quarterly monitoring forms for different funders. The uncertainty generated by the short term nature of funding within the voluntary advice sector creates particular problems in terms of attracting, retaining and progressing staff in an advice career. Generally speaking the short-term nature of funding can also impinge upon advice delivery and quality in that staff in this situation may seek alternative, more secure employment and their skills and expertise are lost from the sector. There are also issues around funding for core running costs and situations can arise where an

organisation may have funded projects in place but are struggling with overheads, running costs and delivering core services.

26. Advice NI believes that a more secure longer term funding base for the voluntary advice sector would help address some of these issues. In addition, there is a need for funders within any longer term funding framework to ensure that funding is on a full cost recovery basis and that monitoring requirements are streamlined so that service provision remains the primary focus and not bureaucratic administrative requirements.

27. In terms of what additional resources should be considered to support this strategy, the document has missed an opportunity to move this issue forward. Advice NI advocates that the all-encompassing inclusive approach advocated above in terms of advice provision must also be reflected in terms of the resources debate. It is in this context that Advice NI is disappointed in the level of detail contained within the resources section of the document, especially in comparison to the detail contained within the Williamson Review document. Within the Review document there is a useful 10 page 'Policy context' section which rightly attempts to highlight key Government priorities and the role (funding & advice/information) of Government departments including the Social Security Agency, HM Revenue and Customs and NI Legal Services Commission.

28. Advice NI believes that the strategy document should retain a 'Policy context' section and link it to the section in relation to the Government Advice & Information Group. This approach would produce more detail, clarity and create a sense of a unified vision of joined up Government as it relates to advice provision. A failure to take this approach creates a top level vacuum within that most critical of aspects of the strategy namely how the sector is to be resourced.

29. It is Advice NI's view that a strategy document which approaches both provision and the funding of this provision in an inclusive manner will be more likely to be effective. This approach will facilitate implementation of the strategy by DSD as it will have the

essential requirement necessary for any ‘change’ situation namely a clear, shared vision between providers and funders for the future of advice services in Northern Ireland.

30. As regards the monitoring arrangements, as far as we can see the only mention of monitoring as regards resources is in the line ‘This Group [GAIG] will monitor the implementation of this Strategy.’ There is no further detail as regards monitoring arrangements and as such it is impossible to comment about whether they are sufficient or appropriate. We can therefore only make a general reference and state that monitoring arrangements should be proportionate, not overly burdensome upon providers to the extent that they and not the service provision become the focus. We would be concerned about what is meant by the line ‘agree the principles to be applied advice and information work’. It is our view that advice services must be independent and this key principle needs to underpin the strategy and run through any out-workings of the strategy. In terms of the GAIG Advice NI would advocate voluntary advice sector representation on this group, so as to ensure an advice input and ensure joined up working not only within the advice sector & within Government but between the advice sector and Government.

31. Advice NI has paid attention to possible unintended outcomes of the strategy in it’s current format and would make the following points in this context:

- The Area Hub in the hub model may well actually undermine the resource-base of the advice sector by virtue of the fact that it advocates a minimalist approach rather than an inclusive approach based on current provision. The concern would be that if an Area Hub is put in place funders may stop there and not fund other essential advice services (local generalist and specialist);
- The Area Hub model and a competitive tendering approach to securing resources does not foster the collaborative approach advocated in the strategy. The recent experience regarding the Department of Enterprise, Trade & Investment tender for money advice services highlights that this approach creates a ‘winner-take-all’ scenario; is exclusive rather than inclusive; and increases the likelihood of a two-tier advice service developing in Northern Ireland.

- Alternative sources of funding which are premised on tendering would see a continuation of short-term-ism and would amount to continuing uncertainty for the staff involved. This may not be the case where there was an agreed tender covering all providers – but history shows us that this is unlikely to happen;
- Tendering also brings a risk of ‘providing services on the cheap’ and a risk of undermining the quality of the service (with the focus being on price).

**QUESTION 4:- Will these proposals improve the quality of advice provision?**

32. Advice NI believes that given the level of detail in the document it is impossible to say with any certainty what impact the proposals will have on the quality of advice provision.

33. The implication of the line “during the development of this strategy, some concerns were expressed about the wide range of organisations involved in provision of advice and information services and the impact this has on levels of efficiency, effectiveness and quality” is that there are too many providers.

34. Advice NI believes that this statement is highly subjective and does nothing to address the issue at hand. Whilst it is consistent with the exclusive Area Hub model advocated within the strategy it ignores the fact that current independent information, advice and representation service provision has developed over time to meet identified need – whether that need be in respect of local geographical areas; or in respect of particular disadvantaged social groups. Members of Advice NI meet the membership criteria which have been reviewed and revised in April 2005. Members of the Citizens Advice network similarly meet membership criteria. It would be helpful to have more factual information to substantiate the above statement, which if provided would enable the areas of concern to be addressed.

35. The focus, in terms of how the quality issue could be moved forward, should be around establishing what quality standards are required; how these standards are to be

monitored and building on the best practise which already exists within the voluntary advice sector. Advice NI believes that standards should focus on quality of advice provision; competence of staff and client outcomes rather than bureaucratic proxy measures such as the existence of rafts of policies and procedures.

36. Advice NI believes that roles in terms of implementing and monitoring quality standards need to be clarified. It is doubtful whether ASA has the capacity or the commitment to produce anything other than high level quality standards applicable across the sector. The strategy recommends that ASA will support local providers, will implement IT-based systems and have a role ‘administering, monitoring, evaluating and implementing quality standards’. There may be some confusion here about the role of ASA as an entity in itself and whether these activities fall within the role of the three independent regional bodies that make up ASA. Again there appears to be some confusion as to whether the Specialist Advisory Panel is to be made up of regional specialist organisations only or include the three independent regional bodies that make up ASA.

37. At this stage in the consultation exercise Advice NI would draw attention to the following issues within the context of quality advice provision:

- Quality costs – in terms of financial resources, staff time and physical resources; in terms of implementing quality standards and monitoring quality standards;
- Traditionally there have been few resources made available specifically to address quality standards issues;
- If the strategy advocates that all providers adhere to the same set of quality standards the costs will tend to be the same for all organisations. Therefore smaller organisations, which are also likely to be those catering for socially excluded groups, may well be disproportionately affected;
- Essential information, advice and representation services must not be alienated or marginalised by prohibitive standards. Quality standards should not reflect bureaucratic need; but rather reflect the needs of service users and contribute to improved quality advice provision;

- Build on best practise currently being implemented within the sector;
- Advice providers will need support to implement quality standards and membership organisations such as Advice NI will require additional resources to provide this support;
- It must be borne in mind that quality standards once implemented must be maintained, therefore there will be ongoing ‘support and supervision’ requirements.

38. Advice NI would also highlight that there is a need for commonality but also flexibility. For example some well resourced centres operate to a very high level; smaller grass roots organisations operate with less resources providing a service targeted towards specific areas of need – it is essential that these services are not choked by bureaucracy. Advice NI advocate a tailored approach to quality standards with a set of agreed core minimum standards and additional proportionate standards based on the type of organisation and the level of service offered.

39. Advice NI also believes that quality standards are in place and run through current advice provision. These standards should be built upon – with a focus on advice outputs and quality as it impinges directly on advice provision to the service user. There is also a need for this work to receive recognition with funders, and ensure that any standards are compatible with funder requirements.

**QUESTION 5:- How can Government and the voluntary advice sector work together to ensure efficient use of resources and minimise duplication of services?**

40. Advice NI agrees in and advocates for greater co-ordination, collaboration and joined up working both within the voluntary advice sector and between the voluntary advice sector and Government. The issue of greater collaboration between providers has been discussed above in paragraph 10 ff. At the level of advice service provision, the clear message is that demand for these services is exceeding supply and that there has actually been a reduction in resources for these advice services (for example the loss of Welfare

Reform funding, the loss of money advice funding, decreasing European funding). Therefore in real terms the advice sector is undergoing and has already undergone rationalisation recently and over recent years. Advice NI believes that the focus should now be on maintaining resources at a level which can effectively cope with demand and expand services to meet areas of unmet need – both geographic and issue based.

41. In terms of the role of Government, Advice NI believes that Government should place more trust and reliance on the voluntary advice sector as a delivery mechanism and vehicle for the delivery of essential services. Whilst the principle of independence would have to be explicitly protected, this approach would lead to a re-alignment between statutory and voluntary information and advice provision; provide a sustainable funding stream for voluntary advice providers and allow resources to be effectively targeted towards geographic areas of need / particular disadvantaged social groups.

42. The strategy objective of a single shared IT-based case recording and information system has been the source of much debate. Advice NI believes that this objective is flawed as a single IT-based system will not cater for the range of voluntary sector advice providers in Northern Ireland. The single system approach will not meet the diverse needs of voluntary sector advice providers in Northern Ireland. It has been highlighted that where generalists may have a single recording category for a certain subject, specialists may have much more detailed levels of sub-categorisation. For example housing specialists may have over 60 housing categories, whilst generalists may have 8 housing categories. The strategy should be advocating an inclusive approach on the issue of IT and one which meets the needs of all advice providers and not just the needs of the funder.

43. Case-recording is about more than simply producing statistics. It is about processes within an organisation. It is about what is recorded, how it is recorded, when it is recorded and who records it. It is then about producing and analysing the information recorded in a format that is acceptable to those who need it. By making a particular case-recording system a criterion for funding, Advice NI believes that:

- Advice organisations will be forced into processes which do not necessarily suit their particular needs nor the needs of their clients;
- A monopoly situation will be allowed to develop where software licenses and support costs may become overly inflated. Advice organisations will have no option but to pay them;
- Advice organisations will have no input into how the case-recording system develops as their needs change and technology advances.

44. The logical conclusion of the strategy objective will be that numerous providers will have to purchase the single system and there will be substantial resource implications in terms of purchase, training and ongoing support. Another conclusion may well be that funding for the voluntary advice sector could be diverted towards a private sector business rather towards the voluntary advice sector.

45. Advice NI strongly believes that in order to address these issues a set of agreed case-recording standards should be developed. Standards such as these should take into consideration the processes outlined above. For example

- Ensuring that all those responsible for recording have a common understanding of what it is they are recording and how they are recording it;
- Ensuring that appropriate audit trails, back-ups etc are in place;
- Agreeing how and where the information is stored;
- Agreeing the format and type of reports required;
- If an advice providing organisation wishes to use a particular case-recording system it can then be “certified” against the agreed set of standards.

46. This inclusive approach is based on best value principles by maximising the effectiveness of systems currently in operation. It will not necessitate the overhaul of IT systems within the sector and the associated training and support costs necessary with such an undertaking. It also allows for systems to meet both the needs of the advice centre and the needs of, in many cases, multiple funders.

## **Equality Impact Assessment**

47. Advice NI notes with concern that there is a potential differential impact on individuals and groups in the following categories:-

Race

Age

Men and Women

Persons with a Disability

Persons with Dependents.

48. In addition Advice NI believe that without more information in relation to those voluntary advice services which target particular geographical areas / particular communities of interest, there could well be potential for differential impact as regards:-  
Persons of different religious belief & political opinion (given the move towards a hub model which could see voluntary advice services centralised, and therefore less targeted towards the needs of geographical areas / particular communities of interest).

49. The measures outlined to mitigate against differential impact require further thought. For example it is suggested that the location of an Area Hub will be identified following a mapping exercise matching advice provision to community need. However, concerns have been raised about the ability of such a centralised infra-structure to meet the needs of our most disadvantaged communities. The satellite and outreach provision may well mitigate against this differential impact but as highlighted above, the lack of detail in particular concerning resources does not instill confidence that this will be the case. It is also Advice NI's view that the strategy should take a more inclusive approach to the role of specialist providers in terms of their role in servicing people within Section 75 categories.

## **Concluding Remarks**

50. Advice NI believes that the voluntary advice sector is likely to undergo significant change in the future, in particular in light of developments regarding the Review of Public Administration. Whilst we welcome this strategy as an attempt to provide a

strategic framework within which the advice sector can develop, this submission has sought to introduce a note of caution in terms of the content of the draft strategy. This caution is based upon the premise that the strategy should be seeking to harness the knowledge and expertise which exists within the voluntary advice sector.

51. The cost implications of any out-workings of the strategy must be fully worked through. For example it must be questioned whether the cost of purchase, installation, training and support associated with introducing a single IT-based recording system represent best value considering effective IT-based systems are already in operation across the sector. Similarly as regards quality, the focus must be on measures directly related to advice outcomes and the needs of service users rather than bureaucratic standards which are resource intensive with limited merit.

52. Advice NI's vision is of a well resourced, innovative and professional advice sector capable of meeting the full range of information, advice and advocacy needs of individuals and communities throughout Northern Ireland. We believe that the strategy in its current format may not fully fulfill this vision. In particular it must be pointed out that the resourcing of the voluntary advice is a fundamental issue. A comprehensive resource package needs to be attached to any proposed advice infra-structure, and this resource package needs to be agreed across local and central government over the long term.

53. Advice NI's mission is to provide leadership, representation and support to members to facilitate the delivery of high quality, sustainable advice services. We believe that this response to the strategy document does represent the views of members as expressed by members during the Advice NI consultation exercises. We will continue to strive to represent members during the out-workings of the finalised strategy, and provide support and leadership in terms of embracing change which will benefit the sector – and most importantly benefit service users. The voluntary advice sector will undoubtedly see a period of change in the future – but we believe care should be taken not to lose what is good and effective about current provision.

**Contact information on this consultation response:**

**Bob Stronge (Director)**

**Fiona Magee (Deputy Director)**

**Kevin Higgins (Head of Policy & Research)**

**Advice NI**

**1 Rushfield Avenue**

**Belfast**

**BT7 3FP**

**Tel: 028 9064 5919**

**Fax: 028 9049 2313**

**Email: [bob@adviceni.net](mailto:bob@adviceni.net)**

**[kevin@adviceni.net](mailto:kevin@adviceni.net)**

**Website: [www.adviceni.net](http://www.adviceni.net)**

**Appendix 1**

**Advice & Information Strategy Consultation**

**Schedule of Advice NI consultation events**

eConsultation – running from Wednesday 22nd February – Friday 24th March  
(open access to anyone with an interest in the advice and information strategy)

Members workshop (North-West) – Monday 6th March, 2.00pm – 4.00pm, City Hotel

Members conference – Wednesday 15th March, 10.00am – 2.00pm, Grosvenor House,  
Belfast

Advice NI AGM focused on the future of the advice sector and acted as a catalyst for  
further consultation events

Advice NI AGM Feedback Paper

Advice NI Briefing Paper on the strategy

Advice NI membership questionnaire aimed at eliciting views of members on key themes of the strategy