



## **Advice & Information - What do you think future provision should look like?**

A report of an e-Consultation on the Department for Social Development's consultation document, A Strategy for Supporting Delivery of Voluntary Advice Services to the Community

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## **Introduction**

This report seeks to reflect the views expressed in Advice NI's e-consultation Advice and Information – What do you think future provision should look like?

At the launch of the Department for Social Development (DSD) consultation document, [A Strategy for Supporting Delivery of Voluntary Advice Services to the Community](#), David Hanson MP, Minister for Social Development said, "The provision of free, independent advice and information is an essential element of any society, but it is vital this important service is delivered in a way that best meets the needs of its users. That is why I am launching a public consultation on a new strategy to support the delivery of voluntary advice services."

Advice NI decided to run an eConsultation on the issue with the aim of gathering the experiences and recommendations of both those who give advice and those members of the public who seek advice. The e-consultation ran from Wednesday 22<sup>nd</sup> February to Friday 24<sup>th</sup> March.

Acknowledgements go to Conor Mc Gale (Omagh Independent Advice Services) & Kevin Higgins (Advice NI) for co-moderating the eConsultation; to Patricia Donald (Advice NI) for providing ongoing support and guidance; to everyone who took the time to participate and post their views; and to Roy McGivern (Voluntary & Community Unit, DSD) for participating in the Question & Answer element of the eConsultation.

### **Case-recording**

The strategy calls for “an acceptable IT based recording system suitable for the comprehensive monitoring of advice services.” The following quotes reflect some of the thoughts and concerns posted by participants in the e-consultation.

It doesn't take into account the needs of the advice service provider but rather the needs of the funder.

However my concern with the strategy is that a single case recording system will be imposed on advice services by making the use of that system a criterion for funding.

Bear in mind the cost of introducing a single system which would mean huge front loaded resources to streamline this and would include re-training a large part of the administrative and advisor section of the sector

Being tied into one system will create a monopoly situation for whichever case recording system.

I have put a lot of time and energy into customising the case recording system we use here... Our partner organisations in GB are also in the first stages of installation, and we would then have the really exciting possibility of UK wide reporting capacity

The provider could disproportionately hike up costs creating an unjust pricing structure for anyone wishing to go down the electronic case recording route. Being in this 'monopoly situation' will also have other negative impacts upon service providers e.g. freedom of choice, restriction of development opportunities etc

What we need are not new systems, but clear information on what data is required.

Effective case-recording forms an essential part of any advice providers work. It is widely accepted that for a system to be able to provide the statistics required to meet the comprehensive monitoring of service delivery, it should be computer-based. Then, underpinning the actual case-recording application itself are the processes involved in recording, i.e. what is recorded, when is it recorded and who records it. These processes together with consistency across an organisation are as important as the application that records the data.

While there are many database applications which allow for case-recording, there are two main systems in use throughout the advice sector in Northern Ireland; Carma which was developed by NIACAB and AIMS which was developed by the London Advice Services Alliance (LASA) and used by many of the independent advice providers.

Most of the independent advice sector relies upon a variety of funders to enable them to provide high quality advice to their clients. Most of these funders have different statistical requirements which form part of their criteria for funding or awarding contracts. Many independent advice providers, particularly specialist providers, are part of a wider UK organisation and therefore have to meet the statistical reporting requirements of their head office as well as funders. It is therefore crucial from a resources point of view that any case recording system used by these providers is flexible enough to meet the requirements of a plethora of stakeholders.

Within this context participants in the e-consultation raised a number of concerns about the strategy calling for a single IT based case-recording system in that it appears to favour a one size fits all mode. There were concerns that this approach would:

- meet the needs of the funder over and above the needs of the advice provider.
- enable funders to make the use of a particular system a criterion for funding
- require huge resources for training staff in the use of a new system
- allow a monopoly situation to develop where advice providers would have no option but to pay any rises in the cost of the system
- not enable those organisations who were part of a wider network to use systems already in place (unless they run two systems).
- Stifle freedom to choose a system that best meets the reporting requirements of the advice provider
- Stifle application developments by becoming tied into and therefore dependent on one software provider.

### **Have you ever used an advice service?**

“Access by all citizens, the disadvantaged in particular, to a level of advice that meets their needs” is a key principle of the strategy. The benefits of the strategy to advice users are highlighted as being: the best use of existing resources; easier to increase resources; improving quality; more consistent services across NI; people who need advice will find it easier to get help; more consistent approach by funders.

The eConsultation had a thread for service users and here are their comments.

I never had occasion to use an advice centre until last year when I became ill and needed help to work my way through a number of quite complicated social security forms. I chose the centre because they were independent from the SSA, they were local and they have a good track record in helping people in my area.

I have never used an advice centre before but recently I used the advice centre in Omagh ... For me it was a complex issue about a housing executive grant. I did not want to approach the executive before I got some good independent advice. Once I had this info, I felt more confident when phoning the grants office.

Omagh Independent Advice Services (OIAS) have, in the last week, carried out an exercise with our users to ascertain where they go for advice and why?  
Where?  
OIAS  
Why?:  
GP/Family/Friends/MLA/Social Workers recommend and/or have used the service before;  
Local papers and news always say that it's a good service;  
Received a letter from the SSA regarding possible entitlement to Pension Credit, and they advised me to contact OIAS;  
Service is convenient to home/ local/ based in my home town;  
Good advice and it's free;  
No charge for it's services-some offices charge for form filling.

I was recently diagnosed with Fibromyalgia and was able to get great advice regarding benefits/health etc from the Fibromyalgia Support Northern Ireland website [www.fmsni.org.uk](http://www.fmsni.org.uk) web support like this is great as my mobility is poor and unable to get out much.

I would like to know what the future holds for local advice centres. If there are going to be cut backs this would mean that there would no longer be local advice centres in your area just main ones that would be hard to get to and this would be especially hard for people with an illness.

Ultimately, the acid test for the strategy will be the impact it has on service users. All aspects of the strategy could have an impact on service users including (i) accessibility of advice services under the hubs and satellites advice infra-structure model; (ii) addressing the resources issue so that core advice services can be sustained in the long term; (iii) ensuring the provision of high quality advice services; (iv) ensuring that these services are planned and co-ordinated so that duplication is minimised and that gaps in geographical spread and range of services are addressed.

The service users thread brought out other issues of importance including:

- The independence of the service;
- A locally based accessible service;
- An effective referral process from others sector including social workers and statutory providers to the advice sector.

Whilst service users may not be overly interested in the resource issues impacting on a service provider, it is certain that sustainable resources underpin quality service delivery. A secure funding base means that experienced staff can be retained, service provision is secure and service users can rely on the service.

The planning and co-ordination of these services links to the resources issue. Where providers can share resources and co-ordinate provision – service users can benefit. The service user thread has highlighted that people are routinely referred on and have alternative services recommended to them. Based on the postings to the eConsultation, having a local advice service is central to the accessibility issue, but this is not inconsistent with a joined up approach by advice providers where referrals can be made depending upon the specialisms and skills necessary to meet the needs of the service user.

Interestingly the comments also highlight the need to consider alternative methods of access to advice services. The strategy indicates that community E-access points could be set up within community organisations. In addition, with Northern Ireland becoming entirely broadband accessible, thought may need to be given to prioritising the provision of E-advice and information direct to people who need the service. This could be a tiered service in terms of access to user friendly information; access to interactive advice (with interactive support to enable completion of forms and letters); with the option of referral to face-to-face advice as required (perhaps where representation is required).

### **Improving co-operation within the voluntary advice sector**

The eConsultation invited views on the strategy assertion that “the voluntary advice sector needs to improve levels of co-operation, to rationalise and minimise duplication of services”. The comments below are quotes from participants in the eConsultation.

Partnerships and cooperation and joint working only strengthen the sector to the benefit of our end users - the public! ... At present there is nothing to stop a client going to different advice centres for advice each time advice is required. This actually promotes and allows choice - at least in areas where multiple advice centres exist. This would not necessarily be the case in rural areas.

In areas of close proximity of advice outlets, duplication can occur with the same client appearing in differing office records ... Opening times only between Mon-Fridays 9-5 also allow for duplication and I see good opportunities for agreeing evening and weekend provision for offices in close proximity to reduce/minimise duplication.

I do feel the strategy needs to acknowledge and build on both existing models of co-operation and previous successful initiatives where partnership working has proven extremely worthwhile to our end users.

Our organisation tried to seek a collaborative approach with the advice provider in Fermanagh, in order to ensure that the service covered the biggest possible area and so to increase the accessibility of the service. This approach was rejected ... It begs the question as to how the strategy will be implemented if there are rejections being made to collaborative working.

There is plenty of "work" out there for all service providers, what we need is adequate resources to increase our capacity to deal with it.

There is a willingness within Advice NI members to co-operate and share resources. In Belfast much of this has been led by Belfast City Councils approach to funding. Members across the city have come together to form consortia/fora.

Funders of advice services are going to have to take some responsibility on this also. By promoting a competitive tendering approach, as seen here in the Health Trust in Omagh/Fermanagh and the recent Money Advice Tender, will promote competition within the sector between advice providers.

The dual issues of increasing co-operation and minimising duplication run throughout the strategy. 'pressures on public funding for more effective use of available resources'; 'advice services have grown in response to need', 'whilst there is much high quality provision there is also inconsistency in terms of geographical spread range and quality', 'resources for advice services must be planned and delivered according to a framework that matches resources and service delivery to need'.

It also seeks to examine and improve the training and IT services provided within the voluntary advice sector.

Regarding co-operation the clear message was that much co-operation already exists within the sector and that these models of collaborative working need to be built upon.

The issue of fostering greater co-operation was taken up within the eConsultation with the view being expressed that greater partnership and joint working can certainly benefit service users. The question of how partnership working can be facilitated is not addressed in the strategy. It should be noted that any meaningful partnership approach does not happen overnight – it can take time to build the relationships and trust necessary for advice providers on the ground to agree on issues such as aligning service provision and agreeing the allocation of resources. The issue of facilitation is important and is one which requires attention within the context of the strategy – especially as the strategy envisages greater joined up working across the voluntary advice sector.

The issue of obstacles to greater co-operation received some attention. This may come about when advice provider(s) simply choose not to engage; or it may be due to external influences for example competitive tendering funding delivery mechanisms. Any issue or set of circumstances which present a difficulty to fostering greater co-operative working within the sector needs to be taken on board and addressed within the monitoring / review arrangements of the strategy.

In terms of training, the view was expressed that more collaborative approaches could be taken. At a local level, as regards ongoing internal training and staff development, providers could collectively agree their training needs and set in place a plan to meet these needs. This approach would have the benefit of minimising duplication in that not all providers would be 'doing their own thing'. At a regional level training could similarly receive attention as regards mapping who is doing what and aligning provision by developing a sector-wide, integrated training plan.

## **Resourcing the voluntary advice sector**

The strategy states that the figure of £4million is needed as the annual funding requirement of local advice services, excluding the funding requirements of regional support organisations and specialist advice providers. The eConsultation asked: "What do you think about the detail contained within the strategy about resourcing the advice sector? Are there any other potential funders not mentioned?" The comments below reflect the thoughts of the eConsultation participants.

The strategy says nothing concrete about resourcing the advice sector. It lays the responsibility of funding solely with the local council. This is fine if the local advice provider in that area has a good relationship with the Council. If it hasn't, or if there is another advice provider in that area which the Council may favour, then that is going to cause great difficulty.

The delivery mechanism of funding for advice is going to be critical. We have already seen our local health trust in Omagh, competitively tendering out a Mental Health and Health and Disability Advice Service to cover a number of council areas. I would worry if this is the shape of things to come! How does tendering promote collaborative approaches to advice work, as advocated within the strategy?

To quote from the document 'work should also begin immediately on identifying the level of sustainable resources that will be required for the first three years of this Strategy.' But how do you approach this when there is little detail in the document around what is required - 'it is proposed that a mapping exercise will be carried out which will match advice provision to community needs'.

The issue of tendering requires specific attention - as tendering creates winners / losers scenario - and what happens to the losers. Are they to be allowed to wither, despite fact that they may provide essential services to their clients. And how does this situation apply to the 'hubs and satellite' joined up model.

The strategy mentions Health Trusts, Charitable Trusts, the Legal Services Commission and possibly the Finance Sector as other possible options in funding advice. How realistic is this?

Interesting information taken from NICVA's State of the Sector IV: subsectoral analysis - the advice sector: 120 organisations involved in advice ... raises some questions around what organisations are involved in advice giving and exactly what resources are required to support the advice sector.

It was highlighted that perhaps DSD should step back from their current role of having lead responsibility. The bulk of the workload of advice agencies is generated by DSD departments (SSA, NIHE etc...). If another department had lead responsibility perhaps more pressure could be brought to bear on DSD to provide more resources.

The strategy document points out that funding pressures are growing on advice providers, with services facing reduction and difficulties retaining staff. A delivery framework is advocated which maps resources, service delivery and need, with a particular focus on meeting the needs of the most disadvantaged.

The eConsultation comments reflect the view that the strategy requires much more detail on the inter-related areas of resources, service delivery and need.

- **Resources:** whilst the strategy advocates a hub and satellite approach there is no costing attached to this model. The model excludes the funding arrangements for the specialist providers and the regional membership organisations. In addition the eConsultation brought out issues related to competitive tendering versus grant aid, with concerns raised about the down-stream impact of tendering on the advice sector.
- **Service delivery:** there is no detail on the number, location and size of hubs; there is no information on the number, location and size of satellite provision; and there is no information on other local services for example outreach and work with community organisations. Whilst the mapping of need is proposed within the strategy, the NICVA information may well highlight that service provision may need to be mapped in an inclusive manner.
- **Need:** the strategy proposes that a mapping exercise will be carried out, which will match advice provision to community needs, to identify the most appropriate location for generalist hubs. The consensus of opinion appears to be that such a mapping exercise would have been a very useful inclusion within the current strategy document. The mapping exercise should not only influence the location of hubs, but the need for and location of satellite and outreach provision; and presumably will be carried out in such a way as to inform specialist service provision.

The strategy outlines that DSD will have a particular role in working with other government departments and other funders to make the best use of available resources. This statement appears to introduce an element of uncertainty in that need can be mapped; an ideal service delivery model can be matched to need – but all of this work may be undermined by a failure to secure adequate resources.

A danger within the outworking of the strategy may well be that a voluntary advice sector infra-structure may be developed which is pulled in one way by community need and in another way by a restrictive funding environment. In this situation service delivery will be compromised, therefore ultimately the key loser within this scenario could be those in need of the advice service, in particular the most disadvantaged communities in Northern Ireland.

## Elements of an Advice Service

The strategy proposes a number of key principles including high quality services that are kept going in the long term, value for money, quality of provision, integrated services that address gaps and overlaps, and making the best use of the distinctive approach of the voluntary and community sector.

I get the impression the writer(s) does not fully understand the historical background to the development and growth of independent advice providers or the unique contribution made by independents in tackling social disadvantage and deprivation from within and on behalf of marginalised communities.

The strategy does not address the comparative lack of advice infrastructure west of the Bann compared to East of the Bann, nor does it address the issue of the border counties and cross - border advice.

I fear the strategy could develop a premiership and league one within the advice sector with area hubs being elitist models attracting more resources and the more experienced / qualified advisers within the sector to the detriment of other providers.

There is no mention of the need to protect the "independence" of the advice centres which is very worrying - as the proposals stand, it feels like these centres would effectively become arms of government, and thus this could also mitigate against some people accessing the services when they need them.

I feel that the advice needs of users are best met by having a diversity of provision which offers choice.

Our service users are looking for **timely intervention** and **accurate information** to enable them to make the choices their circumstances dictate. **Trust** and **confidentiality** are important aspects in this process. **Waiting time** for face-to-face work **is kept to a minimum of 2-3 working days..** We also have extensive **outreach capacity** which is attractive to service users

What is needed for the sector is a recruitment and retention policy - how for example can we expect to drive up quality when staff are on time bound contracts with poor conditions of service?

I think that the strategy needs to reflect the real world of advice services and the ideal it proposes leaves a lot to be desired in terms of improving access to services.

The strategy recommends the establishment of a network of area hubs that will provide a comprehensive generalist advice service at a local level. The location and number of hubs will be dictated by the level of deprivation, population size and the funding that is available. The location of hubs will also be influenced by the Review of Public Administration and where the “Super-Councils” will be sited.

The strategy also states that linked to the proposed area hubs will be a range of outreach and satellite provision to “make sure that people who do not live near generalist hubs will be able to get advice easily”. The satellites should work as part of the hub structure.

Participants expressed a number of concerns about the proposed method of advice service delivery. These included:

- Lack of understanding of the development and growth of independent advice providers;
- Lack of advice infrastructure west of the Bann;
- Doesn't address the issue of Border Counties and cross border advice;
- Need to protect the independence of advice providers;
- Advice needs of users being best met by having a diversity of provision which offers choice;
- Strategy needs to reflect the “real world of advice services”

What service users want from advice providers was also discussed, with timely intervention, accurate information, trust, confidentiality, minimum waiting time and extensive outreach capacity seen as the most important aspects of any proposed advice service delivery. In reference to what the strategy proposes regarding the relationship between generalist and specialist advice providers, it was also felt that some service users may not wish to be passed from one advice provider to another in order to get their query answered. This was particularly relevant to the issue of debt and when the client has already had to “pluck up the courage” once to speak to an adviser about the problem.

Participants also discussed what they felt the impact of the current proposals would have on the advice sector. Some felt it would mean that the area hubs would attract more funding, more resources, and more experienced staff which would be disadvantageous to other advice providers such as satellite centres. The result of this would mean the establishment of a tiered advice sector. It was also felt that the strategy needed to incorporate a “recruitment and retention policy” in order for the sector to keep hold of staff. This should incorporate better employment conditions of service as well as longer employment contracts. It is felt that this policy would allow advice providers and staff to devote more time to improve the quality of advice service provision, rather than constantly look for renewal funding or alternative jobs.

## **Advice Services Alliance**

The Advice Services Alliance (ASA) is a forum made up of senior representatives from Advice NI, Citizens Advice and Law Centre (NI). It has recently appointed an independent Chairperson. It is not an operational body as such but it meets on a regular basis to discuss areas of mutual concern around the delivery of advice services.

The Advice Services Alliance is being asked to implement major changes in the advice sector but it is debatable whether it has the capacity, will or commitment to deliver.

Even if it could it would require significant extra resources which would only take money away from frontline services.

The ASA role should be about promoting the sector and lobbying for recognition for advice centres rather than being complicit in socially engineering services to suit the needs of government and funders.

The document underlines a key role for the Advice Services Alliance within the strategy particularly around the issues of:

- ensuring that consistent quality standards are established and maintained with membership organisations;
- ...produce a standard set of quality measures for Area Hubs, satellite provision and outreach to cover training, I.T., reporting systems, premises and adherence to the core values of advice work. These quality measures will be applied across the advice sector and will inform future funding decisions;
- ...will be supported to implement an acceptable IT based case recording system suitable for the comprehensive monitoring of advice services;
- DSD & ASA will agree how to provide effective co-operation and the best use of all training provided by ASA members;
- ...establish a Specialist Advisory Panel made up of senior representatives from regional voluntary organisations to advise on quality, training and access issues in relation to their client group.

Doubt was cast as to whether or not the ASA can carry out this role. To do so would mean additional resources going to the three headquarter bodies to carry out these functions, and it was felt that the necessary finance would be diverted away from frontline advice groups. Furthermore, it was felt that the ASA does not have the will or commitment to carry out this new role. The history of the ASA has been fraught with a number of difficulties, particularly around the issues of overlap and duplication, whether or not it has a funding role for the advice sector, service delivery mechanism and the competing priorities that exist between the three network organisations in its supporting role to their membership organisations.

However, it was felt that a more appropriate role for the ASA would be in a promoting and lobbying role for the advice sector as a whole, in an attempt to persuade Government and other funders to increase resources going into the advice sector. There was also a role in ensuring that the work of the advice sector is being recognised within Government. It was also highlighted that the Alliance's role must be independent from Government and other funding bodies, and considerably different than assisting Government in shaping the advice sector to suit its needs.

## Section 75 Impact

The eConsultation was particularly effective in exploring the role of specialist providers and their provision under Section 75 legislation as the comments below highlight.

I find it particularly disappointing that there is such a limited recognition of the work these organisations carry out and their role in supporting Section 75 groups.

There are some fundamental misconceptions about the way in which people access advice which do not reflect day to day reality. There seems to be a rigid notion of people seeking advice within their immediate geographical area, which is not necessarily the way it happens in real life. Communities of interest can be as important to individuals as geographical proximity. The effect of this could be to marginalise already marginalised services.

The strategy separates off generalist and specialist to local and regional respectively (2.3.1ff) yet acknowledges that some specialists have to be locally accessible (2.3.3).

The strategy is naive in its vision of the role of specialist regional providers especially regarding the issue of referrals. I work for a regional organisation which has service level agreements with particular agencies to provide advice services to their clients on a purchaser / provider basis ... These agencies expect their clients to be able to access the specialist service we offer at the initial point of referral.

Similar to many of the other advice providers who provide generalist advice to specialised groups e.g. providing advice to people with mental health difficulties, older people etc, the strategy appears not to consider nor facilitate this type of advice provision

I am unable to define our advice services as either generalist or specialist within the confines of the strategy and am concerned that this type of advice provision will fall between the two stools of generalist and specialist advice with no planning and funding directed to it.

The Women's Support Network is extremely concerned of the potential detrimental impact of this strategy on women throughout Northern Ireland in terms of the need for specialist advice. I note from the EQIA that there will be no local specialist advice for women and no structure for regionalist specialist advice ... There is a real need for specialist advice for women around sensitive issues such as abuse, rape, domestic violence and mental health issues. We are very concerned that the strategy and EQIA ignores this.

I am a member of a minority ethnic community in Northern Ireland. I would regularly use my local specialist advice centre as it would cater for my particular needs i.e. language, cultural issues. I feel very comfortable and safe using the service.

### **Quoting from the draft Equality Impact Assessment:**

“This EQIA considers how the revised structure will impact on each of the specified Section 75 groups and concludes that there is a potential differential impact on individuals and groups in the following categories:-

- Race
- Age
- Women and Men
- Persons with a Disability
- Persons with Dependents”

It is therefore perhaps with some justification that specialist organisations representing these and other interests are concerned about the possible implications of the draft strategy.

These concerns are typified by the quotations reproduced within this report and include:

- a sense that specialist services are under-valued within the strategy;
- a perceived lack of understanding within the strategy about the service delivery mechanisms of specialist providers;
- a sense that the definition of what specialists do does not match reality;
- a sense that the vision of the strategy may not actually work in practice;

And of course the concern that voluntary advice provision for some communities of interest / people within Section 75 categories could ‘drop off the radar’ and vanish within a revised structure.

## Direct a Question direct to DSD

Roy McGivern from the Community Development Team of the Department for Social Development agreed to answer any questions that people had regarding the consultation document: 'A strategy for Supporting Delivery of Voluntary Advice Services to the Community'.

The Q&A is reproduced in this section.

Q. I would like to know what the future holds for local advice centres, I had to use an advice centre to help me through a number of complicated social security forms. I choose the centre because they were independent from the SSA, they were local and they have a good track record in helping people. If there are going to be cut backs this would mean that there would no longer be local advice centres in your area just main ones that would be hard to get to and this would be especially hard for people with an illness. I feel local advice centres across Northern Ireland provide a great deal of support to local people.

***A. It is pleasing that you were able to access such a quality local advice service. The focus of the Department's Advice Strategy is to put in place an integrated network of high quality advice centres across Northern Ireland and to make advice provision more accessible, particularly for those who are most in need of these services. There is no intention to cut services or close advice centres, however the Department and other statutory funders would expect local providers to work much closer together and avoid duplication, where appropriate.***

***One of the most important factors in the proposed Area Hubs model is the relationship with and location of local satellite and outreach providers. We need to ensure that people continue to have access to services at a local level and I believe the proposed structures can meet this requirement.***

Q. A couple of questions which arose during the eConsultation has been around the hub model and the role of specialist organisations. The following quotes bring this out:

"The strategy document does not explain clearly enough for me the design and outworkings of the Area Hubs model. How can I be asked to comment on its suitability without knowing what it will look like? Is it an abstract concept of service delivery utilising and sharing the skills of specialist advisers within a geographic area for the advantage of local service providers or is it something more tangible where key staff will be housed centrally and have a physical presence within a community?"

"I work for a regional organisation which has service level agreements with particular agencies to provide advice services to their clients on a purchaser / provider basis. 2.4.4. states that ... 'all initial advice should be sought from a local provider and it is vital therefore that appropriate referral, training and quality mechanisms are put in place to ensure that specialist providers can have confidence that their client group have access to support level'.

These SLA agencies expect their clients to be able to access the specialist service we offer at the initial point of referral.

This model / relationship may work for an organisation such as the Law Centre (NI) but it will not work for my organisation or perhaps the likes of Age Concern or Help the Aged."

Does the Dept have a picture in mind re 'hub' model (network of local providers with integrated working arrangements or a central physical presence or other) & a view on the situation where clients want direct access to the specialist organisation?

Q. First of all, thanks for this opportunity to air our concerns and seek clarification on the proposed strategy.

The Women's Support Network is extremely concerned of the potential detrimental impact of this strategy on women throughout Northern Ireland in terms of the need for specialist advice. I note from the EQIA that there will be no local specialist advice for women and no structure for regionalist specialist advice. A number of women's organisations have been in contact with us to express their dismay at the lack of consideration given to the important and often very sensitive needs of women in terms of their advice needs. While recognising that all section 75 groups have specific needs, we would contend that the advice needs of some women can differ drastically from other sections of the community. There is a real need for specialist advice for women around sensitive issues such as abuse, rape, domestic violence and mental health issues. We are very concerned that the strategy and EQIA ignores this. It is highly unlikely that women who seek advice on these issues will attend a generalist advice service due to the sensitivities involved. We have been in contact with other organisations e.g. Women's Aid to find out the type of advice services on offer - but there does not appear to be a regional women's organisation involved in this particular area of work.

Could you clarify the situation with regards to specialist advice for women both locally and regionally? How can we ensure that the specific needs of women are addressed within this strategy, particularly those issues that are of a sensitive nature?

Q. I am a member of a minority ethnic community in Northern Ireland. I would regularly use my local specialist advice centre as it would cater for my particular needs i.e. language, cultural issues. I feel very comfortable and safe using the service.

I heard the strategy is going to affect how specialist services are offered and that limited funding will mean that many will have to close down. I am very worried, as i am sure that others who use specialist services are also, that i will not be able to access the service or that it will be merged with other advice centres.

Can you explain a bit more on what will be happening with specialist providers? Will i not be able to go to the advice centre and receive the face to face advice i feel comfortable with?

***A. The consultation responses to date have indicated that the final Strategy needs to have a clearer definition of the roles and***

*responsibilities within an Area Hub and the relationship with regional specialist organisations. This is something which the Department will address but I will try to provide some clarification on the specific issues raised.*

*The proposed Area Hubs model is based on the principle that generalist advice, which is sought by the majority of clients, should be readily accessible at a very local level. It is also recognised that there needs to be provision of some specialised services at a local level including tribunal representation, money and debt advice, etc. All of these services should be provided through the Area Hub, with very localised provision through a range of satellite and outreach centres. The level of provision will vary in each of the council areas, taking account of a range of factors including population and deprivation.*

*The Strategy concludes that very specialised provision which is needed by a relatively small number of people is only sustainable at a regional level. This should not, however, undermine the role of specialist organisations in delivering advice services to particular client groups. The establishment of a Specialist Advisory Panel will ensure a formal link between specialist and generalist providers and the proposed model will only work effectively if appropriate referral mechanisms are in place. Advisers within an Area Hub will be expected to provide a high quality frontline advice services and handle a range of specialist enquiries. They will also, however, need to accept the limitations of the local service and to refer cases to a specialist provider, where appropriate.*

*We believe that this is the most appropriate model for delivery of an integrated, quality advice service. If this model is implemented we will of course encourage clients, in the first instance, to access local advice services. They will, however, still have the choice to go directly to a specialist provider.*

*Lynn and Lee raised a number of concerns about specific Section 75 groups. The research which led to development of this Strategy identified only a very small number of local specialist providers dealing with women's issues or ethnic minority groups. The Strategy recommends that specialist provision should continue to be available at a regional level and, indeed, VCU will have a responsibility to work with other government departments and funders to ensure that these regional services are properly resourced.*

*The Department does not see any reason why women or people from an ethnic minority background should not seek advice on generalist issues from their nearest advice centre. More complex or sensitive issues can be referred to, or accessed directly from, the regional specialist organisation.*

*DSD has held recent discussions with the Chinese Welfare Association (CWA) to explore how this might work in practice. We would see a need for an Area Hub in Belfast to have an adviser trained in a number of minority languages to enable them to provide generalist advice on a wide range of issues. For more complex issues such as immigration we would expect the client to be referred to other organisations like CWA.*

***I would welcome further comments on these issues and, in particular, on how we can ensure that the needs of all Section 75 groups are properly addressed within the final Strategy and EQIA.***

Q. Some of my earlier messages has dealt with the confusion and apprehension of advice centres around the idea of competitive tendering to fund advice providers.

What I would like to ask the Department is:

What is the Department's View of Competitive Tendering as opposed to grant aiding advice providers?

Whilst the strategy makes no mention of tendering, it appears that some Government Departments (DETI) and Health Trusts are using it already to decide what advice providers should be funded in each local area. In light of this, how does DSD feel that this approach fits in with the current strategy?

And if in favour of it, how does the Department see it in promoting a collaborative approach to local advice provision? We would argue that tendering provides a "winner takes all approach" with the loser left to continue to provide essential services to the local area, but with substantially reduced resources and thus, creating a two-tiered advice sector.

Would be grateful for your views on this.

***A. The Strategy does not detail the preferred method for establishing Area Hubs as this is something we wanted to explore during the consultation period. I am not aware that there is any overall Departmental view on the benefits of tendering against grant aid, as different business areas have the option of establishing delivery mechanisms which best suit business needs.***

***During the consultation workshops, I have expressed the view that a public tender to deliver an integrated advice service in a specified geographical area might be the best way forward. This would enable different providers to come together to agree on the best method of using available resources to deliver an effective service in their area. I feel that the tendering route would ensure that best value concerns are met and would hope that advice sector organisations would collaborate in submitting proposals. I don't think it would be possible for any single provider to ensure full coverage of the super council areas proposed under RPA, so there will need to be an element of partnership working.***

***The alternative would be to encourage a consortia type approach and we are willing to listen to views on the benefits this. Clearly the option of simply offering grant aid to all existing providers is not feasible if we are to put in place a truly integrated service.***

Q. Thank you very much for offering to respond directly to our queries. I have read the questions, and your responses with a great deal of interest and it has helped to clarify some of my questions.

I work for a specialist regional organisation and welcome your comment that VCU will ensure that there is proper resourcing of specialist services.

I am concerned about some assumptions within the strategy. It has failed to recognise that there are communities of interest as well as geographical communities. Not all callers want to seek advice locally and not all callers

want to be referred. Older people and carers were identified as two groups with gaps in provision but there is very little to clarify how their needs will be addressed. There does not seem to be any recognition of multi-identity issues.

I have a few points I would welcome clarification on:

Will the Specialist Advisory Panel have powers - to make recommendations requiring implementation for instance - or is it envisaged that it will have a less "hands on role"?

There has been a lot of emphasis on referrals - how will these relationships be developed where they do not already exist, and how will the success of this element be monitored?

Was the strategy rural proofed, and will the DSD be considering an integrated equality impact assessment as there are a number of public bodies concerned?

All the many other queries will be in our response, Roy, and again thanks for your input!

***A. Whilst we would encourage all clients to access, in the first instance, their nearest locally-based advice service, it is clearly a matter of personal choice if an individual wants to access a particular specialist service. It is the Department's view that the proposed Area Hubs model can meet the vast majority of generalist advice enquiries, including those from of the particular client groups you have mentioned.***

***The Specialist Advisory Panel will have a key role in working with local generalist providers to ensure that the needs of their client groups are properly addressed at a local level. In effect this means making recommendations about training, accessibility issues and quality standards. We will ask the Panel to report twice a year to the Department on these issues and these reports will be considered by the Government Advice and Information Group. As the name suggests, it is an advisory body but one that will have an important and influential role in implementation of the Advice Strategy.***

***The key to an effective referral process is the relationship between local providers and regional organisations. I would expect the need for referral, where appropriate, will be built into any contract between the Area Hub and relevant district council and monitored by the council as normal. I would expect that the Specialist Advisory Panel will also have an interest in the nature and number of referrals.***

***DSD is anxious to ensure that rural issues are not disadvantaged in any way by these proposals, indeed the objective is to improve access to advice services in rural areas. We are also considering the need for increased resources in certain council areas on the basis of need and taking account of deprivation and rural access issues. As DSD has sole policy responsibility for the voluntary advice sector, we do not consider the need to expand the EQIA to other statutory organisations. We are, however, open to views on how the advice needs of Section 75 groups can be met.***

Q. Following on from the earlier point made around the Money Advice Tender I am curious as to what the future of the money advice sector within

independent advice centres holds. In particular for those independent advice centres that were unsuccessful in the money advice tender application. My concern lies with the money recently invested by DETI into this sector which set about developing and furthering the infrastructure in a number of ways. Frontline services saw a sharp increase in the numbers of clients receiving debt advice. Behind the scenes money advisers were trained to high standards, debt issues were highlighted to the press and lending bodies, I.T was developed, money advice forum meetings and case study sessions were established which resulted in policy issues being highlighted and investigated. This all promoted cooperation and networking within independent advice providers.

My concerns for the future of this sector lies in the following points.

What happens to organisations who currently provide money advice in say a years time if they do not receive funding from other bodies? Will they still be able to offer money advice and will they have to make referrals out due to lack of resources. My concern with this in some geographical areas is that if independent advice centres have to make referrals out to cab that people will receive debt advice face to face as opposed to over the telephone. I also can't help but feel that whilst the independent money advice infrastructure was greatly improved in the last 12mths what is the point if it is not going to be sustained. I do feel that funders need to take responsibility for this!

Also will independent advice centres have difficulty in securing funding in the future. My concern is that all money will now be pooled into cab therefore leaving the independent advice centre by the wasteline.

Interested to hear views. In summary my question is does the strategy value the advice provision of the independent advice centres and if so how is it reflected with regards to the latest developments of the money advice tender?

***A. I cannot comment on the award of the Money Advice tender as that is the responsibility of another Department.***

***I would say, however, that this Strategy is not about funding one part of the advice sector to the detriment of another. DSD values the work of the independent advice sector and have a long-term funding relationship with its regional organisation.***

***My view is that Area Hubs, including linked satellite centres and outreach provision, will be established on the basis of who is best placed to deliver a truly integrated, quality advice service. In most areas, I would expect this to be a combination of CABx and independent providers and this is not about anyone losing funding or their sense of identity.***

Q. I am particularly concerned that the current Advice and Information Strategy does not go as far as it should. Many issues are undefined for e.g. hubs and satellites, what does this mean?

At NIAPN we are particularly concerned that the independent nature of the advice services are recognised, valued and retained.

The strategy seems to suggest a two tier system may be created. In our experience the demand for advice services far exceeds the provision. We know the importance, particularly within disadvantaged communities of the

need to access locally based advice services. How does this strategy propose that local need for local advice services will be met, resourced and secured? Will current infrastructure be built upon and will local advice centres be adequately resourced to continue to provide the essential services these communities desperately need?

As you know NIAPN are still awaiting action on the proposed Anti Poverty Strategy for NI. The role of joined up government in making a difference to the lives of people living with poverty and disadvantage cannot be underestimated. How has DSD factored this requirement into the Advice and Information Strategy?

***A. I accept that there is insufficient detail in the Strategy about the proposed local advice structures and this is something we will address in the final document.***

***One of the core themes running through the Strategy is the need to ensure that everyone has access to quality advice services, but particularly that these services are targeted at the most disadvantaged in society. My earlier response set out how an Area Hub might be lined to satellite centres and I would expect most of these centres to be located in disadvantaged communities. There is of course already a two-tier system in place for advice provision in that complex cases are referred to specialist organisations for action. What we are proposing is a refinement of this model to ensure that local services are properly linked, effective referral mechanisms are in place and that there is a consistent quality of advice provision in place across NI.***

***I take your point about the Anti Poverty Strategy and the proposed Government Advice and Information Group will bring together the main departments involved in supporting the advice sector to ensure that resources are properly targeted through the new structures and, by implication, to those most in need.***

Q. In the strategy document there is reference to the establishment of a government advice and information group - will the advice sector be represented on this group particularly specialist organisations who work at both a regional and local level?

What will be the specific role targets, proposed outcomes and monitoring mechanisms for this group?

***A. The Government Advice and Information Group (GAIG) will only involve statutory organisations but I would anticipate that it would have regular meetings with the Advice Services Alliance and with representatives from the Specialist Advisory Panel.***

***GAIG has a responsibility to monitor implementation of the Strategy although its main focus will be to maximise available resources and ensure best use of these.***

***The full remit of the Group will be defined in the final Strategy document.***