



## Advice NI Consultation Response to

### “Advising, Supporting, Empowering”

#### A strategy for the delivery of generalist advice services in Northern Ireland 2015 - 2020

#### Context

***Demand for the services delivered by Advice NI and member organisations has increased significantly during the lifetime of the ‘Opening Doors’ strategy (September 2007 to date).*** During this period there have been significant changes which have driven this increase in demand and further change will likely continue this trend:

- Banking crisis with the associated collapse of the housing market;
- Recession with associated job losses, reduced working hours and fewer job opportunities;
- Inflation associated with rising energy costs and increased pressure on household bills;
- Austerity and attempts to reduce social security spend including the increase in the state retirement age (initially for women and thereafter for both men and women); & a range of other measures including reductions to mortgage support; housing benefit; benefit uprating; and reductions to in-work tax credit payments and childcare support;
- Increasing need for crisis interventions such as food banks; evidenced by the Advice NI report ‘Turning the Tide’<sup>1</sup> and more recent reports including the All-Party Inquiry report ‘Feeding Britain: A strategy for zero hunger in England, Wales, Scotland and Northern Ireland’<sup>2</sup>.
- Envisaged impact of welfare reform as a wide range of vulnerable low-income individuals and households will require a variety of independent advice services in order to navigate their way through the changes proposed within the Welfare Reform Bill;

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<sup>1</sup> <http://www.adviceni.net/publications/PDF/AdviceNI%20Policy%20paper.pdf>

<sup>2</sup> <https://foodpovertyinquiry.files.wordpress.com/2014/12/food-poverty-feeding-britain-final.pdf>

- Reform of Local Government presents a large degree of uncertainty for advice providers, reinforced by the delay in functions moving from DSD to Councils – including removal of ring fencing of funding for frontline advice services. The advice strategy twinned with local community planning arrangements may help address this uncertainty;
- Budgetary uncertainty also presents a significant challenge for advice providers in terms of the NI Budget; we welcome the fact that DSD document ‘Spending & Savings Proposals’ (4<sup>th</sup> December 2014) states: “Funding will also be prioritised to continue support for ... voluntary advice services in 15 – 16”.

## Introduction

**Advice NI acknowledge that developing a strategy for generalist advice services in the midst of all the uncertainty highlighted above is no easy task. Advice NI acknowledge the lead taken by DSD’s Voluntary and Community Unit;** 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; warmly welcome the consultation document ‘Advising, Supporting, Empowering’ and the genuine engagement between VCU and the sector aimed at identifying areas for improvement as the draft document is finalised.

The purpose of this response is to be constructive and assist with the strengthening of the draft strategy document, which will benefit all stakeholders in particular those people who need to access advice services.

## Over-arching comments on the consultation document

It is striking that in the section entitled ‘*The context for the new strategy*’, all the key points relate to future, ‘top-down’, government policies and initiatives. There is no attempt made to acknowledge or recognise the role or work of the advice sector. **We believe it is important in the context of reform and in the context of staff turnover across key local and regional stakeholders, to set the scene in terms of advice provision, workloads and the key drivers of demand during the lifetime of ‘Opening Doors’.**

**Advice services have developed and been shaped by significant external factors and it is important that this ‘journey’ is properly understood.** For example acknowledging and understanding the phenomenal growth in demand for tribunal representation services (exclusively generated by the introduction of Employment and Support Allowance and the associated reassessment programme) provides invaluable learning in terms of why such services have developed to such an extent and allows strategic planning in preparation for the implementation of future policies.

In terms of access and the provision of advice services, Advice NI continually strives to innovate, do things differently and improve service provision – in order to achieve our mission which is to develop an independent advice sector that provides the best possible advice to those that need it most. **The concept of meeting need is important, particularly in an environment of scarce resources, and appears to be missing from the consultation document.**

Advice NI acknowledges that more should be done to enhance service provision, but we would underline the word 'enhance'. **We believe innovation should complement and supplement: we would caution against embarking on a digital strategy to the detriment of traditional tried and trusted service delivery which is proven to meet demand.** Whilst the consultation document sets out some figures in terms of internet usage, Advice NI would draw attention to the following research which would tend to suggest that people not in paid employment are less likely to use the internet<sup>3</sup>; only 53% of respondents reported being able to get through to the SSA the first time they rang with a perception that the phone system was inefficient, a decreasing willingness to use digital channels with increasing age and a clear preference to contact the SSA in person with one quote stating "I think it's more personal and I get better results in person"<sup>4</sup>; and, long term unemployed, the sick and disabled and those with least formal qualifications are least likely to have online access and be able to embrace technology<sup>5</sup>. We therefore believe that the strategy should use more measured language in terms of access, for example statements such as "the preferred method of contact for advice services should be by use of telephony and digital channels whenever possible" may not 'fit' with the profile of clients who need to access advice services using the face to face access channel.

Advice services assist the most vulnerable with crisis interventions such as dispensing vouchers for food banks where clients find themselves in crisis situations with no food for themselves or their family. **With statutory providers already shifting away from face to face access channels (for example the closure of HMRC Enquiry Centres) there is an ever-greater responsibility on the advice sector to maximise the availability of all channels so that the most vulnerable can access the help they need.**

With particular reference to welfare reform, the consultation document states that "DSD is conscious of the potential impact of the new Welfare Reform Bill" and is working towards "putting in place the necessary support mechanisms to assist the most vulnerable". Welfare reform will bring unprecedented change both for social security benefit claimants and the advice sector and arguably will be the single most significant driver of demand towards the advice sector during the lifetime of the strategy. **Advice NI believes that given the importance of this single issue, the Strategy should have a strategic objective solely dedicated to the future role of advice services in the context of the implementation of welfare reform.** Undoubtedly, the Northern Ireland Advice Services Consortium document 'Why advice matters' would assist in the formulation of such an objective<sup>6</sup>.

The issue of the specialist / targeted provision remains unaddressed. The document states that "this consultation does not address specialist advice services which are typically linked to a specific issue (for example disability, debt or rural issues)". Apart from the fact that 'debt' and 'health & disability'

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<sup>3</sup> <http://www.dsdni.gov.uk/may-omnibus.doc>

<sup>4</sup> <http://www.dsdni.gov.uk/ssa-claimant-satisfaction-survey-2013-14.pdf>

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[http://www.dsdni.gov.uk/work\\_and\\_the\\_welfare\\_system\\_a\\_survey\\_of\\_benefits\\_and\\_tax\\_credits\\_recipients\\_in\\_northern\\_ireland.pdf](http://www.dsdni.gov.uk/work_and_the_welfare_system_a_survey_of_benefits_and_tax_credits_recipients_in_northern_ireland.pdf)

<sup>6</sup> <http://www.adviceni.net/userfiles/file/Why%20advice%20matters.pdf>

were categorised by Opening Doors (2007) as issues which a generalist advice provider would be expected to give advice; there appears to be a contradiction between the extent to which the strategy is DSD-specific and focussed on Council funded providers; or cross cutting as highlighted under Objective 7. ***Advice NI would continue to draw attention to the work of specialist / targeted advice providers and the research conducted in order to clarify what is meant by this provision***<sup>7</sup>.

***The issue of resources and funding is concerning in the current climate of budget cuts.*** Whilst the consultation document does make references to substantial investment in advice provision, pressures on funding, the need to minimise duplication and pool resources; there is no funding information provided regarding current funding or envisaged funding over the lifetime of the strategy.

### **Reform of Local Government**

The strategy document highlights the reduction of 26 councils to 11 by April 2015 and that these 11 councils will take greater responsibility for local generalist advice delivery having regard to guidance issued by DSD. The strategy also indicates that the planned welfare reform programme will see significant change to the benefits system. It highlights that going forward there will be a move towards greater use of digital services and that the preferred method of contact for advice services should be telephony and digital channels. Roles in respect of financial capability, new ways of providing consumer advice and possible delivery of legal services are also outlined.

Advice NI agrees that local government reform does present opportunities for greater local accountability and local decision making. In particular community planning responsibilities are particularly important – to the extent that Advice NI considered responding to the Local Government (Community Planning Partners) Order (NI) 2015 consultation to the effect that a representative advice sector organisation should be specified as a community planning partner of a council. Our rationale was that the Community Planning provisions require participation of community planning partners at all stages of the process and we felt that the provision of advice services was so important that it would be beneficial to have advice sector involvement. However ***we note that the list of specified organisations are all statutory organisations, therefore potentially DSD / VCU may be the more proper bodies to be specified as community planning partners so that all councils do in reality consistently have “due regard” to the advice strategy*** and the importance of advice service provision. Advice NI envisages this will be particularly important in the context of the removal of ring fencing of funding for council-funded frontline advice services.

### **Digital Access and Financial Capability**

Advice NI would reiterate that it is a step too far to advocate that “As a consequence of increased internet usage, and a greater focus on digital and telephony services by government, the preferred method of contact for advice services should be by use of telephony and digital channels whenever possible...”. ***Advice NI would take the view that certainly digital and telephony should complement and supplement: should form a menu of access channels that are available to meet client need.*** We would go further and say that as government focuses on digital and telephony there is actually an

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<sup>7</sup> <http://www.adviceni.net/publications/PDF/Advice%20NI%20Specialist%20research%20summary.pdf>

even greater need to protect and support those people, often the most vulnerable, who are unable to use those channels.

***We would note that areas such as financial capability are ‘emerging’ in terms of advice provision and as such there is further preparation to be done to factor these areas into the ‘business-as-usual’ work of the advice sector.*** We would add that perhaps the Financial Support Service trial is a cautionary lesson in terms of developing provision from a top-down perspective as opposed to taking a ‘needs based’ approach.

There are no doubt opportunities in terms of emerging areas of work such as financial capability and indeed in terms of legal services provided through the advice sector. However we would flag the issues of capacity and resources and ***whilst the Access to Justice review may present potential opportunities, we would be cautious about this given the current budgetary climate.***

On reflection, perhaps the developments around digital could focus on ensuring services are offered to society as a whole, with particular arrangements in place to cater for those most in need.

### **Vision and Values**

The Vision is “To have in place accessible, quality generalist advice services for the people of NI”.

It is proposed the vision will be underpinned by the following values: “Impartiality, Accessibility, Confidentiality, Independence, Effectiveness, Accountability, Free”.

Advice NI warmly welcomes the vision and the fact these principles are acknowledged. In particular ‘independence’ is a key principle amid concerns relating to new Lobbying legislation and quotes like “charities should stick to knitting and keep out of politics” and the pressure faced by charities like Oxfam who were attacked for opposing benefit cuts and zero-hour contracts. The advice sector has a vital role to play and research has shown that independence is crucial in securing client confidence in both the frontline services and social policy analysis.

Given the importance of the principles, they must not be taken for granted, ***we believe there needs to be consideration given to what these principles mean, how they can be evidenced and protected.***

Advice NI also would draw attention to the concept of ‘need’ and the idea of targeting scarce resources towards those in greatest need. ***Whilst it is right that advice services are available to all, we would advocate a focus on those people and areas in greatest social need*** – which would assist in the targeting of poverty generally and particular issues such as fuel poverty, tackling unemployment, increasing employability and tackling inequality in other policy areas such as health, housing and education.

### **Objective 1: To empower and enable people to help themselves**

This is highlighted as the cornerstone of the strategy, to help people to help themselves and enable them to access services when they need to do so. The document states that services must be geared towards digital and telephony channels, and generalist providers should aim to increase self-service provision and triage, thereby freeing up staff to deal with more vulnerable customers.

Advice NI understands that there are opportunities to innovate and tailor services to needs. We acknowledge the drivers for taking this approach include: meeting rising expectations from the public to do business in this way; maximise the opportunities presented by Government's digital services; contributing to improved value for money and enabling appropriate support to be provided to those people who prefer to do business via digital channels.

However ***we would reiterate that local face to face (open door) accessibility remains crucial for the most vulnerable with no access to telephony or online channels.*** As highlighted above, digital access channels may certainly enable an advice offering to be made on a NI-wide basis and effectively meet need for those people who have the skills and the access. ***Consideration must be given to meeting the needs of those with neither the skills nor the access to digital channels.***

Advice NI notes the Social Security Agency and Social Development Ministers have given a specific commitment to retain frontline face to face services. For example the Social Security Agency, Chief Executive, has said: "The Customer First changes, being implemented by the Social Security Agency, bring about a change to how the Agency's office network processes its business and allows us to provide greater choice for how our customers access our services ...however, let me reiterate, there will be no loss of jobs for staff as a result of the Customer First restructuring proposals. No offices will be closing and customers who prefer to see staff face-to-face will continue to do so. The Customer First initiative aims to ensure that all our staff are fully supported in delivering an even better service to our customers."

To summarise, ***we would seek an assurance that moves towards telephony and digital shall seek to complement and supplement; not be at the expense of open door access.***

## **Objective 2: To have an aligned and complementary approach to the delivery of advice services.**

The document describes complex linkages and relationships; with a range of supporting structures to support frontline advice services. In terms of collaborative working describes the need to work collaboratively not competitively, introduce a seamless referral process, talks about the advice sector and government working together with other funders of advice provision.

Advice NI agrees that frontline advice services quite rightly should have the support it needs when it needs it, including recourse to 2<sup>nd</sup> tier expert advice and support on complex legal issues.

Advice NI believes that some acknowledgement of the strides taken to improve collaborative working would be helpful, the current phrasing tends to imply that no improvements have taken place at all in this area. ***We would also argue that use of the word duplication tends to suggest waste, but fails to recognise that advice services are often working at full capacity.***

How advice services will be resourced will obviously have a huge bearing on the extent to which advice services can be aligned and the extent to which advice providers can work collaboratively not competitively. Where funders decide to procure services via the competitive tendering process we are not convinced that this fosters the collaborative approach advocated in the consultation document. ***We believe that meaningful collaboration is worthwhile but challenging, and may need***

**dedicated facilitation.** By collaboration we mean organisations and individuals working together across organisational boundaries in pursuit of shared objectives. We are aware that there are many ways for organisations to work together which vary in both structure and purpose and which have varying degrees of commitment and levels of formality. However there is evidence to suggest that support and facilitation aimed specifically at building collaboration can be effective.

**We believe that the idea of maximising the use of scarce resources should extend beyond the advice sector in terms of an analysis of what is driving demand for advice services.** This ‘demand analysis’ is a powerful tool and may point towards government service delivery ‘failures’; a greater focus on correcting these system failures would free up capacity within the advice sector and also improve public service delivery.

**We would reiterate the ‘independence’ principle at this point, and again care must be taken to safeguard this principle.** A possible implication of the current wording would be slightly concerning for example in terms of “make the best use of services that already exist”; “eliminate in so far as is possible the duplication of services” (extending to cover services provided across the public and advice sectors and beyond). We believe that the wording in this section needs to be reviewed: certainly there is merit in greater awareness of the range of service provision on offer from whatever source, but perhaps **there needs to be a greater recognition of the distinctive roles in particular of public sector and advice sector providers.**

This section of the document also talks about referral to specialist advice services, whilst previously explicitly stating that the strategy does not address specialist advice services. This is a significant weakness because **if the idea is to take a ‘big picture’ view and try to better align provision, then it would have been better to take an inclusive approach to advice services which includes specialist / targeted advice providers** (as defined in Advice NI research). Failure to take this kind of inclusive approach can present problems for example in terms of knowing what support is available and agreeing referral pathways.

### **Objective 3: To have a sustainable advice sector which maximises the impact of resources.**

The document describes future budget challenges, outlines that sustainability is a key challenge, which will affect how advice services are delivered. It talks about making the best use of resources; and adopting common systems for IT, finance, training and other back office services. The strategy recognises the challenge posed by the need for appeal representation and says that a new model for the delivery of this service should be considered. It says that the advice sector should develop new services to meet government policy priorities.

Advice NI warmly welcomes the fact that the issue of tribunal representation has been recognised, and we will play our part in working with the Department to develop a new model for delivery of tribunal representation services.

**We believe that over the longer term, a secure and stable funding mechanism needs to be found that allows for long term planning and development of advice services.** We are concerned that implementation of the strategy may be hampered post-April 2015 by local government funding arrangements: (i) procurement arrangements via competitive tender may undermine provision due

to a potential 'winner takes all' outcome; and (ii) a focus on price as opposed to meeting need.

***Advice NI believes that consideration should be given to ensuring consistent and adequate advice provision across all council areas and so we would recommend that consideration be given to reintroducing ring fencing of funding for advice services.***

**Objective 4: To maximise accessibility to quality generalist advice services.**

The document states that advice services "should be available to everyone regardless of their circumstances" and "in a way that reflects both convenience and need". Quality is an absolute requirement and the recommendation is that services are provided only by organisations who meet an agreed standard. It emphasises that advice provision needs to further grow telephony and online channels and appears to indicate that people should be triaged via telephony to face to face provision which would signal the end of 'open door' provision.

Advice NI agrees that every effort should be made to maximise accessibility to quality generalist advice services. As highlighted above, we believe that digital and telephony services should be developed; but crucially these developments should not be to the detriment of open door access for the most vulnerable who may increasingly need crisis interventions where they have literally no money or require referral for food or crisis counselling. It should be noted that the importance of open door access is generally recognised, for example DETI's Debt Advice Service contract explicitly states that "*clients often visit the advice outlets without appointments and are often driven to the visit under great stress. The service must anticipate such visits and the service provider should be able to provide an immediate and effective response.*"

***We believe that any digital offering needs to be closely scrutinised in terms of it's ability to consistently deliver effective services which actually meet need and don't simply act as a sign-posting service to face to face services.***

***We believe potential infra-structure and skills issues (for both the advice sector and the public at large) in terms of digital provision will need to be carefully considered,*** along with the issue of data security and ensuring compliance with Information Commissioner's Office (ICO) obligations on protecting personal information.

**Objective 5: To encourage the role of the advice sector in contributing to the policy development cycle.**

The document recognises the contribution the advice sector can play in contributing to the wider policy development agenda. It welcomes the independent voice of the sector and acknowledges that has a key role in identifying emerging issues.

Advice NI welcomes the acknowledgement of the crucial role the advice sector can play in shaping policy and identifying emerging issues. We believe the sector has a long track record of contributing to policy development.

***We believe that consideration should be given to further developing the social policy role by developing tools aimed at analysing and measuring the extent to which (i) the advice sector contributes to policy development; and (ii) policy makers act on these contributions.***

### **Objective 6: To support the delivery of the strategy.**

The document describes support arrangements include training, quality standards, IT systems, second tier legal advice, communication strategies and providing evidence based commentary.

Advice NI agrees that there is a clear need for this type of infra-structural support including specialist second tier legal advice.

We would highlight that there has been significant movement and development on all the areas specifically outlined in the consultation document namely training (Consortium training sub-group with joint working on a range of areas); quality standards (Consortium quality sub-group with the development of a quality standard); IT (Consortium management information sub-group and the introduction of the agreed reporting template); policy (Consortium policy sub-group with associated policy and trend analysis reports); the introduction of a Consortium coordinator post and the development of a Consortium newsletter to assist communication with all stakeholders.

As highlighted above, recession and reform over the past number of years has increased demand for frontline advice services, with resultant increased pressure for infra-structural support across a range of areas including information, training, ICT, social policy comment, specialist support. We can envisage added future challenges in terms of how we deliver our services and indeed what services are delivered. ***We would caution that all the implications of meeting future challenges will have to be fully considered, including having in place appropriate support mechanisms, to ensure that the objectives of the strategy are achievable.***

### **Objective 7: To deliver the strategy.**

The document states that a Steering Group will be established; an Action Plan developed; and strong supporting structures will help ensure the implementation of the strategy.

Advice NI welcome the intention to develop an Action Plan and the inclusive approach to membership of the Steering Group, in particular the involvement of representatives from frontline and regional support organisations. Advice NI notes that the Steering Group may also include “other commissioners of advices services”. ***We would caution that as the Steering Group is aimed at overseeing the strategy which is solely focussed on generalist advice provision, there would need to be a mechanism to ensure that advice services that fall outside the remit of the strategy (in particular specialist services) are not disadvantaged or undermined.*** We believe that further consideration must be given to the issue of specialist provision, particularly as the consultation document talks about when it is appropriate to make referrals to specialist advice services (paragraph 37 and Glossary of Terms).

In terms of ultimate responsibility for the implementation of the strategy, there remains a certain degree of ambiguity. Given that policy responsibility for generalist advice services continues to lie with the Department for Social Development but responsibility for funding will lie with local councils, there is a danger of a disjoint and a disconnection between the Department and local government. Council representation on the Steering Group may provide a degree of assurance but there would be

a concern that this mechanism may not provide sufficient assurance in terms of implementing and monitoring the strategy consistently across Northern Ireland.

Advice NI believe that potentially the community planning process may provide at least a partial solution to this problem – and ***we have suggested that the Department could be specified as a statutory community planning partner and so then be in a position to provide consistent guidance to councils on the issue of advice services.***

**Contact information:**

**Bob Stronge (Chief Executive)**

**Fiona Magee (Deputy Chief Executive)**

**Kevin Higgins (Head of Policy)**

**Advice NI**

**1 Rushfield Avenue**

**Belfast**

**BT7 3FP**

**Tel: 028 9064 5919**

**Fax: 028 9049 2313**

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

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

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

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