

Advice NI Briefing Paper:

The Anti Poverty Strategy and independent advice

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The independent advice network

Advice NI's vision¹ is of a society of confident, informed, and active citizens who can access their rights and entitlements.

Using the official definition of the independent advice network adopted by the Department for Communities:

• Generalist advice services:

Generalist advice is considered to cover independent advice given in the categories of advice provided and recorded by Advice NI members and reported to DSD. These categories are:

Welfare benefits
 Money and debt
 Housing
 Immigration
 Asylum
 Legal
 Family
 Employment
 Signposting
 Consumer
 /
 General contract
 Education
 Health
 Tax
 Travel
 Utilities
 Tribunal representation
 and
 advocacy

Note that in categories such as debt, immigration, and legal "straightforward" cases can be dealt with by generalist advice providers whereas "complex" cases would be referred on to relevant specialist advice providers. It is for the generalist advice providers covered by this strategy and the relevant specialist advice providers to determine the point when referral is appropriate.

• Specialist advice providers/services:

Specialist advice providers provide advice to a specific 'target' client group or on a particular subject.

Specialist advice providers for specific 'target' client groups tailor their service towards the interests, needs and demands of a specific, definable target group. Services are bespoke and authoritative in application due to familiarity with and expertise in understanding and addressing the problems, queries or barriers experienced by the particular client groups.

Specialist providers on a specialist subject focus their service on a particular issue, where comprehensive, in depth expert knowledge of a specific subject or topic defines the service provided.

The latest statistical information on the work of the independent advice network is available in Advice NI's latest Annual Report², including for 2019/20:

- 540, 983 enquiries;

¹ Our Vision | Advice NI

² ADNI Infographic Nov 20 (adviceni.net)





The independent advice sector role in tackling poverty

The independent advice network has been to the fore in tackling need over many years but most notably during the Covid-19 crisis.

- Covid-19: The independent advice network stepped up during the pandemic by continuing to deliver vital advice services albeit via digital and telephony channels. Money management training was developed for the public and was available for free. Triage training was available for free to support workers to enable people to access advice services. In addition, Advice NI and the network delivered the Covid-19 Community Helpline which was a key support channel for those seeking emergency food at the beginning of the pandemic, those seeking emergency fuel support and those seeking clarification on public health messages. At the frontline, member organisations were central to delivering local Council-led initiatives such the emergency food box scheme.

- Social security and welfare reform: The importance of the role of the independent advice sector is assisting people to deal with their social security and welfare reform problems can be traced back to the Welfare Mitigations Working Group ('Evason') Report (2016)³:

"It is acknowledged in the [Fresh Start] Agreement that access to skilled, independent advice will be of critical importance in managing, and helping people to negotiate, all of the changes in the legislation. There are many critical points at which people - especially those who are vulnerable as a result of, for example, mental health problems - will need to be directed towards the support that will be available. We can foresee four major areas of work: the time limiting of contributory ESA; the move from DLA to PIP for those of working age; the new sanctions regime and the introduction of Universal Credit."

³ Welfare Reform Mitigations Working Group Report | The Executive Office (executiveoffice-ni.gov.uk)



The advice sector itself set out it's role in the publication 'Why advice matters'⁴ stating:

"The message of this discussion paper is that advice matters. Frontline advisers, backed up with specialist legal advice, provide an indispensable service in order to support people to know about and access their rights and entitlements.

Independent advice agencies provide services in every community in every locality in Northern Ireland. Access to advice supports people to receive the benefits they are entitled to or resolve problems before they escalate. Timely debt advice, for example, enables people to alleviate their money problems and take charge of their financial future. Newcomers to Northern Ireland face particular difficulties and the advice sector plays a critical role in enabling migrants to enjoy their legal rights and entitlements.

Regional infra-structural support organisations provide infra-structural support to frontline providers through a range of services; for example, information, training, ICT support, help with addressing social policy issues, assistance with governance and finance/funding issues and a broad range of other support functions to allow the frontline services to function effectively."

Following a decade of austerity and a year of Covid-19, the independent advice sector is ready and willing to play it's part to the full in tackling poverty and addressing the future challenges as society recovers from the Covid-19 pandemic: and focusing on making people's lives better and changing how things are done to ensure a fairer and more equal society that supports those who need it most.

Likely future demand for independent advice services

It is fully expected that the demand for independent advice services will continue to increase both in (2021/22) and beyond due to:

- Increased job loss: (The number of people on the NI claimant count was 58,400 in December 2020, almost double the number recorded in March 2020);
- Furlough ending at end of September 2021 (98,499 on furlough in NI at December 2020) with likely increased need for employment rights advice and increase in Universal Credit applications (114,000 households on Universal Credit at August 2020);
- Future migration of benefit claimants on to Universal Credit & Planned cuts to the UC £20 per week 'Covid19 increase';
- Social security benefit appeals backlog (total @8,000 with @6,000 PIP [May 2021]);
- Delays in issuing National Insurance numbers. For many people this means that they are working on emergency tax codes and for those already experiencing 80% furlough payments this is a further hardship;

⁴ NIASC Why Advice Matters.pdf (adviceni.net)



- The advice sector is already warning of a debt crisis in NI Advice NI and its members dealt with over half a million enquiries in 2019/20. During 2020, our debt service dealt with over £28m of debt in more than 7,500 agreements and anticipates that this will only become worse;
- The impact of Brexit, the implementation of the NI protocol and the EU Settlement Scheme; services for Black & Minority Ethnic communities and people from abroad;
- Dealing with the knock-on implications of the pandemic in terms of the personal, social, (mental) health and economic consequences of such an unprecedented event. For example, this may include any Government policy decisions in terms of balancing the public finances which could impact negatively on individuals and households;
- The independent advice sector has stepped up and worked flat out to protect people during Covid-19, with many staff deployed to deliver bespoke Covid-19 responses, whilst maintaining existing services. The work and workers of the sector need to be valued, supported and sustained as we emerge from Covid-19;

Previous independent advice service strategies

The Department for Communities is responsible for policy on generalist advice services. This includes advice on issues like welfare benefits, housing, finance, consumer and employment issues. It involves the provision of initial broadly based advice services, with the option for referral to organisations which can provide more in-depth support⁵.

Opening Doors⁶, launched in 2007, was the first strategy for the delivery of voluntary advice services to the community, and was the first ever strategy for the delivery of Voluntary Advice Services in Northern Ireland. The aim of the 'Opening Doors' Strategy was to "put in place an integrated, quality advice service across Northern Ireland and a proper framework to ensure that services are planned and delivered in a way which matches resources need, with a particular focus on meeting the needs of the most disadvantaged in society".

The Advice NI Briefing Paper⁷ on the draft strategy, dated February 2006, made points which remain relevant to this day:

"The strategy does offer a strategic framework for the development of the advice sector in Northern Ireland and it does try to address the issue of sustainability. Advice NI members are in an advantageous position in that generalist members provide a targeted service in response to local need and specialist providers provide a focussed service on one particular issue / to a particular client group."

"By not being side tracked by the Treasury-led efficiency savings mantra that is dominating the public sector, members (both generalist and specialist) can concentrate on highlighting essential advice

⁵ Generalist advice services strategy | Department for Communities (communities-ni.gov.uk)

⁶ <u>http://archive.niassembly.gov.uk/researchandlibrary/2009/6909.pdf</u>

⁷ Advice NI Briefing Paper 2.doc



service provision targeted towards meeting the needs of deprived areas / disadvantaged social groups."

"Members must take the opportunity to press for this approach and not allow the [DSD] advice and information strategy to take an overly simplistic approach, to the long term detriment of the advice sector, and more importantly to the detriment of service users."

"Advice NI and members have to a large extent led the quality assurance debate in recent years. The membership criteria has been revised with a view to focussing on exactly what subjects are advised on by members, to what level, with what information resources and with what training. At a grassroots level, members continue to provide essential advice services to local communities of need / particular social groups and it is essential that this provision be supported in an inclusive fashion. This provision must not be alienated or marginalised by prohibitive standards which reflect bureaucratic need rather than practical need."

"On the issue of service delivery members should take the opportunity to highlight their key role in providing services to socially excluded people who would otherwise suffer by not being aware of their rights, not being able to exercise their rights effectively and having nowhere to turn for independent help and advice."

As this strategy expired, consultation then began on a new a strategy for the delivery of generalist advice services in Northern Ireland - 'Advising, Supporting, Empowering'⁸.

"As Minister for Social Development, one of my key priorities is to help those most in need, people living in disadvantaged areas, people living in poverty. My work, and that of my Department, is about supporting and empowering people to help themselves, enabling them to access the range of support services available which can help in improving their life chances. Generalist advice services are an important part of this support."

September 2014

Nelson McCausland MLA, Minister for Social Development

Advising, Supporting, Empowering⁹ - the Department's strategy for generalist advice provision was consulted upon in 2014¹⁰ and published in 2015, covering the period 2015 – 2020.

Advice NI's contribution¹¹ to the consultation is still relevant and included:

- "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 ... 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."
- *"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*

⁸ Advising, Supporting, Empowering - Consultation Document (communities-ni.gov.uk)

⁹ Advising, Supporting, Empowering - a strategy for the delivery of generalist advice services in Northern Ireland 2015 - 2020 (communities-ni.gov.uk)

¹⁰ <u>Advising, Supporting, Empowering consultation | Department for Communities (communities-ni.gov.uk)</u>

¹¹ Advice NI Response to the advice strategy consultation Dec 2014.pdf (adviceni.net)



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."

- "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."
- *"Advice NI would continue to draw attention to the work of specialist advice providers."*
- "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."
- "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." Additionally 'independence' is something to which public sector service provision such as 'Make the Call' cannot lay claim.
- "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 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."

In launching the strategy, the Social Development Minister said of advice services:

"As Minister for Social Development I am committed to having in place good quality advice services which are readily accessible to all. My work, and that of my Department, is about supporting and empowering people to help themselves and enabling them to access a range of support services which can help them improve their life chances. Generalist advice services are an important part of this support."

October 2015

Mervyn Storey MLA, Minister for Social Development

Poverty in Northern Ireland

There is a somewhat confusing picture as set out by the latest official information on poverty in NI, with there being a clear argument for the Executive and the Department for Communities to introduce consistency in terms of the timeliness of reporting poverty statistics and the presentation of poverty statistics.



The most recent statistics, published on 9th June 2021, are contained in the Executive's Child Poverty Annual Report 2020-21¹². They are taken from the NI Poverty Bulletin 2018/19 (published May 2020):

- In 2018/19, there were approximately 92,000 children in absolute poverty BHC, which represents 21% of children in NI. There were approximately 69,000 children (16% of children in NI) in absolute poverty BHC in 2017/18. This is a statistically significant increase.

- In 2018/19 relative child poverty was 24% BHC (approximately 107,000 children). There were approximately 85,000 children (19% of children in NI) in relative poverty BHC in 2017/18. This is not a statistically significant increase.

However, the Poverty Bulletin: Northern Ireland 2019/20¹³, published on 25th March 2021, presents annual estimates of the percentage and number of people, children, working age adults and pensioners living in low income households in Northern Ireland (NI) for the financial year April 2019 to March 2020. The estimates are used to monitor poverty rates in NI. The estimates for all individuals in Relative and Absolute Poverty, before housing costs, are included as outcome indicators in the NI Executive's Outcomes Delivery Plan.

Relative low income:

- 17% of individuals were in relative poverty, approximately 313,000 individuals. This is lower than the 2018/19 estimate of 19%.

- 22% of children were in relative poverty, approximately 100,000 children. This is lower than the 2018/19 estimate of 24%. • 14% of working-age adults were in relative poverty, approximately 162,000 working-age adults. This is lower than the 2018/19 estimate of 18%. This change was statistically significant. • 18% of pensioners were in relative poverty, approximately 52,000 pensioners. This is higher than the 2018/19 estimate of 15%.

Absolute low income

- 13% of individuals were in absolute poverty, representing approximately 241,000 individuals. This is a decrease on the 2018/19 estimate of 16%. This is a statistically significant decrease.

- 17% of children were in absolute poverty, representing approximately 75,000 children. This is a decrease on the 2018/19 estimate of 21%

Poverty and human rights

At it's heart, independent advice services are all about putting people first. Indeed, in March 2011, Advice NI published a report¹⁴ 'the big idea: putting people first' which set out to analyse the demand facing independent advice services: why people need independent advice services.

"Advice NI was drawn to the systems thinking methodology following work carried out by Advice UK in Great Britain and their concerns that plans for improving legal and advice services would lead to

¹² 2020/21 Report on the Northern Ireland Executive's Child Poverty Strategy (communities-ni.gov.uk)

¹³ <u>NI Poverty Bulletin 2019-20 (communities-ni.gov.uk)</u>

¹⁴ Systems Thinking Report the big idea March 2011.pdf (adviceni.net)



an advice sector which would be more focussed on serving the 'top down' interests of government than the 'bottom up' interests of people seeking advice.

Advice NI believed that a systems thinking approach provided an alternative option and a better way to transform both advice services and public services in Northern Ireland. Essentially the systems thinking approach requires management to understand that systems govern performance, not the people who work in the system; and that up to 95% of organisational performance is governed in this way: so in order for any organisation to improve its performance it needs to understand and improve its system rather than focus on managing.

At the highest level, any system responds to two types of customer demand: 'value' and 'failure' demand. 'Value' demands are those you want customers to place on the system; they are the reason you are in business. 'Failure' demands are those you don't want; demands caused by a failure to do something or do something right for the customer."

Looking at poverty through a human rights lens, with a foundational commitment to the recognition of human dignity, offers a way of *thinking* about poverty that goes beyond the material to embrace the psycho-social and the relational. The material is of course still crucially important – it is, after all, inadequate incomes and living standards which serve to define poverty and which measures of poverty typically attempt to capture: it is about Maslow's Theory of Need¹⁵. As evidenced in 'the big idea: putting people first' and in Advice NI's annual reports, the fact that 75% of enquiries are in relation to social security benefit issues means that the advice services are involved in assisting people at the most basic, fundamental level of securing a basic income, basic employment rights, paying bills, putting food on the table, keeping a roof over your head, trying to achieve financial security. Advice services are crucial in bridging the gap between formal rights and actual rights that make a difference to people's lives.

But the experience of poverty is about more than this. It's not just a disadvantaged and insecure economic condition but also a shameful social relation, corrosive of human dignity and flourishing, which is experienced in interactions with the wider society and in the way people in poverty are talked about and treated for example by politicians, officials, professionals and the media.

A key role of independent advice services is empowerment: advisers do not tell people what to do; they explain their options and the possible outcomes of different courses of action. People are encouraged to make their own decisions and act on their own behalf. Advice providers enable people to manage their own problems by focusing on their needs as individuals.

Anti Poverty Strategy development

The Northern Ireland Act 1998, the cornerstone of rebuilding our society as it emerged from violent conflict, requires the Northern Ireland Executive to develop a strategy 'to tackle poverty, social exclusion and patterns of deprivation based on objective need'. In 2015, the Northern Ireland High Court ruled that there was no such strategy in existence.

¹⁵ The 5 Levels of Maslow's Hierarchy of Needs (verywellmind.com)



In accordance with the New Decade New Approach, the Executive has agreed the indicative timetable for the development and publication of a suite of Social Inclusion Strategies for which the Department for Communities is responsible.

The Strategies¹⁶, which include an Anti-Poverty Strategy, Disability Strategy, Gender Strategy and Sexual Orientation Strategy, will bring focus to identifying and addressing the issues, barriers and disadvantages that undermine equality of opportunity in our community.

In line with New Decade New Approach, the Anti-Poverty Strategy aims to address inequalities and obstacles that directly affect the everyday lives of the most vulnerable people in society and will bring focus to identifying and addressing the issues, barriers and disadvantages that undermine equality of opportunity. It is planned that the Anti-Poverty Strategy will be published in December 2021 subject to Executive approval.

An Anti-Poverty Strategy Expert Advisory Panel¹⁷ was appointed in October 2020 and was tasked with preparing a report setting out key recommendations to Deirdre Hargey, Minister for Communities, about the themes and key actions the Anti-Poverty Strategy should include and the gaps in provision that it should seek to address.

The Department for Communities (DfC) also established an Anti-Poverty Strategy Co-Design Group¹⁸ which aims to advise DfC on the development and drafting of a new Anti-Poverty Strategy which is evidence-based and targeted to address objective need.

Anti Poverty Strategy and independent advice

Advice NI believe that there are fundamental points that need to be reflected in the strategy in relation to independent advice.

The Strategy needs to reflect fully the recommendations of the Anti-Poverty Strategy Expert Advisory Panel (some examples set out below):

4.11 It is recommended that the Assembly prioritises and passes an Anti-Poverty Act enshrining in law the commitment of the Northern Ireland Executive to Sustainable Development Goal no.1 (2015) which is to 'end poverty in all its forms everywhere'. The Act should include:

i. A commitment to 'the right of everyone to social security, including social insurance, that is available, adequate and accessible' (International Covenant on Economic, Social and Cultural Rights).

ii. A legal duty to reduce child poverty, setting targets and timetables for 2030 and beyond, and including the four objective measures of poverty described in the Child Poverty (Scotland) Act 2017 (see Section 10 below).

iii. A legal duty to ensure that children are well-nourished and free from 'food insecurity'.

¹⁶ Social Inclusion Strategies | Department for Communities (communities-ni.gov.uk)

¹⁷ <u>Recommendations for an Anti-Poverty Strategy (communities-ni.gov.uk)</u>

¹⁸ Anti-Poverty Strategy co-design group - terms of reference | Department for Communities (communitiesni.gov.uk)



iv. Requirements on Ministers to make delivery plans and annual progress reports, including a

duty to review plans and progress against targets every five years.

v. Duties placed on the public authorities named in the Children's Services Co-operation Act (NI) 2015 to report annually on actions taken to meet the child poverty reduction targets. vi. A defined role and accountability for arms-length agencies including the community and voluntary sector in the provision of advice and other services supporting the implementation of APS. Recommendations for an Anti-Poverty Strategy // Report of the Expert Advisory Panel

vii. Provisions for an Anti-Poverty Commission (APC) (modelled on Scotland's Poverty and Inequality Commission) with responsibilities to a) monitor progress on reducing poverty and income inequality; b) promote the reduction of poverty and income inequality; and c) advise the Executive on any matters relating to poverty including the impact of UK and NI policies and resource-use on poverty rates and levels of income inequality. The composition of the APC should include only persons who have experienced poverty, who have worked with persons experiencing poverty and who are experienced poverty researchers and policy makers.

viii. Make discrimination in the provision of goods and services on grounds of socioeconomic

status unlawful and implement the commitment in New Decade New Approach to introduce the Age, Goods and Facilities and Services Bill as the basis for ensuring that no one is discriminated against because of their age.

ix. Require the 'poverty proofing' of policies across public and arms-length bodies through the introduction of the 'socio-economic duty' set out in Section 1 of the Equality Act 2010. This requires public bodies, 'when making decisions of a strategic nature about how to exercise their functions, to have due regard to the desirability of exercising them in a way that is designed to reduce the inequalities of outcome which result from socio-economic disadvantage'.

x. Require the APS to advocate, support and advance economic and social policies across government which sustain living standards above the poverty line, and which prevent people

now and in the future from falling below the poverty line.

8.1 Design a new campaign for the take-up of Pension Credit involving advice services, sector stakeholders and political representatives, prioritising those areas where take-up rates are well below the average take-up level, and pensioner couples.

8.4 Design new take-up campaigns to increase take up of housing benefit and disability benefits.

9.20 Plan to expand support for advice services in line with anti-poverty policies and targets, and the diminished claimant rights associated with online applications and payments.

9.24 In consultation with the Consumer Council, the advice sector and other bodies, develop strategies to minimise the 'poverty premium', exclusions arising from personal debts, the negative activities of 'loan sharks' and exposure to all forms of high interest credit targeted at those on low incomes. As a minimum, strengthen the enforcement of lending regulations



and prevent illegal lending by establishing a NI inspectorate with enforcement powers. But also provide support to assist the development of low/no interest financial facilities.

The strategy should set out clearly why independent advice services are so critical to addressing poverty and improving the wellbeing of people in need:

- Recognise that independent advice is the foundation for addressing poverty and making peoples' lives better;
- Recognise that independent advice provides holistic services and cuts across all Departments (in particular The Executive Office, Communities, Health, Justice, Education, Economy);
- Demonstrate through statistics that independent advice consistently evidences an ability to help people who need help most on an ongoing basis – whether this need is driven by politics for example welfare reform / Brexit or external factors for example health / economic / financial crisis;
- ✓ Advocate for certainty in terms of resources to ensure sustainable independent advice services over the medium to long term (3 – 5 years);
- ✓ Advocate for certainty in terms of retaining current funding streams (core, welfare reform, debt, appeal representation, regional support services) to enable effective, creative, strategic thinking and planning as set out in the Expert Panel Report;
- ✓ Advocate for a co-design approach to be adopted in order to gain a consensus on what the independent advice sector should be doing and exploring innovatively how best to do it;

The independent advice sector plays a fundamental role in tackling poverty in NI: the service underpins all other work including community, health, education and economic / social wellbeing. Providing advice and information at the right time for people who need it, in a range of formats and through a range of channels, with benefit entitlement checks, income maximisation, debt advice, tribunal representation, housing and immigration advice (with access to interpretation services as required), allows people to then go on and fully engage and participate in society. But the experience of poverty is about more than this. It's not just a disadvantaged and insecure economic condition but also a shameful social relation, corrosive of human dignity and human rights. A key role of independent advice services is empowerment: advisers do not tell people what to do; they explain their options and the possible outcomes of different courses of action. People are encouraged to make their own decisions and act on their own behalf. Advice providers enable people to manage their own problems by focusing on their needs as individuals.

Access to independent advice should be enshrined within the Anti-Poverty Strategy, it has been an essential service for communities and a lifeline for so many. Therefore, we believe that the strategic outcomes should include a further outcome to ensure independent advice is easily accessible to everyone. We propose the following additional outcome:

Additional Outcome: The right to access independent, free, quality, confidential advice and information, that will provide people with access to a range of welfare support including social security benefits, debt, housing, immigration advice and tribunal representation. This provision should be made widely available across all council areas, with increased provision within areas of high deprivation, and including specialist help for specific social groups and for specific issues as required.



Furthermore, the independent advice sector should be sustained by receiving appropriate, adequate and longer term (3 – 5 year) funding settlements using the full cost recovery model, that will allow for a strategic coordinated approach to delivering advice services and ensuring targeted projects on generalist / specialist services and including benefit uptake, welfare reform, debt prevention, immigration advice (including interpretation costs) appeal representation and financial inclusion: deliverable with clear objectives and outcomes.

The addition of this outcome compliments all the recommendations within the expert panel and creates the foundation in which to build further anti-poverty measures such as digital inclusion, childcare, education and training, employability and health.

Having secured sustainability and certainty, the independent advice network (frontline and regional infra-structure) can deliver on effective, creative, strategic and operational high level objectives, measures and key actions which should be reflected in the Action Plan in order to recognise, value and formalise the key role which independent advice services play in tackling poverty and making peoples' lives better.



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