

Advice Services Alliance response to the DSD Strategy

1. Introduction

The Advice Services Alliance (ASA) is a body that has been formed to represent the Voluntary Advice Sector as a whole and is made up of representatives of Advice NI, Citizens Advice and the Law Centre for Northern Ireland. Each of these organisations will also be responding to the Strategy on an individual basis. It welcomes the opportunity to be consulted on the Department's Strategy for the Voluntary Advice Sector.

The ASA was represented on the working party which brought forward the strategy, and welcomes government adoption of a strategic framework for advice. Importantly, this will require government, for the first time, to define what outcomes it wants for the funding provided. It also sees the strategy as helping to formalise the relationship between the voluntary advice sector and DSD from one based on primarily *ad hoc* arrangements to one that has the potential of developing into a true partnership, where the unique style and skills, approaches and independence that the voluntary advice sector brings will enable better access to services and government departments to fulfil their roles more effectively. While the strategy's emphasis is on the structure of the sector, we would encourage it to be more specific about how this structure will enable clients' needs to be better identified and met.

The strategy implies major changes not only in the role of the ASA but also in the scope and nature of the Voluntary Advice Sector as a whole. These implied changes set out major challenges that will require time, commitment and much negotiation to make explicit and then to achieve. We are committed to this process but believe that the strategy's timetable to have a new network of hubs and satellites in place by December 2008 to be so overly optimistic as to be unrealistic.

The Draft Strategy asks five questions. We do not feel that there is adequate information in the strategy to directly answer them fully. In order to do so we have set out areas for further development or exploration within the strategy. They are

- General Impressions of the Strategy for the Sector
- Placement of Hubs
- Size and Range of Services
- Relationships With Other Providers
- Purchasing / Selection Options
- Co-ordination of Government Departments
- Professional Development
- Quality of Service
- Training
- Information and Communications Technology.

- Quantitative Aspects
- The Role of the ASA

2. General Impressions of the Strategy for the Sector

We recognise that there is a need for resources to be efficiently targeted and that there is also a need to differentiate between general and specialist providers and also between local and regional providers. However we feel that the distinction is not as clear cut as the strategy anticipates and that the sector is extremely heterogeneous. While the hub and satellite model is a familiar one and is used in the advice sector itself, the DSD during the consultation has been unable to clarify how hubs will be selected, what criteria will be used and how they will operate e.g. in a rural area such as Fermanagh or in an urban area like Belfast. It has not identified what support services they will require nor how much they will cost. It has also been unable to adequately define the nature and scope of satellites and their relationship to the hubs. We do not feel that there has been sufficient recognition of the differences in specialist support services (function, client group or locality) and how clients access these.

We are concerned that the nature of the language of hubs and satellites also sets up an impression of hierarchy between elements of the advice sector rather than the equality of distinct but complementary partners.

3. Placement of Hubs

We are concerned about the vagueness around the number and placement of the hubs – there seem to be three factors that are mentioned in selection of their sites *viz.* Population, Deprivation and Access to Services but these may be in conflict and so we feel there needs to be differential weights attached to them so that the criteria for placement can be as objective and transparent as possible. While we note that the strategy must be aware of likely changes under the Review of Public Administration we believe that it should retain enough flexibility in the choice of number and position of hubs that more than one per council area is permissible in order to retain high accessibility to services in areas of highest need. Concomitant to this, the size, placement and nature of hubs will have a knock on effect on the type of satellite provision that the service users will require. We would support the use of a mapping exercise to take an up to date view of the demand for advice in order to analyse likely need. We are aware that such an exercise is being undertaken as part of the LSC review of legal services and see it as a potentially valuable resource in enabling these choices to be made on the basis of objective criteria.

4. Size and Range of Services

We believe that 4-8 workers in a hub to be very low baseline and also a very wide range. The services that a four person hub could offer would be dramatically different to those that an eight person hub could deliver. We see this as a further illustration of the need for the Department to provide much more information on its concept of a hub and to engage existing practitioners in the development of an appropriate hub and satellite model. We are concerned that the strategy focuses on what 'hubs' can provide rather than what services will be provided by a hub and satellite model.

5. Relationships With Other Providers

We are concerned that insufficient thought has been given to the format of the legal or quasi-legal relationships between individual hubs and the Department, other Statutory Agencies and also Local Authorities post RPA, between different hubs that may have differing levels of specialisation and between hubs, satellites and other specialist advice providers.

6. Purchasing / Selection Options

We are unsure about the Department's approach to selecting who and how hubs will be managed. Already some government agencies have used competitive tendering to select advice services while the Strategy seems to favour a co-ordinated approach. We believe this area should be explored and explained more clearly. The role of the ASA is discussed more in section 13 of this document.

7. Co-ordination of Government Departments and other Public Sector Bodies

We welcome the inclusion of other government departments in the co-ordinating body that will secure core high level funding and see this approach as being beneficial for the sector. DSD should take a lead role to ensure that additional funding from other Departments and Agencies is sustainable and aligns with the strategy. We note that DSD has already started to negotiate with other government departments in this respect and would encourage it to consider how it can also include other funders, especially post RPA Local Authorities. We are concerned that there can be a tendency for funding to be on a project by project basis which prevents strategic development of organisations and the sector and ultimately leads to a piecemeal and incoherent service. We believe that, if properly understood, implemented and resourced, the proposed strategy could help to avoid this.

We recognise that there will be a need for the Voluntary Sector to restructure itself in the light of this strategy but see that this should be done in light of a secure and stable funding mechanism that allows for long term planning and

development. We are concerned that implementation of the strategy may be hampered by post RPA organisations setting local priorities that may put at risk adequate support for Voluntary Advice Services as set out in the strategy and note with concern that some existing Local Authorities are already unwilling to take up extra funding that they will have to match. One mechanism to ensure consistent and adequate implementation could be to ring-fence the funding. Therefore we would recommend that the DSD considers reintroducing ring fencing of funding for advice services.

8. Professional Development

We believe that the strategy misses an important opportunity to support the development of the Voluntary Sector by failing to specifically commit to the professional development of staff in the sector. Typically our workers are volunteers or poorly paid and on short-term contracts. While this provides short term value for money, it also leads to problems in recruitment and retention of able staff and poor morale. High turnover means that more staff are spending more time at the bottom of learning curves. A commitment to quality does not mean solely a commitment to efficiency but to effectiveness as well.

We would like to see the strategy reflect the need for development of the profession of advice work so that there is long term funding in place, there are clear career and personal development opportunities for volunteers as well as paid staff, and that quality is not solely measured in terms of the price per case or contact hours.

9. Quality of Service

ASA recognises that high quality services are of utmost importance. The strategy mentions that there are inconsistencies in the quality of the services provided without quantifying the extent of the inconsistencies or stating whether they fall below a baseline of acceptable quality. Both CAB and Advice NI have existing quality standards that they are prepared to work together on to form a quality baseline for the sector that has the potential for incorporating continuing improvements as the sector develops. They also recognise that such systems require extra resources and we do not see these allocated in the strategy.

ASA does not believe that its role is to undertake a hands on quality management function on its members. We see that this is the role of CAB and Advice NI to perform these so long as they are adequately funded and resourced to do so. However, we propose that ASA revisits its existing quality standards and updates them in terms of current legislation and good practice. These will act as an agreed minimum of quality that can then be subsequently built upon.

10. Training

ASA members recognise that there are opportunities for rationalisation in the training sector but also that the training sections of each organisation are working to full capacity. We recognise the existence of duplication and the potential for a consequential over capacity and seek to manage this. However, we also recognise that while there is a common core for some aspects of training there are specialist and organisation specific elements to foundation and induction training that are specific to each.

ASA recognises the need for better

- co-ordination of training plans and evaluations
- co-ordination of core curricula
- co-ordinated context updates

Our members have already delegated the training managers of each sub-group the authority to come up with a single plan to address these potential problems.

11. Information and Communications Technology.

We are concerned about the strategy's approach to ICT and its seeming separation between ICT, strategic goals and managerial information. However, we recognise that a hub and satellite model would require a need for consistent recording and reporting of information. We would like to make the following observations

- We recognise that there are two separate statistical recording systems but would like to know what the specific problems identified were and how these relate to the information needs of the strategy.
- We welcome the commitment to improved access through e-government initiatives but think it can go further than the strategy envisages. We would be keen to explore with the Department and the e-government unit OFMDM how we can develop innovative ICT solutions to providing the public with Advice and Information Services.
- We recommend that there is an external audit of case and statistical recording and usage, system requirements and functionality tied into management information requirements.
- We would like to see estimates of costs and cost / benefit analysis of any proposal.

12. Quantitative Aspects

We are unsure about the methods used to arrive at the figures for demand, we are also unsure at how the figures for costs have been arrived at.

We are concerned that there is not adequate and realistic costings for implementation of the strategy and recommend that DSD updates its figures on the turnover of the sector and produces properly detailed estimates for taking the strategy forward.

13. *The Role of the ASA*

We also recognise that the strategy requires ASA to change internally and to develop its role with regards to its relationships with the Department and its members. Since the strategy will roll out to coincide with the RPA there are significant internal and external challenges for the individual ASA members as well. The strategy requires ASA to take on a type of leadership role that we have not previously had. This will require time and commitment from not only our immediate members but also from their constituent members to negotiate. This is something that we are willing to do and are actively discussing and undertaking at this moment. The development of this response already represents a change in how we work and we have further committed to developing common standards for the sector in areas such as training and quality. We are undergoing a period of significant change and we need to be sure that our stakeholders have a clear awareness of our role, vision and capacity. However, this process is not without risks and we would wish to engage with the Department in further discussion about this. The acceptability of our new role cannot just be assumed. The DSD has set us a number of sophisticated tasks. Not least of which requires organisations in a potentially competitive environment to co-operate. 'We would welcome clarity on the new arrangements for purchasing and commissioning of services under the strategy' To be able to deliver these developments requires a carefully managed process that will entail the continuing support of an Independent Chair, external facilitation and consultancy along with the necessary resources.

14. *Conclusion*

Given the caveats that have been outlined above, ASA warmly welcomes the strategy and the intentions behind it. We acknowledge the need for clarity in the roles of the different providers of advice. We recognise that the strategy will necessitate changes and developments in the Voluntary Sector and are willing to engage with these developments in a constructive and positive manner. In this context we have made the following points

1. We see that the strategy has the potential to deliver higher quality services but that this must be tied to improving terms and conditions for potential and existing staff.
2. We undertake to rationalise our training services

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3. We shall revise and publish our quality standards to better reflect the needs and expectations of our stakeholders.
4. We believe that there should be more explicit agreement between the Department and the Voluntary Sector regarding potential ambiguities in the strategy.
5. We are also concerned about the lack of specific resources allocated to the management of change and the implementation of the strategy.
6. We believe the strategy to be overly vague on the relationships between the hubs, satellites and other organisations in both the Statutory and Voluntary Sectors
7. We are somewhat concerned about the actual nature and scope of the hubs and satellites. Therefore we would like to see more detail on specific aspects of the strategy and the explicit commitment to at least two fully evaluated pilot projects. If these were to go ahead we would like to agree a specific set of criteria on evaluation of the pilots and models in terms of the needs of all of the stakeholders, DSD, ASA and clients.
8. We are of the opinion that the timetable set out in the strategy is unrealistic.
9. We are unsure about how the Department envisages commissioning and purchasing of services, whether it favours open competition (tendering) or sees a co-ordinated, partnership approach as being preferable. We would welcome clarity on this issue.
10. We see a potential opportunity for the strategy to founder without explicit funding from all of our potential funders and recommend that the funds be ring fenced.
11. We would like to see an independent audit of case and statistical recording systems so that the most appropriate solution can be configured.
12. We recognise that this strategy envisages a significantly different role for the ASA, that this role cannot be assumed to be immediately achievable or acceptable to the sector and are willing to engage with the change process that this will entail.

Finally, the ASA thanks the Department for the opportunity to comment on its Draft Strategy and looks forward to working closely with it in producing the final strategy and, more importantly, jointly improving the quality, accessibility and value for money of Voluntary Advice Services in Northern Ireland.