

# The Review of a Strategic Approach to the Provision of Information, Advice and Representation



1939-2009: 70 years  
of Scottish CAB advice

## *Response from Citizens Advice Scotland*

May 2010

### **Summary**

CAS welcomes the range and the scope of the review. We are in agreement with the structure of the future approach to the review.

The emphasis on wide, holistic approach to justiciable problems, and the focus on the individual, which supports this approach is the right one.

While CAS agrees with the focus on best value, and on outcomes as being the key determinant of success, it is important to bear in mind that outcomes are not necessarily possible without adequate resourcing to support the best value outcomes.

The implementation plan, where much of the detail is scheduled to become clearer, is awaited with interest and the Citizens Advice service in Scotland would hope to be able to provide input into the drafting of this plan.

We believe that good data, about existing clients, but also about what unmet need for advice exists, is key to informing effective strategy and planning

Timely advice can save money. Work to show the cost effective nature of advice is crucial, and once undertaken this should be used to free up resources from elsewhere to properly fund advice provision.

All of the major advice providers should be represented on the national implementation body.

In addition to the important role of co-ordination at national level, the development and delivery of policy initiatives, driven by effective joint consultation and participation, should also be part of the role of Scottish Government,

Economic recovery does not immediately lessen the need for advice, nor funding for advice. Issues such as money problems and debt are long term in nature and need long term resourcing.

A national quality framework is of great value, and work should continue to develop it.

While different channels of advice delivery are appropriate for many clients, regard has to be had for face to face provision, which while being resource intensive, is the most effective means of addressing support for those most excluded or most in need. It is not just a question of numbers, but also ensuring effective outcomes, which are most valuable when assessing the value of advice.

Co-ordination of UK and Scottish policies and procedures at governmental and at organisational level should be undertaken.

# The Citizens Advice Network in Scotland

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1. Citizens Advice Scotland and its CAB offices form Scotland's largest independent advice network. Citizens Advice Scotland (CAS) is the umbrella organisation for Scotland's network of 83 Citizens Advice Bureau (CAB) offices.
2. These bureaux deliver frontline advice services throughout more than 200 service points across the country, from the city centres of Glasgow and Edinburgh to the Highlands, Islands and rural Borders communities.

There are 2,200 volunteers in the service, managed and supported by paid staff.

There are citizens advice bureaux in 30 of the 32 local authorities in Scotland, making the network the only independent advice body in the country with truly national on the ground coverage.

3. In 2008/09, Scottish bureaux helped more than 250,000 new clients<sup>1</sup> with a myriad of issues. These clients come from all sections of society right across the country, with many from the most vulnerable areas.
  - 1 in 4 bureau clients are divorced, widowed or separated.
  - 1 in 10 clients are carers for a member of family who has a disability
  - 1 in 7 clients are single parents
  - Less than half of clients are in employment
  - 1 in 6 clients are unable to work due to ill health or a disability
4. New and existing service users brought nearly a million issues to bureaux throughout 2008/09. These issues mainly concerned benefits and debt, but also included many other issues concerning housing, consumer issues, relationship problems, legal issues, and problems with utility suppliers.
5. The CAB philosophy is to start with the person, not the issue putting the client at the heart of the process. Whatever the size of bureau, the training and support systems in place emphasise the importance of holistic advice. AdviserNet, the comprehensive web-based information system which is available to all bureaux to support advice enquiries, contains 1500 separate information items to support advice giving.
6. A survey by Ipsos MORI in 2009 found that clients have a highly positive view of the services offered by citizens advice bureaux. The survey found that:
  - 98% felt able to trust the service and were satisfied with the service provided.

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<sup>1</sup> "New" clients refers to clients who are visiting a CAB for the first time, or to clients who have previously visited a CAB but whose records have been archived because a significant period of time has passed since their last contact with the CAB.

- 98% of clients would be fairly likely, very likely or certain to recommend the service to a friend or relative if they needed help.
  - 97% praised the service for helping people to get fair treatment and agreed it offered advice and support across a range of issues.
  - 86% agreed that the Scottish CAB service was the 'leading advice agency in Scotland'.
7. In a parallel survey of the general public, one in five people stated that they had visited a bureau for advice at least once in the past three years.

# Comments on the Scottish Government Review

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## SCOPE & METHOD OF REVIEW

8. CAS welcomes the range of the scope of the advice provision, However we consider that it needs to be either widened or further clarified. Some elements of holistic advice may have a bearing on, for example, advice on health related issues, which are excluded here.
9. We welcome the inclusion of volunteer advisers in this review. Voluntary advice providers can demonstrate a very high quality of advice provision. This can clearly be seen with the variety and numbers of bureaux who have achieved national quality standards in advice provision. Volunteers also bring exceptional benefits in terms of community empowerment, local accountability, and prior life experience.
10. CAS is in general in agreement with the future structure of the approach to the review.

## NEXT STEPS IN THE REVIEW

11. As primary providers of independent advice in Scotland CAS would hope to be able to play a lead role in planning the provision of advice. CAS will also play a lead role in supporting local bureaux to provide direction for advice in local areas.
12. While CAS agrees with the focus on best value, and on outcomes as being the key determinant of success, it is important to bear in mind that this may not be necessarily possible without adequate resourcing.
13. CAS agrees that increased co-ordination, seamless provision and sharing good practice are good ways forward. The implementation plan, where much of the detail is scheduled to become clearer, is awaited with interest and the Citizens Advice service in Scotland would hope to be able to provide input into the drafting of this plan at an early stage.

## DEFINING THE ISSUE FOR THE REVIEW

14. It is right to have a wide focus when looking at this issue, and specifically when examining what may become justiciable problems. In the current economic climate, social inclusion is important, and the emphasis on a wide, holistic approach to justiciable problems is the right one. Adopting the CAB Service perspective of focussing on the individual supports this approach. An individual may have many, interlinked issues, which are best dealt with as part of an overall solution, and the focus on the circumstances of the individual in service planning is welcome.
15. CAS agrees with the assessment that advice underpins the delivery of many of the national outcomes. It is right that the provision of advice is not just an issue for one element of government, but should underpin the development of policy, practice and service delivery across all departments. Advice should be holistic in nature and the delivery of effective advice supports Scottish government priorities. In addition the CAB model of advice provision through

volunteer provision also supports effective communities and empowers local communities, supporting local priorities.

#### DEFINING THE ROLES

16. While CAS agrees that the clarification of roles is of value, there are key roles which, as a necessity can only be driven forward by central government, and are not mentioned here. Specifically, the development and delivery of policy initiatives, driven by effective joint consultation and participation, should also be part of the role of Scottish Government, in addition to the important role of co-ordination at national level.
17. There is some lack of clarity over the term 'local solutions under a common interest at national level'. This relates to the detail. Specifically, the mechanism to ensure that the common interest is common to all providers, and that locally and nationally, policy and practice combine effectively, is not explicitly defined.
18. For example, in para 68, mention is made of examples of planning and strategic commissioning of services. However, some of this planning may actually narrow the wide and holistic nature of advice provision being provided, which is contrary to the outcome intended.
19. For example in Glasgow, where commissioning has taken place, the effect of the development of tendering has been to define advice more narrowly – concentrating on specific aspects of advice to be funded as part of the tender process, but not for all advice to be funded. This could be at odds with the holistic approach needed to ensure the best outcome for individuals.
20. The strategic commissioning of advice in Glasgow commissioned specific types of advice only, and CAS would like to see a wider set of activities and issues such as employment advice, and other services, not necessarily taken into account in existing commissioning activities, included in future commissioning activity.

#### PRIORITISING ACTIVITY

21. We agree that research and information analysis are key to understanding both the need and the complexities of a mixed delivery model. We believe that good data, about existing clients, but also about what unmet need for advice exists, is key to informing effective strategy and planning. CAS hopes to be able to support the development of strategy and delivery with the provision of data on our clients and the problems that they face. With the introduction of electronic case recording, bureaux throughout the country should be able to make a greater contribution at both national and local level to the collection, analysis and reporting of data on advice provision, and the problems that are faced by clients.
22. All of the major advice providers should be represented on the national advisory body
23. Quality Assurance is a key component of advice and this is supported by our membership scheme. This ensures that bureaux are audited every three years and have to comply with quality of advice measures. It is clear that our QA scheme has ensured that bureaux are able to deliver advice to national

standards levels, which are set at a very high standard. - It is likely that the majority of current national standards holders are bureaux.

#### THE ECONOMIC DOWNTURN

24. CAS would dispute the expectation in para 51 that immediate issues would ease as the economy recovers. In our experience, there is a time delay between immediate economic recovery and the improvement of many of the social issues which lead to a need for advice – advice needs continue to increase even when economic recovery is in place.
25. Issues such as money problems and debt are long term in nature and need long term resourcing – witness the increase in debt advice necessary throughout the expansion period to 2007. Also, job losses within the public sector, which tend to be lower paid and adversely affect women, will be increasing as the public sector cuts take hold. There are other effects of the recession on advice which CAS has highlighted in the response to the independent budget review group.

#### PLANNING PROCESSES

26. CAS agrees that the concordat and national performance framework have established an understandable framework in which to place advice and PFLA support. However, there are limiting factors on determining a strategic vision.–
27. Firstly, there should be a clear method of determining unmet need and at this stage, CAS is not aware of effective, up to date data applicable to the Scottish situation which provides such a vision. We would support such research as a priority.
28. Secondly, the planning processes vary throughout the country, and even on the delivery of such research, the application of such data may correspondingly vary
29. Thirdly, the source of the resources needed to effectively target unmet need are not immediately clear. The application of an SROI approach to advice, which can clearly show the cost effective nature of the provision of timely effective advice, should be used in order to free up resources from elsewhere to properly fund advice provision. For example, timely housing advice which prevents eviction and homelessness, can clearly evidence a cost saving to the housing departments, social work departments, courts service and other areas of government, and effectively re-directing resources to advice in this area will ensure cost savings elsewhere. Having a whole systems approach to planning like this is necessary if the true value of advice is to be taken account of.
30. CAS is pleased that the local partnership approach should be mirrored at national level. We hope that this approach will signal the beginning of a real partnership which will effectively support advice provision. The success of decisions made being effectively translated into activity depends on partnership working, joint working and adequate resourcing.
31. One of the key savings to be made in sharing services lies in sharing management, planning and strategic functions, while preserving as far as possible front line service provision. However, when considering these

issues, the voluntary sector is slightly different from other sectors when considering the impact of potential savings, as boards of management, who undertake many of the strategic functions of the organisation, are composed of elected volunteers. Sharing strategic functions, does not therefore necessarily lead to cuts in costs for service delivery, as the strategic functions are already provided voluntarily.

#### KEY AREAS FOR FURTHER DISCUSSION

32. CAS sees significant development in the following areas:

##### UK BENEFITS POLICY

33. Citizens Advice Bureaux have great experience in developing and running local and national take up campaigns for means tested benefits. We know that any increase in means testing through UK or Scottish benefits changes will place greater strain on bureaux to support those who need to claim, both in raising awareness of the service or benefit, overcoming any stigma associated with claiming, and in navigating through the means test itself.

##### RESOURCING

34. There is a need for adequate resources for advice. Research should be undertaken as a matter of priority to determine unmet need, and as a whole a response to this should be found. Defining and organising the allocation of responsibilities of planning advice as outlined in this paper is important. However, adequate resourcing for advice is also necessary to provide advice effectively. The local and national split of advice provision roles should provide a method or effective planning and delivery.

##### PLANNING

35. There should be a UK input into the planning of advice provision in Scotland. In addition to service delivery and transformation, there are clear policy developments which will have an influence on demand for advice services and the need for differing types of advice, and this has to be taken into account. One example of this is Employment Support Allowance, where a UK policy decision has had a key bearing on the need for advice, support and representation for advisers.

##### PUBLIC EXPENDITURE CUTS

36. Cuts in public expenditure will impact on the service delivery of the benefit system. Reductions in both UK, Scottish and local authority spending is likely to reduce the resources available to administer the benefits system both locally and nationally, thereby increasing the problems that people face in claiming benefits, such as overpayments and lost documents.
37. A reduction in local authority expenditure will likely entail a cut in public services. Cuts to both frontline and back office services are likely to impact on service delivery. This could include debt services and benefit delivery staff, and will result in greater demand for debt advice and help with benefit problems from independent advice agencies. Cuts in expenditure may also impact on housing services, thereby making it more difficult to ensure that



homeless or vulnerable tenants are supported to obtain and maintain a suitable tenancy.

38. Cutting administrative costs within local and national government may merely transfer costs to the third sector. For example, in Glasgow a move to tendering for advice service delivery saw the reduction in contracts for advice provision in Glasgow from 27 to 8, but the service providers now have to work through consortia, arranging additional subcontracts, monitoring arrangements etc themselves to fulfil the contracts. This has the net effect of transferring monitoring, contracting and subcontracting costs onto the service providers.
39. The voluntary sector has already started feeling the impact of cuts in funding. Whilst cutting back on funding to the sector may represent a short term saving for a local authority, it neglects to take into account the longer term value for money that the sector, operating at community and informal level as well as service contract level, provides. Making cuts in funding to voluntary organisations could have the effect of merely shifting the social and financial costs onto public services, thereby negating any short-term savings.
40. The cuts in public sector expenditure will have a profound impact on the quality of services in Scotland, on public sector jobs, and on the demand for advice experienced by citizens advice bureaux across Scotland. Bureaux will be required to help more clients in a climate of rising demand and diminishing resources. This has the potential to be very damaging to our services and in turn to those we support
41. In some cases this may be a consequence of cuts or changes within a department, which leads to the costs being externalised, and impacting on bureaux. In other words, the total cost, systemically, of the client's 'journey' is not reduced; but certain cost elements are moved outside one department's budget, and borne elsewhere – such as a CAB.

#### QUALITY

42. A national quality framework is welcomed, and work should continue to develop it. The CAB has been a key early adopter of the national quality framework, instanced first with our own quality assessment and secondly with the more recent attainment of national quality standards among many of our members

#### FUNDING

43. There has been a lack of strategic planning in funding advice services in Scotland. The development of a co-ordinated mechanism for all aspects of funding planning for government is welcomed. The co-ordination of a means of funding holistic advice provision will be of value.
44. However, care has to be taken that any such funding planning is coherent. The emphasis has to be on planning for holistic advice and in ensuring that all quality advice provision is taken into account. The direction of funding into PFLA should have as a primary function the delivery of client focussed holistic outcomes, and not be used merely as a means to address weaknesses in current legal aid provision.

45. The major independent advice providers should be involved in the design and participate in the delivery of the mechanism for planning which advice provision functions are best delivered locally, regionally or nationally.

#### CHANNELS OF DELIVERY

46. People in need of advice should be able to access it in the most appropriate and convenient format, with the support that is needed to enable them to solve their problems, whether they are complex in nature or otherwise. It is not an easy process to develop services sensitive to the needs of our clients, in a situation of rising demand for service, while supporting clients in the face of a shift to web and telephone based services.
47. Developing effective advice provision is important, and new methods are constantly being found for information and advice to be delivered effectively. Helplines, mobile technology, e-advice, websites and web-enabled tools all have a rapidly evolving role to play in the delivery of advice, and planning and co-ordination of such services is a vital component of developing an effective advice strategy.
48. Bureaux tend to deal with those who are excluded, through debt, loss of a job, homelessness, chaotic lifestyles, age discrimination, or any of a number of other reasons. Part of that work is to support people for whom government contact has failed, in some manner. In the context of government services moving to web, telephone and other channels, part of our work necessarily has to concentrate on face to face work as being the most appropriate access channel.
49. While it is recognised that public sector expenditure is tightening, and agreeing that best value principles should be regarded in the design and delivery of advice provision, regard has to be had for face to face provision, which while being resource intensive, is the most effective means of addressing support for those most excluded or most in need.
50. It is not enough to concentrate on numbers of people seen, to the exclusion of all else. It is not just numbers, but also effective outcomes, which are valuable. Those who are most able to solve their own problems are often those most able to look up the information on the internet, or who have simpler issues to solve. It is important not to lose sight of those who are excluded from the use of these technologies, who are often also those most in need, and need a greater level of support with their enquiries. Also, those with the most complex problems may also be those most in need of face to face support to have their problems dealt with.
51. This is a complex pattern of advice provision, and the advice mix should be clearly focussed on those with most support needs, both in terms of type of enquiry, and in terms of their own ability to cope.

#### SERVICE TRANSFORMATION

52. Within this context, UK and Scottish service transformation development priorities have to be co-ordinated. They are not always in sync, and are dependent on different governments. This may also be the case at local level.
53. Likewise, it is important that the directgov website for government information remains up to date and effective as an information portal for both English and

for Scottish citizens. In the past there have been issues with the delivery of English information that purports to be UK wide i on this portal.

54. There is a specific issue with the co-ordination of CAS service development plans and Citizens Advice in England & Wales (Cit-A). The co-ordination of service transformation is normally dependent on shared IT tools and infrastructure, and so it is necessary for CAS & Cit-A plans to be co-ordinated for effective CAB delivery in Scotland.

#### ADVICE PORTALS

55. The development of an effective method of sourcing advice locally and nationally is important and it is disappointing that Advicefinder has not fulfilled its potential to act in this regard. The development of Directgov is however taking place and CAB development planning includes a greater co-ordination with directgov to deliver e-services to the public through [www.AdviceGuide.org.uk](http://www.AdviceGuide.org.uk) .
56. At the same time, methods have to be found to ensure a coherent, up to date method of referrals to local advice and information organisations, and of co-ordinating methods of reaching the right service. Citizens Advice Direct is providing a method of doing this, and of acting as an advice portal. It currently supports the delivery of GAIN, the Glasgow Advice & Information Network, and bureaux are well placed to become the advice portal for other areas in Scotland, or even throughout Scotland. Bureaux are a well known trusted advice brand providing holistic information and advice – this would enable advice provision to be better co-ordinated.

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