

# Money Advice Policy

<b>1.0</b>	<b>SCOPE</b>
	<b>Purpose</b>
1.1	This document sets out the principles we adopt when delivering our money advice service to customers.
1.2	The purpose of this Policy is to ensure our customers have access to appropriate money advice and providing support, guidance and improved understanding. This will help to ensure that customers pay their rent and service charges in accordance with their lease or tenancy agreement.
1.3	This policy applies to whg's general needs rented customers who require money advice. The Policy does not include non whg customers, Freeholders, Market Rent, Shared Ownership and Leasehold customers although limited advice will be offered if there is a debt owed to whg or if it is highly likely they will fall into debt. We will refer customers who do not fall within the remit of this policy, but who are experiencing financial difficulty, to alternative avenues for support, this could include but is not limited to signposting to free online money management tools and the Citizens Advice Bureau (CAB). We will offer Money Advice to former whg customers if they have applied and are shortlisted for one of our general needs rented properties.
1.4	Money advice may be delivered in several different ways, including (but not limited to) in person and/or over the telephone. It may involve advice only, referrals to external and internal services or a full casework service depending on our resources and the level of support required by the customer.
1.5	We will adopt good practice in this area of work and the service and performance will be continuously monitored to ensure, where possible, positive outcomes are being achieved.
	<b>Legal and regulatory framework</b>
1.6	The Financial Conduct Authority (FCA) is the conduct regulator for financial services and financial markets in the UK. Organisations are required to comply with the consumer credit sourcebook, as well as the FCA's Principles for Businesses (PRIN) when offering a money advice service.

1.7	We are a not for profit organisation and our regulated permissions are limited to debt adjusting, debt-counselling and providing credit information services. We are a limited scope Senior Management Certification Regime (SMCR) firm to which no Senior Management controlled functions apply.
1.8	We have overarching responsibility to ensure money advice colleagues understand and receiving training on the FCA Consumer Duty, conduct rules and CONC 8 of the Consumer Credit Handbook, for delivering regulated consumer credit activities. Training is provided annually or where there is a change in legislation to all relevant colleagues.
1.9	Under the Regulator of Social Housing's Tenant Involvement and Empowerment Standard, registered providers are required to: <ul style="list-style-type: none"> <li>• treat all tenants with fairness and respect;</li> <li>• demonstrate that they understand the different needs of their tenants, including in relation to the equality strands and tenants with additional support needs.</li> </ul>
<b>2.0</b>	<b>POLICY STATEMENT</b>
	<b>Principles and Standards</b>
2.1	We have adopted the following principles and standards: <ul style="list-style-type: none"> <li>• Hold the appropriate consumer credit licence under the Consumer Credit Act 1974 (as amended by the Consumer Credit Act 2006) to provide debt counselling and debt adjusting;</li> <li>• Have professional indemnity and public liability insurance or other appropriate arrangements in place;</li> <li>• Provide the service free of charge to the customer;</li> <li>• Process all data held in line with Data Protection legislation;</li> <li>• Reserve the right to withdraw the service from any customer who wilfully or recklessly withholds information necessary to provide quality advice;</li> <li>• Ensure the remit, boundaries and limitations of the service are explained to the customer before the service is provided;</li> <li>• Ensure advisors hold relevant competencies;</li> <li>• Provide non-judgmental, impartial and confidential advice.</li> </ul>
	<b>Service offer</b>
2.2	Money Advisors will work with customers to agree an approach and timescale that takes into account customers' needs and aims to improve their financial position. Money Advisors will liaise with teams across whg to achieve the best outcomes for customers.
2.3	Money Advice colleagues do not manage customers' finances directly.

2.4	Only Money Advisors who are approved intermediaries will administer insolvency options, including Debt Relief Orders.
2.5	Where the advisor cannot meet the customer's needs, they will refer or signpost them to an appropriate agency with the customer's consent.
<b>3.0</b>	<b>PERFORMANCE MEASURES</b>
3.1	The Money Advice Service will contribute to an overall reduction in current rent arrears as a proportion of the gross collectable debit. Specific performance targets are set annually to focus the resources of the Money Advice Service.
<b>4.0</b>	<b>EQUALITY AND DIVERSITY</b>
4.1	Customer data is used to assess whether the service provides fair and equitable access to money advice and support for whg's customers. Data is collated and reviewed on a monthly basis by the Assistant Manager to inform service improvements. Data is reported as part of our Social Value reporting.
<b>5.0</b>	<b>TRAINING AND DISSEMINATION</b>
5.1	Money Advice colleagues have refresher training each year to maintain accreditation. On top of this, training is delivered when there are changes which may impact the advice and casework provided.
<b>6.0</b>	<b>MONITOR AND REVIEW</b>
6.1	External monthly audits will be conducted by Citizens Advice to ensure quality of debt advice and FCA CONC 8 compliance. Audit performance is shared with our Governance Team for compliance checks.
6.2	The Assistant Manager audits case files on a monthly basis.
6.3	Performance is reviewed on a monthly basis by the Senior Income Manager.
6.4	This policy and accompanying procedures will be reviewed every three years, unless there are significant changes to legislative or regulatory requirements resulting in an earlier review
6.5	This policy will be monitored by the Director of Housing and Customer Services and reviewed regularly by the Policy Group and approved by the Group Executive.
<b>7.0</b>	<b>ASSOCIATED DOCUMENTS, POLICIES AND PROCEDURES</b>

7.1	<ul style="list-style-type: none"> <li>• whg Income Collection Policy</li> <li>• whg Complaints Policy</li> <li>• whg Safeguarding Policy</li> <li>• New Consumer Duty – Annex</li> <li>• Financial Conduct Authority – Consumer Credit Sourcebook 8</li> </ul>
-----	---

<b>Document author</b>	Assistant Manager (Tenancy Services)
<b>Document owner</b>	Assistant Director of Housing
<b>Legal advice</b>	Advice received from Anthony Collins Solicitors (April 2023)
<b>Consultation</b>	Assistant Director of Housing
<b>Approved by</b>	GEXEC – December 2023
<b>Review Date</b>	November 2027
<b>Corporate Plan aim</b>	Deliver high quality homes and services to our customers
<b>Equality Assessment</b>	An EIA has been completed. All protected characteristics will be positively impacted by changes proposed.
<b>Key changes made</b>	Minor changes in policy to formally include informal breathing space as good working practices and to include insolvency options into services provided by whg money advice team where

# Consumer Duty – Annex to Money Advice Customer Policy

<b>1.0</b>	<b>SCOPE</b>
	<b>Purpose</b>
1.1	The purpose of this annex is to outline our commitment to complying with the Consumer Duty, introduced by the Financial Conduct Authority (FCA) in July 2023. The annex establishes the framework for the provision of money advice services by our Money Advice Team, ensuring compliance with applicable regulations and standards.
1.2	The FCA requires organisations to focus on supporting their customers, particularly those in vulnerable circumstances, to make good financial decisions, avoiding foreseeable harm and checking whether they are getting good outcomes. This includes providing information customers can understand, products and services that are fit for purpose and that offer fair value and helpful customer service.
1.3	Our Money Advisors adhere to the FCA’s Principles for Business (PRIN), as detailed in the Consumer Credit Sourcebook 8 (CONC 8), which specifically focuses on the provision of debt advice. The Consumer Duty will complement the FCA's existing Handbook requirements.
1.4	The Consumer Duty applies to all our colleagues that have an influence over customer outcomes. This annex has been prepared for the Money Advice Team and it outlines the responsibilities, processes, and procedures necessary to fulfil the requirements of the FCA Consumer Duty.
<b>2.0</b>	<b>Consumer Duty – Principle 12</b>
2.1	The Consumer Duty Principle 12, which reflects the overall standard of behaviour the FCA wants from organisations and which is defined further by the other elements of the Duty as follows:  <i>‘An organisation must act to deliver good outcomes for customers’</i>  Money Advice will deliver good outcomes by:

	<p><b>Treating Consumers Fairly:</b> Advisors will adopt the New Consumer Duty principle of treating consumers fairly by ensuring that their needs and circumstances are thoroughly understood and considered when providing money advice services.</p> <p>Advisors will consider the needs of customers with protected characteristics under the Equality Act 2010, such as those with physical or mental health disabilities. Advisors will identify clients in vulnerable circumstances or those at risk of becoming vulnerable, as stipulated in the FCA’s Guidance on the fair treatment of vulnerable customers (FCA FG 21/1).</p> <p>This includes, but is not limited to:</p> <ul style="list-style-type: none"> <li>• <b>Health</b> – health conditions or illnesses that affect ability to carry out day to day tasks;</li> <li>• <b>Life events</b> – life events such as bereavement, job loss or relationship breakdown;</li> <li>• <b>Resilience</b> – low ability to withstand financial or emotional shocks;</li> <li>• <b>Capability</b> – low knowledge of financial matters or low confidence in managing money (financial capability); capacity in other relevant areas such as literacy and digital skills.</li> </ul> <p>Advisors will apply a flexible approach with its communication, advice and casework to achieve positive outcomes for customers with vulnerable characteristics. Advisors will act early to reduce the risk of harm emerging or growing. Advisors will have a full understanding of whg’s Safeguarding Policy and applicable procedures.</p> <p>Digital channels and technology will be used to help rather than hinder customers, so that they can achieve their financial objectives. Advice and casework will be progressed in a timely manner, taking into account urgency and key dates.</p>
2.1	<p><b>Service accessibility:</b> Money advice may be delivered in several different ways, including in person and over the telephone, taking into account customers’ vulnerability or preference. The service provided is free, confidential and delivered in a professional non-judgemental manner.</p> <p>We will signpost customers to other organisations if they are unable to meet customer needs, characteristics and objectives. Referral pathways are embedded within the organisation, to ensure money advice is offered to all customers by all colleagues. Our Money Advice Service will provide ongoing support that meets the customer’s needs until outcomes are achieved.</p>
2.2	<p><b>Communications and Disclosures:</b> Communication with customers will be clear, jargon-free, and easy to understand. All communications will comply with the guidelines outlined in CONC 8.3. This will include pre-contract information which details the nature of the service and sufficient information about the available options identified as suitable for the customer’s needs and outcome requirements.</p>

	<p>An advice and guidance summary will be provided to each customer, outlining:</p> <ul style="list-style-type: none"> <li>• customer’s circumstances;</li> <li>• objectives;</li> <li>• advice and guidance provided/casework undertaken;</li> <li>• actions for both advisor and customer; and</li> <li>• expected timeframe for completion.</li> </ul> <p>Advice provided will not be unnecessarily complex or inaccessible, to prevent customer disengaging with the advice or debt solution.</p>
2.3	<p><b>Assessment of Affordability:</b> Advisor will conduct a thorough assessment of the consumer's financial circumstances to determine their ability to afford repayments. This assessment will be fair and consistent, considering both immediate and long-term financial implications, taking into account the customers income, essential expenses, and reasonable living costs. As outlined in CONC 8.3.2.</p>
2.4	<p><b>Providing Advice and Recommendations:</b> All advice given will have regard to the best interest of customers, including needs and desired outcomes. Advice will be appropriate to the individual circumstances of the customer and is based on a sufficiently full assessment of the financial circumstances of the customer.</p> <p>Customers receive sufficient information about the available options identified as suitable for the customers' needs. This will be provided in accessible formats. Advisors will explain why certain options are suitable and why other options are unsuitable.</p> <p>Advisors will ensure customers understand advice provided and will also allow sufficient time between providing the information and entering into a debt solution and advise customer to seek independent advice if so desired or where there is a conflict of interest.</p>
2.5	<p><b>Monitoring and Review:</b> Advisors will keep adequate, accurate and well-organised records of the advice provided to customers. The Money Advice Service will undertake monitoring and review processes to ensure ongoing compliance with the Consumer Duty and CONC 8.</p> <p>Regular reviews of customer outcomes, customer feedback, and complaints will be conducted to identify areas for improvement. The Money Advice Service will engage with our Customer Voice Team to further ensure its services are in line with the needs and objectives of whg’s customers. Where necessary, the Money Advice Service will make appropriate changes to policies, procedures and training programmes to address any identified issues.</p>
<b>3.0</b>	<b>Principle 12 – Cross Cutting Rules</b>

3.1	<p>The “cross-cutting rules” provide three overarching requirements for organisations to deliver on the four good customer outcomes:</p> <p><i>To act in good faith:</i> The Money Advice Service will be open and honest with customers, acting with due skill, care and diligence. Advisors will take into account customer expectations and work together to achieve positive customer objectives. It will ensure that it gives appropriate advice to customers, paying proper regard to the differences in options when providing money advice and to the differences in enforcement actions and procedures.</p> <p><i>To avoid causing foreseeable harm;</i> The Money Advice Team shall actively engage in early intervention to prevent the escalation of debts and financial difficulties for our customers. Money advisors will consider potential changes in customers’ circumstances over the short and long term, in order to prevent foreseeable harm. This includes:</p> <ul style="list-style-type: none"> <li>• assessing how customers may be affected by the change;</li> <li>• how to reassure and protect them;</li> <li>• identifying the steps to take to minimise the impact of the change;</li> <li>• taking appropriate action to prevent or minimise impact of the change;</li> </ul> <p>adapt advice and casework to reflect change.</p> <p><i>To enable and support retail customers to pursue their financial objectives:</i> The Money Advice Service will support customers to make informed choices through the provision of easy access to its service. Information is accessible, taking into consideration customers’ needs.</p>
<b>4.0</b>	<b>Consumer Duty – Four Outcomes</b>
4.1	<p>The “four outcomes”, provide detailed expectations for conduct in areas that represent key elements of the firm/customer relationship, are as follows:</p> <p><i>(i) the governance of products and services;</i> <i>(ii) price and value;</i> <i>(iii) consumer understanding; and</i> <i>(iv) consumer support.</i></p>
4.2	<p><b>Products and services</b></p> <p>Our Money Advice Service will review its products and services regularly to ensure it continues to meet the needs and objectives of the customer. When introducing a new aspect of its service, whg will take account different needs, characteristics and objectives of its customers, to ensure it does not adversely affect service accessibility, provides positive outcomes and avoids foreseeable harm.</p>

	<p>This is achieved through customer feedback, customer satisfaction surveys and independent audits. Where appropriate the service will engage customer representatives, to ensure service improvements remain fit for purpose. The service will also adopt examples of best practice within the sector.</p> <p>If following testing, feedback and audits, an aspect of the service does not meet the needs or objectives of customers, whg will make necessary changes to ensure it meets service and customer objectives.</p>
4.3	<p><b>Price and Value</b></p> <p>Our Money Advice Service is free for eligible whg customers. The value of the service shall be measured against outcomes achieved for customers, tenancy sustainability and customer satisfaction levels.</p>
4.4	<p><b>Customer Understanding</b></p> <p>Where appropriate customer communication will be designed and tested with customer representatives to ensure that:</p> <ul style="list-style-type: none"> <li>• communication meets the information needs of customers;</li> <li>• the information is likely to be understood;</li> <li>• contains relevant information that enables customers to make effective, timely and informed decisions.</li> </ul>
4.5	<p><b>Customer Support</b></p> <p>Customers will receive support, taking into account preferences, vulnerabilities and protected characteristics. Information will be provided in an easily accessible and understandable way. Money advice will deliver its service to customers in a durable medium suitable for the customer, this can range from verbal, written or face to face provisions.</p> <p>Customers will be empowered through financial training, information and self-serve channels where assessed as appropriate. This underpins whg’s strength-based approach to increase financial capability and accountability amongst its customers.</p> <p>Our Money Advice Service will continue to provide welfare benefits and debt advice in response to customer need, this will include self-referrals or through identification of support needs from internal or external colleagues or organisations. Customers may also be supported through a targeted approach, if external factors such as changes to welfare benefits and debt legislation places customer at risk of financial hardship.</p> <p>Customers may raise complaints about the service they have received through our Complaints Policy.</p>

<b>5.0</b>	<b>Training and Awareness</b>
5.1	<p>Money Advisors will undertake appropriate training and development opportunities to enhance their understanding of the FCA Consumer Duty and associated regulations. This will be included in the advisors' annual CPD requirements.</p> <p>The training programs shall cover key principles, customer-focused communication, early intervention strategies, record-keeping requirements, and data protection responsibilities.</p>
<b>6.0</b>	<b>Governance</b>
6.1	<p>Our Money Advice Service will prepare an annual report for Exec+ setting out the results of our monitoring and any actions required.</p> <p>We will annually:</p> <ul style="list-style-type: none"> <li>• review and approve its report on the outcomes being received by customers;</li> <li>• confirm whether it is satisfied that it is complying with its Consumer Duty obligations.</li> </ul> <p>When approving the report noted above, we must also agree:</p> <ul style="list-style-type: none"> <li>• any action required to address any identified risk that customers may not or have not received good outcomes; and</li> <li>• any amendments to our Money Advice Service to ensure that we remain consistent with meeting our obligations under the Consumer Duty.</li> </ul>
<b>7.0</b>	<b>Consumer Duty Record Keeping</b>
7.1	<p>The monitoring carried out by us must record:</p> <ul style="list-style-type: none"> <li>• whether customers are being provided services that have been designed to meet their needs and provide fair value; and</li> <li>• whether customers are equipped with the right information to make informed decisions and whether they are receiving the support they need.</li> </ul> <p>We will keep records in accordance with its Money Advice Service Procedure in relation to our requirements under the Consumer Duty.</p>