

Appendix 1 - BCC draft response for Department for Communities consultation on: Support Framework on Independent Advice and Debt services

DfC submission date: 3rd November 2025

<https://www.communities-ni.gov.uk/consultations/consultation-support-framework-independent-advice-and-debt-services>

Overview

- Council welcomes the introduction of a quality standard for advice provision that will be implemented centrally by the department.
- Council asks the department to note that it supports the delivery of advice services through local providers and that these organisations need to be adequately resourced to provide advice services. The level of departmental funding for generalist advice has remained at a similar level for a number of years whilst the sector reports that it is experiencing challenges in terms of the increased complexity of cases and in recruiting and retaining staff.
- The department should recognise that there are significantly more advice service organisations in Belfast City Council area than in other council areas. There are historical and current reasons for the high number of providers in Belfast and resources should be made available to support the co-ordination of services and referral mechanisms across the city.
- We support the ambition to enhance collaboration and referral, however we note that a resource for co-ordination will have to be provided.
- We support the ambition of the consultation to introduce longer term funding for the advice sector (5 years and beyond) to provide much needed stability.
- It is not clear how the views or users/clients have been factored into the vision/priorities, or whether there are plans to engage specifically with service users / citizens during the further development of the framework. An analysis of the range of issues people are seeking advice about as well as an understanding of the service beneficiaries /client groups is essential to enable a person-centred, tailored service that meets needs. Better profiling and support matching could also support aligning provision / allocation of resources based on analysis of need.
- While there is passing reference to the diverse and changing profile of service users, this could be strengthened by including an analysis of the make-up of customers by Section 75 or socio-economic background, helping to understand need better and minimise barriers. This should also be linked to the outcome/performance measures.
- While the consultation documents include a Rural Needs Assessment and consultation feedback, there is no accompanying equality screening. This is critically important to understand the potential impact of the service on different groups, particularly given the increasing complexity of cases being dealt with and person-centred support provided by the sector.

1. Independent Advice and Debt services

This first section outlines the key features of Independent Advice and Debt Services in NI and the drivers for future policy and delivery.

DfC what we mean

- Independent advice and debt services refers to Department-funded community-based advice and regulated debt advice services
- The need and demand for independent advice and debt services are driven by wider economic and social changes.
- The independent advice and debt sector is part of a wider Voluntary and Community Sector. It comprises community-based advice services delivered in each council area, supported by regional advice organisations.

Scope for improvement in future support:

Our engagement with stakeholders has identified several areas where current arrangements can be improved to better respond to need and to achieve better outcomes. These form the basis for the priorities for investment detailed later in this framework.

- Delivery
- Community-based advice services
- Sectoral support
- Funding

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- Welcome the aim to reduce duplication however removal of the regional Welfare Changes Helpline and introduction of a regional gateway will require additional resources to ensure that there is a mechanism in place for onward routing.
- Any removal of an existing regional resource will have to be accompanied by a robust communications and marketing campaign and this should highlight the range of local services available.
- Would be important to test with current users of regional advice services if removal of a regional helpline will have a negative impact.
- Welcome consistent reporting framework which should include analysis of council area variations and ensure analysis of individuals and types of advice being accessed.
- Welcome simplification of grant streams, however timelines need to include sufficient time for councils to put in place arrangements to accommodate new approaches, particularly in relation to debt.

2. An ambition for future service delivery

This section outlines an ambition for Independent Advice and Debt Services: vision, outcome, guiding principles for delivery and core policy themes.

DfC what we propose:

DfC have set out a vision for independent advice and debt services that contributes to the Programme for Government: Our Plan; 'Doing What Matters Most'. This vision also supports the UK Financial Wellbeing Strategy and NI Delivery Plan.

Underpinning these priorities are eight guiding principles which describes the way in which services should be delivered, reflecting the values of the independent advice sector:

- Confidentiality
- Quality
- Accessibility
- Independence
- Free to the recipient
- Person centred
- Impactful
- Impartiality

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- Worth considering greater linkage between the individual benefits and societal benefits, for example, consider reduction in debt/those facing issues with benefit take up etc. This may also inform the outcome-based framework for the sector.
- Societal impacts should mention impacts on those most disadvantaged.
- Worth considering greater linkage between the individual benefits and societal benefits, for example, consider reduction in debt/those facing issues with benefit take up etc. This may also inform the outcome-based framework for the sector.
- Principles should include reference to supporting the dignity of those accessing services

3. The Department's investment priorities for Independent Advice and Debt Services.

This section sets out thematic investment priorities for Independent Advice and Debt which will determine how the Department funds future services.

DfC what we propose

Investment Theme A: Joining up to improve outcomes

- The Department's investment and the way that it works with other funders of advice services will support a collaborative delivery model, with strong partnerships and effective referral pathways between statutory and Voluntary and Community sector services working together to ensure people get the help and support they need.

Investment Theme B: Enhancing visibility and accessibility of services

- The Department's investment will recognise the need for advice and debt services to be visible and accessible for all those who need advice, in a way that reflects their preferences and requirements.

Investment Theme C: Quality and Innovation in Services

- The Department's investment will support a formal quality standard as a fundamental part of the service.

Investment Theme D: Measuring Performance and Impact of Services

- To ensure the Department's investment in advice and debt services is appropriately targeted, we need to ensure the right things are recorded.

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Theme A

- We support integration of funds; the department needs to ensure that there is sufficient time to support introduction of new arrangements at council level.
- We support the collaborative delivery model proposed and would suggest that as research shows a link between the advice sector and improving health outcomes, particularly in terms of mental health, easing stress and financial instability; there may be scope to utilise additional referral pathways or promotion/outreach opportunities through community-based networks, GP or library facilities etc.
- Role of Regional Advice Partnership needs to be clearly defined with clear targets for operation.

Theme B

- Enhancing visibility & accessibility refers to multi-channel delivery. It appears focused on streamlining and on-line/self-help support, but it is vital that:
 - community face-to-face delivery is robust, accessible and readily available, particularly given the complexity of issues which those facing hardship may present and certain groups ie. older and those where English not first language, can face additional barriers.
 - the increasing diversity of the population should also inform delivery and factor in the language and cultural barriers that people may face in accessing the service.

- In this context consideration should be given to ensuring resources are available to expand the scope and nature of advice and support which may be required by newcoming communities.
- Enhancing visibility needs to include marketing and communication workstream and resource to support delivery of this centrally.

Theme C

- Welcome implementation of a quality standard for advice and debt services, a timeline for implementation would be helpful.

Theme D

- Welcome the development of the **outcomes-based framework** which includes key performance measures, lived experience and outcome measures. The development of a framework has to be cognisant of the increased complexity of cases and therefore should not only focus on numerical analysis.

4. Support and strengthen the Independent Advice and Debt sector through effective regional support

This section outlines how the Department's investment will provide effective regional "infrastructure" support to meet the needs of and strengthen the Independent Advice and Debt Sector

DfC what we propose	<p>Investment Theme E: Support and Strengthen the Sectors</p> <ul style="list-style-type: none"> • The Department recognises the need to support the effective and efficient delivery of community-based advice and debt services through continued investment in regional "infrastructure" support that best meets the needs of the sector and people who use it.
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- Welcome introduction of integrated regional infrastructure support provision that meets the need of community-based advice services. The role of support organisations should be clearly defined and there should be local mechanisms for links between advice providers, infrastructure organisations and local councils.

5. Delivering the Framework.

This section sets out the proposed implementation plans to support independent Advice and Debt Services

Section 5	<p>Delivering the framework</p> <p>This section sets out the Departments plans for the implementation of the priorities in this framework to support future delivery of independent Advice and Debt Services.</p>
Proposed Action:	<p>Phase 1 – Develop Stage – Laying the foundations by establishing defining outcomes and quality measures</p> <ul style="list-style-type: none"> • Develop an outcomes-based framework • Progress Advice Quality Standard <p>Phase 2 – Design Stage – Pilot and refine frameworks while developing service specification</p> <ul style="list-style-type: none"> • Pilot outcomes framework • Appoint an independent NIAQS accreditation body • Design service specification for community advice services (with councils) and regional delivery <p>Phase 3 – Delivery Stage / Commission services</p> <ul style="list-style-type: none"> • Department commissions regional services • Council implements the service specification for community advice services

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- Council strongly welcomes the introduction of a centrally implemented quality standard
- An indication of timeframes for the phased approach would be helpful.
- We note further development will be informed by key delivery partners including local government, and the independent advice sector; however, we would refer to the work carried out in Scotland [Social Security Experience Panels: legacy report - gov.scot](https://www.gov.scot/publications/social-security-experience-panels/legacy-report/pages/1-1-introduction.aspx) where those with **lived experience** were recruited in the pre-consultation stage to form a reference panel to transform the system, therefore involving users from design to implementation and enhancing accountability.