



**NIACRO Response to the Department for Work & Pensions
and HM Treasury Public financial guidance review:
consultation on a single body**

13 February 2017



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1. Overview

1.1. NIACRO is a voluntary organisation that has been working for almost 50 years to reduce crime and its impact on people and communities. Specifically, its contributions have been to:

- Support the resettlement of adults leaving prison and those on community supervision
- Build skills, confidence and employability of people both in prison and in the community
- Build the resilience of children, young people, families and adults who are displaying behaviour that would put them at risk of engaging with the criminal justice system, supporting positive lifestyle choices
- Influence service providers in the statutory, voluntary and community sector and building their capacity to provide appropriate support and bespoke training
- Contribute to public debate and influencing others with regards to criminal justice matters, at the highest level.

1.2. At the heart of NIACRO's work is a drive to reduce (re)offending within the understanding that integrated and flexible approaches towards desistance are most effective.

1.3. NIACRO delivers the Families and Money Matters (FAMM) project which provides debt and money management advice to families of people in prison. It supports families who are not engaging with mainstream debt advice services and who have a relative who has either recently entered custody or is nearing their release date. The project also aims to research and evaluate the reasons why people do not engage with mainstream debt support services. This project is funded by the Money Advice Service. Further information on the project can be found on the NIACRO website: <http://www.niacro.co.uk/families-and-money-matters-famm>

2. Preliminary Comments

2.1. NIACRO welcomes the opportunity to comment on the Department for Work & Pensions and HM Treasury Public financial guidance review: consultation on a single body. Please find below a list of the questions provided in the consultation document along with responses from NIACRO.

2.2. Q1. Do people with protected characteristics under the Equalities Act 2010, or any consumers in vulnerable circumstances, have particular



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needs for public financial guidance or difficulty finding and obtaining that guidance?

NIACRO's Families and Money Matters (FAMM) service, supported with funding from the Money Advice Service, highlights to us the importance of early intervention and support for people in prison custody to prevent a money management issue from becoming a debt problem. Through direct engagement with people in custody and their families in the community we are discovering that entering custody is the beginning of financial problems for many. We are also aware of the lack of public financial guidance within prisons in Northern Ireland and that most demographics referred to as 'protected characteristics' in this consultation are represented in the numbers who have used our service. We would suggest that another category is added to reflect life in Northern Ireland, i.e. political belief as defined by [Section 75 of the Northern Ireland Act 1998](#).

2.3. Q2. Do you agree that these areas capture what the broad role of the SFGB should cover?

Yes, the five key areas cited in the consultation - (1) debt advice for those in problem debt; (2) information and guidance on matters relating to occupational or personal pensions, accessing defined contribution pension pots, and planning for retirement; (3) information to help consumers avoid financial fraud and scams; (4) information for people on wider money matters and coordinating and influencing efforts to improve financial capability; (5) and co-ordination of non-governmental financial education programmes for children and young people – covers the financial guidance needs of people from school age, to working age (whether in or out of work) through to retirement and beyond.

2.4. Q3. Do you agree that the SFGB'S financial capability initiatives should focus on priority groups such as those who are in most need of support to build resilience?

The SFGB'S financial capability initiatives should be made available to all with emphasis on those identified as 'just about managing' and the 'squeezed' groups. More information can be found in the [Money Advice Service 2017-18 Business Plan](#) consultation document.



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2.5 Q4. Do you agree that the SFGB should have a strategic role, working with the financial services and pensions industry and third sector organisations to improve financial capability?

NIACRO believes it is essential that the SFGB should be an autonomous, independent body, void of political interference and have a strong strategic role 'to ensure that funding is delivered to high-quality programmes that have been proven to work and to help consumers most in need'. The avoidance of duplication, better coordination of resources and having one strategic plan for the delivery of services to consumers will lead to improved outcomes.

2.6 Q5. How might the SFGB develop its understanding of what works and usefully contribute to sector wide research?

As a UK-wide body, the SFGB should apply the learning already available from the four regions (England, Wales, Scotland and Northern Ireland) to assess and determine what works best. Information should be readily available from within the voluntary and community sectors in these jurisdictions to inform policy on what works best and what doesn't. We do know that the needs of people in England or Wales will be different from those in Scotland or Northern Ireland and the corresponding response will reflect these differences.

2.7. Q6. In what ways could the SFGB co-ordinate and add value to the provision of financial education?

SFGB should examine how best to communicate and engage with young people. Financial education could be better facilitated through the marketing and use of digital platforms and applications that could be downloaded using mobile phones. Targeted awareness-raising and marketing is essential to ensure that these groups have greater knowledge of and access to financial education resources suitable to their needs.

2.8. Q7. Are there other delivery channels that the SFGB should consider that would be effective for delivering to consumers?

NIACRO agrees that a multi-channel approach should be offered to consumers including a public facing website, telephony advice, web-chat, and other digital platforms. It must be noted that the impact of face-to-face support cannot be underestimated and should not be substituted by the SFGB especially when reaching out to people from geographically remote areas and environments



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where the access to telecommunications and the use of digital platforms such as websites, and telephone connections are strictly controlled for example, in prisons.

2.9. Q8. How should the SFGB ensure that it engages consumers at the right time for them?

The SFGB could apply a contact process with consumers at key life stages for example, at age 16, on entering first employment, on entering university, when submitting application for benefits, when applying for an unsecured loan, applying for a mortgage, leaving work through illness, on retirement and so on. It will require the cooperation of public and private sector bodies such as statutory agencies and the financial services sector to responsibly share consumer data with the SFGB.

2.10. Q9. Do you agree that the SFGB should be able to exercise some flexibility in the way funding is directed?

NIACRO believes that the SFGB should have the flexibility in deciding where funding is directed in order to meet the old and new challenges in a changing landscape without detriment to the core operational concerns.

2.11. Q10. Would these proposals have any impact on the delivery of public financial guidance in Scotland, Wales or Northern Ireland?

Given the current period of political instability in Northern Ireland, the upcoming Assembly Election in March 2017 coupled with the growing uncertainty as to the timeline of if and when a new Executive will be in place, we believe the transitional leadership team should have a contingency plan for awarding debt advice contracts and financial capability projects in Northern Ireland given the uncertainty as to the immediate future of the devolved legislative institutions. Our devolved institutions may not be formed to deliver these or, given the legal time constraints may see a return to direct rule of the devolved matters from Stormont to Westminster.

2.12. Q11. Do you have any other comments about the proposed delivery model and consumer offer?



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NIACRO understands the impetus to create a new single financial guidance body (SFGB) to replace the statutory functions of the Money Advice Service (MAS), the Pensions Advisory Service (TPAS) and Pension Wise is a desire to reduce duplication, to bring pensions guidance, money guidance and debt advice under the one roof, to ensure consumers can access the highest quality financial guidance and to deliver a more coordinated strategy for those most in need of help.

We believe the SFGB should be an autonomous body, distanced from political interference and influence and should have the independence to set tangible outcomes for the sector instead of concentrating on meaningless targets/outputs. We also believe that the SFGB should have the flexibility to direct funding levied in the financial sector where it deems will have the most impact in terms of delivering outcomes.

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