



# DAPA Scheme Newsletter

Volume 1, Issue 4

November 2020

## Inside this issue:

Spotlight— A Day in the life of a DAPA Assessor	1
Dear DAPA -	2
> Impact of Insolvency on DAPA findings	
> Options advice when no FS complete	
> High expenditure	
> Independent Financial Advice and mortgaged properties	
Benefit Checks	3
Weblinks	3
A day in the life of a DAPA Assessor	4
DAPA Common Themes	4

## Welcome

Welcome to issue 4 of our DAPA Scheme newsletter. As we draft this newsletter, the country is entering yet another lockdown period. Whilst on the one hand it feels like there is no end in sight for this virus, on the other hand the world of debt advice waits with baited breath for the fallout from the last few months.

As demand for debt advice starts to increase, it is as important as ever to ensure that the quality of

the advice provided remains high, and that this is evidenced within the case records.

If you have any further ideas for future issues, please share these via your Lead Organisation or by email to [peerreview@recognisingexcellence.co.uk](mailto:peerreview@recognisingexcellence.co.uk)



## Spotlight— A Day in the Life of a DAPA Assessor

A typical day starts bright and early with checking the work schedule, as the workload is planned weeks ahead to ensure SLA deadlines are met. The planning of the work programme is important as there are many different pieces of work happening at the same time across different quality initiatives such as webchat, Recipient Level DAPA and Triggered Technical Site Visits which all have different deadlines and they always overlap.

We have a weekly team meeting and keep in close contact on a daily basis, discussing cases and scenarios to make sure consistency of approach is maintained across the team. Our Quality Manager and Operations Manager are always a phone call 'away' for technical support with complex issues or when it is difficult to make a decision on a specific criterion. Discussing these issues amongst our team and someone more experienced, brings clarity and a quicker decision regarding the matter.

Assessing a file involves a lot of focus and decision making around each criterion based on previous experience and technical knowledge. It is time consuming too, as we strive to be very thorough. Every document contained in the case record is read, because sometimes advice is recorded in unexpected places. We want to find/assess the advice given and to do so, time and dedication is needed. Our greatest 'pleasure' is scoring 100% for a file. This is because the client has received an excellent service and great advice and it is the culmination of hard work from both advisers and supervisors, advice agencies and Lead Organisations, in a common effort to improve quality of debt advice.

The reason why I joined the RE team, was my passion for continuous improvement of both my professional knowledge, as well as the quality of debt advice across the sector. I know debt advice is a complex legal field and after being a legal professional and debt adviser for over 15 years, I understand both the amount of hard work that it entails as well as that it is everchanging. It evolves like any other legal field to mirror the development and changes of our society. This in itself makes it very challenging, for all parties involved – advisers, supervisors, quality managers and Assessors- as it pushes us to continuously learn and develop to provide the best quality service that we can.



## Dear DAPA

**If **limited** advice **has** been presented to the client but the overall outcome for the client was insolvency, would the missed advice be counted as an Area of Improvement rather than an Area of Concern. For example, if the client was not advised of any CCJ enforcement advice but the client had a successful DRO, would this constitute as an Area of Improvement?**

Yes this would be classed as Area of Improvement as the DRO has resolved the situation. However, it is not automatic that if the client was insolvent, all Area's of Concern then become Area's of improvement – it depends on what the issue is and the potential impact. For example, the client was not advised on all available options, this would remain as an Area of Concern as this had the potential to impact the clients decision on their preferred strategy.

---

## Dear DAPA

**If an adviser has discussed options with a client without completing a financial statement and offers of repayment have been sent – when reviewing the 'options' part of the file, would this be seen as N/A or Not Met?**

This would be classed as Not Met and an Area of Concern as it was not known if the client could afford the repayment offers.

---

## Dear DAPA

**If areas of expenditure are excessive and not justified, does this score as an Area of Improvement or an Area of Concern?**

If the expenditure was above the SFS guideline figures for the situation and not justified then it may be an Area of Improvement or an Area of Concern, depending on what happened in the case. If offers of payment were made based on the financial statement, then it would be an Area of Concern as the statement may be challenged. If the financial statement was not shared then it could be an Area of Improvement but it will depend on what advice was given based on the financial statement to determine this.

---

## Dear DAPA

**How would the Scheme view cases where advisers have advised clients to seek independent financial advice regarding mortgaged properties and not explored the issue fully?**

The Scheme would expect the adviser to investigate the situation regarding the mortgage so that it can be ascertained how the mortgage affects the client's overall situation. This would include how long is left on the mortgage term, whether the client is making payments to the mortgage, and whether there is equity in the property etc.



## Benefit Checks

In all circumstances, a **benefit check** should be carried out, or the client signposted appropriately for this. Establishing **potential benefit entitlement** through benefit checks is essential to ensure that clients are receiving all the benefits they are entitled to at the correct amount. This also includes confirming that the client is not entitled to any benefits.

Failing to carry out a **benefit check** could lead to missed opportunities for income maximisation. This process will also inform the adviser if there are any deductions from benefits for other debts. If money advisors do not have the necessary skills or knowledge to complete the check themselves, then it may be just as effective to refer or signpost the client accordingly.

The DAPA Scheme criteria 5.1(c) CW / 3.2(c) AO considers income maximisation through a **benefit calculation** only. Benefits/Income which can maximise the client's income that would be not be identified through a benefit calculation is considered under 5.1(a) CW / 3.2(a) AO.

Where a benefit check is completed, a copy should be kept on the file as if no copy is available, it is not possible for the DAPA assessor to check the accuracy of the calculation. Assessors take care to ensure that this criterion is not dual counted with criterion requirement 11.4 CW / 5.1(d) AO.

Where it is clear that the client was entitled to benefits which were not claimed and a **benefit check** was not carried out or the client signposted/referred for a benefit check, this will be an **Area of Concern**. If it is not clear whether the client was entitled to any additional benefits, failure to carry out a **benefit check** will be an **Area of Improvement**.

If client is already in receipt of Welfare Benefits, the adviser should check, or signpost the client for a check, to ensure that the benefits are being paid at the correct rate. If it is stated that the client's income is too high for benefits, it needs to be evident how this conclusion was reached. This will be an **Area of Improvement**.



Where it is identified that a **benefit check** has already been carried out, the adviser should explore when it was carried out, by whom, the outcome of any application (if applicable) and whether the client's circumstances have changed since. A linked file does not necessarily always need to be supplied to evidence this, a short paragraph within the case record can confirm this information and evidence that this action has been carried out by the adviser.



### Weblinks

Where **weblinks** are used as a record of the advice given, the DAPA Scheme will expect these to be tailored to the individual circumstances of both the client and the issues presented. Weblinks generally deal with many issues and therefore need to be tailored to the client's particular circumstances otherwise this is going to indicate generic advice. This can be evidenced by noting the sections discussed within the case notes e.g. advised client on X, including paragraphs 1, 2, 3, 7, 9, and 10, all other paragraphs not relevant. Additional notes should be added where relevant.

If the weblink is not evidenced as discussed with the client and/or the sections were not noted as discussed, then the Scheme would view this as providing information rather specialist debt advice.

## Preparing for a DAPA Assessment

'The Scheme has previously shared some guidance for organisations to ensure that case records presented for assessment provide the full documentary evidence for each client's case. In addition, a suggested structure for organisations to share documents was also created. (Please see page 5 of the Overview and Guidance Document – Recipient Level DAPA V2 August 2020.)

*'Where a case file comprises multiple documents, it is recommended that a folder/sub folder structure is applied to aid the assessment process. A suggested approach is as follows:*

- Preliminary Information (Equal opportunities / Form of Authority/ Special Category data etc)
- DAT Information
- Financial Information (Budget sheet, SFS, MART, proof of income/expenditure)
- Creditors Correspondence
- Client Correspondence
- Confirmation of Advice (Letter, Factsheets, Information Leaflets, Application Forms (Benefit Checks, QBC, DRO, DHP, Trust Funds, Court Docs')

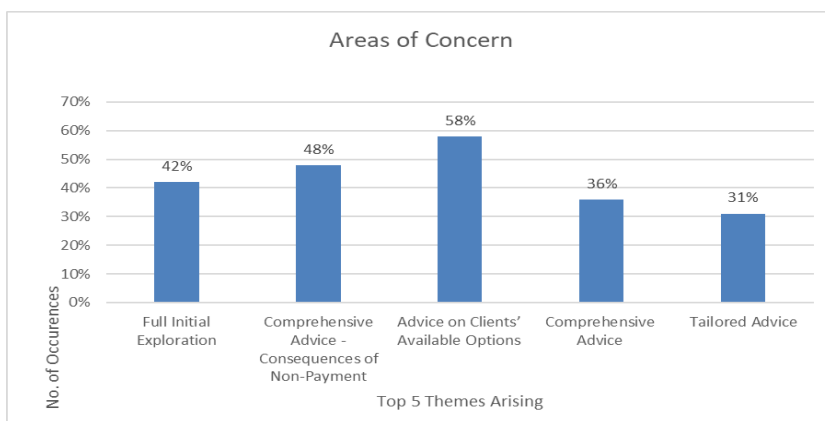
The Scheme has seen an increase in the number of documents submitted for assessment which has led to the suggested folder structure to assist with the assessment process. This is positive as it is a full record of the comprehensive advice that clients are receiving. This ensures the client is empowered to make an informed decision to resolve their financial problems based on their own personal circumstances.

The Scheme has recently seen some issues with financial statements and budget sheets. It would seem these are dated when the documents are printed rather than when the document was produced. The Scheme recommends that case records confirm when the budget/statement was produced. This ensures if there are multiple statements/budgets in a case record, it can be easily identified when the original statement was produced. It would also assist the assessment of a case if the documents provided were in chronological order, this applies to creditor/client letters.

The Scheme has received some benefit checks for clients in a format which cannot be accessed which does impact on the assessment. The Scheme also has completed assessments where documents had been omitted from the file contents. This has included DRO applications, Court applications and charitable applications. When there are missing documents from the case records this will have an effect on the assessment of that case. If an organisation provides the full record of a case this will ensure the Scheme can complete an assessment based on this full information.'

## Common Themes

The following data has been taken from the most recent round of Recipient Level DAPA Assessments (November 2020), with the graph below showing the top 5 most common themes in relation to Area's for Concern seen by the DAPA Scheme. Any Area's for Concern identified within assessments should be a priority when developing an action plan and taking steps to improve in preparation for the next assessment.



**Recognising Excellence Ltd**  
Unit 3, Twigworth Court  
Business Centre,



Phone: 01452 733 510  
Email: [peerreview@recognisingexcellence.co.uk](mailto:peerreview@recognisingexcellence.co.uk)