

Appendix 1 - Money Advice Team – Self assessment against Consumer Duty key responsibilities – June 2025

Compliance item	Action taken/measures already in place	Further actions to be completed to ensure compliance
Those with governance responsibilities for your service are aware of the Consumer Duty and understand their responsibilities under it	Board updated with Consumer Duty report at July 2023, July 2024 and July 2025 meetings	
An implementation plan for the Duty has been approved by the firm’s Directors	Included with 27 July 2023 Consumer Duty Board report	
Arrangements are in place to identify and respond to any increase in the demand for advice	<p>Monitored within the service and reporting mechanisms in place to update Management on any issues arising. Any changes to service provision then agreed by Management.</p> <p>This includes monitoring referral numbers and waiting times on a monthly basis.</p> <p>Response also includes giving customers the option of being referred/signposted to other free national and local debt advice agencies.</p>	
Thought is given to how the debt advice we provide can combine most effectively with support in other areas	<p>The Money Advice team already work closely with the Welfare Rights Team and make referrals where appropriate to ensure benefits are maximised.</p> <p>The team signpost/refer to other agencies to deal with the root cause of the customer’s issues (e.g., for support for addictions).</p>	

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<p>Plans are in place to anticipate and respond to any changes in operational and financial resilience</p>	<p>Operational resilience is provided by the option of using other staff (Welfare reform team) for non-regulated activities when demand is high.</p> <p>Financial resilience (for staffing budgets) is assured by the service being part of Derby Homes and this area of support for customers being a key priority for both Derby Homes and Derby City Council. In particular during the cost-of-living crisis period.</p> <p>The service is funded via an annual contribution from the Councils HRA, with annual increases linked to any pay award. There are no external charges made for services given.</p>	
<p>Appropriate systems are in place to ensure that clients receive good quality advice</p>	<p>All staff giving FCA regulated debt advice have completed (or, in the case of new staff, are working towards) the Certificate in Money Advice Practice qualification and have to comply with ongoing CPD requirements.</p> <p>Quality of advice is monitored through the file reviews completed by management (monthly) and the Institute of Money Advisors (IMA) (quarterly).</p>	
<p>The rules and guidance set out in Chapter 8 of the Consumer Credit Sourcebook are followed https://www.handbook.fca.org.uk/handbook/CONC/8/?view=chapter</p>	<p>Compliance with FCA rules is monitored through the file reviews completed by management (monthly) and the IMA (quarterly).</p>	

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<p>Systems are in place to correctly identify clients in vulnerable circumstances so that they are able to achieve good outcomes</p>	<p>We identify vulnerabilities by:</p> <ul style="list-style-type: none"> • Exploring any issues with capacity or preferences in terms of contact with our customers at our initial appointment with them and recording our findings on our ‘vulnerabilities checklist’. The checklist is reviewed and updated as appropriate throughout the period of support to the customer. • Checking any ‘flags’ on Open Housing (tenants housing management system) • Checking previous case notes on the Derby Advice case management systems (currently AdvicePro, previously Civica APP) <p>We adapt the advice we give depending on any issues identified, including:</p> <ul style="list-style-type: none"> • Using of language interpreters • Offering various channels of advice- telephone, face to face (including home visits) • Being flexible with appointment times, where appropriate, to suit the customer’s needs • Giving vulnerable customers more time to engage with the service before closing their case <p>FCA compliance monitoring programme referencing how we ensure customers are treated fairly.</p> <p>The Money Advice Team Leader is ensuring, through completing reports and carrying out file reviews, that any customer vulnerabilities / requirements are appropriately recorded in the new case management system.</p>	

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	<p>Derby Homes have introduced the 'About You: household survey' to identify vulnerable customers and any reasonable adjustments that may be required. The Derby Advice team will be supporting with completion.</p>	
<p>Systems are in place to monitor the impact of our work and learn from the outcomes that we achieve – and don't achieve – for clients</p>	<p>The new case management system, AdvicePro, has been in place since December 2023 and enables us to be able to record vulnerabilities and outcomes for customers.</p> <p>Feedback from customers on the outcomes which are achieved is gained through completing our customer survey.</p> <p>Reports have been produced to identify vulnerable customers based on data for 2024/25 and will be continued to be monitored on a regular basis.</p>	
<p>Systems are in place to understand our clients' journeys into, through and out of advice and make sure that they are supported throughout all stages of the debt advice process</p>	<p>Monitored through regular file reviews of 1st and 2nd tier cases by management.</p>	
<p>Communication with our clients is improved so that we understand what is important to them, make it easy for them to understand the information that we have provided and help them to get the most from our service</p>	<p>We offer various channels of advice and can adapt communication methods according to our customers' needs and preferences.</p> <p>We complete a vulnerabilities checklist confirming any capability issues and preferences in terms of contact.</p>	

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	<p>The Derby Homes Communications team have reviewed the Money Advice confirmation of advice letter template to ensure its intelligible and client friendly.</p> <p>A new question on how easy it was for the customer to understand the information provided to them by Money Advice has been introduced into the customer feedback survey. Between 1/4/24 and 31/3/25, 94 % were satisfied that their wellbeing has been improved since receiving support and advice from the Money Advice Team and 100% were satisfied that the information and advice given by the Money Advice Team was easy to understand.</p>	
<p>If we use digital channels and technology, we do so in ways that help rather than hinder clients so that they can achieve their financial objectives</p>	<p>Derby Advice have not adopted telephony chat bot. Contact from customers remains via a specific phone number for Derby Advice, or email (to a Derby Advice email address). Once a case is in progress the customer is given their adviser's direct contact details.</p>	<p>Any introduction of the telephony and / or web bot, would be limited to initial signposting of general advice / support fund applications. These are publicly available already. If the customer requires support with a specific query – this will remain to be looked at by an appropriate Advisor (and not an automated reply).</p>
<p>Appropriate systems are in place to deal with data protection and cyber security risks</p>	<p>Staff have mandatory training on this subject on an annual basis. If not completed, then access to the system is withdrawn until it is completed.</p>	

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	<p>Use of Egress when sending confidential emails.</p> <p>The IT infrastructure is managed by the Council and Derby Homes and there are robust procedures (and insurance) in place to guard against cyber risks.</p>	
<p>We invest in our workforce, helping our team to develop a shared understanding of what good debt advice looks like, particularly for clients in vulnerable circumstances</p>	<p>All advisers giving FCA regulated debt advice have completed (or, in the case of new staff, are working towards) the Certificate in Money Advice qualification and are given time out of work to complete CPD.</p> <p>These issues are regularly discussed in Money Advice team and Derby Advice service meetings.</p>	
<p>We assess our compliance with the Duty at least once a year, with the first report to have been considered by the board or equivalent management body within 12 months of the rules coming into force, i.e., by 31 July 2024.</p>	<p>This has been incorporated into the FCA monitoring plan which is already in place which is reviewed every 6 months.</p> <p>Mechanism for the Board to receive an annual update on compliance with the Consumer Duty is in place.</p>	