

Money Guidance Boundary and Escalation Policy

Pocket Money Adventures CIC | Version 1.1

Effective: 2 October 2026 | Review: 2 October 2027 or sooner on relevant change

Policy owner: Nathan Waldron, Director | Signatories: Nathan Waldron and Bernadette Houlton | Approved policy issue

Adopted by Pocket Money Adventures CIC on 2 October 2026.

Signed electronically: Nathan Waldron, Director and Designated Safeguarding Lead.

Signed electronically: Bernadette Houlton, Director and Deputy Designated Safeguarding Lead.

Typed electronic signatures in the established policy format.

Current operating requirements

Maximum planned session headcount: 50 people in both school and community settings, including every child, accompanying adult, host or school staff member, volunteer, observer and PMA facilitator. Use the lower of 50, the venue safe capacity and the assessed number supported by competent staff. This is a ceiling, not a supervision ratio or insurance confirmation. Reduce numbers, add support or split groups where necessary.

PMA provides education and general money guidance within assessed competence. It does not provide personalised regulated financial or debt advice; benefits support is referred to a competent specialist service. Do not describe all benefits information as FCA-regulated advice. Nathan's separate financial-adviser role does not authorise the CIC or turn a children's session into an advisory service. Adult support requires a separate safe, private, assessed arrangement.

Detailed policy and procedures

Money Guidance Boundary and

Escalation Policy

This policy defines the line between what Pocket Money Adventures CIC does when it talks to an adult about money, and what only a regulated or specialist service may do. It applies to every director, employee, sessional facilitator and volunteer, in every setting. The single sentence this policy exists to protect Pocket Money Adventures provides financial education and non-regulated money guidance. It does not provide financial advice, and no one delivering for the organisation may give it, imply it, or allow a participant to believe they have received it.

1. Guidance and advice: the difference we work to

Guidance gives a person information and options and leaves the decision with them. Advice recommends a course of action for that person's circumstances. We give guidance. The distinction is not a formality: advising on debt solutions, credit, insurance, investments, pensions or mortgages is a regulated activity, and carrying it on without authorisation is a criminal offence under the Financial Services and Markets Act 2000.

2. What our people may do

- explain, in plain words, how money decisions work, including needs and wants, planning ahead, irregular costs and the effect of borrowing;
- help an adult understand what an impartial public tool asks and how to complete it, including the MoneyHelper Budget Planner, Benefits Calculator, Bill Prioritiser and Debt Advice Locator;
- help an adult write their own plan, in their own words, with figures they keep;
- describe what different services do, so an adult can choose which one they want;
- help an adult make contact with a service while that adult is present and in control of what is said; and
- listen, without judgement, and record only what this policy and our data protocol permit.

3. What our people must never do

- recommend a debt solution of any kind, including a debt management plan, a debt relief order, bankruptcy, an IVA, or consolidation;
- tell an adult that they are or are not entitled to a benefit, or interpret a calculator result as a decision;
- recommend, compare or arrange any financial product, including credit, savings accounts, insurance, pensions, mortgages or investments;
- advise which debt to pay first beyond explaining the published definition of priority debts, or suggest that any debt be left unpaid;
- assess affordability or suitability, or complete an income and expenditure form on a creditor's behalf;
- negotiate with a creditor, landlord or utility, or speak to any third party as the adult's representative;
- ask for or accept bank statements, credit reports, account numbers, PINs or passwords, or record detailed debt schedules;
- handle a participant's money, or witness or assist with a financial transaction; or
- hold out any director's personal professional qualification as though it belonged to the organisation or to this service.

4. Competence and training

Everyone delivering adult guidance completes induction on this policy and works to the Money and Pensions Service Money Guiders competency framework as professional development. The organisation is not MaPS accredited and does not describe itself as accredited. No one delivers adult guidance before that induction is recorded.

5. Stop-and-connect triggers

The conversation stops and becomes a supported connection whenever an adult:

- asks what they should do about a debt, an arrear or a creditor;
- asks whether they qualify for a benefit, or what a calculator result means for them;
- asks about any financial product, or about borrowing to cover a shortfall;
- describes enforcement action, eviction, disconnection, a court letter or bailiffs;
- describes being unable to afford food or heating now;
- describes another person controlling their money, or pressure to hand money over; or

- asks a question the facilitator is not certain they may answer. Uncertainty is itself a trigger. Nobody is expected to judge a borderline case alone, and no one is criticised for stopping early.

6. The words we use when we stop

Facilitators use a consistent form of words, so the boundary is clear to the participant rather than felt as a refusal: "That is exactly the right question, and it needs someone qualified to answer it properly, which is not me. What I can do is help you get to them today. Shall we do that together now?"

Where an adult presses for an opinion, the facilitator repeats the boundary once, offers the connection again, and does not answer the question. What follows is recorded under our Information Sharing and Supported Connection Protocol.

7. Escalation

- Immediate risk to life or safety: call 999 first, then inform a director the same day.
- Safeguarding concern, including financial abuse, domestic abuse or coercive control: follow the Adult Safeguarding and Trauma-Informed Response Procedure and inform the Designated Safeguarding Lead the same day.
- Crisis need such as no food or no heating today: offer a supported connection to the appropriate published route immediately, and record it.
- Boundary uncertainty: pause, tell the participant you will check, and speak to a director before continuing.
- Any occasion on which this policy may have been crossed: report it to a director the same day. Reporting a mistake promptly is treated as doing the right thing.

8. Records and complaints

We record that a conversation happened, the type of action the adult chose, and whether a connection was offered, made or declined. We do not record the content of an adult's financial circumstances beyond what our data protocol permits. Anyone who believes they received something other than guidance may complain under our Complaints Policy, and any such complaint is reported to the Board.

9. Responsibility and review

The Board is responsible for this policy. A director supervises adult guidance delivery, samples records and holds a boundary discussion at each team briefing. The policy is reviewed annually, or sooner if our delivery, the regulatory position or the Money Guiders framework changes.

Issue control: current approved issue dated 2 October 2026. Earlier issues are archived. Policy approval does not complete host agreements, individual acknowledgements or venue checks.