

National Assembly for Wales

Bethan Jenkins AM - Financial Education and Inclusion (Wales) Bill

FEI 1 – SNAP Cymru

SNAP Cymru provides Parent Partnership Services and Disagreement Resolution across 22 LA's and is the second largest provider of independent advice and information in Wales. We provide:

- Independent issue based advocacy service for children and young people – 'About me'
- Issue based consultation with young people across Wales
- Approved centre and provider of accredited training

SNAP Cymru meets the requirements for changing legislation and policy through our customers being able to get information, advice and support from a single point of access. Recently the Welsh Government suggested that advice and information services should have the capacity to handle initial phone, electronic, or face-to-face enquiries, and preferably be located in easily accessible premises that are independent of the local authority.

SNAP Cymru is well positioned to take on new challenges:

- Participation in ESF projects with partners including WCVA and DFES
- Trusted among young people, parents and carers throughout Wales
- Well-trained and experienced workforce with in-depth knowledge of legislation and issues related to families and young people
- Experience of working within the most deprived communities in Wales
- Experience of obtaining good outcomes of young people at risk of long term NEET and exclusion
- Provides a comprehensive service extending to health and social care
- Secure existing infrastructure to provide quality and reassurance
- 25 years' experience of supporting parents, carers and Young People
- Skills and strengths required to offer a holistic, bilingual, service

SNAP Cymru deals with enquiries from families and young people around living in poverty and finds that many find it difficult to join the system so that they can get support to fill in the forms necessary to obtain financial or housing support.

This consultation looks at how we can:

- Increase prosperity in Wales by improving the financial education and literacy of our citizens
 - Improving financial capability amongst school-age children and young people by making it a legal requirement that financial education is included in the school curriculum;
 - Strengthening the role of local authorities in helping people avoid falling into financial difficulty, by requiring local authorities to adopt a financial inclusion strategy to promote financial literacy and address issues around financial inclusion.
 - Provisions in the Bill relating to internet access in public libraries; the financial education of looked-after children; and the signposting of information about financial management

Bethan Jenkins AM proposals

To require that financial education becomes a compulsory part of the curriculum from Key Stage 2 onwards, by amending section 101 of the Education Act 2002 and placing financial education on a similar footing to personal and social education (PSE) or work-related education. Therefore, financial education would be legally required as part of the basic school curriculum but subject to non-statutory guidance on how schools deliver it.

SNAP Cymru comments

In undertaking the response to this consultation SNAP Cymru found the following recent research very helpful

Money Lives

Research for the Money Advice Service March 2014

“Our research suggests that it is possible to design interventions which increase levels of financial capability. However, this is only possible when time is taken to really understand the person and how they live. To have an impact on an individual’s behaviour towards money, you need to look beyond their skills and knowledge into their attitudes, their motivations, and the opportunities they come across.” www.moneyadviceservice.org.uk

- 1. What are your views on making financial education a statutory part of the curriculum (from Key Stage 2 onwards), in a similar way to personal and social education (PSE) and work-related education?**
- 1.1 SNAP Cymru welcomes the realisation that currently we are failing our children and leaving them vulnerable to poor and mal-practice in financial services
- 1.2 SNAP Cymru is concerned that squeezing more and more required elements into the school curriculum through guidance and inspection will inevitably stress an already straining at the seams system
- 1.3 SNAP Cymru believes that the most important aspect of financial acumen is having the underpinning maths skills to enable the child or adult to understand comparisons. We have to tackle the general state of maths being taught to our children, the Programme for International Student Assessment (Pisa) tests evidence [Wales was below average](#) for reading and maths. ‘To improve standards, numeracy should be taught across the curriculum, saying it helps with everything in life - even sport’.
- 1.4 SNAP Cymru is concerned that the proposal may not support children and young people with additional learning needs. Wales has a higher percentage of children with additional learning needs, a higher percentage of poverty and in many ways a greater need for financial education than other countries.
- 1.5 Too often we confuse age with stage of development, being **in** KS2 is not the same as being able to cope with and understand money matters
- 1.6 All children require a level of mathematical competence before they are able to make age appropriate guesses and computations even at the basic level of playing shop. We do need to consider the approach to mathematics generally to enhance or ameliorate deficiencies
- 1.7 Children need to be using real coins, using real life money situations to support numeracy, we need to ensure these opportunities happen in order that they have a context within which to begin to learn about money matters, choices and comparisons. Families, communities and schools need to work together to achieve this.
- 1.8 Young children are likely to be bought things as and when the occasion arises, and are very unlikely, in our over cautious age to be in charge of money or save money.



- 1.9 We need to better understand how children deal with money, at what age, in what circumstances to inform guidance for schools.
- 1.10 Young people in transition moving toward differing levels of independence, employment and career opportunities need real life financial education, advice and support to make informed choices.
- 2. To what extent should there be increased provision of financial education in schools to better prepare young people for the challenges and financial decisions they face beyond school?**
- 2.1 Financial understanding should permeate across the curriculum.
- 2.2 Teachers will require the resources, such as games, web based activities, appropriate life based activities to implement financial education as a cross curricular strand to minimise the risk of subject lesson imbalance. We do not need a whole new line of books illustrated lavishly with money matters to solve in order to comply with government demands.
- 2.3 Before making yet another ask of schools to fix the world we should think what we can slim down to make space for this and which is more relevant at what stage?
- 3. In what ways and to what extent are money and financial matters relevant to what young people should be learning at school?**
- 3.1 Money matters must be taught alongside emotional literacy
- 3.2 Envisage a set of problems where KS2 children are asked to compare the relevant value for money of chocolate bars and know that while the mathematically competent child will work this out the actual arbiter of whether it has value to the individual is whether they want it or not
- 3.3 This is the same for the KS3 and 4 young person they may be able to work out that the Kindle Fire is better value for money than the iPad but they want the iPad
- 3.4 We need to teach continence in what young people see and want but we put all the onus on helping people resist temptation and very little on controlling the vultures within our society
- 3.5 Many young people will not be at a stage of mathematical agility to deal with the types of comparison the financial services markets put them under. Even the ordinarily mathematically competent person is befuddled by the obfuscation of rates and returns and liabilities that financial services in all aspects of paying for things we need subject us to: from looking at special offers in the supermarkets to deciding which utilities company to purchase from.
- 3.6 The number of factors to compute in any real life financial situation are better taught through a practical independence / home management course than another set of computational hoops to jump through
- 4. If financial education becomes a statutory part of the curriculum, should schools have flexibility in how they follow guidance on its delivery? (This would be similar to PSE and work-related education but different to the way national curriculum subjects are taught.)**
- 4.1 The PSE guidance is full to bursting and many aspects may receive only minimal teaching time
- 4.2 If you inspect it, and rate schools on it, the area will get taught to an appropriate level and enable some pupils to pass an exam
- 4.3 In this case the emphasis will be on getting the evidence that it has been taught and that children display competencies but whether this will advantage these pupils once school is over is highly debateable.

- 4.4 The tenor of this paper is to avoid teaching to test happening with emphasis on understanding the areas of money involved in more than mathematical situations
- 4.5 However we already see a generation of spoon fed learners arriving in FE in all areas and the culture of over examination is causing these learners to demand more spoon feeding to get through another round of obstacles to achieve certification.
- 4.6 The child without the strong underlying understanding of the practical application of general numeracy may learn the computations necessary but will not be able to apply them to emotionally charged areas of life
- 4.7 We must then ensure that concomitant to teaching financial matter we also are teaching young people how to deal with the emotionally charged areas of life??

5. What are your views on the Welsh Government and local education authorities having a statutory duty to ensure financial education is delivered during compulsory education from Key Stage 2 onwards?

- 5.1 If you inspect it, and rate schools on it, the area will get taught

From the paper:

It is important that financial education is considered when the curricula for individual subjects are reviewed and revised. The Welsh Government has said that the on-going curriculum and assessment review is taking into account the place of financial literacy. This would ensure such practice is provided for in legislation

- The paragraph above from page 14 of the consultation makes it seem that we can simply look at how cross curricular themes and curriculum content can be revised to add this in. It is surely paramount that the business of adding this work in and removing other themes that have previously been seen as important is done before making any decision of including this in the school curriculum

6. What are your views on imposing a duty on Welsh Ministers to ensure that financial education is taught on a cross-curricular basis in primary and secondary schools and considered as part of any reviews of the curriculum?

- 6.1 If there is a duty to ensure this is taught and a proposal to inspect and examine it de facto becomes part of the curriculum and takes up space in that curriculum
- 6.2 As this consultation paper has made plain there are existing areas of the curriculum and existing guidance setting out financial education needs and requirements. If this is not being done to a high enough standard, or at all, then either the teachers are not competent to teach it or they do not have time
- 6.3 There is a skills and support level to achieve on the part of all teachers if this is to have a cross curricular theme so the Welsh Government will need to provide additional training and money for replacement staff during training in order to attain this standard across Wales
- 6.4 The government would need to change and provide additional accredited modules for schoolteacher and FE education
- 6.5 In KS2, 3 and 4 there are currently over 22,000 teachers (Full Time Equivalent) and apart from specialist maths teachers they would all need training
- 6.6 In addition as much of the education of children with ALN is left in the hands of TAs then these TAs will also all need training and many of these will not have the basic GCSE mathematics requirement that teachers are expected to have

7. What are your views on the Welsh Government being required to formally consult relevant stakeholders and experts when developing curriculum content on financial education?

7.1 Please consult formally and NOT just before or during the summer holidays

8. Which persons and organisations should be consulted?

- School teachers
- FE and higher education lecturers
- Unions and professional associations
- Young people in KS2, 3 and 4
- FE students
- Higher education students
- Young people NEET
- Special schools and units
- Employers
- Charities

9. What are your views on making it a duty on Welsh Ministers to review the progress of financial education in schools and to produce an annual report on this?

9.1 Numeracy is the key and money management a part of this

9.2 The Welsh Government has the responsibility for ensuring:

- A well-trained and motivated teaching workforce
- A well-trained and motivated teaching assistant workforce with the skills and abilities to support young people with ALN access all aspects of the curriculum
- Bilingual materials that promote fun and involvement
- A curriculum that aspires and is well grounded in the practical application of aspiration to pupil progress

9.3 Currently target setting is having a negative effect on outcomes for some pupils with ALN. Too much measurement does little to celebrate or support inclusion.

10. What are your views on how this duty should be delivered? For example, should this be a required part of Estyn's role in inspecting schools and local education authorities in Wales

10.1.1 Inspection rather than reporting is the key to ensuring implementation. Particular attention should be paid to the activities and progress being made by pupils with ALN.

11. How appropriate or necessary would it be to require universities and further education corporations to provide information to students about where to get advice about financial management?

11.1 All educational institutions should have information and advice available. Some establishments have a Community Information Point (available free of charge in Wales from SNAP Cymru) where they can display important information about where help and advice is available locally. All FE providers should consider the financial education and support needs of young people. Poor money management and poverty is a considerable barrier to access and maintain FE.

12. Are there any implications for the autonomy and status (classification) of higher and further education institutions in placing such a requirement on them?



12.1 Whilst we have no comment on the legal status of these institutions, they do receive public funding and therefore should be required to perform relevant useful services which can only improve outcomes for students.

13. What are your views on requiring each local authority to have a strategy outlining how it intends to promote financial inclusion and the financial literacy of its residents?

13.1 There could be a requirement for financial inclusion and financial literacy to be included within each LA poverty strategy. Activity is already underway nationally and locally although much is being led by the Third Sector and this work is at risk of financial cuts. The 2014/15 Welsh Government third sector Child and Family Development Grant (CFDG) criteria focusses a strand on financial inclusion

13.2 Ideas and evidence will arise from the work completed under this strand to inform others. The sharing of LA strategies and outcomes from all agencies will improve the lives of residents and help alleviate poverty through better financial skills

14. What are your views on requiring each local authority's financial inclusion strategy to show how authorities intend to:

- effectively regulate street trading;
- take steps to prohibit cold calling in their area;
- engage with credit unions in their area; and
- promote financial inclusion when buying goods and services?

14.1 Our understanding is that the above points are already on the LA agenda. A national push on public education through TV and other media will help all areas

15. Are there any other things that the strategy should contain in terms of how local authorities promote financial literacy and inclusion?

15.1 Strategy should give a high focus on the third sector and volunteering. Active people are, healthier, happier and generally better supported through their engagement. Volunteering and training opportunities are vital for people who are often isolated whilst living in a climate of financial insecurity

No comment 16-18

19. Should the public be able to use online facilities in libraries without having to pay for them, and if so, is it necessary to put this down in law?

19.1 As libraries disappear from smaller communities where need for this service may be most apparent this is a step that may enable some to access internet services but one that has little hope of national impact

19.2 Better to engage Helplines that are available bilingually and nationally across Wales and support them to access this advice for people

20. Do you envisage any problems that could arise by prohibiting libraries from charging for internet access?

20.1 No income no future?

21. Do you believe there are occasions when the public should be charged for using computers in libraries?

21.1 Open free access is preferable



22. How appropriate or necessary would it be to require local authorities to provide specific financial management advice to those who were formerly looked-after children?

- 22.1 As LAC are frequently moved around regions they may well not get any sort of education to succeed
- 22.2 LAC should have education at all levels free of charge up to the age of 25 and ask for and receive 1:1 or small group support in any and all areas of education that they have difficulty with

23. How appropriate or necessary would it be to require local authorities to provide specific financial management advice to individuals seeking assistance on other related matters?

- 23.1 This should be mandatory and available through bilingual national helplines that may already be set up to provide other advice and could include specific financial advice
- 23.2 This might be achieved through co-operation between existing Independent Advice Providers in the third sector, e.g. CAB, SNAP Cymru, Shelter Cymru

24. Do you foresee any financial implications, in terms of either costs or benefits, for any organisations or persons in relation to the proposals in this document? If so, can you describe and quantify these impacts?

- 24.1 Costs related to training, teachers and teaching support staff
- 24.2 Costs related to third sector infrastructure, training and co-operation
- 24.3 Costs in kind related to impact on an already overcrowded curriculum
- 24.4 Benefits in a national access to financial information and advocacy to support those with problems and educate and empower those who would otherwise become financially disabled.
- 24.5 Long term benefits for the next generation in relation to numeracy and financial inclusion.

25. Are there any other comments that you would wish to make on my proposals, which are not addressed in any of the previous answers?

SNAP Cymru applauds the aspiration and energy displayed but asks that a note of caution and common sense is applied so that this does not pile pressure on schools. Our education system is already having to lead to remedy the ills of society, support and action from families and all agencies is required.