

**National Assembly for Wales
Bethan Jenkins AM - Financial Education and Inclusion (Wales) Bill
FEI 22 – Flintshire Advice Management Board, Flintshire County
Council**

Response from Flintshire's Advice Management Board (*response in italics*)

Consultation questions

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?

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?

3. In what ways and to what extent are money and financial matters relevant to what young people should be learning at school?

Money and financial matters should be taught at school as an essential life skill. We would advocate that this is something that needs to be adopted throughout the whole school journey, as a constant message depending upon the age and ability of the child/young person; it is not just a single 'lesson' at a single point in time. The key point in time would however be before the young person is eligible to live independently.

It should also be remembered that the 'learning' should not just be undertaken at school; this needs to be a holistic approach; involving parents and possibly as an inter-generational project.

Other agencies such as housing associations already provide 'financial inclusion' packages as support e.g. Clwyd Alyn Housing Association, which could be adapted and adopted as good practice.

The measurement of the effectiveness of the 'learning' also needs to be undertaken to help ensure that good practice is shared and that ineffective practices are reduced.

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.)

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?

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?

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?

This is essential as there is limited expertise in this area. The Welsh Government already have a Financial Inclusion Delivery Group which represent many of the key agencies; CAB, Money Advice Services, Community Housing Cymru etc. This should be drawn upon as many of the 'leading' experts already sit round this table.

Other stakeholders to be consulted would include the teachers and advisors in the development of a training package to support the learning.

Children and Young People's Partnerships would also be a useful stakeholder.

The curriculum content could be developed across the core subjects e.g. examining and understanding Credit Agreements in 'literature', as well as the more obvious numeracy curricular developments.

Stakeholder involvement is essential from the start if a true partnership approach of 'experts' is required to help support delivery of the principles of the proposed Bill.

8. Which persons and organisations should be consulted?

As above in question 7.

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?

Agree that an annual report is important to review progress which could be incorporated within standard school reports. Just as important however is the measuring of the effectiveness of the progress; which admittedly is more complex and longer-term, but is important to demonstrate what's working well and where directions may need changing.

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?

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?

Yes, this is important, but support would be needed as inconsistent advice is currently being provided. Advice needs to be impartial; some current advice is potentially misaligned due to incentivisations of bank sponsorships with particular institutions.

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

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?

We are supportive of this. The Financial Inclusion Strategy for Wales has five themes which following review could provide a framework for local authorities to follow.

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?

We would need to engage further with the relevant sectors to gauge their opinion on this. However, the authority's financial inclusion strategy could still identify 'how' the authority intends to take action on all of the above. Further guidance would be needed to more fully understand the implications of promoting financial inclusion when buying goods and services i.e. is this in relation to Community Benefits, procuring services from the voluntary sector and/or the principles of buying ethically.

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

The importance of partnership and collaborative working needs to be emphasised. A cohesive and collective approach from all services providing support with consistent messages, terminology will be needed. This will also enable any gaps in support to be identified.

A good example of partnership working in Flintshire has been the development and commitment to our Flintshire Connects hubs where advice agencies such as Jobcentre Plus are located within the same 'contact' point as the Council staff providing advice and support.

It is also important that the strategy links into other local and national strategies; both from a service delivery aspect e.g. Homelessness, Families First, and also from an internal policy perspective such as within HR policies to support staff etc.

Similarly the strategy needs to 'be connected' at a national level; a potential area to explore for this would be inclusion within the Future Generations Bill.

16. What are your views on requiring local authorities to publish an annual report on how they have implemented their financial inclusion strategy?

Agreed. Suggest that it be incorporated within each authorities business planning cycles.

17. Should the Bill make any further provision with regard to monitoring or enforcement arrangements in relation to the financial inclusion strategy? If so, what should these provisions look like?

Potentially monitoring and enforcement could be undertaken by the Wales Audit Office in relation to their responsibilities under the Future Generations Bill.

18. What are your views on enabling Welsh Ministers to issue guidance to local authorities about any aspect of their compliance with the provisions of the Bill (including the production and implementation of their financial inclusion strategy)?

Guidance would be welcomed; the involvement of the WLGA in producing this guidance would help maintain consistency of approach.

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?

Flintshire does not charge for online usage in libraries (nor our other facilities such as Flintshire Connects hubs). A consistent approach would be needed across Wales; thus this may need to be legislated for. We also need to be mindful of the requirements of Universal Credit and the increasing reliance on web-based services.

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

There may be an impact on reduced income generation from those authorities who already charge for these services. We suggest that there should be no charge for those customers using online services to access Universal Credit.

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

No, as this could potentially have a greater charge in enforcement and regulation.

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?

*We feel that it is imperative that formerly looked-after children are provided with financial management advice.
Perhaps there is a potential for the Personal Education Plans to be strengthened in this area.*

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?

It is to be expected that local authorities will be proactive in either providing financial inclusion/money management advice or support to people accessing their services on or referring on to appropriate providers. For example, since the implementation of the Welfare Reform Act in April 2013, helping households who have lost social security income to manage the impact on their household budget through better financial management is a common response from LA's. Likewise, it will have been good practice for many years, when LA's undertake homelessness prevention work, for households at risk of homelessness to receive advice and support on financial matters.

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?

There should be an overall financial benefit to organisations, communities and persons in relation to these proposals in terms of social and economic wellbeing.

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?

Terminology and language used needs to be consistent; it is suggested that the terms financial inclusion and financial education are confusing and that a more general term of 'money management' might be more easily understood.