

**National Assembly for Wales**  
**Bethan Jenkins AM - Financial Education and Inclusion (Wales) Bill**  
**FEI 21 – Conwy County Borough Council**

**Conwy LA Response to 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?

*Positive....it would build on the delivery established through the mathematics curriculum which includes understanding and using money at each Key Stage, for example at Key Stage 4, pupils are given opportunities to:*

*Calculate with money and solve problems related to budgeting, saving and spending, including currency exchange rates, profit and loss, discount, hire purchase, best buys, household bills and compound interest.*

*It also states that at Key Stage 4, 'learners consolidate their knowledge and understanding ... enabling them to solve problems in a variety of contexts ... particularly the management of personal finances'. However, how this is delivered is not specified - this will need greater clarification for schools to address through schemes of work and can link to PISA testing.*

*Again opportunities for learners to further engage with financial literacy can take place as part of embedding Literacy & Numeracy Framework(LNF) across all key stages.*

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?

*It has to be proportional to time that physically can be allocated and timetabled. This is probably easier at primary school level with a more flexible approach to curriculum delivery although it has to be allocated time in line with schools meeting requirements of delivery of all other statutory Welsh National Curriculum - again can be delivered through mathematics and numeracy curriculum, however can also be delivered as part of Personal Social Education (PSE) curriculum, but most important on a cross curricular basis. The same principles apply to the delivery at secondary school level -addressing delivery on a cross curricular basis can allow delivery to be used as part of learner's problem solving, improving own learning, and developing skills in a range of curriculum areas e.g. science; design and technology; home economics; geography; business studies and economics where they can relate learning and translate and solve financial tasks in relation to real life problems.....which in turn relate to 'Life Skills' which can be used in daily life upon*

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*leaving school for the world of work. Secondary timetabling is less flexible – delivery would have to be audited under the numeracy framework to ensure it is included in Schemes of Work at different key stages. KS4 and KS5 allowing for subject choices of pupils can either enhance experiences/ or limit them depending on subject choices for these age groups.....a basic delivery would have to be acknowledged through mathematics, and PSE. At KS5 preparation re ‘Life Skills’ as they engage in ‘Further or Higher Education’ needs to be addressed mainly through PSE curriculum.....young people need sound knowledge of financial skills in relation to paying of bills; dealing with banks/building societies/accessing grants and loans....and more importantly having sound knowledge of staying financially solvent.*

*Through PSE programmes external providers could engage in curriculum delivery with teachers e.g. Credit Union could attend lessons to raise awareness of financial skills/learner understanding of sound financial skills etc.*

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

*Develops numeracy skills which they will require for every day purposes in a range of activities/ tasks which they will undertake for the rest of their lives, and which in turn will be / can be cascaded to their own children. This should allow this next generation of learners with better financial education knowledge and greater opportunities and life chances in turn.*

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.)

*Each school would have to comply with what would be laid down in terms of statutory requirements – schools should be allowed to deliver depending on sector with a flexible approach so long as they meet statutory requirements and deliver the outlined minimum noted according to time allocated, but must ensure that all agreed national financial education content is delivered across a range of specialist mathematics curriculum /or across a range of cross curricular areas which can include PSE. Estyn already evaluate numeracy delivery – again this area of financial literacy can be formalised and included as part of inspection process – individual schools could build evaluation/monitoring and measure of impact as part of their School Evaluation Review, and can be acknowledged as a priority area in their School Improvement Plans. This can be acknowledged in the same manner through audits of cross curricular provision across both sectors, and again will be identified*

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*in Departmental Development Plans at secondary level, and Curriculum Lead Areas at primary level.*

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?

*There is a requirement that it is already being delivered through mathematics curriculum at all key stages at both primary, and secondary sector level. Embedding the Literacy and Numeracy Framework is also a priority for all schools working alongside WG National CfTB L & N programme – Estyn in their role of inspecting schools will measure impact and acknowledge sound practice in line with National Curriculum delivery. Each school has a nationally assigned CfTB partner to assist with embedding LNF...again they are involved in working with schools to audit, monitor, and evaluate numeracy provision throughout the academic year – good practice exists here with schools working as a cluster to share good practice etc. Extra funding through cluster planning can also be accessed through this programme to further embed numeracy by buying resources and accessing extra training to deliver. At present no confirmation from WG how long this programme will be funded – if to be a success, further funding needs to be maintained for all schools and Pupil Referral Units to access.*

*Conwy LA through commissioning of GwE Regional Education Services also will get reports and feedback which confirms delivery is meeting requirements across all schools.*

*Use of WG School Effectiveness Grant: Pupil Deprivation Grant: and LAC Grant also allows school to ensure high quality experiences, with the latter ensuring equal opportunities with added funding for vulnerable learners in ‘closing the gap’ re performance in the whole range of Key performance indicators at the end of Key Stages at both primary and secondary sector. These grants are used to embed, track and monitor impact in relation to literacy and numeracy outlined in the WG Literacy and Numeracy Framework – again plans, and reports are scrutinised by LA Officers and GwE System Leaders to ensure that numeracy provision is being delivered – again this can include elements of ‘financial literacy’ which again using these grants will ensure inclusion re access and provision to skills.*

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?

*It is already encompassed through mathematics and numeracy curriculum at present, the numeracy element already ensures that if delivered well, and if carefully planned in schemes of work is already being addressed on a cross*

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*curricular basis therefore not an issue. Again care needs to be taken by making delivery compulsory as to how much curriculum delivery time would be imposed – careful thought needs to be taken before imposing it as a duty.....at the expense of which other elements of curriculum which schools have to provide?*

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?

*Essential that consultation should take place but with a range of stakeholders involved – this will need to include the learner.*

8. Which persons and organisations should be consulted?

*Teachers and educational practitioners; Learners; Youth Service; Careers Advisory Groups; Parents/Carers; School Governors; WG Officers; Specific Curriculum Subject Advisers; External partnerships e.g. Credit Union/ Citizens Advice; LA Officer with responsibility for Revenue and Benefits/ Welfare Rights/ Finance /Inclusion; Higher Education Institutes(HE) and Further Education Institutes(FE); School and Youth Councils;*

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?

*Estyn already inspect schools in line with WG cycle.....they already provide reports on mathematics elements as a core subject area along with reporting on numeracy standards and delivery. WG also commission Estyn to conduct ‘thematic inspections and reports’ – again recent ones include reports on ‘Mathematics at Ks4 ‘ and ‘Numeracy delivery’ – WG could commission Estyn to conduct one specifically on ‘Financial Education’ for the future...however there could be an element of duplication here.*

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?

*Please see comment in 9 above.*

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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?

*It would be considered highly appropriate for universities and further education corporations to provide information to students about where to get advice about financial management as individual circumstances will change through their lifetime and it is important they are provided with this advice at every stage.*

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

*Learners who will be accessing HE or FE institutions for the future should through implementation and whole school delivery of numerical literacy be up skilled with a suitable level of knowledge to allow access to different level courses, and work based learning/ apprenticeship opportunities. Again, further delivery of financial literacy can be a continuous and built in through specific and cross curriculum provision – there will be an extra cost to ensuring appropriate staff can provide for these learners, and there will be a need to up skill providers with necessary skills to deliver through CPD provision. Again, evaluating and monitoring of impact would need to take place to ensure continuum learner benefits over time.*

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?

*A number of plans/strategy already exist within local authorities in relation to financial inclusion and financial literacy related issues. Perhaps instead of imposing the burden of developing more strategic documentation within Council's the focus should be on alternative options for improving practice and achieving outcomes e'g' establishment of a Corporate Financial Inclusion Standards for Wales and sharing best practice.*

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?

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*The establishment of a Corporate Financial Inclusion Standards for Wales could include a requirement for Councils to meet a minimum standard and in doing so being required to meet certain regulations such as those suggested around street trading, cold calling, engaging with credit unions, buying goods and services. Such an approach could have the potential to provide a continuous improvement framework for many public, third and private sector organisations in Wales to engage with, ensuring the role is not just left to Councils.*

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

*See above*

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

*A Corporate Financial Inclusion Standard for Wales could set out requirements for an annual report.*

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?

*No*

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)?

*The issue of guidance may be appropriate in certain situations but may not be appropriate to all 22 local authorities in Wales.*

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?

*Yes, we believe the public should be able to use online facilities in libraries without paying for them. Protecting this by law would ensure no erosion of the service, or the potential of having different offers / charges from the library authorities across Wales. The costs of replacing the hardware following the initial investment of the New Opportunities Fund some 13+ years ago will need to be addressed in the very*

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*near future to ensure the level and quality of online facilities is retained and offered consistently across Wales.*

*Whilst local authorities are under financial pressure it is understandable to question the costs for free services as the hardware and infrastructure costs are currently borne by local authorities, but to not provide this would lead to digital, social, financial and educational exclusion, frequently affecting the most vulnerable in society.*

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

*No. Prohibiting libraries from charging for internet access would provide clarity at a time when Councils are by necessity being forced to consider all potential income generation opportunities. The introduction of what may develop into inconsistent and ad hoc charging arrangements would be both confusing for the client and would be in conflict with the digital inclusion agenda.*

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

*On occasion overseas visitors are eager to pay for the online service as they are very appreciative of the service, but, monitoring and administration of this would, it is envisaged prove problematic as charging some users and not others raises both practical and ethical questions. The practicalities of implementing a charging regimen, if accepted, would require much more detailed consideration.*

*Initial concerns being raised relate to:*

- i) methods of monitoring usage e.g. should charges be applied based on timed usage; specified web-site/software usage.*
- ii) fairness and consistency of applying any agreed charges*
- iii) validation of types of usage – other than within legal and filtering requirements, libraries don't judge the use of online sources made by users – any more than they judge the information or reading use of libraries.*

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?

*If LAC receive financial education and up skilling throughout their time in schools through full range of curriculum delivery, and associated extra curricular experiences they should have sound knowledge of 'financial life skills' ensuring*

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*equal opportunities as for any other learner specific to age. This should facilitate them with skills to avoid becoming 'NEETS' and prepare them for the 'world of work' or further/higher education where they can again receive further support through college systems.*

*If LA's can further support LACs for formally looked after children this would be excellent, however this would need a structure so they can access information and support through a range of services, which in turn this would need extra national funding for resources, including staff with expertise. \* Each LAC while at school receives extra WG LAC Funding (2014-15 = £918 per learner - however this might only be in place for a year) this funding can be used to ensure 'closing the gap' delivery on this aspect through identified staff and linked to individual LAC Learner Plan and can be planned according to individual ability and learner needs. LA LAC Officers can address plans and seek extra support for learners, and equally so monitor impact of extra funding and support.*

**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?

*On numerous occasions it is seen as appropriate and necessary to require local authorities to provide financial management advice to individual seeking assistance on other related matters. However, at present in many instances clients are signposted to the third sector for assistance due to the lack of funding.*

**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?

*Schools would need to ensure they have access to suitable bilingual resources suitable for all learners - differentiation being a priority to ensure understanding of all learners whatever educational needs to ensure inclusion agenda - and that all are prepares with appropriate 'financial life skills'.*

*Along with noted bilingual resources there would be financial implications in employment of more teachers to deliver on this curriculum area - need to take into account limited number of quality mathematics ad numeracy specialists across all sectors. Funding would be required to allow for CPD opportunities to up skill both teachers and HLTA's in order to be able to deliver curriculum - funding likely to be needed to attract colleagues to take up teaching this as part of higher education priority. Higher Education Institutions and colleges need to ensure that they have funding to attract practitioners to take up role in schools - again a cost in recruiting*



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*people with correct skills to become teachers/support staff, and a cost in ensuring appropriate resources for these staff.*

**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?**

*While the objectives of the Bill are accepted as being of significant importance it should be given priority consideration in order to prepare young people with skills relating to financial management. The Authority feels strongly that it should be considered as a specific curriculum area, to be delivered across all key stages and should be taken into consideration at the same time as the National Curriculum is being reviewed. To ensure successful delivery it is vital that Welsh Government provide adequate financial support to address delivery, this will include training of a range of staff and ensuring sufficient resources for program delivery.*