



Department
for Education

Consultation Response Form

Consultation closing date: 16 April 2013
Your comments must reach us by that date.

**Reform of the National Curriculum in
England:**

Consultation Response Form

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes, primarily the Freedom of Information Act 2000 and the Data Protection Act 1998.

If you want all, or any part, of your response to be treated as confidential, please explain why you consider it to be confidential.

If a request for disclosure of the information you have provided is received, your explanation about why you consider it to be confidential will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 1998, and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

Please tick if you want us to keep your response confidential:	<input type="checkbox"/>
Reason for confidentiality:	
Name: Mr John Davies	
Organisation (if applicable): Credit Action	
Address: 6th Floor, Lynton House, 7-12 Tavistock Square, London WC1H 9LT	

If your enquiry is related to the DfE e-consultation website or the consultation process in general, you can contact the Public Communications Unit by e-mail: consultation.unit@education.gsi.gov.uk or by telephone: 0370 000 2288 or via the Department's ['Contact Us'](#) page.

Please indicate one category that best describes you as a respondent

<input type="checkbox"/>	Primary School	<input type="checkbox"/>	Secondary School	<input type="checkbox"/>	Special School
<input type="checkbox"/>	Organisation representing school teachers	<input type="checkbox"/>	Subject Association	<input type="checkbox"/>	Parent
<input type="checkbox"/>	Young Person	<input type="checkbox"/>	Higher Education	<input type="checkbox"/>	Further Education
<input type="checkbox"/>	Academy	<input type="checkbox"/>	Employer/Business Sector	<input type="checkbox"/>	Local Authority
<input type="checkbox"/>	Teacher	<input checked="" type="checkbox"/>	Other		

Please Specify:

Credit Action is a national financial capability charity (registered Charity in England & Wales No. 1106941) established in 1994.

Credit Action empowers people across the UK to build the skills, knowledge, attitudes and behaviours to make the most of their money throughout their lives. It develops and delivers products and services which provide education, information and advice on money matters, in an appropriate way for young people and adults. This includes the direct delivery of financial education workshops to students in secondary schools and colleges through our *DebtCred* and *Future Ready* programmes.

Through its work Credit Action reaches approximately 500,000 UK citizens every year.

Are you answering this consultation in response to particular subjects? Please tick all those that apply.

<input type="checkbox"/>	English	<input checked="" type="checkbox"/>	mathematics	<input type="checkbox"/>	science
<input type="checkbox"/>	art & design	<input checked="" type="checkbox"/>	citizenship	<input type="checkbox"/>	computing
<input type="checkbox"/>	design & technology	<input type="checkbox"/>	geography	<input type="checkbox"/>	history
<input type="checkbox"/>	languages	<input type="checkbox"/>	music	<input type="checkbox"/>	physical education
<input type="checkbox"/>	Not applicable				

1 Do you have any comments on the proposed aims for the National Curriculum as a whole as set out in the framework document?

Comments:

2 Do you agree that instead of detailed subject-level aims we should free teachers to shape their own curriculum aims based on the content in the programmes of study?

<input type="checkbox"/>	Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Not sure
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Comments:

3 Do you have any comments on the content set out in the draft programmes of study?

Comments:

As a financial capability charity that works extensively with young people to help them build the skills necessary to manage money effectively, our primary concern with regard to the new National Curriculum has been the inclusion of compulsory financial education. This is something we have called for in our responses to a number of previous Department for Education consultations, such as the original Call for Evidence for the National Curriculum Review (April 2011), and the Request for Representations for the Review of PSHE Education (July 2011).

In light of this, we would like to initially make clear that we are delighted by the Department's decision to include financial education as a compulsory part of the National Curriculum, and believe that this represents a very important step in ensuring that young people across the UK are adequately prepared to manage their finances in adult life. Moreover, we are pleased that the proposed content covers not only the mathematical aspects of dealing with money, which builds in stages in Mathematics between Key Stages 1 and 4, but also material that deals with broader financial skills and knowledge, such as understanding the importance of personal budgeting and how to use credit (currently located in the prospective programmes for Key Stage 3 and 4 Citizenship). We believe that this sort of broader content is particularly crucial to enabling young people to learn about actually using money in the real world.

In terms of the suggested content itself, while only limited detail has been provided at this stage, we believe that what has been outlined is generally strong. In terms of Key Stages 1 and 2 Mathematics, money is used as a way of introducing pupils to concepts such as addition, subtraction and decimals, but we feel the particular focus on calculating interest as part of Key Stage 3 Mathematics is important, and helps build towards a consideration of the essential concept of compound interest at Key Stage 4. Meanwhile, the topics considered as part of Citizenship are broadly in the right place from our point of view, with Key Stage 3 content around budgeting, money management and financial products providing an appropriate platform for examining more advanced issues such as wages, credit, debt and risk at Key Stage 4. Overall therefore, we are supportive of the content that has been proposed thus far.

Indeed, much of this is already reflected in the programmes which we currently deliver in schools. Credit Action runs two main educational programmes: our *DebtCred* workshop is aimed at 11-16 year olds and covers issues such as budgeting, the importance of saving and understanding credit; meanwhile our *Future Ready* programme is delivered to 16-19 year olds and covers similar topics, but also prepares young people to engage with banks and the financial product market as well as providing an overview of student finance options. Our evaluation data shows that the vast majority of students respond positively to this kind of content, suggesting that if it can be delivered effectively it can have a valuable impact – for example, 84% of

DebtCred participants agreed that they felt more confident about dealing with money matters as a result of the session, as did 80% of *Future Ready* participants. In addition, our experience of delivering these programmes raises two broader issues, which we will address further on in this response. Firstly, the success of our *Future Ready* workshop demonstrates that there is a demand for financial education after Key Stage 4, a point we will discuss in more detail in our answer to Question 6. Secondly, our work also helps illustrate the important role that external providers of financial education can play in delivering content, an issue we will pick up on again in responding to Questions 11 and 12.

However, whilst we view the inclusion of compulsory financial education as enormously positive, a key point that we would emphasise at this stage is that in order for it to make a genuine difference to young people's ability to manage money, it is crucial that it is integrated into the Curriculum in a meaningful and coherent manner. It is in this respect, and particularly with regard to the overall structure of Citizenship, that we feel the current draft National Curriculum potentially creates some problems.

Although we believe that the specific subject content around financial skills is well judged, it also sits alongside a diverse range of other issues within the Citizenship stream, such as parliamentary democracy and the electoral system, the justice system and volunteering. In our view, the overall feeling of Citizenship is consequently quite disjointed, and we are concerned to some degree that this lack of coherence may make it quite difficult to teach. Indeed, we fear that there is a risk that, partly as a result of this, Citizenship may take on an implicitly lower status than other subjects, with greater attention being paid not only to the three Core Subjects but also other compulsory Foundation Subjects which are better structured.

From our perspective, the worst case scenario would be that Citizenship comes to be regarded by both students and teachers as something of a "dumping ground" for content which doesn't quite fit elsewhere, and that as a result it ends up being taught less rigorously and effectively than other subjects. We would therefore encourage the Department to give due consideration to how this can be avoided.

We understand that, ultimately, the manner in which Citizenship is taught and the profile it is afforded amongst teachers and students is to some extent an issue that schools themselves are best placed to resolve. Nonetheless, we believe that it is important for the Department to reflect on how it can contribute to maximising the impact the subject has, and the place of financial skills content within it.

For example, throughout the debate that has developed in recent years around financial education, one issue that has been repeatedly raised is that some form of assessment is crucial to ensuring that sufficient curriculum time is dedicated to the subject – this was one of the key conclusions of the All-Party Parliamentary Group on Financial Education for Young People's highly respected *Financial Education and the Curriculum* report, published in 2011 (p. 29). On the basis of this, one option which could be explored in order to ensure a sufficiently high profile for Citizenship might be the introduction of

some form of compulsory assessment at the end of Key Stage 4. We recognise that the Department is currently engaged in substantial further work around the reform of GCSE qualifications which will largely define the shape of Key Stage 4 assessment, so it is difficult to make any firm proposals. However, our main point is simply to highlight that levers are available to the Department which could help stimulate greater rigour in the teaching of Citizenship, if it wished to do so.

As a final point, we would also briefly draw attention to a slightly anomalous situation that now exists with respect to PSHE Education, which includes an economic well-being component that covers financial capability (as well as other areas such as enterprise and work-related learning). In those schools which choose to offer (non-statutory) PSHE Education, students will effectively be taught about personal finance across three separate subjects at Key Stages 3 and 4, as those schools will also be required to deliver the statutory financial content within Mathematics and Citizenship. Our concern in this regard is that where personal finance teaching is split three-ways it could become excessively fragmentary, and therefore difficult for staff to co-ordinate messages effectively. While we obviously would not want any changes to be made which remove the statutory underpinning that financial education now has (and also believe, as outlined at the beginning of our response to this question, that the distinction between mathematical skills and broader financial knowledge is a significant one that should be embodied in the Curriculum), we feel it is important to highlight the issue. Indeed, in our view this helps illustrate a wider point, that making financial education a compulsory part of the National Curriculum does not in itself mean everything is resolved, and that the Department needs to show the leadership necessary to ensure that the content that is now in place is drawn together consistently in practice.

4 Does the content set out in the draft programmes of study represent a sufficiently ambitious level of challenge for pupils at each key stage?

	Sufficiently ambitious		Not sufficiently ambitious	X	Not sure
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Comments:

Currently, the framework document for the consultation provides only limited, top-level information on the prospective financial education content, particularly in terms of the financial skills material in Citizenship. This makes it difficult to comment at this stage about whether such content represents a sufficiently ambitious level of challenge. Therefore, in response to this Question we would largely reiterate the points made at the start of our answer to Question 3, and note our general support for the content that has been suggested so far. Beyond this however, there is clearly more work to be done in terms of developing the fine detail of the financial education content, and we will reserve further judgement until this has been put forward.

5 Do you have any comments on the proposed wording of the attainment targets?

Comments:

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6 Do you agree that the draft programmes of study provide for effective progression between the key stages?

<input type="checkbox"/>	Agree	<input type="checkbox"/>	Disagree	<input checked="" type="checkbox"/>	Not sure
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Comments:

As discussed in our response to Question 3, based on the limited detail that has been put forward so far there would seem to be effective progression in terms of financial content across Key Stages 1 to 4 for Mathematics and between Key Stages 3 to 4 in Citizenship, although further information is required to enable us to form a firm a judgement on this. However, for us, the issue of progression between the Key Stages also raises the broader question of whether there should be some form of compulsory provision after Key Stage 4, and indeed before Key Stage 3 in terms of the broader skills and knowledge content which is currently only addressed in Citizenship.

In terms of post-Key Stage 4 provision, we feel that there is a strong case for this – as made clear in our response to Question 3, we believe that the success of our *Future Ready* programme amongst 16-19 year olds illustrates that there is a definite demand for financial education at this level. Indeed, in the context of the Department’s current policy of ultimately raising the participation age to 18, which has been explicitly justified in terms of “helping young people to develop the skills they need for adult life and to fulfil their full potential” (Department for Education Factsheet, *Raising the Participation Age – Important information for sixth forms, colleges and other education providers*) our view is that the provision of some form of compulsory financial education at this stage would be hugely valuable for those involved. Young people aged between 16 and 18 are at a key point of transition, and in our experience their financial needs evolve over this period as they begin to prepare to live independently, whether that is in higher education or paid employment. Therefore, the need for effective financial education to prepare young people for the financial responsibilities of adulthood is particularly pertinent at this stage, and we therefore believe the Department should give due consideration to how compulsory financial education could be viably extended beyond Key Stage 4 as the participation age increases.

Furthermore, we would also ultimately like to see the financial skills and knowledge content which is currently contained in Key Stage 3 and 4 Citizenship extended, so that it is delivered at Key Stages 1 and 2 as well. In our view, the ideal way to build young people’s financial capability is to start exposing them to simple ideas around the what money is and how to use it from the point they start school, to supplement the more operational mathematical skills which are already being built up from Key Stage 1, and support the development of responsible and constructive attitudes about money from an early age. We do however recognise that given the current design of the draft National Curriculum, implementing this immediately is perhaps not practical (in particular, given that there is currently no proposed programme of study for Citizenship at Key Stages 1 and 2, adding financial education on a compulsory basis at this level would involve

integrating it with a different compulsory subject, which may be difficult to do coherently without further work). We do see value in the principle of delivering this sort of broader content from Key Stage 1 though, and would therefore encourage the Department to work towards its inclusion in the future.

7 Do you agree that we should change the subject information and communication technology to computing, to reflect the content of the new programmes of study?

<input type="checkbox"/>	Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Not sure
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Comments:

8 Does the new National Curriculum embody an expectation of higher standards for all children?

<input type="checkbox"/>	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure
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Comments:

9 What impact - either positive or negative - will our proposals have on the 'protected characteristic' groups?

Comments:

10 To what extent will the new National Curriculum make clear to parents what their children should be learning at each stage of their education?

Comments:

11 What key factors will affect schools' ability to implement the new National Curriculum successfully from September 2014?

Comments:

From the perspective of financial education, one of the key challenges in terms of effective implementation is the fact that teachers will be required to teach content which has not been compulsory before. The inclusion of financial education in the proposed format does not simply involve the adjustment of pre-existing curricula, but the addition of entirely new mandatory content – as a result, there will be teachers that have never taught the subject matter before, or received any training in how to deliver it, who will now require support to do so.

Indeed, this is particularly significant given that a number of pieces of research have highlighted that a lack of subject knowledge and confidence are amongst teachers' main concerns when discussing the obstacles they face to delivering financial education effectively. Both Ofsted's 2008 good practice survey on *Developing financially capable young people* (paragraph 41) and the All-Party Parliamentary Group on Financial Education for Young People's *Financial Education and the Curriculum* report from 2011 (p. 24) identify this as a key issue. Moreover, a small soft survey that we ran amongst secondary school teachers when preparing this submission further supported this – while the number of responses we received was relatively small, it was nonetheless notable that a majority of those who took part stated that a lack of subject knowledge, and of training in the subject, represented key challenges when teaching financial education to their students.

Therefore, in order for financial education to be provided effectively, appropriate thought needs to be given to the support mechanisms that will be put in place for teachers. However, with regard to this, we note that the consultation document states in paragraph 11.3 that, in terms of teacher training, the Department intends to move away from “large-scale, centralised training programmes ... and towards a market-based approach”. The implication of this would appear to be that no form of universal, standardised training will be provided to teachers to help them deliver financial education.

Given that this content is both new and acknowledged as something that teachers themselves can find challenging, we therefore believe that there needs to be greater clarity around how the Department will provide the support necessary to aid delivery. Within this, it will be crucial to set out the role of key stakeholders. For example, external providers such as ourselves currently work extensively with schools who offer financial education on a non-statutory basis, either by training teachers or delivering programmes directly to students. As we will set out in more detail in our response to Question 12, we believe that we can continue to play a valuable role after financial education becomes compulsory, but it will also be important to understand what part the Department envisages us playing in the future.

Equally, the Money Advice Service is currently tasked with overseeing all work aimed at improving the financial capability of young people, and in its 2013-14 Business Plan states explicitly that it “will work with the Department and providers of financial education in the run-up to the implementation deadline of September 2014 to equip secondary schools to deliver [compulsory financial education]” (p. 32). However, the detail of what this means in practice still needs to be made clear. As we will discuss further in answering the next Question, such debates are not simply of academic interest, but will prospectively have a tangible impact on the structure of funding in the sector moving forward. Therefore, it is important that these questions are resolved, so that all those involved in supporting teachers to deliver effective financial education are clear about the sort of position they will occupy once the new National Curriculum comes into force.

12 Who is best placed to support schools and/or develop resources that schools will need to teach the new National Curriculum?

Comments:

As outlined in our response to the previous Question, external providers such as ourselves currently work extensively with schools that teach financial education on a non-statutory basis. In terms of our programmes, which focus on direct delivery to students through our *DebtCred* and *Future Ready* workshops, our evaluation data suggests that the vast majority of teachers find these interventions well designed and helpful. For example, 96% of teachers who provided feedback on our sessions agreed that they were relevant, 86% agreed they were engaging, and 95% agreed that they were pitched at an appropriate level for students.

While the new National Curriculum will undoubtedly change the landscape, we do feel that our services will continue to be a useful source of support for teachers. In particular, given that much of the content covered by our workshops is becoming newly compulsory, we anticipate that those who have not previously delivered financial education and perhaps feel they lack knowledge or confidence to do so will appreciate the contribution that an organisation with a number of years of experience in doing so can bring. Therefore, once the new National Curriculum comes on stream we envisage that demand for our services, and those of other external providers, will be maintained and prospectively even increased in the short to medium-term. Of course, we recognise that if relevant teacher training and Continuing Professional Development programmes are introduced, this may well enable teachers to ultimately deliver effective financial education on a much more self-sustaining basis. However, we are aware that the impact of this may take several years to filter through, and that the role of external providers will therefore remain an important one in the meantime.

However, one fundamental issue which could change with the introduction of compulsory financial education concerns access to funding for such external providers. The financial services industry currently provides much of the funding for financial education programmes, and indeed does so on multiple fronts. Most financial institutions fund the Money Advice Service through an industry levy (and those that currently do not will end up doing so in the future, as a result of imminent regulatory shifts). In addition, many firms also deliver their own financial education initiatives, or provide support to specialist provider organisations such as ourselves through their Corporate and Social Responsibility (CSR) programmes – as a result, such institutions can reasonably argue that they are paying twice to support financial education, through CSR on one hand and the Money Advice Service levy on the other.

The sums involved are significant. The Money Advice Service's Business Plan for 2013-14 suggests that the industry levy will raise £43.8m towards the Service's financial capability work during the current financial year (as well as a further £34.5m towards funding its debt advice functions). Meanwhile, in its *Impact Review of Financial Education for Young People* report of 2012 the Service estimated that total CSR funding

for financial education amounted to £24.87m in total in 2011/12 (p. 19). Our concern, however, is that once financial education becomes compulsory, the industry will judge that responsibility has effectively passed to the state, and that the case for providing current levels of CSR funding (which external providers largely rely on) is much reduced. Moreover, should the Money Advice Service become more closely involved with supporting work in schools under the new National Curriculum as its Business Plan for 2013-14 suggests, funders may see even less justification for funding financial education initiatives through CSR.

Therefore, despite the continued value which we believe external providers of financial education will offer for teachers, there is a risk that they may find funding opportunities increasingly restricted. In our view, were this situation to come about it would create serious difficulties. Once financial education becomes a compulsory part of the National Curriculum, the worst possible outcome would be for the Department, the financial services industry and the Money Advice Service to decide that their mission had been accomplished and the matter settled. The reality is not as straightforward, and we believe that unless external organisations are provided with sufficient support, effective delivery may become a problem.

In conclusion, we would stress that it is vital for the Department to recognise the key role that external providers play in delivery in this field, and that they will continue to occupy in the short to medium-term. In light of this, it will be crucial to ensure that appropriate funding mechanisms are put in place to ensure such organisations are adequately supported as the new National Curriculum comes into effect. We would add that were the Government to want to move away from this model of provision, the only viable alternative that we can see is to put quality teacher training programmes in place to enable teachers to build the knowledge and confidence necessary for effective delivery. Either way, it is essential that policy makers do not regard the addition of compulsory financial education to the National Curriculum as being, on its own, “job done”, and that they take the steps necessary to ensure that students can genuinely benefit from its inclusion.

13 Do you agree that we should amend the legislation to disapply the National Curriculum programmes of study, attainment targets and statutory assessment arrangements, as set out in section 12 of the consultation document?

<input type="checkbox"/>	Agree	<input type="checkbox"/>	Disagree	<input type="checkbox"/>	Not sure
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Comments:

14 Do you have any other comments you would like to make about the proposals in this consultation?

Comments:

15 Please let us have your views on responding to this consultation (e.g. the number and type of questions, whether it was easy to find, understand, complete etc.)

Comments:

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

Please acknowledge this reply

E-mail address for acknowledgement:

Here at the Department for Education we carry out our research on many different topics and consultations. As your views are valuable to us, would it be alright if we were to contact you again from time to time either for research or to send through consultation documents?

Yes

No

All DfE public consultations are required to meet the Cabinet Office [Principles on Consultation](#)

The key Consultation Principles are:

- departments will follow a range of timescales rather than defaulting to a 12-week period, particularly where extensive engagement has occurred before
- departments will need to give more thought to how they engage with and consult with those who are affected
- consultation should be 'digital by default', but other forms should be used where these are needed to reach the groups affected by a policy; and
- the principles of the Compact between government and the voluntary and community sector will continue to be respected.

Responses should be completed on-line or emailed to the relevant consultation email box. However, if you have any comments on how DfE consultations are conducted, please contact Carole Edge, DfE Consultation Coordinator, tel: 0370 000 2288 / email: carole.edge@education.gsi.gov.uk

Thank you for taking time to respond to this consultation.

Completed questionnaires and other responses should be sent to the address shown below by 16 April 2013

Send by post to:

Consultation Unit,
Area 1c,
Castle View House,
East Lane,
Runcorn,
Cheshire,
WA7 2GJ.

Send by e-mail to: NationalCurriculum.CONULTATION@education.gsi.gov.uk