



# *The Money Charity response to Ofsted Education Inspection Framework (April 2019)*

The Money Charity is the UK's leading financial capability charity.

We believe that being on top of your money means you are more in control of your life, your finances and your debts, reducing stress and hardship. And that being on top of your money increases your wellbeing, helps you achieve your goals and live a happier more positive life as a result.

Our vision is for everyone to be on top of their money as a part of everyday life. So, we empower people across the UK to build the skills, knowledge, attitudes and behaviours, to make the most of their money throughout their lives.

We believe financially capable people are on top of and make the most of their money in five key areas:

- Planning (including budgeting)
- Saving
- Debt
- Financial services products
- Everyday money (including wages, cash, bank accounts)

*The* **MONEY** *Charity*

The Money Charity welcomes the opportunity to comment on Ofsted's *Education Inspection Framework 2019: inspecting the substance of education* (ref no: 180044).

## **Key Points**

The key points in our response are the following:

- We support the move to assessing quality of education.
- We think the current drafts of the inspection handbooks do not adequately reflect the place of financial capability in the PSHE curriculum. We propose that financial capability be brought more explicitly into the inspection framework.
- We think the under-representation of financial education is part of a larger gap in relation to learners' economic lives as a whole.
- We propose amendments to the draft inspection handbooks which would remedy the gaps in relation to financial and economic education.

In our view, by making a number of relatively small but significant changes to the inspection guidelines, Ofsted has an opportunity to substantially upgrade the way schools teach about economic issues and the relationship between our economic lives and British values more generally.

## **The Money Charity**

As explained on the cover page, The Money Charity is a financial capability charity whose vision is to empower people across the UK to build the skills, knowledge, attitudes and behaviours to make the most of their money throughout their lives.

We have a young people programme at Key Stages 3 and 4 and Post 16, which reaches around 20,000 learners per year in England, Wales and Northern Ireland, a university student programme<sup>1</sup> and an adult programme that reaches people recruited through workplaces, prisons and community-based groups such as travellers' and refugees' associations. We deliver to people in vulnerable situations as well as to those not experiencing a heightened vulnerability.

Our young people programme is predominantly delivered in schools, but is also delivered in other settings such as refugee groups, Pupil Referral Units and youth groups. Most of our workshops are delivered within the PSHE curriculum; some are delivered within citizenship and mathematics.

This experience has given us insight into effective teaching, the relationship between financial education and the school curriculum and, organisationally, how schools work.

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<sup>1</sup> See our *Student Money Manual*, available at: <https://themoneycharity.org.uk/resources/>

## Financial education in schools

Despite financial education being included in the PSHE curriculum, it remains, in our view, substantially underprovided. This is for a number of reasons including lack of resources and staff training, competition for curriculum time and the focus of schools on subjects that are examined and inspected and therefore carry more weight in terms of school evaluation.

The under-provision of financial education has serious impacts on learners later in life. A significant proportion of the UK population has low measured and self-evaluated financial capability, many people are financially vulnerable and, in surveys, many respondents say they wish they had learned more about personal finance at school.<sup>2</sup>

Our policy for young people is that:

- Children and young people of all ages should receive meaningful financial education throughout school and college, with financial education being a statutory part of the PSHE curriculum.
- The Money and Pensions Service (MAPS)<sup>3</sup> should calculate the total funding requirement for comprehensive financial education in schools and colleges and advocate, campaign for and contribute to the sustainable funding stream (combination of Government funding and industry levies) needed to meet this requirement.
- As an interim goal, DfE and MAPS should adopt the target that by 2021, 60% of 7-17 year olds should receive meaningful financial education.
- Financial education should be added to the primary curriculum.
- These commitments should be supported by sufficient teaching time, clear school leadership, additional resources and teacher training.
- Budget should be available to engage external experts, such as The Money Charity, to deliver financial education as part of the school programme.
- Young people with specific needs should receive financial education tailored to these needs.
- Financial education should be Ofsted-inspected and examined, to ensure prioritisation by schools and colleges.

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<sup>2</sup> Money Advice Service 2018, *Young Adults and Money Management: behaviours, attitudes and useful rules of thumb*.

<sup>3</sup> Formerly Money Advice Service (MAS) and Single Financial Guidance Body (SFGB).

- For post-16 students, PSHE financial education should be included in the T-level core curriculum, with meaningful outcomes for each learner, including a financial plan to support them as they transition to adulthood.<sup>4</sup>
- When financial education in schools is evaluated, the standard applied should be consistent with that of other subjects, adjusted for the lower frequency and duration of financial education compared to most core subjects.

### **Financial education and pupil motivation**

We note in paragraph 186 (page 53) of the draft schools handbook that Ofsted believes that:

“Pupil motivation and positive attitudes to learning [are] important predictors of attainment. Developing positive attitudes can also have a longer-term impact on how pupils approach learning tasks in later stages of education.”

We agree wholeheartedly with this. In our schools programme we have found a strong link between financial education and pupil motivation. The Money Charity workshops ask learners to identify life goals then plan their financial approach to achieving these goals. This process of making goals conscious and thinking through the necessary steps energises learners and has a visibly positive effect on their motivation and attitudes.

### **Economic education in the national curriculum and PSHE guidelines**

The national curriculum in England states:

“All schools should make provision for personal, social, health and economic education (PSHE), drawing on good practice.”<sup>5</sup>

The PSHE curriculum guidelines are delegated by DfE to the PSHE Association, which sets out for each Key Stage the economic topics that should be covered. For example, for Key Stage 4, the PSHE Association recommends a comprehensive set of learning opportunities, including:

“L14. about changing patterns of employment (local, national, European and global); about different types of business, how they are organised and financed

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<sup>4</sup> See *TMC response on DfE Call for Evidence on PSHE*, Nov 2018. Available at: <https://themoneycharity.org.uk/media/The-Money-Charity-Response-DfE-Call-for-Evidence-on-PSHE-Nov-2018.pdf>

<sup>5</sup> *The national curriculum in England – Key stages 3 and 4 framework document*, December 2014, Department for Education, paragraph 2.5, page 4.

L17. attitudes and values in relation to work and enterprise (including terms such as ‘customer service’ and ‘protecting corporate or brand image’)

L20. to recognise and manage the influences on their financial decisions, (including managing risk, planning for expenditure, understanding debt and gambling in all its forms); to access appropriate support for financial decision-making and for concerns over money, gambling etc.

L21. to be a critical consumer of goods and services (including financial services) and recognise the wider impact of their purchasing choices

L22. their consumer rights and how to seek redress.”<sup>6</sup>

These learning opportunities are central to financial capability. They are addressed in our school workshops and by schools committed to financial education within the PSHE curriculum. For Ofsted to make a full assessment of the substance of education, these opportunities need to be reflected in the Ofsted inspection framework.

### **The missing economic aspect in Ofsted’s proposed inspection framework**

While the political, social and cultural aspects of life are referred to at some length in the current draft of the Ofsted schools handbook, the economic and financial life of the UK is comparatively absent.

For example, paragraph 206 (page 60) refers to ‘the fundamental British values’ of:

‘democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.’

This wording originates from the Prevent strategy<sup>7</sup> and forms part of the Government’s strategy for combating extremism and terrorism. However, adopted in isolation, it misses the economic aspect of British values. Economic freedom is just as important as political, social and cultural freedom.

For example, ‘democracy’ involves not only political action, but economic activities such as fund-raising, opening bank accounts, renting property and buying and selling goods and services. It is the freedom to act economically that makes democracy possible in practice.

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<sup>6</sup> PSHE Association 2017, *PSHE Education Programme of study – Key Stages 1-5*, page 31. Available at: [https://www.pshe-association.org.uk/system/files/PSHE%20Education%20Programme%20of%20Study%20%28Key%20stage%201-5%29%20Jan%202017\\_2.pdf](https://www.pshe-association.org.uk/system/files/PSHE%20Education%20Programme%20of%20Study%20%28Key%20stage%201-5%29%20Jan%202017_2.pdf)

<sup>7</sup> DfE 2014, *Promoting Fundamental British Values as part of SMSC in Schools – Departmental advice for maintained schools*. The same wording appears in Regulation 5 of the Education (Independent School Standards) Regulations 2014.

Similarly, religious freedom involves the freedom to build places of worship and associated facilities, to raise funds, make investments, buy goods and services, publish literature, travel to religious observances and so on.

The freedom to do these things is as much a fundamental British value as freedoms defined in political, social or cultural terms.

One of the purposes of education is to shine a light on ‘things we take for granted’, to evaluate them and, if necessary, critique them. For this reason we think it is vital that Ofsted’s inspection framework recognises the place of the economy, money and finance in learners’ lives. This can be done by amending a number of paragraphs in the draft inspection handbook, as we suggest in response to Proposal 6 below.

### **The Money Charity’s response to the Ofsted proposals**

#### **Ofsted Proposal 1: quality of education judgement.**

We (Ofsted) propose the introduction of a new ‘quality of education’ judgement built around our working definition of the curriculum. It will focus on a provider’s educational intent, implementation and impact. Inspectors look at teaching, assessment, attainment and progress under the current inspection framework, and they will continue to do so, but these considerations will contribute, viewed in the context of the provider’s curriculum, to a single quality of education judgement. In short, we propose to take a holistic approach to considering the quality of education rather than artificially separating the leadership of the curriculum from teaching, and separating teaching and the use of assessment from the impact this has on the outcomes that learners achieve. This will de-intensify the inspection focus on performance data and place more emphasis on the substance of education and what matters most to learners and practitioners.

**To what extent do you agree or disagree with the proposal to introduce a ‘quality of education’ judgement?**

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don’t know
<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**The Money Charity Comments:**

In our experience, an excessive focus on performance data tends to disadvantage financial education in schools. It displaces PSHE overall and, within PSHE, displaces financial education. This is because teachers focus on the subjects that are most data-relevant and most likely to be examined and inspected. We often hear teachers saying to us, 'We'd love you to come to our school, but we simply don't have the time.' We have seen regular PSHE lessons removed from the timetable and replaced with core subject time and we often find that PSHE is only taught on 'off timetable days', amounting to 1-3 days per year.

Switching to a 'quality of education' approach should allow teachers to take a more balanced approach to the curriculum and provide more opportunities for financial education.

We therefore support this change.

**Ofsted Proposal 2: separating judgements on personal development from those on behaviour and attitudes**

We propose to judge 'personal development' separately from 'behaviour and attitudes' to enhance the inspection focus on each and enable clearer reporting on both. This approach recognises the very different elements in focus. We believe that the behaviour and the attitudes learners of all ages bring to learning is best evaluated and judged separately from the provision made to promote learners' wider personal development, character and resilience.

**To what extent do you agree or disagree with the proposed separation of inspection judgements about learners' personal development and learners' behaviour and attitudes?**

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**The Money Charity Comments:**

As explained in our opening remarks, financial education has a positive impact on attitudes and motivations, helping learners identify their life goals and the strategies to achieve them.

These effects are positive for personal development.

Separating the judgement of personal development from classroom behaviour will, we think, will give more scope to recognise the impact of PSHE and of financial education within PSHE, so we support the change.

**Ofsted Proposal 3: amended approach to early years settings.**

We want to ensure that the education inspection framework 2019 judgements (see section above and para 131 in the EY handbook]) are appropriate for the range of early years settings.

**To what extent do you agree or disagree that the judgements will work well for:**

	Strongly agree	Agree	Neither agree or disagree	Disagree	Strongly disagree	Don't know
Childminders	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
Childcare on non-domestic premises	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
Childcare on domestic premises	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X
Childcare settings that offer care exclusively before and after school	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X



**The Money Charity Comments:**

Evidence supports beginning financial education as early in life as possible, pitched at the appropriate learning level. Our policy is that financial education should take place within pre-school and primary education as well as at secondary level.

However, we are not currently active in the early years sector, so we do not feel competent to comment on Ofsted’s specific proposals.

**Please use this box to record any additional comments in relation to the detail set out in the early years draft inspection handbook.**

n/a

**Maintained schools and academies**

**Ofsted Proposal 4: increase inspection time to two days**

Since their introduction in 2015, section 8 inspections of good and non-exempt outstanding schools have been valued by the sector. The changes made to the operation of these inspections from January 2018 have been welcomed by most schools inspected since then. The purpose of a section 8 inspection of a good school is to confirm that a school remains good. This will not change. However, as we have stated previously, the new education inspection framework represents an evolution in what it means to be a ‘good’ school.

We have set out within the schools handbook (paragraphs 267-279) the fact that a section 8 inspection of a good school will focus on particular aspects of the school's provision, as a subset of the full education inspection framework criteria. These are drawn principally from the quality of education judgement, but also include specific elements of pupils' behaviour, personal development and safeguarding.

Currently, section 8 inspections of good schools (or 'short inspections') last for one day. We want to ensure that there is opportunity to gather sufficient evidence while on inspection to confirm that a school remains good under the new criteria. Therefore, we are proposing to increase the time for which the lead inspector is on site to two days.

**To what extent do you agree or disagree with the proposed focus of section 8 inspections of good schools and non-exempt outstanding schools and the proposal to increase the length of these inspections from the current one day to two days?**

Strongly agree <input type="checkbox"/>	Agree <input type="checkbox"/>	Neither agree nor disagree <input type="checkbox"/>	Disagree <input type="checkbox"/>	Strongly disagree <input type="checkbox"/>	Don't know <input checked="" type="checkbox"/>
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**The Money Charity Comments:**

No comment.

**Ofsted Proposal 5: preparation for inspections on the previous afternoon**

In addition to the wider education inspection framework proposals we are introducing, we also propose a new approach to how our inspectors prepare for and begin inspections. This is in response to feedback that initial contact can be data-driven and not allow schools to communicate fully with inspectors.

We propose the introduction of on-site inspector preparation for all inspections carried out under section 5 and section 8 of the Education Act 2005. Currently, inspectors carry

out pre-inspection preparation remotely on the day prior to on-site inspection. We propose that, from September 2019, this preparation takes place at the school on the afternoon before the inspection, enabling inspectors and leaders to carry out preparation collaboratively wherever possible.

On-site preparation will allow for better communication between the lead inspector and the school, allowing the school a clear role in preparation work. It will help to reduce the burden on schools of making logistical arrangements on the morning of the inspection and providing documentation. It will provide more time to establish good, professional relationships between school leaders and the lead inspector.

We propose that Ofsted will provide formal notification of the inspection no later than 10am on the day before the inspection. We then propose that the lead inspector will arrive on site no earlier than 12.30pm on that day. The lead inspector will use this time to talk with senior leaders in order to gain an overview of the school’s recent performance and any changes since the last inspection.

Conversations will focus particularly on how the school has built on its strengths, what weaknesses leaders have identified and what action they have planned or have in train to address those weaknesses. It will also be an opportunity to make practical arrangements, including about the documentation or other evidence that inspectors will need to see in the course of the inspection. Inspectors will complete their on-site inspection preparation and leave the school premises by **no later than 5pm** on the day before the inspection starts. Paragraphs 51 - 53 of the school inspection handbook set out in more detail what we expect on-site preparation to cover.

**To what extent do you agree or disagree with the proposed introduction of on-site preparation for all section 5 inspections, and for section 8 inspections of good schools, on the afternoon prior to the inspection?**

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X

### **The Money Charity Comments:**

No comment.

### **Ofsted Proposal 6: not to use internal performance data**

The recent Teacher Workload Advisory Group report<sup>8</sup> noted that ‘time associated with data collection and analysis... is most frequently cited as the most wasteful due to a lack of clarity amongst teachers as to its purpose’.

Ofsted is committed to ensuring that our inspection work does not create unnecessary work for teachers, and as such we propose that inspectors will not use schools’ internal performance data for current pupils as evidence during an inspection. This is because:

- internal data for current pupils has its limitations, and inspectors will not be able to assess whether the data is an accurate and valid representation of pupils’ learning of the curriculum
- inspectors will gather direct evidence of the quality of education in schools
- inspectors will have meaningful discussions with leaders about how they know that the curriculum is having an impact.

Inspectors will, however, ask schools to explain why they have decided to collect whatever assessment information they collect, what they are drawing from this information and how that informs their curriculum and teaching. We believe that this will help to reduce unnecessary workload for teachers; we do not believe that it will have a negative effect on our ability to judge effectively the quality of education in a school.

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<sup>8</sup> ‘Making data work: report of the Teacher Workload Advisory Group’, Teacher Workload Advisory Group, 2018; [www.gov.uk/government/publications/teacher-workload-advisory-group-report-and-government-response](http://www.gov.uk/government/publications/teacher-workload-advisory-group-report-and-government-response).

**To what extent do you agree or disagree with our proposal not to look at non-statutory internal progress and attainment data and our reasons why?**

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X

The Money Charity Comments: *If you disagree, please be specific about the types of data that you think inspectors should consider.*

No comment.

**Please use this box to record any additional comments in relation to the detail set out in the **draft school inspection handbook****

In our opening remarks (pages 6-7) we made the point that there are opportunities within the school inspection handbook to better reflect the role of financial education within PSHE and to broaden the approach to British values and to the moral, social and cultural development of learners to better reflect the economic life of UK society.

We propose the following amendments to the draft handbook.

Proposed deletions are shown struck through. Proposed additions are shown in bold type.

**Paragraph 177 (impact)**

Amend bullet point (page 46) to read:

“learning must build towards a goal. At each stage of pupils’ education, they are being prepared for the next stage of education, training, ~~or~~ employment

**and participation in the economy and life more widely.** Inspectors will consider whether pupils are ready for the next stage **of life** by the point they leave the school or provision that they attend.”

The point here is that the purpose of education is to prepare learners for adult life in the widest sense, not just for further education, training or employment. We find in our financial capability work that broadening the scope to life goals in general creates the greatest engagement and emotional investment in the process of learning.

### **Paragraph 202 (personal development)**

Add bullet point (page 58):

**“developing the financial capability of all learners, so they are attuned to the UK’s financial environment and prepared for the financial decisions they will need to make in the course of their lives.”**

Amend the final bullet point (top of page 59):

“supporting readiness for the next phase of education, training, employment **and participation in the economy and life more widely** so that pupils are equipped to make the transition to the next stage **of life** successfully.”

### **Paragraph 205 (moral development of pupils)**

Add bullet point:

**“ability to recognise the difference between right and wrong in our financial and economic relationships.”**

### **Paragraph 206 (social development of pupils)**

Amend final bullet point (page 60):

“acceptance of and engagement with the fundamental British values of democracy, the rule of law, **economic freedom**, individual liberty and mutual respect and tolerance of those with different faiths and beliefs. They will develop and demonstrate skills and attitudes that will allow them to participate fully in and contribute positively to life in modern Britain.”

### **Paragraph 207 (cultural development of pupils)**

Add bullet point (page 60):

**“interest in exploring our economic and financial lives, particularly as these relate to the content of British culture and the way in which culture is produced.”**

### **Non-association independent schools (NAISs)**

All independent schools are inspected at the direction of the DfE, which is the registration authority for independent schools. In standard inspections of non-association independent schools, Ofsted assesses compliance with the independent school standards (ISS) and makes graded judgements under the inspection framework. This model will continue when the new education inspection framework is introduced in September 2019.

### **Ofsted Proposal 7: use non-specialist curriculum for inspection of NAISs**

Some non-association independent schools offer a specialist curriculum and Ofsted recognises their autonomy to do so. For example, some schools offer a specialist faith-based curriculum, while others offer a specialist education in the performing arts. Inspectors will assess a school’s entire provision, including any specialist provision offered, when assessing compliance with the ISS and when reaching judgements under the education inspection framework in the following judgement areas: overall effectiveness; behaviour and attitudes; personal development; and leadership and management.

When reaching a judgement under the new quality of education judgement area, the non-specialist curriculum will normally be inspectors’ primary source of evidence. It is important that, where schools offer a specialist education, pupils also study a broad, rich curriculum alongside it. This is supported by Ofsted’s research, and is a requirement of the ISS.

However, where a school chooses to deliver a substantial number of the required subject areas<sup>9</sup> through the specialist curriculum (for example through faith-based content or other forms of immersive study), or where there is insufficient evidence from the non-specialist curriculum that the quality of education criteria are met, inspectors will consider evidence from the specialist curriculum in arriving at their judgement.

**To what extent do you agree or disagree with the proposal that inspectors should normally use the non-specialist curriculum as their primary source of evidence in assessing the extent to which the school meets the quality of education criteria?**

Strongly agree  <input type="checkbox"/>	Agree  X	Neither agree nor disagree  <input type="checkbox"/>	Disagree  <input type="checkbox"/>	Strongly disagree  <input type="checkbox"/>	Don't know  <input type="checkbox"/>
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**The Money Charity Comments:**

We agree with this.

Financial education generally falls within the non-specialist curriculum, so a focus on the non-specialist curriculum will assist our efforts to increase provision.

Financial education currently sits within several curriculum topics: citizenship, mathematics and PSHE. In our view, PSHE is the right place for it as financial education is not about narrowly defined skills but is about attitudes, life goals and strategies.

**Ofsted Proposal 8: quicker updated judgements of NAIS performance**

Currently, where the DfE commissions Ofsted to conduct additional inspections of independent schools, such as progress monitoring or emergency inspections, Ofsted checks whether the ISS are being met but does not make new graded judgements about the school. As a result, a school retains the judgements from its most recent full standard inspection, even where it has improved and is now meeting the standards, or has declined and is no longer meeting them. A new graded judgement is not provided until the school's next standard inspection.

<sup>9</sup> The Education (Independent School Standards) Regulations 2014, paragraph 2(2)(a) <http://www.legislation.gov.uk/uksi/2014/3283/schedule/made>



We are aware that some schools may wish new inspection judgements to be made more quickly than they currently are, to reflect their improvement. We are also aware that when a good or outstanding school is no longer meeting the standards but retains its most recent standard inspection judgements, this can be misleading for parents and others.

To provide parents, school leaders and the DfE with better information, we are proposing to recognise and acknowledge sooner where schools have improved or declined, for example by bringing forward a standard inspection.

**To what extent do you agree or disagree that where non-association independent schools have been found to improve or decline at an additional inspection, Ofsted should provide up-to-date judgements about the school’s current performance?**

Strongly agree <input type="checkbox"/>	Agree <input type="checkbox"/>	Neither agree nor disagree <input type="checkbox"/>	Disagree <input type="checkbox"/>	Strongly disagree <input type="checkbox"/>	Don't know <input checked="" type="checkbox"/>
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**The Money Charity Comments:**

No comment.

**Please use this box to record any additional comments in relation to the detail set out in the **non-association independent schools draft inspection handbook**.**

Amend the non-association independent schools handbook in the same way as the equivalent paragraphs in the schools handbook, to reflect our economic and financial lives and financial education in the PSHE curriculum.

In particular, with the wording proposed in the box after Proposal 6, amend paragraphs 165 (impact), 192 (fundamental British values), 195 (moral development), 196 (social development) and 197 (cultural development) of the non-association independent schools handbook.

### **Further education and skills**

The further education and skills sector is broad and diverse, with providers that deliver a wide range of education and training provision in different settings. We have drafted the proposed education inspection framework and handbook to be adaptable for all the types of provider that we inspect.

Under the common inspection framework, we currently inspect all publicly funded provision. We grade, and report specifically on, six different types of education and training provision:

- 16–19 study programmes
- adult learning programmes
- apprenticeships
- traineeships
- provision for learners with high needs
- full-time provision for 14–16 year olds.

### **Ofsted Proposal 9: rationalisation of inspection categories**

We believe that it would make our inspections and reports more coherent and inclusive if we were to reduce the types of provision that we grade and specifically report on as follows:

<b>Proposed education inspection framework types of provision</b>	<b>Current types of provision</b>
Education programmes for young people	16–19 study programmes, including: <ul style="list-style-type: none"> <li>■ academic, technical and vocational study programmes</li> <li>■ study programmes for those with education, health and care plans, aged 16 to 24 (and those with high needs)</li> <li>■ 16–19 traineeships</li> <li>■ full-time provision for 14–16 year olds.</li> </ul>
Apprenticeships	Apprenticeships at levels 2 to 5, whether frameworks and standards, levy or non-levy funded.
Adult learning programmes	Adult learning programmes 19–24 traineeships.

We will cover education and training for people with SEND and/or high needs thoroughly and appropriately within the relevant type of provision rather than separately. We consider that this will ensure that they are fully and properly represented and not marginalised or isolated within the inspection and report.

T-levels, a major reform of technical education at level 3, will be introduced from September 2020. That will take place after the beginning of this new framework. We intend to review how we should best integrate the coverage of T-levels into this framework closer to the time of their introduction and will consult further on this in due course.

**To what extent do you agree or disagree that the proposal to reduce the types of provision we grade and specifically report on will make our inspection reports more coherent and inclusive?**

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X

**The Money Charity Comments:** *If you disagree, are there any specific areas you are concerned about?*

We do not have a view on the rationalisation of the categories, but our FE policy is that financial capability should be at the heart of education programmes for 16-19 year olds and 19-24 year olds.

This is the time when learners are preparing for life in the workforce: opening bank accounts, making payments, needing to budget and being exposed to credit for the first time in their lives. Research shows that many people in this age group are financially under-prepared and wish they had learned more during their formal education.<sup>10</sup>

Our FE policy is that DfE should:<sup>11</sup>

### **1. Define what has to be done**

Use the Further Education Planning Framework<sup>12</sup> developed by the Money Advice Service and Youth Financial Capability Group to define outcomes for meaningful post-16 financial education. This should include an entitlement for each learner to a financial plan to support them as they transition to adulthood.

### **2. Use proven methods**

Define who in the school or college is responsible for leading financial education; use outside experts such as The Money Charity and others specialising in financial education; make sure teachers are properly trained in financial education.

### **3. Provide money and other resources so that schools can comply**

As an indicative budget, we suggest £30-£50 per student as an initial target.

### **4. Put in place the mechanism(s) to ensure it is done**

Include PSHE financial education in the T-level core curriculum; make PSHE with financial education an examined subject; require it to be inspected by Ofsted.

- For post-16 students, PSHE financial education should be included in the T-level core curriculum, with meaningful outcomes for each learner, including a

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<sup>10</sup> Money Advice Service 2018, *Young Adults and Money Management: behaviours, attitudes and useful rules of thumb*.

<sup>11</sup> See The Money Charity Nov 2018, *The Money Charity response to the DfE call for evidence on PSHE*. Available at: <https://themoneycharity.org.uk/work/policy/consultation-responses/>

<sup>12</sup> <https://www.young-money.org.uk/resources/details/financial-education-planning-framework-1119-years>

financial plan to support them as they transition to adulthood.

- PSHE financial education should be Ofsted-inspected.

### **Ofsted Proposal 10: extra time on site for short inspections**

Under the current common inspection framework, Ofsted carries out short inspections of most good further education and skills providers. This happens within five years of the previous inspection. Some good providers instead receive a full inspection for reasons of risk. We intend to continue with short inspections for most good providers on the same basis. However, given greater focus on the quality of education in the education inspection framework 2019, we believe we need to change the way we carry out the short inspection of good providers in some respects.

Under our current methodology, we undertake to confirm that a provider remains good by exploring a number of lines of enquiry that differ for each provider. As we are introducing a new inspection framework with a focus on the quality of education and the curriculum, we propose introducing an approach that focuses on the quality of education and training, safeguarding and effective management, and that this should be the same for all providers. We are continuing to pilot our proposed approach. The proposed areas we are piloting are:

- Is the quality of education/training good?
- Has the provider addressed the areas for improvement/next steps identified in the last inspection report well?
- Are the provider's safeguarding arrangements effective?
- Are careers education and guidance of a good quality?
- Has the provider managed and implemented changes to provision effectively since the last inspection?

We will refine the above areas based on our pilot activity and from feedback following this consultation. In order to ensure that short inspections are planned effectively with providers, and to ensure coverage, we are proposing to increase the time the lead inspector, or in the case of larger providers, the lead inspector and another member of

the inspection team, spend on site. We propose that the lead inspector, or in larger providers, two inspectors, arrive at the provider on the day following notification and complete the planning for the inspection on site with the provider (see paragraphs 126-133 of the draft further education and skills inspection handbook). They would then start inspection activity prior to the full inspection team arriving the following day.

**To what extent do you agree or disagree with the proposed model for short inspections?**

Strongly agree <input type="checkbox"/>	Agree <input type="checkbox"/>	Neither agree nor disagree <input type="checkbox"/>	Disagree <input type="checkbox"/>	Strongly disagree <input type="checkbox"/>	Don't know <input checked="" type="checkbox"/>
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**The Money Charity Comments:**

No comment.

**Ofsted Proposal 11: extra six months for repeat full inspections of providers requiring improvement**

We are proposing to extend the timescale within which we should inspect providers judged to require improvement from 'normally 12 to 24 months' after the last inspection to 'normally 12 to 30 months' after the last inspection. This will provide greater flexibility to give providers more of an opportunity to improve to good while still allowing some providers to be re-inspected earlier if they are ready for it. A provider that has been judged as requires improvement would continue to receive a monitoring visit between inspections.

**To what extent do you agree or disagree that the timescale within which providers that are judged to require improvement receive their next full inspection should be extended from ‘12 to 24 months’ to ‘12 to 30’ months’?**

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X

**The Money Charity Comments:**

No comment.

**Inspection of colleges at campus level**

Ofsted has, for some time, intended to introduce grading and reporting on individual colleges within college groups as part of the overall inspection of the college group, subject to receiving the funding to be able to do this.

Since the disaggregated data that will make it possible to determine what provision is delivered by which college will not be fully available until 2021, it will not be possible to introduce that for the beginning of this framework. We will therefore consult further on this in due course. We will, in the meantime, look at ways in which we can better differentiate the relative performance of individual colleges within inspection reports of college groups.

**Please use this box to record any additional comments in relation to the detail set out in the **further education and skills draft inspection handbook**.**

We propose amendments to the further education and skills draft inspection handbook similar to those we proposed for the schools handbook and the non-association independent schools handbook:

**Various paragraphs**

Where the phrase “future success in education, employment or training” appears, replace it with “future success in education, employment, training **and participation in the economy and life more widely.**”

**Paragraph 216 (page 49)**

Amend the bullet point on fundamental British values to include the words “**economic freedom**”.

Add a new bullet point:

**“developing the financial capability of all learners, so they are attuned to the UK’s financial environment and prepared for the financial decisions they will need to make in the course of their lives. This should include a financial plan to support them as they transition to adulthood.”**

(end)