

	A	B
1	Name	Erel Onojobi
2	Organisation	Ministry of Thrift
3	Email	Erel@ministryofthrift.co.uk
4	Question 1	I understand that it may cover 10 years, however it will definitely need a 5 year review and refresh if necessary. It should be a more fluid document rather than waiting till the end of the period, especially when key events take place like a change in government etc.
5	Question 2	The new framework is more holistic and comprehensive. It shows what some of us on the ground knew 8 years ago but it finally feels as if those responsible for the strategy have caught up with the reality. This is a much better Framework than outlined in the previous strategy and so I am more confident that this new strategy will be more effective.
6	Question 3	The objectives appear reasonable, although I just about understand them. My only concern when reading them is that they seem slightly unrealistic, noble but how in practice can they really be achieved.
7	Question 4	These appear very accurate.

	A	B
1	Name	Erel Onojobi
2	Organisation	Ministry of Thrift
3	Email	Erel@ministryofthrift.co.uk
8	Question 5	Of course it is important to track the levels of financial wellbeing but only insofar as they match what we see in the economy/society. I would expect an effective Financial Capability strategy to have a positive impact on the attitudes, behaviours, debt and savings levels of the nation. It is important but who and how will it be tracked? This is linked to comments I will make about the general process of monitoring and evaluation.
9	Question 6	The priority areas are fine as long as they include groups like the in-work poor and squeezed middle. I imagine they might be caught in the groups that manage day to day but i'm concerned that there is not enough done to stop the 'OK' groups falling backwards as well as encouraging them to go forwards.
10	Question 7	I strongly support this aim.
11	Question 8	Again the recommendations are fine, but I'm surprised at the lack of focus on digital tools. I know this is only a method rather than an end result, but I believe significantly more investment is needed not only in the design and production of digital tools but their promotion and use of social media. I believe this is something that needs a real commitment.
12	Question 9	This is an extremely important and welcome part of the Strategy

	A	B
1	Name	Erel Onojobi
2	Organisation	Ministry of Thrift
3	Email	Erel@ministryofthrift.co.uk
13	Question 10	I'm concerned about the lack of suitable options not just financial products but the fact that people have lost confidence in pensions. We must persuade people but also be conscious that they cannot be forced, we need to look at the options that they are looking at and explain the merits and disadvantages of each and not treat people as if they are ignorant or stupid. For example there are many people who still believe property is a better option than pensions, others are attempting other unregulated products. Every year there is a new 'crowdsourced' option or 'peer-to-peer' option made possible through changes in technology and we need to show that we are abreast of that. We need to consider the growing number of people who have become self-employed and 'entrepreneurs' since the recession - the 'We Are All In Campaign' will be irrelevant to them. We need to consider options for women - many have not been in paid employment for large periods of time due to childcare and family care. Women are 50% of the population so perhaps require their own strand of the Strategy?
14	Question 11	
15	Question 12	Again regarding accessibility although this will change in the coming years as those less familiar with technology reduce there is still the issue of digital exclusion, access to technology and knowing how to use it. There is also the possible decrease in cognitive and physical ability. In summary I would like to have a better understanding of what is meant by budgeting tools for older people.
16	Question 13	The aim is good and i would support it.

	A	B
1	Name	Erel Onojobi
2	Organisation	Ministry of Thrift
3	Email	Erel@ministryofthrift.co.uk
17	Question 14	<p>Again these are fine - although as with the other recommendations they do not look very different from what currently occurs.</p> <p>A key issue for people in Financial Difficulties is that all the help available is just not visible enough. The Citizens Advice bureaux are successful as they have a visible presence on many high streets. Many other providers of help due to funding are not as visible in the physical or digital space, there is still much under-funding in this area. We need to be more innovative, be present in shopping centres, supermarkets, high streets, have market stalls if necessary. We need mobile apps, social media campaigns, text access and done to the same standard as the commercial ones which often doesn't happen -again due to funding.</p>
18	Question 15	
19	Question 16	<p>These are quite good - happy to see an online focus here but again this has to be done to the appropriate standard with the appropriate marketing otherwise the tools will just sit on the the website and won't be taken up as desired</p>
20	Question 17	I support it - but believe it is the most ambitious aim
21	Question 18	<p>In this culture you will need 'counter-celebrities' or 'anti-celebrities' even to put forward your message. You will need significant investment in marketing to fight 'fire with fire' as it were and we are bombarded left right and centre by materialistic messages.</p> <p>You will need a return to old norms and values that people don't really respect anymore - perhaps we need another war (please take with pinch of salt) to return to values of WW1 and WW2. This is the type of thing that the Ministry of Thrift (<a href="http://www.ministryofthrift.co.uk">www.ministryofthrift.co.uk</a>) is trying to achieve with its spoof propaganda campaign branding that is being received very well by both young and old people. If you support and amplify initiatives like that then there may be some real success.</p>
22	Question 19	
23	Question 20	<p>As a small organisation the whole issue of evidence and evaluation is traumatic - it is necessary important but due to funding it probably isn't done as accurately or as long term as it ought to be. If valuable data is to be gained, some aspects of evaluation needs to be done differently. It is more than training but actually increasing capacity and reducing fear. If an organisation knew that hands on support would be given to develop appropriate tools and then to support the ongoing management and monitoring without threat of the withdrawal of funding then things might be better in this arena. If the professionals could come in and do their part and allow and support practitioners to do what they are good at, we could have a very meaningful partnership. In terms of good-practice Comic Relief is an excellent funder, supporting projects, allowing change and using their own evaluation team to support projects.</p>

	A	B
1	Name	Erel Onojobi
2	Organisation	Ministry of Thrift
3	Email	Erel@ministryofthrift.co.uk
24	Question 21	We would be happy to review any updates and contribute in the areas of Children & Young People, Older People, Women and Digital Tools and Social Media if you add these in.
25	Question 22	We can assist in the design and production of mobile tools and their marketing and promotion. Our specialism is Digital Financial Inclusion.

	A	C
1	Name	Eamonn McCarron
2	Organisation	North Lanarkshire Council
3	Email	mccarrone@northlan.gcsx.co.uk
4	Question 1	<p>The remit is very wide, it would be a mistake to set unrealistic time limits on such a project. A prioritisation exercise which responses will inform will indicate quick wins which will inject momentum and highlight development areas. In short a staged plan with SMART outcomes would be best</p> <p>The framework also seeks to introduce common language, then common framework which could lead to more relevant and informing evaluation and review. Important to also maintain client focus</p>
5	Question 2	<p>The Framework is easily read, well crafted and pulls together for the first time all aspects of financial capability. The recognition of component parts and their influence, the identification of different groups is crucial for further development. the recognition the document is a flexible framework which needs positive input by partners to be successful</p>
6	Question 3	It's a no brainer !
7	Question 4	Clear and specific easily understood tracks development needed to break debt cycle

	A	C
1	Name	Eamonn McCarron
2	Organisation	North Lanarkshire Council
3	Email	mccarrone@northlan.gcsx.co.uk
8	Question 5	<p>Very, but people tend to underestimate how precarious their financial situations is. I would suggest that a number of constantly struggling may classify themselves as making ends meet</p> <p>I would suggest that additional work could be done by the evaluation and review toolkit. Proportionate evaluation and review is important in informing next stage of development but funders and agencies do not stress importance of this.</p> <p>This could be done with funded projects making universal evaluation and review part of best practice and then essential for future funding</p>
9	Question 6	<p>as discussed at event in Edinburgh , preparing for later life can be sub-divided is too vague</p> <p>ps I do think that the ask MA adverts do a good job re influencing social norms - asks how do we deal with debt, how do we create savings strategies</p>
10	Question 7	Is a good plan lots of local activities to build on , identify best practice and share. Need new partners in education, further education to do this inhouse rather than use advice agencies
11	Question 8	<p>whilst there is a lot of local activity ,common language is not used key messages can be lost , changing social norms to discuss family finances crucial - this is easiest to tackle because of amount of existing activity and so should be priority</p> <p>Young people on cusp of employment should also be very receptive group</p>
12	Question 9	<p>This one is more of a planning for retirement. Your website actually deals with this with info around life events very well - that is good</p> <p>stick with that - later life too vague</p>

	A	C
1	Name	Eamonn McCarron
2	Organisation	North Lanarkshire Council
3	Email	mccarrone@northlan.gcsx.co.uk
13	Question 10	see above - tackle life events, securing a job, savings strategies, buying/renting a home, budgeting , children, redundancy etc as well as planning for retirement
14	Question 11	good well structured
15	Question 12	engagement with new agencies to access older people
16	Question 13	Yes small financial shocks followed by bad decisions and debt spiralling out of control is too common, see below for engagement suggestions



	A	C
1	Name	Eamonn McCarron
2	Organisation	North Lanarkshire Council
3	Email	mccarrone@northlan.gcsx.co.uk
17	Question 14	DWP and Social Housing Landlords are key, they have pre-existing relationship with tenants and as such are trusted intermediaries who can spot early problems such as rent arrears and accessing crisis loans. This then informs actions of advice agencies would suggest funding RSL's to provide these bespoke services rather than generic advice agencies
18	Question 15	Access to affordable credit is huge issue. The gap between mainstream including credit union and sub prime lenders is too big to bridge for many. would suggest looking at CDFI - Scotcash (Glasgow) good example - they link to housing associations see engagement above - well worth a visit
19	Question 16	Promote CDFI's not credit unions - bridge the gap !
20	Question 17	Great as above ask ma adverts good
21	Question 18	see above - all good - would love to see more basic debt on tv soaps
22	Question 19	proportionate evaluation tool is essential; consultation process followed by linking evaluation to funding. If consultation successful can be called a national standards evaluation tool rather than MAS evaluation tool
23	Question 20	get them by the purse strings and their hearts and minds will soon follow

	A	C
1	Name	Eamonn McCarron
2	Organisation	North Lanarkshire Council
3	Email	mccarrone@northlan.gcsx.co.uk
24	Question 21	yes
25	Question 22	We are a local authority who fund 9 advice agencies and provide council debt and welfare rights advice, as part of service level agreement Scottish National Standards accreditation mandatory for funding, now need soem softer measures we would be happy to pilot these. Have spoken to Alison Barnes re using your evaluation toolkit for a new project

	A	D
1	Name	Nick Pearson
2	Organisation	The Debt Counsellors Charitable Trust
3	Email	nick.pearson@thedebtcounsellors.org.uk
4	Question 1	We believe that given this strategy requires a sea change in consumer behavior, at least for a large part of the UK public. In our view this should be a 5 year strategy in the first instance but NB see our comments below.
5	Question 2	The framework is certainly comprehensive but it may not be achievable given the resources for implementation. We have real concerns about many of the objectives are a) deliverable and b) measurable.
6	Question 3	Providers and Regulators should work on the basis consumers are about as financially capable as its ever going to be. Consumers should be able to purchase financial services products safe in the knowledge that it delivers what the provider said it would and are itâ€™s suitable for their needs. Consumers need to a) be able to trust that the products they buy are fit for purpose and b) trust that the advice provided during the sales process is independent and impartial and aimed at meeting their best interests as a consumer.
7	Question 4	They are probably the right targets

	A	D
1	Name	Nick Pearson
2	Organisation	The Debt Counsellors Charitable Trust
3	Email	nick.pearson@thedebtcoutsellors.org.uk
8	Question 5	We welcome any research that sheds more light on these issues.
9	Question 6	They seem to be the right areas.
10	Question 7	No Comment
11	Question 8	No comment
12	Question 9	No comment

	A	D
1	Name	Nick Pearson
2	Organisation	The Debt Counsellors Charitable Trust
3	Email	nick.pearson@thedebtcounsellors.org.uk
13	Question 10	No comment
14	Question 11	No comment
15	Question 12	No comment
16	Question 13	Its all been tried, and its failed before eg we in the free to client debt advice sector have tried for 30 years to get people in debt to seek advice earlier and it has never been achieved. There is nothing new here and therefore its unlikely to work. it is unclear if MAS has the powers to deliver some of what is proposed eg key insight 4 - can MAS deliver legislative changes of this sort?

	A	D
1	Name	Nick Pearson
2	Organisation	The Debt Counsellors Charitable Trust
3	Email	nick.pearson@thedebtcounsellors.org.uk
17	Question 14	We are firm believers in encouraging saving and believe MAS should focus on this as a priority. The other priorities identified are too woolly, unmeasurable, undesirable (priority 6 - MAS is only one part of the debt advice funding jigsaw and one which is focused more on targets than clients) or simply not achievable by MAS.
18	Question 15	No comment
19	Question 16	No comment
20	Question 17	No comment
21	Question 18	No comment
22	Question 19	No comment
23	Question 20	No comment

	A	D
1	Name	Nick Pearson
2	Organisation	The Debt Counsellors Charitable Trust
3	Email	nick.pearson@thedebtcounsellors.org.uk
24	Question 21	We are not sure we would want to be involved.
25	Question 22	We will pursue our own objectives and use MAS where we think it is prudent or desirable to do so for our clients.

	A	E
1	Name	eileen thomson
2	Organisation	CAB
3	Email	eileenthomson@arbroathcab.casonline.org.uk
4	Question 1	The next 5 years
5	Question 2	The recognition of the importance of attitudes and motivation and their addition to the framework is welcome, however this may make it more difficult to implement and evaluate behaviour change
6	Question 3	I agree with the objectives however there has to be differentiation between the financial capability of vulnerable people and people on a low income and others who are less vulnerable or have a higher income and more means to prepare for their life ahead
7	Question 4	They are clear and straightforward



	A	E
1	Name	eileen thomson
2	Organisation	CAB
3	Email	eileenthomson@arbroathcab.casonline.org.uk
8	Question 5	Vitaly important unless another tool is developed to measure the impact of the Financial Capability Strategy
9	Question 6	They cover all areas
10	Question 7	Completely
11	Question 8	The recommendations are adequate but I think if financial education is on a curriculum it should be as a stand alone subject rather than embedded within another subject eg maths
12	Question 9	Completely

	A	E
1	Name	eileen thomson
2	Organisation	CAB
3	Email	eileenthomson@arbroathcab.casonline.org.uk
13	Question 10	The recommendations are valid but do not specify how to increase the take up of financial capability support.
14	Question 11	Fully
15	Question 12	The recommendations are comprehensive, I have no suggestions for improvement
16	Question 13	Fully

	A	E
1	Name	eileen thomson
2	Organisation	CAB
3	Email	eileenthomson@arbroathcab.casonline.org.uk
17	Question 14	The recommendations should include investigating mandatory money management advice for clients seeking debt advice
18	Question 15	Fully
19	Question 16	The best recommendation is the terms and conditions and consequences of financial products and services should be expressed in pounds and pence not percentages. I have no suggestions for improvements.
20	Question 17	Fully
21	Question 18	Although I support these aims they are long term and the outcome may not be realised within a five year strategy
22	Question 19	Fully
23	Question 20	Financial capability projects are so diverse it will be challenging to create a common evaluation framework.

	A	E
1	Name	eileen thomson
2	Organisation	CAB
3	Email	eileenthomson@arbroathcab.casonline.org.uk
24	Question 21	Inclusion in further consultation events
25	Question 22	Our financial capability project funding ends in April 2016 so this would be dependent on obtaining funding for another project

	A	F
1	Name	June Menzies
2	Organisation	Citizens Advice and Rights Fife
3	Email	jmenzies@carfonline.org.uk
4	Question 1	The period covered should be 5-10 years. Financial capability has been an under reported problem for UK citizens for decades and a short term reporting period of 2-3 years does not provide the support a strategy like this requires. A 10 year period allows time to establish a baseline and can legitimately assess the impact of financial capability. Annual reporting should be an intrinsic feature of the Strategy ensuring that trends are quickly identified and addressed where applicable.
5	Question 2	The framework on first glance looks overcomplicated to a large degree. Even for a delivery agency it is difficult to assess without further clarification of points and definitions of each factor. There must a simpler delivery framework which demonstrates the positive and negative influence on an individual's decision making capacity?
6	Question 3	There is little issue with the actual objectives of the Strategy and it should be commended for the introduction of separate target areas namely, the Individual, the System and the Environment. This demonstrates a willingness to acknowledge the role of a variety of factors in influencing financial capability. The difficulty with the objectives is their ability to be measured accurately. By having objectives related to "Better outcomes" and "more positive attitudes" there is an inherent difficulty in measuring the progress towards such objectives.
7	Question 4	They are wide ranging, simple to understand and allow for key behaviours to be categorised within certain parameters

	A	F
1	Name	June Menzies
2	Organisation	Citizens Advice and Rights Fife
3	Email	jmenzies@carfonline.org.uk
8	Question 5	<p>This measurement is key to the underpinning of the Strategy as a whole. The staircase framework devised to show Financial Wellbeing as a graphic, displays the steps that people need to take to attain greater individual financial security. The graphic is a very powerful illustrative tool and allows individuals to place themselves on a step in a very easy manner. The definitions within each step are sufficiently different to allow individuals to assess their financial resilience and look to see how they can take the next step to move up the ladder. There is one important comment to make on this segment. The staircase does not give an indication of financial wellbeing. Instead it gives an accurate description of an individual's financial resilience and as such, there is a strong argument that this should be named the 'Financial Resilience Staircase'. The staircase measures this directly and while there is a clear link between financial resilience and financial wellbeing, the link is so clear as to call the framework the 'Financial Wellbeing Staircase'.</p>
9	Question 6	<p>The priorities for action miss a huge swathe of society, namely those in receipt of benefit. Any Financial Capability Strategy that doesn't undertake a specific priority for action surrounding those poorest members of our society cannot have the impact that it desires. Those sections of society who are trying to manage with the least must be a high priority for a Financial Capability Strategy attempting to have maximum impact. To exclude this section as a priority for action would leave such a Strategy with minimal credibility. Statistics currently indicate over 2 million people across the UK are unemployed. Not to view this section of society as a priority area of action would be a critical oversight.</p>
10	Question 7	<p>This aim is excellent. All-encompassing and recognising of children and young people's abilities</p>
11	Question 8	<p>The recommendations are admirable although much emphasis is placed on parental/carers guidance. There perhaps need to be greater emphasis on the role that the educational system can play in achieving this sectors aim. Put simply, learning takes place in schools regardless of parental input. By over-emphasising the role to be played outwith an educational establishment there is a danger that there is over-reliance on parents who demonstrate difficulties in their own financial capability. By using an already existing culture of learning within school there is a greater likelihood of achieving the aim set out for this group under the Strategy. It is also key to note that pre-school education can be delivered via nurseries and there is no need to wait until children attend formal state education.</p>
12	Question 9	<p>The way in which the aim is written appears to be unattainable. The paragraph before the aim states '12.2 million people will have inadequate incomes and retirement' directly implying they cannot make ends meet when they come to retirement. It is perhaps prudent to make a distinction at this point, financial capability doesn't make up for the fact people have no money. You can be the most financially capable person in the UK but with no money this would make no difference. The aim should instead take cognisance of this and an alternative may be 'To improve people's financial capability so that everyone reaching retirement age has the ability to make informed decisions to help make ends meet and to achieve higher levels of financial resilience and security.'</p>

	A	F
1	Name	June Menzies
2	Organisation	Citizens Advice and Rights Fife
3	Email	jmenzies@carfonline.org.uk
13	Question 10	The recommendation for actions would tie in nicely with the aim written above as part of the response to Q9. The recommendations for action would NOT meet the current stated aim of everyone who reaches retirement age making ends meet.
14	Question 11	There would not be an issue in fully supporting this aim.
15	Question 12	The recommendations are all well directed and give nods to all relevant organisations. There is a small point in that the recommendations for action point 7 contains a specific figure of older people who find managing their day to day finances difficult (1 in 3). This should instead read "Support those older people who find managing their day to day finances difficult to become more effective money managers. The statistic of 1 in 3 will change over time and as such the recommendations of action should not include or reflect on a changeable statistic.
16	Question 13	The aim could be re-written to include "To improve financial capability, thereby reducing the number of people who become over-indebted and enabling more people to resolve their debt problems quickly, securely, sustainably and independently"

	A	F
1	Name	June Menzies
2	Organisation	Citizens Advice and Rights Fife
3	Email	jmenzies@carfonline.org.uk
17	Question 14	These are very English-centric. Much of the early intervention discussions being promoted within this section have already been established across Scotland. Furthermore, the MAS does not deliver debt advice in Scotland meaning that point recommendation of action points 13, 14 and 15 do not relate sensibly in a Scottish context. MAS has minimal debt advice influence in Scotland with regards to legislation and debt practices with this falling under the remit of the Accountant in Bankruptcy. Also in point 15 it should be noted that National Standards and CAS Codes of Practice dictate the quality of advice in debt advice provision.
18	Question 15	No issues with the aim although no requirement for the word "the" in the opening line of the aim. Currently reads: "The Strategy's overall aim is to improve the financial capability by enabling better access to appropriate and easy to use financial services and advice, with the consequences of decisions made clear" Should read: "The Strategy's overall aim is to improve financial capability by enabling better access to appropriate and easy to use financial services and advice, with the consequences of decisions made clear"
19	Question 16	No issues regarding the recommendations for action.
20	Question 17	This is a more controversial aim in the fact that it is aiming at directly shaping the way in which people think about financial capability. However, in order to improve financial capability across the UK there needs to be greater emphasis placed on people's attitudes to financial management, education and ownership. For this reason alone, the aim would be one which we would wholeheartedly support.
21	Question 18	It is not clear how the recommendations for action would influence societal norms. Perhaps the actions need to be more subtle and aimed at a predominantly individual level to increase potential for change in societal norms.
22	Question 19	The aim here can be fully supported
23	Question 20	The key area here is to support organisations and guide them as to the expectations placed upon them. The development of a standard outcome framework is an absolute ESSENTIAL to ensure consistency of effectiveness. Much of the onus on this section is on the MAS to assist in developing research to plug existing knowledge and evidence gaps and assisting in the establishment of effective methods in overcoming human reluctance with regards unexpected events.



	A	F
1	Name	June Menzies
2	Organisation	Citizens Advice and Rights Fife
3	Email	jmenzies@carfonline.org.uk
24	Question 21	CARF (within the auspices of CAS) has been a committed delivery partner of the MAS project for several years. The Financial Capability Strategy for the UK is a piece of work that CARF welcome the opportunity to feed into and we would welcome the opportunity to continue being involved in the development of the Strategy. It should be noted that certain strands of the Strategy are somewhat centred on England and CARF could advise/assist/provide evidence for debt advice delivery models especially in relation to the key aim around people with financial difficulties.
25	Question 22	CARF (again under the auspices of CAS) will be highly likely to play an increasingly significant role in this. As one of the lead delivery providers for advice services in Scotland with a Scotland-wide presence, the Strategy will have great bearing on clients accessing our business. The scope of influence held by CARF (and CAS) is such that for any Financial Capability Strategy to be ultimately successful in improving individual financial capability, the CAB service across Scotland will be integral to many of the themes stated throughout this paper.

	A	G
1	Name	Christine Sinclair
2	Organisation	Dumfries & Galloway Citizens Advice Service
3	Email	christine.sinclair@dagcas.org
4	Question 1	Initially 5 years
5	Question 2	We agree with the research which states that attitude and motivation are important. I believe that this is in respect of both a willingness to learn as well as a willingness to put the knowledge into practice.
6	Question 3	We agree with the objectives of the Financial Capability Strategy but the strategy will only work if individuals have a willingness to improve their financial skills and knowledge regardless of the access to financial products and services.
7	Question 4	The financially capable behaviour domains are simple steps which individuals can put in place to help them cope with decision making. Depending on an individual's situation it may be that they are starting at the bottom and working their way up.

	A	G
1	Name	Christine Sinclair
2	Organisation	Dumfries & Galloway Citizens Advice Service
3	Email	christine.sinclair@dagcas.org
8	Question 5	Having a Financial Capability Strategy is pointless unless it is possible to show a positive impact of the strategy therefore it is essential that this is measured.
9	Question 6	We agree that these are the main priorities for action as this covers most areas where a change could be made which could have a significant impact on the future.
10	Question 7	We fully support the aims for children and young people. Unfortunately, many children and young people are not taught about financial capability at home in some cases due to the parents or carers not having financial skills, therefore it is important that children are able to build their financial capability to break this cycle.
11	Question 8	We agree with the recommendations for action but it is important that any financial capability programmes are properly resourced and education is delivered by suitably trained people or organisations.
12	Question 9	We fully support the aims of the strategy, however, people on low levels of earnings often struggle to even pay for essentials therefore could still struggle to prepare for later life regardless of how much knowledge they are given.

	A	G
1	Name	Christine Sinclair
2	Organisation	Dumfries & Galloway Citizens Advice Service
3	Email	christine.sinclair@dagcas.org
13	Question 10	We agree with the recommendations for action, however, see response to question 9.
14	Question 11	We fully support the aims of the strategy for older people. In the longer term if the strategy in respect of preparing for later life is successful, there should be less older people struggling to manage their money which will be an indicator that the strategies are working.
15	Question 12	We agree with the recommendations for action.
16	Question 13	We support the aims of the strategy, however, it will take time to reduce the number of people who become over-indebted.

	A	G
1	Name	Christine Sinclair
2	Organisation	Dumfries & Galloway Citizens Advice Service
3	Email	christine.sinclair@dagcas.org
17	Question 14	Whilst we agree with the general principals of the recommendations we believe that in Scotland there should be a lead role for Money Advice Scotland and Citizens Advice Scotland. In addition to this it is important to recognise that there is different debt legislation in Scotland in particular regarding formal debt solutions eg Debt Arrangement Scheme, Protected Trust Deeds and Bankruptcy.
18	Question 15	We support the strategy but it is important that there is a balance to ensure that individuals do not get into unaffordable debt.
19	Question 16	Previous sections of the strategy have stated that on-line access to information is a barrier for many people, however, recommendation 19 is increased use of on-line self assessment tools. The barrier to on-line access needs to be taken into consideration more.
20	Question 17	We fully support the strategy's aim although this may be the most difficult aim to achieve.
21	Question 18	Not sure that these actions will make any difference.
22	Question 19	We fully support evaluation relating to outcomes and impacts.
23	Question 20	In general, we agree with the recommendations and believe that it is essential that evaluations are carried out but there needs to be some flexibility in approach to take account of different demographics and geographical areas.

	A	G
1	Name	Christine Sinclair
2	Organisation	Dumfries & Galloway Citizens Advice Service
3	Email	christine.sinclair@dagcas.org
24	Question 21	We very much support increased financial capability and are happy to be involved in any further consultation in development of the strategy.
25	Question 22	We are a Scottish National Standards for Information and Advice Type III accredited organisation which provides advice in Money Advice, Benefits Advice and Housing Advice. Our work includes prevention as well as crisis intervention therefore we would look to have a strong role within the implementation of the Strategy both as an individual organisation and through our membership of Citizens Advice Scotland and Money Advice Scotland.

	A	H
1	Name	Mike Ellicock
2	Organisation	National Numeracy
3	Email	emma@nationalnumeracy.org.uk
4	Question 1	
5	Question 2	<p>There is limited research on the link between financial capability and numeracy, however the evidence that does exist shows that while financial knowledge and awareness are important, they are not by themselves enough. A foundational World Bank paper from 2011 argues that "cognitive constraints rather than lack of attention are key barriers to improving financial knowledge".</p> <p>We believe that good numeracy is a key factor when it comes to making individuals financially capable. Hence, we are pleased that "Applied numeracy"™ is included as a basic skill in the detailed representation of the Financial Capability Framework.</p> <p>However, as experts on numeric skills, we would like to propose an amendment to the terminology. The use of "applied numeracy"™ does imply a misunderstanding of the term "numeracy"™. Numeracy is already applied. In their PISA report, the OECD define it as "an individual's capacity to identify and understand the role that mathematics plays in the world, to make well-founded judgements and to use and engage with mathematics in ways that meet the needs of that individual's life as a constructive, concerned and reflective citizen". Our "Essentials of Numeracy for All"™ provides an overview of the different skills this entails " www.nationalnumeracy.org.uk/essentialsofnumeracy. □</p> <p>While we respect the need to pay attention to Basic skills as a whole in the "Ability" section of the framework, we do believe that the relationship between financial capability and numeracy is closer than the rest. We therefore propose that there should be more emphasis on this in the framework.</p> <p>It is interesting to note that the recently published (20th Oct) Social Mobility and Child Poverty Commission Report recognises the importance of numeracy and quoted Andreas Schleicher from the OECD - "Good numeracy is the best protection against unemployment, low wages and poor health"™ (p125). □</p> <p>The OECD also recently published work looking at Financial Capability support in schools (not in England unfortunately) and found that the only factors that closely correlated with the financial capability of 15 year olds was their maths performance and whether they had a bank account.</p>
6	Question 3	<p>We are pleased to see "Better financial skills and knowledge"™ as an objective. As per points above, better numeracy skills are a key part of this objective and we believe that needs to be made more explicit: it is common sense that no one can be financially capable unless they are numerate " and that there therefore needs to be a specific objective within the strategy given that 49% of the working age population are working at primary school levels in their numeracy.</p> <p>We agree with the emphasis on attitudes and motivation " but again believe that supporting underpinning numeracy will have a positive impact here as individuals will begin to feel more empowered to take control of their own finances once they start to build confidence and competence to use numbers and think mathematically in everyday life.</p>
7	Question 4	<p>In order to make informed decisions individuals need to have a basic level of numeracy " so whilst the domains make sense, they all need the underpinning numeracy. With this, individuals begin to feel more empowered to take control of their own finances once they have start to build confidence and competence to use numbers and think mathematically in everyday life. Without a basic level of numeracy none of the financially capable behaviour domains can be achieved.</p>

	A	H
1	Name	Mike Ellicock
2	Organisation	National Numeracy
3	Email	emma@nationalnumeracy.org.uk
8	Question 5	<p>Undoubtedly important â€” and we need to address the underpinning issues much more clearly for those in the bottom two steps; the 9m identified in â€”Indebted Livesâ€™. The findings of the OCED analysis of PISA and PIAAC data suggest that â€”good numeracy is the best protection against unemployment, low wages and poor healthâ€™ (Andreas Schleicher Dec 2013) â€” and National Numeracy believes that we need to be much more explicit in supporting numeracy if we are to make any real difference to these peoples lives.</p>
9	Question 6	<p>Numeracy is the key underpinning foundation upon which financial capability is built. However, 78% of adults in the UK are working below Level 2 (roughly equivalent to A*-C at GCSE). We believe improving numeracy levels in the UK should be added as a priority area.</p>
10	Question 7	<p>The final sentence needs amending as the data around the effectiveness of financial capability and entrepreneurial education is weak. The OECD also recently published work looking at Financial Capability support in schools (not in England unfortunately) and found that the only factors that closely correlated with the financial capability of 15 year olds was their maths performance and whether they had a bank account.</p> <p>There is an excellent opportunity to far more explicitly bring financial capability into school maths and also â€”numeracy across the curriculumâ€™â€” not as an add on but as an example of the practical application of the Essentials of Numeracy for All - <a href="http://www.nationalnumeracy.org.uk/essentialsofnumeracy">www.nationalnumeracy.org.uk/essentialsofnumeracy</a>.</p>
11	Question 8	<p>As financial capability is built upon good numeracy, we welcome closer attention to how schools can deliver training in alignment. Some basic skills will need to be covered in maths class before financial concepts can be truly explained to young people.</p> <p>In addition, we want to highlight that early numeracy training can reinforce good financial behaviour. In our parent toolkit, we recommend that parents teach children numeracy by doing shopping and other activities with money: <a href="http://www.nnparenttoolkit.org.uk/6-9-year-olds-maths-and-money">http://www.nnparenttoolkit.org.uk/6-9-year-olds-maths-and-money</a>.</p> <p>On these basis, we would like to see a recommendation for action in â€œChildren and Young Peopleâ€”which recognises the excellent opportunity to be far more explicit about bringing financial capability into school maths and also into â€”numeracy across the curriculumâ€™â€” not as an add on but as an example of the practical application of the Essentials of Numeracy for All - <a href="http://www.nationalnumeracy.org.uk/essentialsofnumeracy">www.nationalnumeracy.org.uk/essentialsofnumeracy</a>.</p>
12	Question 9	<p>Support the aims.</p>



	A	H
1	Name	Mike Ellicock
2	Organisation	National Numeracy
3	Email	emma@nationalnumeracy.org.uk
13	Question 10	<p>Evidence from longitudinal research and snapshot international surveys shows that the numeric skills of people in later life are often poorer. There is a strong elements of skills decay that affects many adults – especially those who have not been in regular work (and hence are most at risk of financial difficulties). We feel that retirement poses very specific financial challenges and introduces people to very particular financial products. Planning for it and managing finances in that later stage taxes one’s numeracy skills. □</p> <p>We again wish to propose a campaign to up-skill people in mid-life and later life so that they have the necessary skills to truly meet the financial challenges they are about to face and understand the products presented to them.</p> <p>We agree this is a good area of focus but think this goes beyond just preparing for retirement. Our work has highlighted that later life can be a time when individuals come in to difficulties managing their finances. For example becoming a widow and having to manage the household finances that were all previously accounted for by a partner can be a massive learning curve.</p> <p>The National Numeracy Challenge should be promoted as a free (at the point of access) way to improve your numeracy.</p>
14	Question 11	Support the aims.
15	Question 12	<p>As per answer to Qu.10:</p> <p>Evidence from longitudinal research and snapshot international surveys shows that the numeric skills of people in later life are often poorer. There is a strong elements of skills decay that affects many adults – especially those who have not been in regular work (and hence are most at risk of financial difficulties). We feel that retirement poses very specific financial challenges and introduces people to very particular financial products. Planning for it and managing finances in that later stage taxes one’s numeracy skills. □</p> <p>We again wish to propose a campaign to up-skill people in mid-life and later life so that they have the necessary skills to truly meet the financial challenges they are about to face and understand the products presented to them.</p> <p>We agree this is a good area of focus but think this goes beyond just preparing for retirement. Our work has highlighted that later life can be a time when individuals come in to difficulties managing</p> <p>their finances. For example becoming a widow and having to manage the household finances that were all previously accounted for by a partner can be a massive learning curve.</p> <p>The National Numeracy Challenge should be promoted as a free (at the point of access) way to improve your numeracy.</p>
16	Question 13	Given that the OCED analysis of PISA and PIAAC data suggest that “good numeracy is the best protection against unemployment, low wages and poor health” (Andreas Schleicher Dec 2013), we think that there needs to be reference to this crucial underpinning skill.

	A	H
1	Name	Mike Ellicock
2	Organisation	National Numeracy
3	Email	emma@nationalnumeracy.org.uk
17	Question 14	<p>We believe it is very likely that poor numeracy skills are a strong contributing factor to people miss-managing their finances. It should be a priority that projects working with people in financial difficulties integrate benchmark numeracy tests. The National Numeracy Challenge should be promoted as a free (at the point of access) way to improve your numeracy.</p> <p>In addition, we would welcome further research by MAS on the basic skills of people in different areas of the financial wellbeing staircase.</p>
18	Question 15	
19	Question 16	A recommendation should be added to make numeracy content of products and services easily accessible to those that may have low literacy and/or numeracy skills e.g. information should be visually represented wherever possible.
20	Question 17	Our contention is that the biggest social norm that undermines financial capability and needs to be combatted is the social acceptability of "I can't do maths" - this needs to be explicitly addressed.
21	Question 18	The societal norm that we tackle most strongly in our campaigns is "I can't do maths" being a badge of honour. This attitude is a barrier that undermines financial capability and we therefore believe that it needs to be addressed explicitly in this area.
22	Question 19	Agree - but need to link back to underpinning skills - this has been remarkably absent from research to date.
23	Question 20	<p>There is a huge evidence gap linking (or not!) underpinning numeracy to financial capability. We are keen to work with MAS on this because the common-sense link is there and the OECD data both overall with analysis of PISA and PIAAC data suggesting that "good numeracy is the best protection against unemployment, low wages and poor health" (Andreas Schleicher Dec 2013) and specific to Financial Capability suggesting that the only factors that closely correlated with the financial capability of 15 year olds was their maths performance and whether they had a bank account - both suggest that current approaches are not correct. □</p> <p>"Off-line" conversations with leading Financial Capability researchers have suggested that research commissioned by Financial Service providers INTENTIONALLY excludes the impact of underpinning factors such as numeracy - this needs to change.</p>

	A	H
1	Name	Mike Ellicock
2	Organisation	National Numeracy
3	Email	emma@nationalnumeracy.org.uk
24	Question 21	<p>We believe that there is clear evidence from the OECD that numeracy needs to be much more explicitly part of the financial capability agenda - “good numeracy is the best protection against unemployment, low wages and poor health” (Andreas Schleicher Dec 2013). □</p> <p>We believe that MAS has made positive steps in this direction but has not yet committed to a course that will enable the 50% of the population whose numeracy is at primary school levels to properly engage with your excellent work “ because they do not have the underpinning numeracy to do so.</p> <p>We believe that this Strategy review represents a fantastic opportunity to start to make steps towards building a financially capable population but that this will not occur unless numeracy “ or everyday maths as encapsulated in our “Essentials of Numeracy for All” are explicitly recognised.</p>
25	Question 22	<p>We would like to work with MAS and other organisations to embed the underpinning numeracy “ or everyday maths skills “ into all work to improve financial capability. □</p> <p>The National Numeracy Challenge is a good starting point “ free at the point of access, with the ability to share anonymised “distance travelled” data with partners and with 75% of the “Check-up” questions on a Financial Capability theme.</p>

	A	I
1	Name	HENRY COBBE
2	Organisation	ELSTON CONSULTING
3	Email	henry@elstonconsulting.co.uk
4	Question 1	To be able to observe genuine changes in behaviours the strategy needs to be long-term and cohort based. We suggest 20 year evaluation period s as a minimum, broken down into four sets of 5 year strategies.
5	Question 2	We consider this to be a powerful framework to support better decision-making and a better financial quality of life. However we think that inertia is hard to overcome and hence nudge style policies and the use of “default option”™ will be essential to delivering better outcomes and simplifying financial decision making for consumers.
6	Question 3	We concur with the objectives, but again we think there should be the presumption of inertia. This was core to the success of other long-term savings projects such as Child Trust Funds and NEST.
7	Question 4	These are comprehensive and coherent.

	A	I
1	Name	HENRY COBBE
2	Organisation	ELSTON CONSULTING
3	Email	henry@elstonconsulting.co.uk
8	Question 5	It is important but not essential that impact can be assessed through savings rates, asset levels, personal debt levels, late payments, but also through survey and evidenced based assessment.
9	Question 6	One other area is about ensuring access to banking and financial education in inner city areas. Take up of long-term savings products is unevenly geographically distributed. There should be focus on areas where there is little or no long-term savings take-up with resources through the Citizens Advice Bureau to boost financial capability.
10	Question 7	We support this entirely. Financial education should be delivered early and often. Young people have the opportunity to save via Junior ISAs. We need simpler products and more interactive engagement strategies to build confidence in young people as regards their interaction with finance.
11	Question 8	Education should be focused on the need to build financial capability rather than an overly technical induction to investments. The end game is to have a better savings culture.
12	Question 9	Expectation management is essential. Modelling tools (if used) have a role to play here. In the context of inertia we have to focus on how managed solution such as target date funds can have a role to play.

	A	I
1	Name	HENRY COBBE
2	Organisation	ELSTON CONSULTING
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13	Question 10	We concur.
14	Question 11	We concur.
15	Question 12	We concur.
16	Question 13	We concur.

	A	I
1	Name	HENRY COBBE
2	Organisation	ELSTON CONSULTING
3	Email	henry@elstonconsulting.co.uk
17	Question 14	Not our area of expertise.
18	Question 15	Not our area of expertise.
19	Question 16	Not our area of expertise.
20	Question 17	Not our area of expertise.
21	Question 18	Not our area of expertise.
22	Question 19	Not our area of expertise.
23	Question 20	Not our area of expertise.

	A	I
1	Name	HENRY COBBE
2	Organisation	ELSTON CONSULTING
3	Email	henry@elstonconsulting.co.uk
24	Question 21	We would like to be aware of events, new papers and would be happy to brief as regards the US experience in the online "guidance" space.
25	Question 22	We are bringing together "fin tech" (eg financial data aggregation, interactive tools, simpler purchase journeys) with "fund tech" (eg professionally constructed and managed investment solutions). We researched the US "guidance" market that, together with the shift to online services and automatic enrolment has been a driving factor behind a "do it all for me" fund ranges, such as target date funds. Although not the only solution the combination of behavioural and investment science that is proven in the mass market US could talk neatly to the objectives of the DWP.



	A	J
1	Name	Alexandra Grant
2	Organisation	Betternest/ Behavioural Sciences postgraduate student, University of Stirling
3	Email	aeg00008@students.stir.ac.uk
4	Question 1	n/a
5	Question 2	We welcome the focus on “attitudes” and “motivation” as drivers of financial capability but would like to see a framework that integrates the interaction between opportunity and motivation, external context and internal mind-set. Specifically, how the “ease” of service design, and the simplicity of financial products has a strong effect on attitudes (such as trust), motivation to act and financial skills: financial product and service design contributes to understanding and motivation.
6	Question 3	We agree that the Financial Capability Strategy should focus on products and services the people can fully understand since research shows this should support the first two objectives- it should influence more positive attitudes and restore trust. ( <a href="http://faculty.chicagobooth.edu/emir.kamenica/documents/simplicitySeeking.pdf">http://faculty.chicagobooth.edu/emir.kamenica/documents/simplicitySeeking.pdf</a> )
7	Question 4	Saving for children should be included in the “Prepare for Life Ahead” domain. Firstly, asking people to prepare for their children’s life ahead may be a more effective motivation to save than preparing for their own future, such as retirement. Research shows that a barrier to saving for retirement is that people are psychologically disconnected from the distant future self, and therefore saving “may feel to the present self like giving money to a stranger years in the future”: however, the success of Child Trust Funds (and Junior NISAs) show that people are strongly motivated to save for their child (See <a href="http://www.dangoldstein.com/papers/Hershfield_Goldstein_et_al_Increasing_Saving_Behavior_Age_Progressed_Renderings_Future_Self.pdf">http://www.dangoldstein.com/papers/Hershfield_Goldstein_et_al_Increasing_Saving_Behavior_Age_Progressed_Renderings_Future_Self.pdf</a> ). Secondly, there are clear benefits to individuals and society from intergenerational exchange (See: Social Market Foundation: “Family Fortunes: the bank of mum and dad in low income families”). The draft strategy cites the debt problems of Young People: if young people start life with their own savings, they are less likely to get in debt and this may improve their ability manage their own money.

	A	J
1	Name	Alexandra Grant
2	Organisation	Betternest/ Behavioural Sciences postgraduate student, University of Stirling
3	Email	aeg00008@students.stir.ac.uk
8	Question 5	<p>We note the FCA's research into the positive relationship between financial capability and wellbeing: on the basis of this, welcome further research on the specific causes of wellbeing as it relates to financial capability (Taylor et al. 2009). Feelings of wellbeing may be an important motivator of financial capability. Products and services have an important role to play in improving financial wellbeing. The financial capability strategy could support further research on the drivers and barriers of financial behaviour, and on interventions that can improve financial wellbeing.</p> <p>The financial capability strategy could encourage better product and service design by supporting research on the impact of specific policies, products and services on financial wellbeing.</p> <p>Questions about financial wellbeing should be included in any surveys, including the Financial Capability Tracker, and these should be included early on so they are not influenced by earlier questions. We support relatively broad measures of wellbeing based on the "OECD Guidelines on Measuring Subjective Well-being".</p>
9	Question 6	We support the addition of working people who are saving for their children's life ahead as a priority for action.
10	Question 7	We support the aim that children should be encouraged to manage money from a young age, and this should include having access to a savings or investment account.
11	Question 8	<p>A recommendation should be that all children have equal access to their own savings or investment account, such as a Junior NISA or Child Trust Fund. By saving for their children, parents can improve attitudes towards savings and debt. If children are involved in contributing to their own savings account, such as a Junior NISA, they can learn about saving and investment and be motivated to manage their own money.</p> <p>We note that you cite figures from the charity StepChange concerning the number of young people with personal debt problems. A step towards solving this is that young people start adult life or higher education with savings from a Junior NISA account or disadvantaged students should be funded by a bursary so they are not so over dependant on personal debt.</p> <p>Encouraging students to totally dependant on loans to fund their living costs and tuition fees establishes debt as a social norm: a savings accounts would be an important means of changing attitudes.</p> <p>A "recommendation for action" could be supporting evidence-based innovation (such as Mobile Apps) that is targeted at improving skills and motivation, and offers financial services. Mobile Technology plays an important part in the life of Young People and has shown that innovation can enable behaviour change (such as moneythink.org). Established technologies have proved "successful" in encouraging positive financial behaviours in children. We invite the strategy to support new "disruptive" innovation that uses the same design and technology to encourage children to manage money successfully.</p>
12	Question 9	<p>The recent budget reforms depend on people to make a proactive decision on retirement "completely the opposite behaviour promoted by Automatic Enrolment which builds on people's inertia and procrastination. Furthermore, people will not be able to draw on any previous knowledge or experience; they are likely to suffer similar effects of "choice overload" resulting in inertia and may opt for the simplest choice (such as leaving a "lump sum" in cash), rather than the choice that maximises their financial wellbeing.</p> <p>A simple way to overcome this would be requiring pensions schemes to provide beyond retirement decumulation phase flexible "defaults" based on Department for Work and Pensions guidance.</p>

	A	J
1	Name	Alexandra Grant
2	Organisation	Betternest/ Behavioural Sciences postgraduate student, University of Stirling
3	Email	aeg00008@students.stir.ac.uk
13	Question 10	<p>Recommendations could include providing decumulation phase default options for automatic enrolment pension schemes that are suitable for most scheme members and offer high standards of governance.</p> <p>These should be flexible and provide an age-appropriate income and investment strategy: guidance could be based on the existing “Guidance for offering a default option for defined contribution automatic enrolment pension schemes”<sup>TM</sup> and promote high standards of investment governance. Flexible retirement income strategies such as collective income drawdown may be more appropriate for the majority and reflect the fact that most people no longer face “cliff-edge”<sup>TM</sup> retirement at 65 and being locked into a single rate annuity may not be suitable.</p> <p>This could follow the example of default investment options offered in US 401k plans, which typically include an age-based investment strategy or Retirement Date Fund that is designed for both accumulation and decumulation phases, from members 20s to their 90s. Pension providers in the UK such as The Cheviot Trust and AllianceBernstein are already providing Collective Drawdown funds as a best practice solution to beyond retirement income and investment.</p>
14	Question 11	
15	Question 12	
16	Question 13	

	A	J
1	Name	Alexandra Grant
2	Organisation	Betternest/ Behavioural Sciences postgraduate student, University of Stirling
3	Email	aeg00008@students.stir.ac.uk
17	Question 14	
18	Question 15	We support the strategy's aims as to "ease and accessibility" but would like to see a greater focus on simplifying choices and supporting products and services that make decisions easier to understand. As the "Sergeant Review for Simple Financial Products: Interim Report" writes simplifying processes would not only improve the ease and accessibility of products, but improve attitudes and restore trust in financial services.
19	Question 16	<p>Promoting clear product labelling based on the objective and suitability of different products would improve understanding, work on motivations as well as knowledge and encourage better governance.</p> <p>A means of improving the ease of consumer decision-making, would be introducing a government Kite Mark scheme for financial products that are appropriate for particular purposes (such as Junior ISA savings) and meet certain suitability standards set by an Independent body. These could be based on the guidance for offering Stakeholder products and the existing "Guidance for offering a default option for defined contribution automatic enrolment pension schemes". □</p> <p>We fully support the strategy's recommendation for continuing innovation in online decision aids but think self-assessment tools need to be backed-up by suitable products.</p> <p>To improve accessibility, the strategy could support innovation in financial products (such as Centralised Investment Propositions or goal-based products) that are suitable for a non-advised sale, aided by online decision tools or sold with simplified advice.</p>
20	Question 17	The strategy could recognise the influence of financial product and service providers, and government policy on societal norms and could develop means of addressing these. For example, the policy of promoting student loans influences the social norm of debt dependence in young people.
21	Question 18	The strategy could also test policies and products that might have unintended consequences, which discourage financially capable behaviours (such as student loans or access to lump sum cash on retirement): interventions can then be proactively developed.
22	Question 19	
23	Question 20	Data aggregation platforms used by service providers such as the Money Advice Service could be incorporated into the tools used for evaluation.

	A	J
1	Name	Alexandra Grant
2	Organisation	Betternest/ Behavioural Sciences postgraduate student, University of Stirling
3	Email	aeg00008@students.stir.ac.uk
24	Question 21	<p>We would be particularly keen to be involved in any research on behavioural interventions in “planning ahead” capabilities, wellbeing and financial capability; specifically, the impact of pensions automatic enrolment on overall savings rates; at retirement decisions and financial decisions under risk.</p>
25	Question 22	<p>Research and development behavioural interventions in financial capability and the causes of financial capability as it relates to wellbeing. Research specifically focuses decision under risk with a prospect to developing on-line decision aids and data aggregation platforms.</p> <p>We are promoting government policies that simplify financial decisions, including the introduction of a Government Kite mark scheme for “Educational Savings Plans”, based on the Stakeholder Child Trust Funds and government’s initiative for Simple Financial Products. I co-authored the Centre of Policy Studies report 'Introducing Education Savings Plans' (<a href="http://www.cps.org.uk/files/reports/original/141017123634-IntroducingEducationalSavingsPlans.pdf">http://www.cps.org.uk/files/reports/original/141017123634-IntroducingEducationalSavingsPlans.pdf</a>).</p>