

## Section 1: Introduction

There are no questions in this section.

## Section 2: Funding disadvantage

### Principles for the operation of disadvantage funding (paragraphs 33-34)

- Disadvantage funding would be an additional sum of funding allocated to a provider delivering to:
- any economically disadvantaged young person aged 16 or 17 who participates in education and/or training, and meets the terms of raising the participation age legislation and
- any economically disadvantaged 18 year-olds in full time education.
- The above categories cover all 16-19 provision, including Apprenticeship provision.
- It would be paid at a standard flat funding rate for all young people who qualify, regardless of where they live or other circumstances.
- It would be paid pro-rata for part time learners.
- It would be calculated as an allocation to the provider.
- The provider would be free to decide how disadvantage funding should be invested to the benefit of disadvantaged young people, in line with the Government's objectives.
- The funding would not be ring fenced and would not be accounted for at an individual level. However providers will be expected to demonstrate publicly to the communities they serve, to governors, and to the government the progress they have made in addressing issues of disadvantage through the use of this funding.

1 Do you agree that these are the right principles for the operation of disadvantage funding?

Agree

Agree with basic principles but key issues are:

How is disadvantage to be determined? Definitions of economic and educational disadvantage overlap but are not congruous

Support funds provided must be sufficient to meet need – transport particularly.

Disadvantage funding should be additional money, as is the pupil premium, not taken or redistributed from core 16-18 funding.

### Options for the scope of funding for disadvantage (paragraphs 37-43)

Option 1: A single fund to recognise all forms of disadvantage

Option 2: A fund to address economic disadvantage only with a separate budget to address other support needs and low level LDD needs, very similar to current arrangements

Option 3: A fund to address general economic disadvantage only, with a separate budget to address low level LDD needs. Funding to address other learning support needs to be integrated into programme funding.

2 Which of these three options would you support? Do you have any comments on the three options or additional options that should be considered?

Option 2

Comments:  
Option 2 is the only logical option. Economic disadvantage and low level LDD are not the same issue. Many students can have the latter but are not economically disadvantaged. It would be fairer to raise the size of the basic programme for all learners. Redistribution of funding to disadvantaged students from core funding has already had a hugely negative impact on all student programmes, particularly in SFC's where teaching time has had to be cut, subject choice reduced and enrichment diminished. Option 1 is the most unacceptable – the danger of merging and 'simplifying' is that different aspects of disadvantage become muddled - fair distribution is imperative.

**Options for calculating and allocating disadvantage funding (paragraphs 45-49)**

- Option 1: Mirror pre-16 eligibility
- Option 2: Index of Multiple Deprivation (IMD)
- Option 3: Income Deprivation Affecting Children Index (IDACI)

3 Which of the three options for establishing eligibility for disadvantage funding would best reflect the Government's objectives? Do you have any comments on these three options or are there other options that should be considered?

Option 3

Other (please comment)

Comments:

All measures are proxies and leave pockets of disadvantage unsupported e.g. rural communities with transport and other real needs. Of the measures being considered we believe the IDACI is the best. However the EMA assessment of need was the fairest and consideration should be given to restoration of this approach even if the level of funding per student or threshold income is changed. Option 1 is the most unacceptable.

**Determining eligibility for additional funding for specific groups  
(paragraphs 50-56)**

4 a) Do you agree that the removal of the additional categories for funding purposes is a welcome simplification?

Agree

Comments:

We agree with paragraphs 52/53.

4 b) If not, what is your case for recognising some or all of these categories for all provider types?

Comments:  
N/A

5 Do you believe that children in care and recent care leavers should attract additional funding?

Yes

Comments:

Yes we believe that these students should attract additional funding although they only represent a small number of special cases.

6 Do you believe that service children should attract additional funding?

No

Comments:

We do not understand why these students are seen as exceptions.

### Consultation section 3: Simplifying participation funding

#### Options for funding full time learners (paragraphs 64-85)

Option 1: Funding all full time learners at the same rate

Option 2: Uplift to recognise larger programmes

Option 3: Funding to recognise different programme sizes

7 a) Do you agree that a single rate for all full time learners based upon historical average delivery (option 1) is appropriate?

Strongly disagree

Comments:

Programmes for full time learners differ too much to make this financially viable or fair. The problem with this question is that it is difficult to have an opinion without knowing whether the quantum will be sufficient to fund full time college programmes. Funding should be based on the realistic cost of providing an appropriate education for a 16-18 full time student, not the other way around.

7 b) If yes, would you support an additional programme weighting for delivering the International Baccalaureate diploma?

No

Comments:

The IB is a successful programme and highly regarded by Universities and those SFCs which offer it. It is difficult to have an opinion as to whether it should be properly funded without understanding the impact on the funding for other programmes and the effect on the general funding rate.

7 c) If no, do you believe that there should be recognition of larger programmes?

Yes

Comments:

Large vocational programmes and A level programmes, especially those in Sixth Form Colleges comprising 5AS/4A2 or 4AS/3A2 are followed by many students and meet their career/HE aspirations and broader educational aims. These were well articulated in the Curriculum 2000 proposals which were well received by all sides of government. The new methodology should not make it financially impossible to deliver what is now the standard and highly regarded curriculum of most Sixth Form Colleges and large school sixth forms. There should either be a single rate (other than International Baccalaureate) or 3 rates – this will need further consideration as more details emerge.

8 a) If you do believe that there should be recognition of larger programmes, do you support option 2 or option 3?

Option 3

Comments:

All evidence suggests that student programmes should be both deep and broad. While there is a need to eliminate programmes which contain elements to attract funding rather than enhance educational experience, programmes which are highly regarded by HEI's, employers, learners and parents such as an A level package with enrichment and tutorial support should be recognised and supported.

A package of 5 A levels is not a standard package for the majority of Sixth Form Colleges. An A level package should be redefined as 4 A level programme over 2 years.

8 b) For the large programme(s), would you support a further rate or weighting?

Yes

Comments:

Those large programmes which are recognised as of value (e.g. International Baccalaureate) should be funded fairly. The definition of large should be higher than a core entitlement but the entitlement needs to reflect the normal curriculum for Sixth Form Colleges (see above).

9 What would be the best way to avoid an upward drift to larger programme sizes?

Comments:

1. Retain the success rate factor in the methodology.
2. Identify particular programmes which qualify rather than just guided learning hours.
3. Give due consideration to those institutions with a good track record of delivery and outcomes of such courses and but it would be unfair to restrict entry to new institutions where there is an equally good educational case for students to follow large programmes.

**Part time programmes (paragraphs 86-94)**

10 Do you agree with the proposal of applying a proportion of the basic full time programme funding for part time learners?

Agree

Comments:

Nothing to add to the proposal

11 Do you agree that it is appropriate to fund at three part time levels?

Agree



Comments:

Nothing to add to the proposal

**Weighting for programme funding (paragraphs 95-107)**

12 Do you agree that we should merge the lowest two programme weightings into one?

Agree

Comments:

We think 1.06 would be acceptable

13 Do you agree that we should reduce the number of weightings for vocational programmes?

Agree

Comments:

14 Would reducing the number of weightings for vocational programmes be a significant simplification?

Yes

Comments:

15 Do you think that the proposed weightings for programmes would appropriately reflect the relative delivery costs?

Not Sure