

SFCA response to DfE Consultation on the Allocations methodology for the 16-19 Discretionary Bursary fund

May 2019

Question 1: Do you agree that using a 2009/10 EMA based disadvantage measure to calculate the 16 to 19 discretionary bursary allocations is no longer appropriate? Yes/No. Please give reasons for your response.

Yes. These are out of date calculations. It will also be beneficial for newer institutions who don't have historic EMA data to receive a properly costed bursary allocation. The method of allocation needs to better target the needs of these students to ensure they enrol for post-16 education and receive assistance they need to enable them to complete their learning programmes. Although better targeting of funding to match student need is welcomed, in order for it to be most effective the provision of additional funding nationally is necessary.

It's important to highlight that while a more equitable distribution of bursary funding will be welcomed by colleges, changes to methodology that don't increase the funding pot are perceived by the sector as just shuffling money around.

The DfE should revise the decision made in 2016 to remove money from the bursary fund in respect of 'double funding' of providers with FE Free Meals allocations. This would result in extra money being made available to the overall funding pot to better support disadvantaged students.

Question 2: Do you agree that using a postcode-based deprivation measure would be a better proxy for the overall financial deprivation of students at an institution than a FSM measure? Yes/No. Please give reasons for your response.

No. Postcode-based measures may disguise pupils living in deprivation. In all areas of the country deprived and affluent households can be side by side. Colleges therefore have considerable reservations given the variation within postcodes, and are concerned that their allocations may not match actual levels of deprivation. If there is an available measure that is more granular this would be preferable. In addition, other indicators of household deprivation, for example single-parent households, would not be covered by a postcode measure.

Question 3: Do you agree that using the latest available version of IMD, as the disadvantage measure within the methodology would better reflect the deprivation level of students, compared to using IDACI? Yes/No. Please give reasons for your response.

Yes. The IMD is preferred as it is a more comprehensive basket of indicators. However, we have reservations about how well it captures household-level variations.

Question 4: Do you agree we should include a travel element to better match the allocations to the student need for travel support? Yes/No. Please give reasons for your response.

Yes. See Q5 below.

Question 5: Do you agree that distance to travel and rurality are appropriate factors to build into the travel element? Yes/No. Please give reasons for your response.

Yes. The fund is essential in providing students ability to travel to a college of choice from a wider radius and thus offering a greater choice of courses to those maybe on offer at local sixth-forms. Local travel costs in some rural areas can be higher compared to bigger cities that are able to subsidise transport. Therefore it is essential that different local costs are factored into the bursary.

But to do this effectively this should be costed, then the total bursary pot adjusted as necessary. It is not appropriate to assume that the current pot will be sufficient to meet all distance to travel needs.

An additional concern is that the consultation document suggests that distances "under 3 miles" do not require support. However, we feel there are two important factors to consider with regard to this. For a distance 0-3 miles, it may be thought that students could walk to college, and therefore the cost of travel would not be a barrier to learning. In deprived areas, it is often not appropriate to expect a young person to walk what may be considered a short distance due to safety concerns in the area. Students may be forced to walk in unsafe situations if their cost of travel was not met. Also, measuring distance 'as the crow flies' is a flawed methodology as in practice shorter journeys could be more expensive, involving multiple buses for example.

Question 6: Do you agree we should reduce the travel element calculated for students with a home and delivery postcode in the London area by half, so as to account for the additional support these students have available to them via the TfL offer? Yes/No. Please give reasons for your response.

No. Colleges in London feel strongly that halving the travel element for students with a home and delivery postcode in London is unfair. The TfL offer does not cover free tube travel. Without the bursary support, students who travel long distances to reach college may no longer be able to attend their preferred provider. London transport costs should cover all methods of transport.

Question 7: Do you agree we should introduce a small element in the discretionary bursary methodology that accounts for the additional costs likely to be faced by disadvantaged students undertaking T Level industry placements? Yes/No. Please give reasons for your response.

No. The T-level has a mandatory work placement, which will see an increase in their travel needs. Setting aside a pot of funding for T-level placement transport will decrease the support available for the vast majority of 16-19 students who are on level 3 academic courses. T-level placement costs are a new and extra element that should be properly costed and given additional funding – not the current ‘rob Peter to pay Paul’ proposal. In addition, the government aim is for a significant number of students to do a T-level course. If this happened, this would significantly reduce the bursary funding available to other students.

T-levels are a new initiative, there must be additional funding provided to cover these costs. It would disadvantage students on other courses if the pot is stretched to cover T-level travel too. From an equalities perspective there is no reason why these students should be prioritised.

Question 8: Do you agree we should support the 27% most disadvantaged students by IMD for the disadvantage element? Yes/No. Please give reasons for your response.

Yes. But the IMD is not a direct measure of deprivation, so ranking areas is an imperfect measure. So while we agree with this, it is important that the implemented revised methodology is carefully assessed through regular feedback from providers. We have concerns that the postcode measure will mask disadvantage.

Question 9: Do you agree that we should include a wider cohort of the most disadvantaged students by IMD in the specific costs element of the revised allocations methodology? Yes/No. Please give reasons for your response.

Yes. But reservations about industry placement funding weightings are set out in Q7 response.

Question 10: Are you aware of any particular equalities impacts? How could any adverse impact be reduced and are there any ways we could better advance equality of opportunity or foster good relations between people who share a protected characteristic and those who do not? Please provide evidence to support your response.

The discretionary bursary is an important enabler of social mobility. It is essential that changes are carried out in such a way as to ensure there is no risk of destabilising short-term financial support for students. Colleges believe that a fairer distribution of bursary funding is welcome, but means little without an increase to the quantum of funding.

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