

## **Consultation on the amended English and maths condition of funding policy: results**

**March 2024**

## Introduction

On 13 February, the Department for Education [announced changes](#) to the policy relating to funding restrictions for students that do not study eligible qualifications in English and maths, if they did not achieve a grade 4 or above in English or maths GCSE at key stage 4.

Natspec, [together with other FE organisations](#), has concerns about the additional requirements in the new guidance for students who are not exempt. The requirements are:

- the introduction of minimum teaching hours (3 hours per week for English and 4 hours for maths)
- how these hours are used. It must be “stand-alone, whole-class, in-person teaching, with any additional support, such as small group tuition or online support, supplementary to these minimum classroom hours”
- a [phased removal of the tolerance](#) from 5% to 0%, starting from academic year 2025 to 2026.

There is no change to the exemption rules: students with an EHC plan, who are assessed as not able to study towards either GCSE or stepping stone qualifications can be marked on the ILR as exempt. These students must be individually assessed, there should be no blanket exemptions and colleges “must make every effort to enable students to study approved qualifications” before assessing them as exempt. Any individual student assessed as not able to study a qualification should still have literacy and numeracy within their programme at an appropriate level.

In early March, we consulted with Natspec members to understand more about the implications of these additional requirements for students at their colleges. Below are the results of that consultation.

## Consultation responses

### Question 1. Respondent information

In total, we received consultation responses from 46 different Natspec members. Respondents included those in roles such as Head of College, Education Lead, Business Lead, Data Compliance Co-ordinator and Systems Officer.

### Question 2. How many ESFA funded students are at your college in 2023/24?

Responses to this question ranged between 10 and 254, with the total number of ESFA funded students across all responses numbering 3,713, an average of 81 per college. All students have an Education, Health and Care Plan (EHCP).

### Question 3. Of these, how many have you assessed as not able to study qualifications in English and/or maths, and are therefore exempt from the condition of funding?

Responses ranged from 0 to 224, with the total number deemed exempt from the condition of funding totalling 2,177, an average of 47 per college.

This is 59% of all ESFA funded students reported in Q2.

**Question 4. Where students are not exempt and are studying approved qualifications, how many are studying each of the following:**

- GCSE – English: 178 students
- GCSE – maths: 139 students
- Functional Skills – English: 923 students
- Functional Skills – maths: 919 students
- Stepping stone qualifications – English: 269 students
- Stepping stone qualifications – maths: 267 students

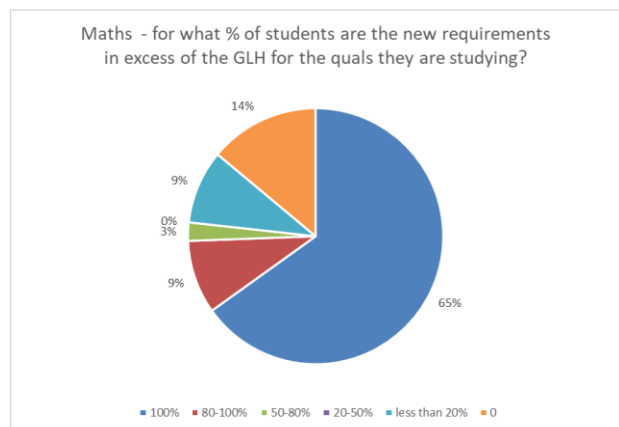
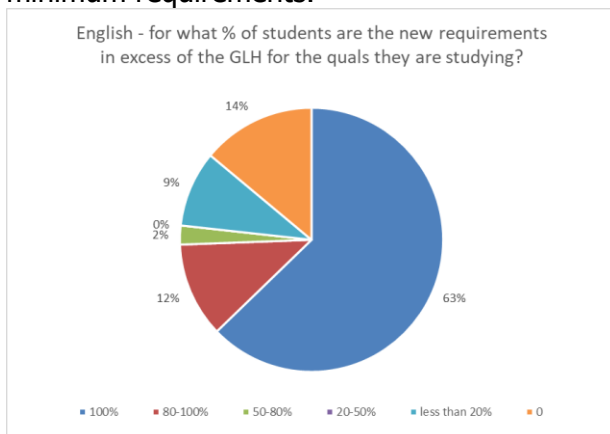
As can be seen from the data, a significant majority of students in specialist colleges who are studying maths and English qualifications are not studying GCSE, but study functional skills/stepping stone qualifications instead. 12% study GCSE, 68% Functional Skills and 20% stepping stone qualifications.

**Question 5. Are the new minimum requirements in terms of teaching hours (3 hours per week for English and 4 hours per week for maths) in excess of the Guided Learning Hours for the qualifications being studied?**

There were 43 responses to this question. Responses are broken down as follows:

- Yes, for 100% of students studying qualifications: 27 responses for English and 28 responses for maths
- Yes, for more than 80% but less than 100% of students studying qualifications: 5 responses for English and 4 responses for maths
- Yes for 50-80% of students studying qualifications: 1 response for English and 1 response for maths
- Yes, for 20-50% of students studying qualifications: 0 responses for either English or maths
- Yes, for less than 20% of students studying qualifications: 4 responses for English and 4 responses for maths
- No: 6 responses for English and 6 responses for maths

These results are presented as charts below: for 63% of students studying English and 65% of students studying maths, the GLH of the qualifications they are studying are less than the new minimum requirements.



**Question 6. What impact would enforcing the new requirement of minimum teaching hours (3 hours per week for English and 4 hours for maths) have on these students?**

Of the 43 responses received to this question:

- 60% anticipated there would be a 'Negative impact for all students studying qualifications' (26 respondents)
- 19% anticipated a 'Negative impact for some of these students' (8 respondents)
- 7% anticipated there would be 'No impact / neutral' (3 respondents)
- 12% anticipated a 'Negative for some and positive for others' (5 respondents)
- 2% anticipated a 'Positive impact for some of these students' (1 respondent)
- and 0 respondents anticipated a 'Positive impact for all students studying qualifications'

In total, **91%** of respondents said that enforcing the new minimum teaching hours (3 hours per week for English and 4 hours for maths), would have a negative impact on some or all of their students who are studying qualifications.

All comments describing impact listed in Appendix 1.

**Question 7. What impact would there be when enforcing the new requirement of "stand-alone, whole-class, in-person teaching, with any additional support, such as small group tuition or online support, supplementary to these minimum classroom hours"?**

Of the 43 responses received to this question:

- 53% anticipated there would be a 'Negative impact for all students studying qualifications' (23 respondents)
- 16% anticipated a 'Negative impact for some of these students' (7 respondents)
- 16% also anticipated there would be 'No impact / neutral' (7 respondents)
- 12% anticipated a 'Negative for some and positive for others' (5 respondents)
- 2% anticipated a 'Positive impact for some of these students' (1 respondent)
- and 0 respondents anticipated a 'Positive impact for all students studying qualifications'

**81%** of respondents said that the requirement for "stand-alone, whole-class, in-person teaching" would have a negative impact on some or all students, citing the importance of a person-centred approach, with "small groups and 1:1 interventions are the primary method of delivery for many of our students."

All comments describing impact listed in Appendix 2.

**Question 8** asked respondents if they would be willing to submit a short case study describing the impact of the new requirements on students' learning. Natspec will follow up with those who told us they would be happy to do this.

**Question 9. Currently ESFA do not impose penalties if 5% or fewer students do not meet the condition of funding. The revised policy reduces this to 2.5% in 2025/26 (affecting funding in 2026/27) and to 0% tolerance in 2026/27 (affecting funding in in 2027/28). Do you agree or disagree with this proposal?**

Of the 45 responses received, 88% either slightly or completely disagreed with the proposal, 7% were neutral and 4% agreed with the proposal. 0 respondents completely agreed.

All comments further describing views listed in Appendix 3.

# Appendix 1

Comments received in response to question 6: What impact would enforcing the new requirement of minimum teaching hours (3 hours per week for English and 4 hours for maths) have on these students?

## **Negative impact for all students studying qualifications**

- Their engagement may decrease due to extended time in functional skills sessions. We would have to put them in larger learner groups to manage the increase. The majority of our learners are not desk based learners.
- These new guidelines will not support their success in E&m - we need to embed where we can - the new guidelines for all providers will cause a huge amount of behaviour issues, staffing issues and student numbers - this is not a viable new way of working.
- Negative impact as learners with SEND need the option to chunk the GCSE into smaller time chunks allowing for learners to manage the content load; 3 or 4 hours for many learners with SEND is not manageable. Our learners with an EHCP deserve the opportunity (where appropriate) to undertake GCSE and other English/Maths qualifications that currently meet the conditions of funding. However, due to the specific needs of our learners, we need the flexibility to offer the programme in smaller chunks. Not all of our learners can manage 3 or 4 hours of content each week. We currently have the flexibility to deliver teaching in smaller chunks and to deliver the GCSE programme over two years. We focus on covering sufficient content in sufficient detail to enable the learner to achieve their target level which may be a 2 or 3. For the learner this GCSE level represents their maximum achievement and they are proud of this qualification. We also offer learners the opportunity to resit/repeat their GCSE if they have not achieved their target grade/level or could, with additional sessions, achieve a higher level. Again the programme that works best is 2-2.25 hours per week per GCSE, giving time to revisit/overlearn key components of the programme. Where learners are targeting a Level 4 or above or are more cognitively able, we do offer the GCSE programme for 4.5 hours a week per GCSE
- This would impact on other areas of the curriculum, such as learning skills for employment and skills for independent living, which are the primary aims of the courses the learners have enrolled for.
- The time spent on this would take away from learners completing work experience, personal and social development and vocational subjects.
- Our learners are here to get into the workplace and thrive on practical skills based sessions in working and community environments. Good functional skills development and enhanced communication skills are absolutely essential, but if learners have not achieved after 15 years of classroom provision through school and FE it seems unhelpful for both learning and motivation to bring in such an unwieldy demand
- concentration levels; less time on vocational skills and vital skills related towards EHCP outcomes; Increased stress and pressure on learners affecting their mental health. We feel that this would reduce learner attendance leading to additional stress and sessions to ensure the curriculum is covered to become successful in exam time. Some learners may leave due to increased focus on functional skills.
- we have set maths/English teaching time already in our curriculum and then we have experiential extensive embedded functional use of both across the curriculum to support total communication, preparation for adulthood and fiscal independence. To remove this from the curriculum and have students have to do set learning hours in a classroom removes real life learning opportunities and concrete examples of both, this is going to impact on our autistic learners future life long learning opportunities.
- Current guided learning hours are 1.5 hours per week. This would mean that learners would be missing out on up to 2.5 hours of lessons addressing social skills, life skills, community access, RSE, Enrichment, ICT etc per week. These are crucial skills for our autistic young people to develop whilst at college, to prepare them for adulthood and improve their quality of life post college. There could also potentially be behavioural issues from learners who are forced to study non-preferred topics for longer periods
- Less vocational input which will impact on students engagement as well as their enjoyment of the study programme.
- The additional teaching would mean that it is a disproportionate percentage of their total guided learning hours.
- We already deliver complex and busy timetables. Our timetable is closely aligned to the Curriculum Framework for Visual Impairment (CFVI) and covers learning needs including independently accessing technology, habilitation (ILS/mobility), social emotional and physical wellbeing. To add more to timetables could impact on students' wellbeing and attendance, and in turn their achievement. From a budget perspective, having to staff these additional hours because they are mandatory would almost certainly lead

to reductions elsewhere and we already run a lean organisation. Reductions in other areas would have a detrimental impact on students' overall experience and progression.

- Our students struggle to concentrate and be in a classroom environment. We teach mostly 1:1 and they have many other sessions that are important to their needs and EHCP. These additional hours wouldn't necessarily mean our students learn more or are more prepared. It could mean they are overwhelmed.
- 7 hours a week of timetable content will make providing other areas of their provision prohibitive. A lot of Entry level and pre entry Literacy and Numeracy provision is no discrete and embedded into PFA practice.
- We run an embedded English and Maths programme following the Preparing for Adulthood curriculum. We do some discreet sessions but a total of 7 hours on these subjects specifically would be unrealistic and counter productive for our cohort.
- Our SEMH and EHCP students work very hard to motivate themselves just to cover the current English & maths curriculum hours over the 2 year period.
- The new minimum requirements would mean other aspects of the current curriculum would not be able to be delivered. Being a SEN provision a diverse range of subjects and embedding Maths and English throughout the various pathways is core to our offering.
- Students come to us to do a Supported Internship because they have had enough of school or college. Telling that they will have to study English and maths for longer will not suit and they won't attend. It will also negatively impact on the time that they have available to spend in the workplace which will mean that they don't develop their Employability skills and will mean it is less attractive for an employer to offer a supported Internship placement.
- This would impact on the time to deliver other elements of the curriculum including independent living skills and employability skills.
- Learners with SEND cannot concentrate for long periods of time.
- this would limit the breadth and diversity of the curriculum offer linked to individual learners and their aspirations and result in learners losing key skills due to less time in other important areas. Logistically, due to being a small college, this would affect the delivery of our curriculum, staff skills and expertise, timetabling and ultimately would impact funding from the ESFA due to learners likely needing 1:1 or very small group sessions which costs more.
- Guided learning hours for students undertaking Functional Skills equals 55 hours over the year. This equates to approx. 1.4 hours a week. Therefore this will double the teaching hours and take away learning in other relevant areas such as independence, social interactions, employability, placements etc. Due to current funding, a large percentage of our students are part time which limits teaching time further in the week.
- Students already struggle to fully engage with the CoF subjects on their work preparation programme, often missing their dedicated education day. Increasing the expected hours will increase drop-out rates overall.

#### **Negative impact for some of these students**

- Change to the curriculum balance and curriculum offer would negatively impact the learners studying qualifications in that they would not be able to access the full curriculum to the level that they currently do.
- The majority of students studying require the flexibilities within their study programme - We ensure that Math and English is embedded within all learning to allow for a flexible and person centred approach. This would also take away from other opportunities within the study programme for development and future progression.
- It would mean them studying discrete sessions for more hours than they currently do, which may lead to some disengagement. Depends how flexible we think the rules allow for embedded delivery in other timetabled activities. A positive is it does mean our timetabling teams need to give English and maths the hours needed rather than it's a add on. Will be further dis-incentive to follow accreditation and staff may make more justifications for exempting. Through the year we evaluate how students are doing on English and maths and enter if getting close to be ready to take a qualification. We would then retrospectively looking for sufficient hours to meet COF.
- Functional Skills GLH is 55 on Learning Aims Search (1.5 hours across 36 weeks). So a student studying both subjects could be expected to undertake 3 hours per week across 36 weeks. The blanket 3 or 4 hours more closely relates to the GCSE 120 GLH/30 weeks (assumes a student sits their exam May end/June). All of our students have EHCPs and are High Needs and it is therefore important that study programmes are individualised to suit student's needs, so a blanket hours requirement is not appropriate for our students. We already provide additional hours for individual students who show desire and enthusiasm to spend more time on English and or Maths. The vast majority of students are autistic, and while some do and would respond well to additional hours of subjects like Maths, we believe the majority could not respond well to a significant part of their 3-day timetable taken up with English and/or Maths, which could include longer



sessions. In the post-16 sector as a whole, students who choose the College route often feel disillusioned with the imposed English and Maths Condition of Funding and the treadmill of re-sits they need to comply with. We know for our students in particular, the mental well-being impact of being coerced to continuously study English and Maths towards an externally assessed examination, however well you prepare students. For the College as a whole, it is problematic to recruit English and Maths specialists, which is exasperated by the pay gap between the FE sector and Schools.

- Some students who are anxious about Maths and or English struggle with stand-alone lessons and respond better to an embedded approach.
- Time out of their vocational course, pressure and stress to complete exams which has had a major impact in the past.
- For learners studying GCSE English there will be no impact as they currently study 3 hours/week. However for GCSE maths this will be an extra timetabled hour and for learners studying functional skills this will be an additional 1.5 hours and 2.5 hours respectively for English and maths. For learners needing to study both maths and English this will rise to 7 hours/week. Many learners who do not yet have their GCSE grade 4s have had negative experience of maths and English at school and for some having to continue to study maths and English is a barrier to continuing their education. For others they have struggled for years with maths and English and have plateaued and are wanting to come to college to study new skills which are more practical.
- For some students on work experience or vocational qualification pathways, the minimum teaching hours would be a restriction on the time available for these pathways. This would impact the students ability to undertake meaningful vocational activities to support their future life aspirations.

#### **No impact / neutral**

- We do not have any learners currently working towards qualifications in Maths and English

#### **Negative for some and positive for others**

- Many already struggle with time in the classroom and would find additional hours very challenging- likely they would not engage/ attend/ leave the programme.
- The blanket application of min hours implies that DfE still believes all people will reach their arbitrary standard if given enough time and exposure. This creates a sense of failure/shame for those who are unable to reach the required standard no matter how many hours of teaching they experience.
- Number of hours are too much - many of our learners would not enjoy or engage for that number of hours in those subjects across a week/study programme. (could generate anxiety) It will impact on the opportunities for other learning/curriculum subjects to be timetabled and potentially restrict timetabled hours for the completion of other accredited qualifications.
- Taking time away from vocational areas & preparation for adulthood, which are significant for SEND learners. The amount of hours required would cause significant challenges to absorb, retain and consolidate the amount of information that would be covered within a week. The positive, for some learners the additional exposure and time would give them chance to achieve more, plus potentially allow for reinforcement and securing the knowledge.
- those who require extra time with maths will benefit, those who need extra time with preparation for learning quals will miss out, due to taking the extra maths hours from prep for learning

#### **Positive impact for some of these students**

For many of our learners it means that they will more than double their classroom time. Our learners do 45 minute sessions and often just as they are beginning to understand a concept the lesson is over. We have had already started the process of adding more hours and interventions because of this.



# Appendix 2

Comments received in response to question 7: What impact would there be when enforcing the new requirement of “stand-alone, whole-class, in-person teaching, with any additional support, such as small group tuition or online support, supplementary to these minimum classroom hours”?

## Negative impact for all students studying qualifications

- Too much time focused on desk based learning - this is antithetical to the college method and curriculum. Our student cohort are practical workshop learners - kinesthetic and practical.
- Online learning is the new era!
- As a college for young people with SEND we utilise additional and small group support and reinforcement/over-learning. For this time not to be recognised/be an option within the 3 or 4 hour model will significantly negatively disadvantage our learners and is not meeting their learning needs.
- Students at our college all have special educational needs and are most are unable to access any learning through a 'whole class, teacher standing at front' approach. Small groups and 1:1 interventions are the primary method of delivery for many of our students. One of our pathways adopts an entirely small-group based model, as students find being in larger groups distracting and overwhelming, which has an impact on everyone's learning and safety.
- Having only 3 days at college this would negatively impact learners thriving in a subject that links to their desired outcome.
- Our class sizes for these subjects are very small, often 1, 2 or 3 students. While we would interpret this as 'whole-class teaching', this might be challenged. With our students' needs, and their prior experiences of these subjects, it would not be appropriate to teach, for instance, our 10 L2 maths students in one group, even if the timetable allowed for it. In addition, we find that 121 tuition opportunities are invaluable in supporting students to catch up, to focus on specific parts of the subject that they may find particularly challenging, and to build their confidence. Maths, in particular, can be a very visual subject and includes concepts which can be particularly challenging for those who have never had useful vision. We would be unlikely to be able to afford to fund this essential part of our provision if it was classed as additional support, which would put a further barrier in our students' way.
- Either a longer class day or reduced opportunities for community and practical learning
- Negative impact on learners progression and individual learner timetables, reduce learners ability to increase transferable life skills that will successfully impact on their future goals.
- Our students have bespoke person centred learning timetables, these are directed from EHCP outcomes and aspiration. To take away this person centred learning and replace with dictated hours will make learning difficult to access for our autistic students and as such negatively impact on outcomes that have so far proven to be successful using our method of teaching and learning that is SEN/autism specific and enriches lives as well as prepares young people for employment appropriately.
- There would be a staffing impact, with teaching staff taken away from the other subject areas to deliver maths and English and support staff needed to enable learners to stay focussed in longer sessions.
- Less vocational input which will impact on students engagement as well as their enjoyment of the study programme.
- We run an embedded English an Maths programme following the Preparing for Adulthood curriculum. we do some discreet sessions but a total of 7 hours on these subjects specifically would be unrealistic and counter productive for our cohort.
- The students we have struggle in a formal learning environment and enforcing this will only impact the SEMH needs further
- We could not deliver this level of teaching to our vulnerable students. This would mean our 70 students will regress into not accessing education at all and will go back to their bedrooms as before.
- Detrimental to the education of our learners due to need type and variety required when delivering core skills.
- Our students complex needs impact already on their ability to focus, and the necessity of using and embedding functional skills cross curricular would exclude our students from meeting the criteria for minimum funding hours. These restrictions do not consider individual needs of SEN students and whereas a specialist provision timetables and lesson delivery is highly personalised and majority of teaching is outside the classroom, this would have a detrimental impact.

- The model of embedding these functional skill can be more effective than stand alone sessions and enables learners to develop skills in 'real life'.
- as above (comment referred to here was "Guided learning hours for students undertaking Functional Skills equals 55 hours over the year. This equates to approx. 1.4 hours a week. Therefore this will double the teaching hours and take away learning in other relevant areas such as independence, social interactions, employability, placements etc. Due to current funding, a large percentage of our students are part time which limits teaching time further in the week.")
- Class sizes will have to increase; there is a presumption that we will be able to recruit additional teaching and support staff in time for September delivery - this is unlikely; the mix of ability levels within classes will impact differentiation; anticipate increased anxiety levels.

#### **Negative impact for some of these students**

- same as above. Additionally this would make timetabling and staffing resources very challenging.
- Change to the curriculum balance and curriculum offer would negatively impact all learners studying qualifications in that the increase in stand alone hours would reduce the time accessing other areas of the curriculum aimed at preparation for adulthood. Functional Maths and English are currently themes running throughout the whole curriculum.
- If has to be discrete sessions and embedding is not allowed will be negative for most with additional team dedicated to only this area. There will be pressures on staffing/additional hours/recruitment.
- A significant impact on staffing levels, we just couldn't afford to run the model, as a subcontracted college of a GFE. The learners timetable would be over a 3rd of maths and English!
- The majority of learners currently cope with functional skills for 3 hours/week, however attendance is lower in maths and English than in vocational sessions and so additional hours of maths and English could impact negatively on attendance rates.

#### **No impact / neutral**

- Our aim is to always take a person centred approach to all learning and delivery, if we are required to adopt alternative methods of teaching and learning then we would aim to do this through a transition to ensure all a learners are able and comfortable with their study programme.
- We deliver some of the English and maths curriculum in a horse-based, vocational environment as our students feel anxious about being in a classroom for too long or at all. We already do this as a 'supplementary' to the GLH's.
- The majority of our students already have access to discrete English and Maths lessons delivered by specialists, so we would just increase the volume of these sessions and need to recruit additional staff. These lessons are still supported by learning support staff as appropriated and dictated by the needs of the students.

#### **Negative for some and positive for others**

- Same as above plus; The impact on learners who have lower ability levels may find it challenging to be in stand-alone discreet sessions for that amount of time.
- We deliver functional skills additional support as identified above on a personalised basis in response to identified need already, the extensive additional hours are not required.
- Students with severe learning difficulties are unlikely to benefit from the increased standalone sessions and it will place additional demands on staff to plan additional contextualised learning opportunities outside of other curriculum areas where contextualised maths/English learning may naturally occur.
- Some students would benefit from the additional support, however other students require more work on their wellbeing rather than English and Maths.
- This requirement does not consider the complex needs of our learners, the teaching strategies and delivery approach that is required. Age of our learners 19+ - it is more relevant to teach learners functional maths and English skills in real life contexts If learners have reached their ceiling of skill learning in these subjects at this age there is other learning that would be far more useful towards the preparation for adulthood.and intended destinations

#### **Positive impact for some of these students**

- For some it will improve their maths and English, but for others they are already at capacity and wont make any difference in the long run. In some cases the learners have been through school for 15+ years and I don't see how increasing the hours will change anything for the 2-3 years they will be with us.

## Appendix 3

Comments received in response to question 9: Currently ESFA do not impose penalties if 5% or fewer students do not meet the condition of funding. The revised policy reduces this to 2.5% in 2025/26 (affecting funding in 2026/27) and to 0% tolerance in 2026/27 (affecting funding in in 2027/28). Do you agree or disagree with this proposal?

### Agree

- We agree with the principle, however the timeframe is quite short.
- Whilst I'd prefer 5% to stay for college's sake. I understand the reasoning behind removing it, to ensure everyone gets Maths & English who needs it. And no students, who are an edge case, are hidden within the 5%

### Neutral

- We are not impacted by this on our current cohort.
- I don't think this will impact us.

### Slightly disagree

- There are anomalies that can occur occasionally, but the guidance is accessible and clear, so almost all students will meet the conditions of funding. It may penalise smaller providers in terms of headcount percentage.

### Completely disagree

- The reduction in tolerance could lead to learners being enrolled on stepping stone qualifications or similar which are not meaningful to the learner, would adversely impact the quality of the curriculum due to the hours that would need to be delivered on Maths and English alone and would fail to recognise the complexities and specific needs of learners with complex SEN on preparation for adulthood programme.
- Too restrictive and narrow an approach - not all SEN learners fit into these boxes, there has to be flexibility and understanding of neurodiverse learning needs.
- This does not lend itself to a person centred approach and factor in additional needs of students with and without an EHCP. This adds more pressure to the individual and all departments involved.
- Please speak to front line staff and students - you need a tolerance for individual students - please speak to the people who matter with these changes!
- This is a complex data set and to have no tolerance (with such a potentially significant financial impact) is disproportionate. It feels punitive to lose funding where often this is a coding error or where a learner has changed during the year from exempt to not exempt for example. This could encourage some settings to blanket exempt if there is a high level of concern about getting the number in the ILR correct.
- We've had to use 5% several times where otherwise a student would disengage completely. There are also some withdraws count as non achievers.
- The policy is completely disregarding the reality of our sector
- Learners individual needs will impact on this proposal and there is no room for a flexible approach. Many of our learners have medical and physical needs that this funding proposal does not consider and will have a negative impact.
- This proposal would restrict the time we have for other curriculum areas that prepare our learners for adulthood
- It very much feels as though ESFA are decreasing opportunities for specialist provisions to support SEN young adults into happy fulfilled future lifestyles and replace them with social care options if students require alternative pathways to academic/vocational success.
- A zero tolerance approach does not allow for any mistakes with regard to ESFA, at the best of times the conditions can be difficult to understand and this approach would allow no room for error
- Disagree due to constraints on financials.
- Just because they are not working towards an accredited qualification does not mean they are not working to improve or maintain their maths and English skills. It is an absolute disgrace and I hope after the next election this will be reversed.
- as a small provider all learners study functional skills in a way that we find works for them why should funding be affected because of the possible majority.

- The tolerance was originally introduced to allow for a technical administrative glitch, as there are always some students who are on their core aim for more than 42 days and then withdraw (usually not long after 42 days) without having 42 days attendance on their English and Maths (so they will trigger funding and performance measures but not meet the E/M CoF). Our students can be exempted as they all have EHCPs, but generally those without an EHCP, who, for reasons often connected to ill health, cannot cope with a programme where they are doing both English and Maths as well as their core aim. These learners are often not Band 5 full time, but are on more than 150 hours. Removal of the tolerance for these students potentially forces students to do things they are not currently capable of doing, which is far more likely to end up with them withdrawing and becoming NEET.
- It is hard enough convincing our students to aspire to achieve these qualifications.
- Colleges shouldn't be penalised for the failures of the education system - general principle.
- As per my above commentary regarding the complexity of our students, and the policy demands teaching to be delivered in a way that does not meet our students needs.
- A limited tolerance or lack of tolerance does not work with many students with SEND due to ongoing changes in their needs and their wellbeing.
- The ILR does not work well for Specialist Colleges as it is and this would further complicate matters and result in funding problems.
- Failure to recognise the complex needs of our learners, the spikey academic profiles they have and the changes in the engagement with learning that can arise during a study programme/educational placement  
Inability to be totally compliant and therefore the potential of the organisation incurring financial penalties
- We do not agree with the conditions of funding in the first place. Sometimes students do not meet the conditions due to attendance, mental health issues and for various other reasons out of our control.
- Regardless of the CoF penalty, colleges will be impacted by the policy. The lagged funding is affected overall by students leaving courses earlier than planned. This policy change will hugely affect students who want to develop the practical skills needed to work but struggle in a classroom environment, leading to an increase in drop-out rates and reduced funding.