



Staff Policy

TUITION FEES POLICY 2018-19 (CAPITAL CITY COLLEGE GROUP)

Lead Responsible	Director of Integration and Information
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CAPITAL CITY COLLEGE GROUP FEES POLICY 2018-19

1.0 Policy Objectives:

To provide a framework that ensures that consistent and comprehensive guidance and information regarding the financial contributions to the cost of learning in fees subsidised or otherwise is available and accessible to all learners, customers, sub-contractors and other partners, staff, governors and other stakeholders.

This policy covers all CCCG provision except for courses and qualifications delivered through partnership arrangements with sub-contractors. Sub-contractors are responsible for their own policy on fees and financial contributions from individual learners.

The following fees are covered:

- Tuition fees.
- Exam, registration fees, materials and equipment fees.
- Concessionary fees.
- Overseas learners.
- Instalments.
- Refunds.

This policy provides guidelines for the group; however, fees are set by the member colleges and CCCT. The group operates in a competitive market place and fees need to be set at a level that reflects market demand. College Principals and the Managing Director of CCCT have discretion to vary fees and the rules by which they are applied, provided always that they remain within the rules set by the funding bodies. This discretion includes:

- college-wide additional fees and/or waivers
- changes for specific courses, and
- exceptional fee waivers for individual learners.

2.0 Fee Setting

The Group and its members aim to set fees at a price that is accessible for the communities and the businesses that we serve, while reflecting the environment in which we work.

The Group receives funding from the Education and Skills Funding Agency (ESFA) and a range of other public sector organisations. Where students meet the eligibility criteria for this funding we are able to provide free education to 16-18 year olds, free education and training to adults who meet certain criteria, and subsidised training to adults who fall outside these criteria. In addition, for adults wishing to study at level 3 and above who do not meet the criteria for funded courses, we can provide access to Advanced Learner and Student Loans.

Separate fees apply to home and overseas learners. Home learners are those learners so classified by the Education and Skills Funding Agency (ESFA) or the Office for Students (OfS), as appropriate, and supported by Government guidelines on fees, as determined by the Education (Fees and Awards) Regulations 1997, and subject to residency criteria. This generally includes nationals of the European Economic area and other overseas nationals holding a Home Office settled status. Asylum seekers meeting certain criteria may also be granted Home fee status. Those learners not classified as “home” will be charged at the overseas rate.

Home learners can be either:

- **Fully Funded** – Eligible for fee remission, with tuition, examination and essential checks (DBS), materials and resources funded by the ESFA.
- **Co-Funded** – Required to pay a financial contribution towards the cost of their learning, including tuition, examinations, checks (DBS) and materials; the cost of the course is partially funded by the ESFA.
- **Loan-Funded** – Required to pay the full financial cost of their tuition, examinations, checks (DBS) and materials with a loan from the Student Loans Company.
- **Unfunded** – Required to pay the full financial cost of their tuition, examinations, checks (DBS) and materials; zero contribution from ESFA towards fees.

There are three types of fees that the college may expect from an individual and/or employer, and these are outlined below.

2.1 Tuition Fees

Tuition fees reflect the cost of delivery of the qualification or course and normally exclude costs related to materials, learning resources and equipment; these elements are charged to relevant learners and are in addition to the tuition fees.

2.2 Examination Fees

Examination Fees are the cost of accrediting a qualification through an awarding body uplifted to incorporate the cost of administration of exams. Examination fees are applicable to **co-funded** and **unfunded** learners, but not to **fully funded** or **loan-funded** learners.

All learners will be responsible for the cost of their examination resit fees, subject to two exemptions:

- Resits for 16-18 year old learners may be **paid by the Group** where they have achieved the required attendance and progress targets on their course, **and** where a core external examination as part of a full time course (such as BTEC) has to be passed for the learner to achieve the full qualification. The decision is subject to approval by the relevant college Principal.
- English and maths GCSE/functional skills where these are compulsory resits will be **paid by the Group**.

2.3 Material/Resources Fees

All learners, regardless of whether they contribute towards the cost of their tuition and/or exams are liable for the actual cost of materials and resources directly relevant to the delivery of courses such as uniforms, specific equipment or consumables. This will be determined and explained when student eligibility and fees are assessed during the enrolment process.

Where the material/resource is essential for the completion of the course, only **co-funded** and **unfunded** learners can be charged fees.

Where the material/resource is not determined to be essential, learners in all categories (**fully funded**, **co-funded**, **loan-funded**, **unfunded**) may be liable for the related fees.

Where fees are charged for identity cards, these may be waived for students who attend taster days and subsequently enrol for a full course, or for returning learners who re-enrolled on a College course before the main August enrolment programme.

3.0 Fees on ESFA Funded Courses

The Group uses the ESFA's eligibility criteria to determine if students are eligible for some or all of their fees to be paid by the Agency. Where students are eligible for some form of ESFA funding the following conditions apply:

3.1 Learners Aged 16-18 (16-25 with an Education Health & Care Plan)

No fees are paid by ESFA funded learners aged 16, 17 or 18, on 31 August at the start of the funding year in which they begin a learning programme. No fees are paid by ESFA funded under 25s who have an Education Health and Care Plan (EHCP).

Free tuition for these learners also extends to examinations and Disclosure and Barring Service (DBS) checks.

Learners returning for a second year of a two year course will continue to receive fee remission on the same basis as the first year.

The following individuals are entitled to **full funding** for their learning:

- Learners aged 16 and over but under 19 years at 31.08.2018 on any ESFA funded course.
- Learners aged 16 and over but under 25 years at 31.08.2018 on any ESFA funded course in receipt of an EHCP.

3.2 Learners Aged Under 16

There is a single date when young people can legally leave school. That date is the last Friday in June for those young people who have completed year 11. For the purposes of this document 'under 16' means of 'compulsory school age'.

School age learners enrolling on a twilight or evening course will be charged the hourly fee rate of **£10.50 per guided learning hour** where the course is unrelated to their school programme. The enrolment of school age learners requires the prior approval of their school and their parent/guardian.

Where school pupils of compulsory age wish to follow part of their programme at college, and the school has indicated their approval, the college will charge the school for the cost of this provision.

3.3 Learners Aged 19-23

ESFA funded learners aged 19 to 23 (inclusive) on the **first day** that the qualification or course commences may be **fully funded**, and therefore pay no tuition fees, depending on their personal circumstances or the qualifications they study. These are set out below. Note that these concessions are subject to variations in accordance with ESFA guidance. Any concessions for fees will apply from the beginning of a learner's programme to its end.

An individual aged 19-23 years old who meets one or more of the following criteria will be considered a **fully funded** learner:

- Studying their first full Level 2 qualification.
- On provision to support progression to a first full Level 2.
- On provision up to and including Level 2, for those who already have a full Level 2, if they are *unemployed*. (If they are not the provision is **co-funded**).
- Studying English and Maths learning aims up to level 2 as part of the suite of English and Maths qualifications.
- Studying ESOL learning aims up to level 2, if they are *unemployed*. (If they are not the provision is **co-funded**).
- Studying their first full Level 3 qualification (Other level 3 qualifications are **loan-funded**).
- Studying on provision at L2 or below and employed on a low wage earning less than £15,736.50 per annum.
- Studying a traineeship.

'*Unemployed*' means learners who are either:

- Receiving Jobseeker's Allowance (JSA), including National Insurance credits only
- Receiving Employment and Support Allowance (ESA) and are in the work-related activity group (WRAG)
- Receiving Universal Credit, earn either less than 16 times the appropriate age-related rate of the National Minimum Wage/National Living Wage per week or £338 per month (individual claims) or £541 a month (household claims) and are determined by Jobcentre Plus as being in one of the following:
 - The All Work-Related Requirements Group
 - The Work Preparation Group
 - The Work-Focused Interview Group
- Offenders who are released on temporary licence (RoTL) and studying outside a prison environment and not funded by the Ministry of Justice.
- At the College's discretion, learners who earn either less than 16 times the appropriate age-related rate of the National Minimum Wage/National Living Wage per week or £338 per month (individual claims) or £541 a month (household claims), who are on other state benefits and want to be employed or move into more sustainable employment.

Individuals judged to be eligible at enrolment as **fully funded** learners shall be eligible for the whole of their learning aim/programme, even if their circumstances change.

Adults aged 19-23 studying for a further education qualification at L3 or above, other than their first full Level 3, are **loan-funded**, see s3.5 below.

All other adults aged 19-23 are **co-funded** and are required to pay tuition, examination and materials fees.

3.4 Learners Aged 24 Years and Older

ESFA funded learners aged 24 and older on the **first day** that the qualification or course commences who meet one or more of the following criteria will be considered **fully funded** learners:

- On provision up to and including Level 2, if they are *unemployed*. (If they are not the provision is **co-funded**).
- Studying English and Maths learning aims up to level 2 as part of the suite of English and Maths qualifications.
- Studying ESOL learning aims up to level 2, if they are *unemployed*. (If they are not the provision is **co-funded**).
- Studying on provision at L2 or below and employed on a low wage earning less than £15,736.50 per annum.
- Studying their first full Level 2 or Level 3 qualification and have either who have left the British armed forces in the past 10 years after completing four or more years of service, or been medically discharged from the British armed forces due to an injury in active service, after completing basic training.
- 24 year olds studying a traineeship.

Individuals judged to be eligible at enrolment as **fully funded** learners shall be eligible for the whole of their learning aim/programme, even if their circumstances change.

Adults aged 24+ studying for a further education qualification at L3 or above are **loan-funded**, see s3.5 below.

All other adults aged 24+ are **co-funded** and are required to pay tuition, examination and materials fees.

3.5 Loan-Funded Learners

Advanced Learning Loan funding is available to learners aged 24 and over studying for level 3, level 4 or higher level qualifications (excluding Higher Education qualifications), plus those aged 19 to 23 studying for a qualification at these levels *other than their first full Level 3*.

The Student Loans Company (SLC) is responsible for administering the Advanced Learning Loans. Full details of the eligibility criteria for the Advanced Learning Loans and the application process are available from the Student Loans Company website. More information on Advanced Learning Loans can be found online:

www.gov.uk/advanced-learning-loans

www.slc.co.uk/students-and-customers/students-from-england.aspx

www.gov.uk/student-finance

It is the responsibility of individuals choosing to finance their study via Advanced Learner Loans to secure their loan with the SLC; the college can offer guidance and support, but the responsibility to complete the applications process sits with the learner.

Exams and materials fees are not applicable to **loan-funded** students.

Loan applications to the SLC should be completed within the within the relevant 'qualifying period', as follows:

- Courses < 14 days in duration, qualifying period = 1 attendance

- Courses between 2 weeks and 24 weeks (14 days to 167 days) duration, qualifying period = 14 days from learner's first attendance on the course
- Courses greater than or equal to 24 weeks (168 days or more) duration, qualifying period = 42 days from learner's first attendance on the course

Individuals whose loan application to the SLC is either

- not submitted within the qualifying period, or
- not agreed by the SLC by the end of the term during which the course starts

will be considered by the college to be **unfunded** and will be personally liable for the full published course fees for their chosen programme(s) of study.

3.6 Apprentices

No fees are charged directly to apprentices. Apprenticeship fees are charged to employers, the value of which depends on whether or not they pay the Apprenticeship Levy.

4.0 Commercial and Full Cost Courses

Fees for commercial courses or cost recovery will be priced at a level to reflect the full cost to the college plus a **40%** margin, which can be varied in response to market forces.

5.0 Overseas and International Learners

All learners who are ineligible for ESFA funding, regardless of nationality, must pay the overseas/ international tuition fee rate for that course.

International learners are students who require a Tier 4 student visa or a Short Term Study Visa to study at the College, and who are therefore processed by the International team. Subject to immigration status, these students will be considered as international fee-paying students. Overseas and international learners enrolling on full cost recovery courses (section 4), including part-time English as a Foreign Language (EFL) course will be charged the standard tuition fee for that programme.

Fees charged to overseas and international students are fully inclusive of tuition fees and the cost of the first attempt of any approved examination, with the exception of English as a Foreign Language (EFL) course where any examination fees are charged in addition. Learners will be charged re-sit fees for any further attempts of examinations.

Agreed additional learning support will be charged in addition to this fee.

All other courses will be charged as indicated below:

Type/Age	Course Type	Financial Contributions		
		Tuition Fees/£	Exam Fees/£	Materials Fees/£
Overseas/ International students of all ages	A levels (2 years)	£6,900 per year	As published on student record system	Yes

Overseas/ International students of all ages	A level – 1 year Intensive	£7,450 per year	As published on student record system	Yes
Overseas/ international students of all ages	Level 3 courses, including BTEC Extended Diplomas, Access to Higher Education, UAL Level 3 Diplomas (not including Culinary Arts and Hospitality courses)	£6,500 to £7,500 (per year)	As published on student record system	Yes
Overseas/ international students of all ages	International Culinary Arts/ Patisserie/Hospitality Courses	£13,000 to £17,000 per year	As published on student record system	Yes
Overseas/ international students of all ages	International Foundation Programme (1 year and Fast Track)	£9,500 per year	As published on student record system	Yes
Overseas/ international students of all ages	Foundation Degree courses (Level 5)	£7,690 to £7,990 (per year)	As published on student record system	Yes
Overseas/ international students of all ages	BA Top – up (Level 6)	£7,990/ year	As published on student record system	Yes
Overseas/ International students of all ages	A levels (2 years)	£6,900/ year	As charged by relevant testing organisation	Yes

Bespoke courses can be created for the international market based on demand. These may attract non-overseas learners in some cases. There is one fee rate for these courses and this rate applies to all students. Bespoke courses and summer school course tuition fees will be calculated as full cost recovery courses, as outlined in section 4 of this policy.

6.0 Higher Education Provision

The Office for Students (OfS) definition of full-time/part-time will be used to determine the full-time/part-time status of HE provision and will, therefore, determine the fees chargeable. Full time fees where the learners are enrolled at a CCCG College are generally capped at £6,000 per annum; and part time fees at £3,150. Fees, where learners are enrolled by a University partner and CCCG provide sub-contracted services, will be determined by the University. Examination resits will be charged at £595.

The course fee for full-time/part-time students is deemed to be payable by the student unless they have full or part sponsorship from Student Finance England (SFE), evidenced by a financial assessment letter showing the contribution to be paid by the SFE. For EU learners from outside the UK, the SFE will supply a letter as evidence of sponsorship (if applicable).

In certain circumstances SFE evidence may not be available at enrolment in which case written evidence of an application being made to the SFE is accepted, as an interim measure. Should SFE funding not be approved the student will be liable for all fees due.

Students whose fees are being paid by their employer must supply written confirmation of sponsorship at enrolment. The confirmation must be on Company headed paper, be unconditional, state the name of the student & course, the amount of sponsorship and be signed by an authorised signatory (not the student).

In respect of Student Loan funded HE students following a standard academic year:

- Nothing will be charged if they withdraw/suspend before the 12th October.
- 25% of the annual fee will be charged if they withdraw/suspend on or after October 12 and before January 4.
- 50% of the annual fee will be charged if they withdraw/suspend on or after January 4 and before April 11.
- 100% of the annual fee will be charged if they withdraw/suspend on or after April 11.

7.0 Fee Payment Options

Credit or debit cards and direct payment into the College's bank account can be used to pay fees. At the College's discretion students may also be able to pay by cash or cheque.

7.1 Instalment Plans

All fees become due at enrolment; however the college recognises that some students may be unable to pay their fees in full at enrolment.

Permanent UK and EU citizens with 3 years or more residency in an appropriate EEA country may be entitled to pay by instalments where they are enrolling onto a course which lasts 10 weeks or more and their total course fees exceed £200.

Students applying for loan funding (Higher Education or 24+ further Education) are not eligible for instalment payments and must pay the whole of their personal fee contribution at enrolment and provide evidence of any application/award to/from the Student Loans Company.

All eligible students will be required to pay 50% of their total course fees within 7 days of enrolment. For students on courses lasting 18 weeks or longer the balance will be spread equally across 2 instalments (25% each). Students on courses lasting between 10 and 17 weeks will be required to pay the balance (50%) in one instalment. The initial Instalment will fall due on the 1st working day of the month that starts at least 21 days after the date of enrolment with any 2nd instalment, for eligible students only, falling due on the 1st working day of the subsequent month.

Business organisations, sponsoring students' fees, are not eligible for instalment payments. All organisation invoices fall due for payment 30 days after enrolment.

In general overseas students are expected to pay all their fees at enrolment; however, in exceptional circumstances the College may allow payment in instalments. Applications for overseas student instalment plans must be made to the International Officer before students attempt to enrol.

All instalment payers will be asked to complete a standing order or direct debit as a condition of acceptance onto an instalment plan. Students should therefore ensure that they are in possession of their bank details when they attend the college to enrol.

7.2 Payment by Employers or Sponsors for non-Apprenticeship courses

A learner may have made an agreement for course and other fees to be paid by their employer or sponsor. This is an agreement made between those two parties. This section does not apply to apprenticeships, where the agreement for fee payment is between the employer and the College.

Where it has been confirmed as part of the advice and guidance and enrolment process that the fees for the learner are to be paid by a sponsor or an employer, then formal and written confirmation of this must be submitted to the College. The College must receive any such letter of authority or payment by a third party at the point of enrolment, otherwise the learner will be asked to pay the full fees due.

Where learners have applied for a loan from the SLC to pay for their intended courses' tuition fees, written confirmation from the SLC must be presented by the learner, or the College must be able to see approval by the SLC for the loan application on the SLC's portal.

Where the learner whose course fees are being paid by the SLC, but the learner withdraws from the course and the SLC stops payment of course fees before the final instalment, the learner will not be liable for the remainder of the course fee.

If the learner has left the employment of the company that had agreed to pay the fees but is still attending the course, then the learner will be liable for any outstanding fees. It may be possible that the learner has changed employment and the new employer is willing to pay the fees. In this event, it is acceptable for the liability to the College to be transferred, provided that the new employer confirms its willingness to pay the fees in writing on its official letterhead.

7.3 Outstanding Fees

Learners must be advised that any fees that remain outstanding beyond their due date for settlement will prejudice their continuance on the course, entry for an exam and the award of any certificates.

All outstanding fees are to be paid up in full before a learner can progress onto the next year of their course or a new course at the College.

Learners who do not pay their fees may be referred to a debt collection agency, as set out in the College's Debt Recovery Procedures.

8.0 College Refund Policy

CCCG has a 'no refunds' policy, however, refunds may be considered if any of the following circumstances exist:

- The college terminates a course which has already started
- The college is not able to provide an advertised course
- The college changes the time or location of a course from that advertised

- The college cancels an examination
- The college recommends a student transfers to a course with a lower fee
- The college has overcharged a student or assessed their fees incorrectly
- Medical conditions, certified by appropriate medical professionals, resulting in the student having to leave the college completely
- You notify the College, in writing, you are withdrawing at least 7 days before the course starts

If after enrolment you decide to withdraw from your course for any other reason you will not get a refund. If we have agreed for you to pay in instalments then you must pay all unpaid instalments immediately.

Refund applications will only be considered if received on a correctly completed form, available from all college centres on request. Where refunds are declined the college may issue a credit note or voucher for another college course, as an alternative.

Where the college terminates a course which has already started, you will receive a full refund of all amounts paid,

All other refunds will be subject to deductions for classes already attended, the examination fee where the college has already registered your entry, unpaid student membership fees, unpaid fees in respect of other programmes of study and an administration fee of £30.

Refunds will be made to the person or organisation who has made the payment to the College, be this the individual learner, a sponsor or the Student Loans Company.

For Higher Education courses only:

- the College will make payment to learners to cover any additional travel costs incurred by them if they are affected by a change in the delivery location of their course, or will make funding available to offset these additional costs.
- If it is not possible for the College to continue to deliver a course, the College will make a payment to cover any additional maintenance costs and/or lost time incurred by a learner. The College will also make a payment to cover any tuition and/or maintenance costs incurred by a learner where these are of a greater value than they would have incurred had the College continued to deliver a course for which they were enrolled.

8.1 Refunds for International Students

For international students whose visa application, made outside the UK, is refused any deposits paid will be refunded less a £100 administration charge. Where the College believes the refusal is due to a UK Border Agency (UKBA) mistake then the refund will only be made on completion of a UKBA Administrative Review, initiated by the student.

If you have made your visa application from within the UK and have not received the UKBA's decision prior to the commencement of the course you must enrol and start your course to maintain your visa eligibility; however you do so at your own risk as no refunds will be made in the event your visa is refused. If you choose not to enrol and/or attend classes then your study offer will be withdrawn and your entire deposit forfeited. If your visa is refused before you start your course then you will receive a refund of any deposits paid less a £100 administration charge. If you start your course and your visa is refused the College may

agree to support you in appealing the UKBA decision and in exceptional cases may consider a full or partial refund.

All UKBA decision letters should be forwarded to the International Office within 4 days of receipt. Deposits will not normally be refunded in any other circumstances. If you successfully obtain your visa but elect not to study at the College then you will forfeit your entire deposit.

8.2 Disclaimer

The College will do all that it reasonably can to provide the educational services as described on its website, in the prospectus or in other documents issued to appropriately enrolled students. Sometimes circumstances beyond the control of the College mean that it cannot provide such services. Examples include (but are not limited to):

- Industrial action by College staff or third parties
- The departure of College staff (in this situation the College will provide cover wherever possible)
- Power failure
- Acts of terrorism
- Damage to buildings or equipment

The college will not provide a refund of fees paid in the event of such circumstances.

9.0 Bursary Funds

9.1 16-18 Bursary Scheme

Learners aged 16-18 who experience hardship and can be identified as being in need of financial support, may be eligible for a bursary. Learners in the following groups may be eligible for and receive the maximum bursary of £1,200 a year:

- Young people in care.
- Care leavers.
- Young people claiming Income Support or Universal Credit in their own name.
- Disabled young people who receive both Employment And Support Allowance and either Disability Living Allowance or Personal Independence Payment in their own name.

To receive the maximum bursary, the learner's course must last 30 weeks or more. For courses of less than 30 weeks, a pro-rata amount will be calculated based on the length of the course. Payments are dependent on good attendance and punctuality standards.

Students on apprenticeship programmes, or paid learning or training, cannot get a bursary. However, students on a traineeship programme are not paid so they are eligible.

Other students facing genuine financial difficulties may be awarded a bursary at the discretion of the college.

The college reviews its approach to the distribution of bursary funds on an annual basis to ensure that the funds are allocated to best support learners facing genuine financial hardship. Bursary payments are made dependent on individual learners maintaining acceptable levels of attendance and progress.

9.2 Advanced Learning Loans Bursary Fund

Learners funded by an Advanced Learning Loan may be eligible for support through the Loans Bursary Fund. This fund is to provide support for eligible learners with hardship & childcare fees. Funding rules emphasise that priority is to be given to vulnerable groups, but can also be used to help other disadvantaged learners. Assessment of learner needs is required and learners will be means-tested. Evidence that learners are in receipt of the loan is required. Loans bursary funding cannot be used “to cover costs and charges for items without which a learner could not complete their course.”

9.3 Higher Education Internal Progression Bursary

In order to encourage current students to stay within the College and internally progress onto Higher Education courses the College will offer an incentive progression bursary that will operate for 2018/19. This will comprise of an award of up to £500 for students over the two years of their course and be based on a cash bursary of £200 (awarded at the end of November in year 1) and a cash bursary of £300 (awarded on completion of year 2 at the end of July). The bursary will apply to all students who internally progress onto the first year of all Foundation Degrees and all Higher National programmes. Full details for the bursary are contained in the terms and conditions that are available online.

Table 1: Summary Table of Government Contributions

Provision	19-23 year-olds	24+ Unemployed	24+ Other
English and Maths up to and including Level 2	Fully funded ¹	Fully funded ¹	Fully funded ¹
Level 2	Fully-funded ¹ (first and full)	Fully funded	Co-funded ²
Learning to progress to Level 2	Fully funded ³	Fully funded	Co-funded ²
Level 3	Fully funded ¹ (first and full)	Loan-funded	Loan-funded
	Loan-funded ⁴ (previously achieved Level 3 or above)		
Traineeship ⁵	Fully funded (including 16-24 year-olds ⁶)	N/A	N/A
English for Speakers of Other Languages (ESOL) learning up to and including Level 2	Co-funded ²	Fully funded	Co-funded ²
	Fully funded - unemployed		
Learning aims up to and including Level 2, where the learner has already achieved at Level 2 or above	Co-funded ²	Fully funded	Co-funded ²
	Fully funded - unemployed		
<ol style="list-style-type: none"> 1. Must be delivered as one of the qualifications required for the legal entitlement. 2. Low wage flexibility may apply. 3. Must be delivered as entry or level 1 provision from local flexibility. 4. Availability of loans at Level 3 does not replace a 19- to 23-year-old's legal entitlement to full funding for a first full Level 3. 5. Excludes flexible element where funding depends on age and level. 6. 16-18 year olds must be eligible under the ESFA's young people's residency requirements. 			