

# **16-19 BURSARY FUND POLICY**

THIS POLICY APPLIES TO THE HOPE SENTAMU LEARNING TRUST BOARD, THE CENTRAL TEAM,
AND ALL TRUST SCHOOLS/ACADEMIES

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# **Contents**

Policy Updates	2
Statement of Intent	3
1. Legal Framework	4
2. The Setting's Responsibilities	4
3. Raising Awareness and Take-up of the 16-19 Bursary Fund	4
4. Bursary Fund Statement	5
5. Eligibility	6
6. Young Offenders	7
7. Discretionary Bursaries	7
8. Vulnerable Bursaries	8
9. Paying Bursary Funding to Eligible Students	10
10. Conditions for Receiving Bursary Funding	11
11. Recycling Bursaries	12
12. Student Declarations	13
13. Managing Applications	13
14. Quality Assurance	14
15. Fraud	14
16. Conditions For Using The Bursary	15
17. Complaints and Appeals	15
18. Monitoring and Review	15

# **Policy Updates**

Date	Page	Policy Updates
October 2022	New policy	Complete document
September 2023	6	5.10 - Two bullet points removed to clarify eligibility to apply for a bursary at the local provision (Funded or co-financed by the European Social Fund and 16-19 traineeship programme removed)
September 2023	11	9.11 - Contact information updated
September 2023	12	10.10 - Conditions for ceasing payment of a bursary amended to reflect current processes
September 2023	Whole policy	Authorised approval changed from Resources Committee to the Chief Operating Officer inline with Trust-wide policy approval changes (mentioned on page 0, 2 and 15)
November 2023	Whole policy	Updated inline with new Scheme of Delegation

This policy has been approved by:				
Signed	Chief Operating Officer	Date		

#### Statement of Intent

At Archbishop Sentamu Academy, we are committed to closing the attainment gap between students from disadvantaged and more advantaged backgrounds, and ensuring that every young person participates in, and benefits from, a place in 16-19 education and training. The bursary is intended, therefore, to help eligible students with the essential costs of their studies, e.g. important books, equipment and travel costs.

#### We are dedicated to:

- Distributing 16-19 bursaries via a fair and equal process that is transparent, accountable and easily understood.
- Ensuring that information regarding the application, award and administration of 16-19 bursaries is publicly available via the school website and sixth form administrator.
- Widening access to, and participation in, 16-19 education and training.
- Monitoring and reviewing our policies to ensure effectiveness.
- Setting high targets and objectives to develop a culture of continuous improvement.
- Ensuring adequate resources are available to implement policies, as much as is reasonably practicable.
- Sharing and acquiring best practice through partnerships with neighbouring settings.

### 1. Legal Framework

- 1.1 This policy has due regard to all relevant **legislation** and **statutory guidance** including, but not limited to, the following:
  - ESFA (2022) '16 to 19 bursary fund guide 2022 to 2023 academic year'
  - Equality Act 2010
- 1.2 This policy operates in conjunction with the following **Trust** policies:
  - Complaints Policy and Procedures
  - Attendance and Absence Policy
  - Behaviour Policy
  - Data Protection (UK GDPR) Policy

# 2. The Setting's Responsibilities

- 2.1 The setting will be responsible for setting eligibility criteria for students at the institution and will set conditions for receiving the bursary, such as regular attendance. Arrangements for applying for bursaries will be straightforward and confidential.
- 2.2 The needs of each student who applies for the bursary will be assessed by the setting and evidence will be obtained to support each application. The setting will claim vulnerable bursaries from the Student Bursary Support Service (SBSS) for each eligible student.
- 2.3 Records will be kept by the setting of all assessments and payments. The application process will maintain confidentiality.
- 2.4 The setting will make this policy available early enough for students to be able to use the information when deciding which post-16 setting to attend.
- 2.5 The setting will comply with the requirements of the Equality Act 2010 when setting its criteria and will not discriminate against students because of their protected characteristics.
- 2.6 The setting will inform the ESFA of the total amount of any unspent funds (not previously reported) by completing the ESFA online enquiry form no later than 31 March each year.
- 2.7 The setting will ensure it completes the new Individualised Learner Record (ILR) or census fields to provide data on the number of students participating in extended work placements.

# 3. Raising Awareness and Take-up of the 16-19 Bursary Fund

- 3.1 To raise awareness of the bursary, the setting will employ different marketing activities, including the following as appropriate:
  - Posting information about the bursary on the school website and in the prospectus, as well as on posters around the setting
  - Distributing information at open evenings for Year 11 pupils

- Providing students who attend a pre-enrolment interview with a brochure which includes information about the bursary and directs them to the setting's website
- Providing further information, such as the application form and details of the bursary, following enrolment for all new entrants to the setting in an enrolment pack, as well as a text message and email about the bursary at the start of the academic year
- Working with local support services to target potential students who are homeless and providing them with the necessary information
- Providing tutors with information to inform discussions between tutors and students
- Working with social workers, who help the most disadvantaged students, to identify those who
  may be eligible for vulnerable groups
- Sending text messages throughout the year to inform students of the financial support available in the Summer term, text messages are sent to inform students that the application form can be downloaded and completed
- 3.2 To identify students who may be eligible for vulnerable groups, the setting will work with the LA, LAC education services and care leaver services to help and encourage students to apply for a bursary.
- 3.3 In addition, the setting will work with the LA to establish local data-sharing agreements to share information about which students may be eligible and who should be supported to make an application.
- 3.4 The setting will work with local stakeholders to identify eligible students for vulnerable groups by:
  - Including information on the bursary within bulletins to social workers, published three times a year.
  - Developing networks with foster parents, schools, asylum support teams, youth offending services and health services.
- 3.5 The setting will use the DfE's Education 'Key to Success' service to establish whether students were in receipt of the pupil premium funding in Year 11 or received SEND support, which may indicate whether they are eligible for a discretionary bursary. The school will proactively approach identified students to see if they require support.
- 3.6 The setting will ensure that, in any marketing materials and the application form, procedures for how the institution maintains confidentiality are outlined to encourage more students to apply for the bursary.

## 4. Bursary Fund Statement

- 4.1 A bursary fund statement will be published every January on the school website.
- 4.2 The bursary fund statement will outline the following:
  - How the setting will use its funding
  - The eligibility criteria for the bursary
  - Terms and conditions for receiving the bursary, e.g. attendance and behaviour requirements
  - The type of support offered through the bursary, e.g. with transport, books and equipment

- Whether the bursary fund contributes to other costs, e.g. attending university open days and interviews
- A statement explaining that the support available to students is from the bursary fund

## 5. Eligibility

- 5.1 Students who are aged 16 or over and under 19 years old on 31 August before the academic year in question may qualify for bursaries for that academic year.
- 5.2 Students aged 19 or over can receive a bursary if they are continuing on a study programme they began aged 16 to 18, or if they have an EHC plan, provided they remain eligible and the setting determines they need the support to continue their participation.
- 5.3 Students aged 19 or over will not be eligible for bursaries for vulnerable groups.
- 5.4 The setting will only pay bursaries to students aged 16 or over, unless in exceptional circumstances, e.g. where a student is following an accelerated study programme. The setting will use its discretion to decide whether a student under the age of 16 is eligible this is explained further in the 'Discretionary bursaries' section.
- 5.5 Students on apprenticeship programmes, or any waged training, are considered to be employed rather than in education as such, they will not be eligible for the bursary.
- 5.6 Non-employed students aged 16-19 who are participating in a Prince's Trust Team Programme will be eligible to receive the bursary in the same way as any other student.
- 5.7 Students on distance learning provision will not likely need help from the bursary, but in instances where they require financial help, the setting will provide support in-kind, e.g. a temporary travel pass to attend exams.
- 5.8 Students can apply more than once if their circumstances change. In this case, they will be reassessed, including a one-to-one interview to determine if there are any exceptional circumstances to consider.
- 5.9 Most students who receive a bursary will get a tailored award from the discretionary bursary. Students in need of more support can apply for a vulnerable bursary.
- 5.10 Students must be participating in provision that is subject to inspection by a public body which assesses quality, e.g. Ofsted. The provision must also fall into one of these groups:
  - Funded directly by the ESFA or by the ESFA via an LA
  - Otherwise publicly funded and leading up to a qualification (up to and including level 3) accredited by Ofqual or on the ESFA list of qualifications approved for funding 14-19

## 6. Young Offenders

- 6.1 Students convicted or cautioned for a criminal offence, i.e. young offenders, can apply for a bursary if they:
  - Are serving a non-custodial sentence.
  - Have been released early from a custodial sentence, except on temporary licence.
  - Have been remanded to a non-secure institution.
- 6.2 As with all bursaries, the setting will provide in-kind support to young offenders rather than cash payments wherever possible.

# 7. Discretionary Bursaries

- 7.1 The setting will ensure that discretionary funding is allocated to the students who are most in need of financial support. The setting's eligibility criteria for receiving a discretionary bursary will include:
  - Students who are completing a high cost course (over £2,000) in which specialist equipment and clothes are required, including industry placements.
  - Students living in a low-income household
  - Students who are from a single parent family or have one or more dependent siblings in their family.
  - Students who have additional responsibilities, such as being a young carer or parent.
  - Students who travel greater than **five** miles to the institution.
- 7.2 Discretionary bursaries may be awarded for students in low-income households. The setting will use household income(total benefits in addition to any net pay), in some way, to help establish the amount of support awarded to a student, if possible.
- 7.3 The amount awarded will be dependent on the amount of household income this will be allocated on different levels, as follows:
  - L1 discretionary bursary: total household income is less than, or equal to, £16,190
  - **L2 discretionary bursary**: total household income is more than £**16,190**, but is less than, or equal to, £**20,817**
  - L3 discretionary bursary: total household income is more than £20,817, but is less than, or equal to, £25,521
- 7.4 Students who apply will be assessed individually. This assessment will be documented and evidence to support the claims will be obtained and retained for auditing purposes.
- 7.5 The assessment will be based on a student's financial needs and the setting will consider any unearned income, such as shares or investments, savings, and rental income.
- 7.6 The setting will not make blanket or flat rate payments to all students or students in the income bands outlined above without considering the actual needs of each student.

- 7.7 The setting will use in-kind payments over cash payments for discretionary bursaries wherever possible.
- 7.8 The setting will manage the discretionary bursary to keep payments within budget. Where possible, the setting will retain a small emergency fund from its allocation to support students who face exceptional circumstances during the year due to a change in their situation that impacts on their ability to participate in education evidence of a student's eligibility for emergency funds, the individual assessment and their actual participation costs will be held for audit purposes as for any other bursary award.
- 7.9 In individual cases of severe hardship, the bursary fund will be used where appropriate to provide food support for a student attending their programme of study. Food support will be provided where the setting believes the student to be in real need, and will not require checks on household income or other evidence-gathering that would usually be required. Where food support is provided, copies of the following records will be retained for audit purposes:
  - The total number of students provided food support
  - The number of days this support is given to each student
  - The total value of support given to each student along with the rationale for its provision
  - Signed confirmation of receipt funding by the student or actual spend receipts

### 8. Vulnerable Bursaries

- 8.1 The setting's eligibility criteria for receiving a vulnerable bursary will include students who are:
  - Looked After Children (LAC) (this includes those classed as an unaccompanied asylum-seeking child).
  - Previously Looked After Children (PLAC).
  - Receiving Income Support or Universal Credit because they are financially supporting themselves and/or someone who is dependent on them and living with them, such as a child or a partner.
  - Receiving Disability Living Allowance or Personal Independence Payments in their own right, as well as Employment and Support Allowance (ESA) or Universal Credit in their own right.
- 8.2 Via the application form, the setting will remind parents that they will not be able to continue to claim Child Benefit if the student successfully applies for ESA.
- 8.3 Students who are in one or more of these categories can apply for a vulnerable bursary of up to £1,200.
- 8.4 Where a vulnerable student is on a course lasting 30 weeks or more and is participating full-time, they will be eligible to receive up to £1,200; students on study programmes of less than 30 weeks will receive a pro-rata amount the setting will consider the number of hours involved in eligible student's study programmes when deciding if a pro-rata payment is more appropriate.
- 8.5 The setting may pay a student in a vulnerable group more than £1,200 if it believes the student needs extra help to remain in education; the extra payment will be paid from the setting's discretionary

- bursary allocation or its own funds. The rationale for such a decision will be included as part of the setting's auditable records.
- 8.6 The setting will only pay students the amount they need to access education, based on individual assessment. Students will not automatically receive £1,200 or a set amount of funding unless this is in line with their actual financial need.
- 8.7 Proof will be needed to evidence that a student is eligible for the bursary, for example:
  - LAC or PLAC: written confirmation, such as a letter or an email, of current or previous LAC status from the relevant LA (the LA that looks after them or provides their leaving care services)
  - In receipt of Income Support: a copy of the Income Support award notice, which must evidence that the student is entitled to the benefit in their own right, and confirm that the student can be in FE or training
  - In receipt of Universal Credit: copies of the Universal Credit Award notice from the last <u>three</u> <u>months</u> to estimate assumed income for the year which must evidence that the student is entitled to the benefit in their own right, as well as additional documentation to confirm their independent status, e.g. a tenancy agreement in the student's name, a child benefit receipt, children's birth certificate, or utility bills
  - In receipt of Universal Credit or ESA and Disability Living Allowance or Personal Independence Payments: a copy of the Universal Credit or ESA award from the Department for Work and Pensions (DWP), as well as evidence of receipt of Disability Living Allowance or Personal Independence Payment.
- 8.8 The setting will only submit a funding claim to the SBSS once sufficient evidence has been provided and the setting has confirmed that the student needs financial support to participate.
- 8.9 The institution will be responsible for assessing whether students are eligible to receive a vulnerable bursary.
- 8.10 The institution may decide that, although a student may be eligible for a bursary, as they fall within one or more of the vulnerable groups, the bursary is not required as they do not have any financial need and do not need further support. If financial needs are already met and there are no other costs or they do not require the maximum award, the institution may decide not to allocate a bursary to the student for example, where:
  - A student attends specialist residential provision that covers their education costs in full.
  - A student undertakes a distance learning programme and there are no financial barriers to participation, e.g. no travel or food costs.
  - A student is in LA care and education costs are covered in full by the LA.
  - A student is financially supported by their partner.
- 8.11 Where the setting decides that a student is ineligible for funding in accordance with the above criteria, the setting will explain to the student and/or the student's parents the aim of bursary funding and why it is appropriate to not award any in this instance <u>during a face-to-face meeting</u>, <u>followed by written confirmation</u>.

- 8.12 If a student or the student's parents still want to claim a bursary for vulnerable groups, they must inform the setting. The setting will then consider the particular circumstances in each case and assess whether:
  - No bursary should be awarded, as the student has no financial needs; or
  - A reduced bursary should be awarded, as the level of financial help needed is limited.
- 8.13 The setting will ensure its bursary application form is clear about the possibility of no award or a reduced award.

# 9. Paying Bursary Funding to Eligible Students

- 9.1 The setting will aim to pay all funding in-kind, using cash payments only where necessary.
- 9.2 Payment in-kind may include, for example, travel passes, vouchers or credits for meals, or required books or equipment.
- 9.3 Where in-kind payments are given to students within vulnerable groups, the setting will explain the value of these payments to the student and how these have been deducted from the total £1,200.
- 9.4 Where payments are made to students, rather than in-kind, the funding will be paid by BACS transfer to the student's own bank account.
- 9.5 Payments will not be paid into another person's bank account unless exceptional circumstances mean that a student is unable to administer their own account. If a student cannot manage their own funds, the setting will consider who can manage the bursary on the student's behalf.
- 9.6 The setting has the right to determine how often payments are made when doing so, the following will be considered:
  - The reason the bursary was awarded
  - The student's circumstances
  - Local arrangements
- 9.7 The setting has the right to insist that students only spend bursary payments on the support that has been identified as necessary to help them access education, e.g. to pay for travel costs.
- 9.8 The setting will adhere to good practice guidelines to make regular payments to students on a **weekly** basis.
- 9.9 The setting will not pay bursaries to students in large or lump sums.
- 9.10 In order to decide how best to use individual students' bursary funding, the setting will employ the following procedures:
  - Every student who qualifies for a bursary is offered an interview with a financial support advisor to decide the best way to allocate their support
  - Priority areas are addressed first, including travel to the setting, equipment costs and support with studies

- Students are allocated a higher amount of funding at the beginning of their course to address the priority areas
- A percentage of the funding is kept back as a hardship fund to respond to any emergencies that
  may arise during the year the total amount held is discussed with the student during the
  initial interview
- The student services team meet with individual students on a <u>regular</u> basis to help them with budgeting
- 9.11 If students or their parents have any queries about payments, they should contact the **Head of Sixth form** via **hello@asa.hslt.academy** or telephone the school reception on **01482 781912**.
- 9.12 The setting may use up to five percent of its allocation from the ESFA for administrative costs.

## 10. Conditions for Receiving Bursary Funding

- 10.1 Receipt of a vulnerable or discretionary bursary will be conditional on the student meeting the agreed standards set by the institution.
- 10.2 The conditions of payment will be clear and accessible to students, as well as being thoroughly explained as part of the induction process.
- 10.3 Evidence that the student has seen and agreed to the conditions will be kept for audit, such as an agreement signed by the student, in accordance with the 'Student declarations' section.
- 10.4 Students in receipt of bursaries must have 90 percent attendance at timetabled lessons, unless the absence is authorised. Consideration will be given to the impact on attendance that might be caused by illness, caring responsibilities or other exceptional circumstances.
- 10.5 In line with the setting's Attendance and Absence Policy, students that are absent due to sickness will be expected to present a note from a qualified medical practitioner if their absence is longer than **three** days.
- 10.6 Vacation breaks outside timetabled school holiday times are not permitted.
- 10.7 Students in receipt of bursaries will be expected to abide by the Behaviour Policy of the setting.
- 10.8 Where there are concerns regarding a student's attendance or behaviour, the setting will discuss the issue with the student and consider individual exceptional circumstances before withholding any payments. In all cases, sanctioning will not occur to the extent a student's ability to attend education is undermined.
- 10.9 The setting will ensure that all parents and students are aware of the possible impact that attendance may have on payments, outlined in the application form.
- 10.10 The setting will stop payments where a student withdraws themselves from a study programme.

- 10.11 Money may be taken back from students if it has not been spent for the reasons it was awarded to them. Before doing so, the setting will always consider the impact of this on the student.
- 10.12 The setting may specify that students return any books and equipment purchased for them through the bursary, such as a laptop, at the end of their study programme for use by other students. This will be clearly communicated to students and their parents upon confirming eligibility for the bursary.
- 10.13 The setting will require receipts for expenditure where appropriate to confirm that funding is being used for the reason it was awarded. For standard weekly costs, e.g. travel and food, receipts will not be collected for each transaction, and will instead be evidenced initially by receipts and then paid afterwards linked to attendance. Students may be asked at various points in the year to provide further receipts. For one-off or infrequent costs, receipts will always be collected. In all cases, students will not be asked to incur expenditure and provide a receipt prior to receiving funding payment will be made first and a receipt provided afterwards, as necessary.
- 10.14 The setting will highlight to students and parents the impact of receipt of the 16-19 Bursary Fund on other benefits. This includes information that:
  - Receipt of bursary funding will not impact the receipt of other means-tested benefits paid to families, e.g. Income Support.
  - Receipt of Disability Living Allowance or Employment Support Allowance will mean parents can no longer receive certain benefits for that child, e.g. Child Benefit.

# 11. Recycling Bursaries

- 11.1 The setting will be able to recycle unused funding for bursaries for vulnerable groups, e.g. if a student leaves early after only receiving part of their bursary (until 30 April annually).
- 11.2 Where the setting has accrued funds as specified above, it will use these funds for another student, rather than claiming for the full £1,200, e.g. if a student left and £700 was unspent, the setting will only claim £500 towards another eligible student.
- 11.3 If the setting has enough funds to cover the costs of a full bursary (£1,200), it will submit a funding claim showing a value of zero to the SBSS and use the amount to fund the new student.
- 11.4 If the setting decides that a student is in one or more of the defined vulnerable groups, but does not have any actual financial need, it will submit a funding claim showing a zero amount.
- 11.5 The setting will be able to add any funding for bursaries for vulnerable groups it has claimed, but no longer needs, for eligible students for discretionary bursaries (from 1 May annually). Funds will be allocated in this way on a case-by-case basis after assessing students' needs.
- 11.6 The setting can also carry forward any unspent funds to the next academic year any carried funds will only be used to support students in line with this policy, and will not be added to general funds. Unspent funds carried forward will be used before using the setting's new academic year allocation.
- 11.7 If the setting has no other students who are eligible for a bursary for vulnerable groups and funds have been claimed in error, it will contact the ESFA and arrange to return the funds.

#### 12. Student Declarations

- 12.1 Students and/or their parents will sign a declaration when they apply for either a vulnerable or discretionary bursary, confirming that any evidence given in support of the application is correct.
- 12.2 By signing the declaration, the student and their parents are agreeing to all the conditions and eligibility criteria.
- 12.3 The setting will retain copies of the declaration and supporting documentation for six years this includes:

#### For vulnerable groups:

- A copy of the funding claim sent to SBSS.
- Evidence showing that the student is eligible, in line with this policy.
- Evidence of payments received from the SBSS, e.g. bank statements.
- A copy of the student's individual assessment of actual financial need.
- Evidence of payments made to the students.

#### For discretionary bursaries:

- Evidence used to assess eligibility, such as individual circumstances e.g. whether the student has an Education, Health and Care Plan (EHCP) and an assessment of household income.
- A copy of the student's individual assessment of actual financial need.
- Receipts for purchases made, e.g. bus pass, lunch receipts or book receipts.
- 12.4 All data will be handled confidentially and stored securely in line with the Data Protection Policy.

## 13. Managing Applications

- 13.1 The setting will use its own application form for the bursary fund.
- 13.2 The application form will capture all the relevant information needed to assess the application in line with this policy, including:
  - Household income.
  - The student's actual financial needs to support their participation.
  - Specific deadline dates.
  - The student's signature indicating they have seen and agreed to the terms and conditions of the funding and that all information provided is accurate.
- 13.3 All applications for the 16-19 bursary will be submitted by **30th September** of each year wherever possible, to allow the setting to correctly and fairly assess overall demand and distribute discretionary awards. The setting will not, however, implement a cut-off date for applications, in recognition that some needs may arise throughout the academic year.

- 13.4 The date for applications to be submitted will be outlined in the bursary fund statement, the bursary application form and any marketing materials.
- 13.5 Application forms and marketing materials will outline that students who meet the criteria for bursaries for vulnerable groups are not automatically entitled to receive them, e.g. if they do not have any financial needs or these needs are covered by alternative means.

# 14. Quality Assurance

- 14.1 The setting uses the ESFA's <u>16 to 19 Bursary Fund Checklist</u> to confirm which documents have been provided for each student, as outlined in the '<u>Student declarations</u>' section these relate to the following:
  - The application process
  - The decision to award the specified amount of bursary
  - The funds that have been issued to the student
- 14.2 The setting maintains written records of the following:
  - The number of applications received
  - The value of all bursaries awarded
  - The purpose of all bursaries awarded
  - Which applications qualified for the bursary and which did not
  - Brief descriptions of the institution's justification for any decision to award a bursary or not
- 14.3 The setting retains copies of any documents the student has signed to give formal agreement to their conditions for payment, as well as any others mentioned in this section, for six years.

#### 15. Fraud

- 15.1 The setting will be responsible for investigating any suspected instances of fraud relating to bursary fund applications.
- 15.2 Students and their families will be informed that providing false or incomplete information that leads to incorrect payments or overpayment may result in a referral to the police with the possibility of the student and/or their family facing prosecution.
- 15.3 If evidence comes to light that supplied information is misleading or fraudulent, the setting will stop any further payments and will attempt to recover any payments already provided to the student.
- 15.4 Where significant fraud is identified, the setting will report this to the ESFA. Significant fraud involves one or more of the following:
  - The amount of money is in excess of £5,000
  - The particulars of the fraud are novel, unusual, systematic or complex
  - There is likely to be great public interest due to the nature of the fraud or the people involved

## 16. Conditions For Using The Bursary

- 16.1 The bursary fund will not be used by the setting for any reasons which would give them a competitive advantage over other settings, such as:
  - Enrolment or administration fees imposed by the setting.
  - Fees for access to facilities in the setting.
  - Block subsidy of the canteen.
  - Block subsidy of transport.
  - Block provision of equipment, material or books.
  - Bonus payments to reward attendance or achievement.
- 16.2 Block payments to students for attendance, irrespective of their actual financial need, will not be paid.
- 16.3 The bursary fund will only be used for supporting students who have a genuine financial difficulty which might prevent them from continuing in education, rather than acting as an incentive for attendance.

# 17. Complaints and Appeals

- 17.1 All complaints and appeals must be made in writing in accordance with the Complaints Procedures Policy.
- 17.2 If the complaint or appeal concerns operational processes or customer service for a vulnerable bursary funding claim, the SBSS will deal with the case. If the case is not resolved following this, it will be passed to ESFA.
- 17.3 The setting will act as a first point of contact for students who have complaints and will support students as much as possible throughout the complaints procedure.
- 17.4 Complaints made regarding the setting and the setting's provision of support will be dealt with in accordance with the procedure set out in the Complaints Procedures Policy.

#### 18. Monitoring and Review

- 18.1 This policy will be reviewed annually by the Chief Financial Officer (CFO). This policy will be approved by the Chief Operating Officer (COO).
- 18.2 The next scheduled review date is shown on the cover page of this document.
- 18.3 The setting will ensure that this policy is implemented correctly and appropriately at all times.
- 18.4 The setting will communicate any changes to this policy to all staff and relevant stakeholders.