Welsh Government
Consultation – summary of responses (updated)

Disabled Students' Allowances (DSAs)

July 2020
Updated September 2020

Summary of responses

Question 1 - Do you agree that one allowance would be better than four separate allowances?

Yes	59	55.14%
No	17	15.89%
Not Sure	29	27.10%
Left blank	2	1.87%
Total responses received	107	

Overall, most respondents felt that having one allowance would be better than four separate allowances.

The most obvious theme from Question 1 responses was that respondents welcomed the flexibility and simplification one allowance would offer but expressed concern around the potential inclusion of the travel allowance. Most respondents commented that the travel allowance should remain separate, with a number further suggesting that an additional, separate 'exceptional' allowance should be made available for those students with 'low incidence, high cost impairments'.

The positive points included:
- Positive change for students with more complex needs;
- Welcome the alignment of Undergraduate (UG) and Postgraduate (PG) allowances;
- Be more straight forward to administer and explain to students;
- Easier for learners and parents to understand and less complicated for SFW;
- Reduce the time spent applying for additional funds from the general allowance as this can take time due to the funding process and results in a delay to continuing support;
- Students should be able to use all the allowance in the areas where support is needed;
- Streamlined allowances will be more cost-effective. The system would be easier to navigate for students;
- One allowance would mean that all aspects of support would be more easily accessible.

The negative points included:
- Having separate allowances help manage customer/student expectations and head off unreasonable requests;
- Having categories provides a meaningful structure for the assessment and highlights the types of support available;
- A risk with dispensing with categories is to the student's independence. It would be easy to provide all support in the form of NMH which may create a culture of dependency and ill prepare students for life outside the HEP;
- The maximum equipment allowance must be raised or removed all together to allow disabled people to purchase the most appropriate equipment for their needs;

- Given the issues with Universal Credit rolling out one payment/allowance system, consolidating would not bring benefit to the students;
- It would reduce the amount available for non-medical help, they should remain separate to encourage individuality;
- May disadvantage students as the equipment allowance is a one off and as such would have to be debited from the first year of support;
- May make the allocation of funds difficult to justify, students would like to spend more from one allowance than is currently allowed by taking from other allowances, may see a total amount and expect this amount to be allocated;
- The current system works well for students, do not believe it to be in the best interests of the student.

Those who were unsure raised the following points:
- A single allowance will need to consider the higher transitional costs which can occur during the early stages of study;
- Does not matter if there is one or four allowances, what matters is that there is sufficient funding available to meet the student's disability study needs;
- Many students use only a fraction of their entitlement available, there should not be an upper limit set, rather an open opportunity to make an application based on need.
- Depends whether the proposed one funding allowance would be capped which potentially could disadvantage learners with complex or multiple support needs;
- Might be better to distinguish between the different disabilities, especially when it comes to sensory impairment;
- Funding bodies must provide clear guidance to how the money can be spent;
- The travel allowance to be considered as another separate allowance.

Other points raised in response to this question:
- Consideration to the VAT element as some NMH are VAT registered and some are not, increasing the amount of allowance used;
- Review the 24p per mile allowance;
- Consider the impact of students existing free travel pass and abolish cost of travel deduction, the practice of deducting normal commuting costs can leave a disabled student out of pocket;
- Care needs to be taken not to conflate DSA costs and the HEP's duty under the Equality Act;
- Having funding carefully targeted to meet the student's needs rather than in four crude bands would help assessors and agencies better meet their needs;
- One allowance would be better if it was the same level of help;
- Only if it doesn't result in cutting the amount awarded, flexibility for student and assessor to determine what is needed, without worrying about what category it comes under and that there is sufficient funding available would be better. Must not become a one size fits all.

Furthermore, NUS Wales suggest that any new system should be subject to a comprehensive review by Welsh Government within three years of launch.

Question 2 - Could a DSA 'package of support' be awarded rather than requiring every disabled student to undergo a study needs assessment?

| Yes | 34 | 31.78% |

No	47	43.93%
Not Sure	23	21.50%
Left blank	3	2.80%
Total responses received	107	

Overall, there was little difference between those respondents who felt that a DSA 'package of support' should not be awarded and those who felt it could be beneficial.

The positive points included:
- Recognise the logic of a package of support to provide quicker access to support with the same outcome and ultimately achieve better value for money;
- The EDA assessor's professional standards, expertise and knowledge means that they can easily make the recommendations necessary for support;
- A standard package of support could work for certain groups of students but this would require more consideration than this consultation currently affords;
- In some circumstances (i.e. SpLD) it may be appropriate for standard packages of support to be predetermined which should meet the needs of the majority of students within that category;
- In reality, this happens anyway, this is hugely beneficial to students because of the shorter timeframe;
- Creating a package would speed up the process for many students and ideally there would be flexibility in the package if amendment to equipment was required;
- If clearly communicated to the student, it might remove some of the hoops in the DSA process;
- Providing that it's really clear to students that they do not have to accept this, it could speed up the process for students with conditions where recommendations tend to be fairly standard. It would need to be done sensitively;
- With regards to which disabilities could be considered as having their needs met by an agreed suitable package of support, and what those packages of support might be, data from past reports should be used to determine this;
- Could assist with simplifying the process;
- In principle, this is a good idea. The current system wastes large amounts on forcing students with common disabilities such as dyslexia to attend needs assessments, when a disability adviser should be capable of recognising what support is required;
- Needs assessments are necessary for more complicated conditions – any research conducted will uncover a uniformity of recommendations for say, dyslexic students.
- The current cost of needs assessments is way too high and differs across the country, as does the standard of reports. Assessors rarely contact universities to enquire about on-site support or for information about the course, they often recommend unnecessary support;
- Assessments can feel as if there is a level of judgement even though staff are non-judgemental and helpful;
- If their needs are straight forward, it could be beneficial if students get equipment straight away. However, if complex, then an assessment will be needed.

The negative points included:
- This undermines the core premise and benefits of the DSA concept;
- Making assumptions on disability is a medical model and highly assumptive – the current system requires a medical model approach to eligibility and the needs assessment allows a social model approach;
- It would require all students to disclose their disability to the university which many do not wish to do, it may be illegal to suggest they do just to access DSA support;

- Disability advisor capacity in HEPs is very tight, they will not have time to do this extra work;
- HEPs disability and wellbeing officers are not sufficiently staffed or skilled to come close to the current performance of assessment centres;
- Adding multiple pathways to DSA will be confusing and result in multiple tier support;
- This system would not be possible for HE courses delivered at further education colleges;
- HEP disability advisor would not be able to support a non-enrolled student, this will prevent students accessing DSA in advance of receiving an unconditional offer and receiving their kit in advance of starting university; removal of the professional analysis of assessment will mean personal and customised support will be hollowed out;
- Students who need to be encouraged to engage with support would be more likely to choose a package and forego a full needs assessment;
- Many students will not feel confident to refuse a package of support and request a needs assessment;
- It is important for the assessment process to be on-going as the student discovers what works for them and what does not, as well as the way their disability impacts them changes;
- Offering a package of support could be very damaging for students suggesting that others know more about their support needs than they do;
- Risk deterioration in the student experience in comparison to the current system;
- Concern over whether SFW can genuinely predict when items are needed or not, how they are being used, quantities and types;
- Will lead to students receiving inadequate and/or unsuitable support;
- Not suitable for autistic person as the extent to which a person is impacted will not be clear without an in depth understanding of the individual, who may be masking their disability;
- A concern would be the inclusion of non-medical help within any pre-agreed package;
- Removing the assessment interview from the DSA process eliminates the 'value added' recommendations assessors are able to make which incur no cost;
- For universities to take on additional responsibility, it would require significant staff resource to be made available;
- Increase in the workload of disability assessors will create more delays for both current students as well as applicants;
- Even for disabilities such as dyslexia, that have similar features and software packages designed specifically for difficulties such as spelling, each student will differ and have different opinions on the support they require. Concerned that without the needs assessment, students would receive inadequate support and not make the most out of the software or equipment recommended;
- In terms of person-centred practice and neurodiversity, making the assumption that all learners, for example with dyslexia will require the exact same support recommendations is unprofessional and not always conducive for the individual. The majority of learners who apply for DSA have co-occurring difficulties and therefore, specific and individual support recommendations would need to be considered in order to remove barriers to accessing education;
- Everyone is different and every person's study needs support is different. An informed assessment can make the difference between a student's success or failure in their academic studies;
- Many students are completely unaware of their support needs. Additionally, they do not know what support is available to them via the DSA until they get into the needs

assessment. Therefore, if they are simply offered a 'package' they could be missing out on support that they need, but they would be completely unaware of this;

- Although the consultation is suggesting that students can opt for a needs assessment later in their course, in many cases, how are they meant to know whether they actually require additional support unless they have a meeting with a specialist needs assessor;
- Many students tell us they feel a sense of relief following the assessment as they have spoken it through with somebody (often they have never had this opportunity);
- Needs Assessments are crucial as these are highly specialised and help identify individual needs;
- It would disadvantage students to replace a needs assessment, which is a specialist and personalised assessment, with a generic package of support. A generic package can only ever meet the needs of a 'typical' student with a specific disability, so students with 'atypical' needs would not have these needs met;
- The suggestion that students can request a full needs assessment assumes that they would be able to do so. In my own case I know that if I had been offered a standardised package of support rather than a needs assessment, my communication difficulties and low self-esteem would have prevented me from doing anything other than accepting whatever support was given to me, whether I felt it was what I needed or not;
- I think it is crucial that someone fully qualified can assess an individual to consider all aspects of their needs and to ensure full support is available. From my own experience, being able to have my needs assessment before starting my course helped me tremendously. I feel like not having a needs assessment could mean missing out on potential support that might be specific to that person. I do not feel a package would be better than support decided on after a more intensive assessment;
- My needs assessment put me at ease by informing me of help available and even previewing equipment to see what would be best suited for my needs;
- The £600 cost does seem excessive;
- Those with existing support and a clear idea of their support needs could be have a simple, efficient needs assessment. That would still allow for tailored assessments and support without an unnecessary and long process. Those who are completely new to even the idea they might have a disability or who discover a brand new one during the initial assessment could then be given more detailed/extended assessment appointments;
- The waiting time to receive support could be solved by phasing its rollout - give the support that meets known needs or that can be provided easily straight away. And deliver the rest as soon as possible;
- I would not have received the equipment that was useful to me [without an assessment], the assessor showed how each device worked, asked a lot of questions and they showed me how they all would suit my needs. This was valuable as I would not have known what would have been helpful without this time taken.

Those who were unsure raised the following points:
- Who would be responsible for compiling and checking the packages are fit for purpose;
- Concerned that if not implemented carefully, the proposed package of support could reinforce the stereotypes associated with specific disabilities and perpetuate a homogenous view of diagnostic labels rather than seeing students as individuals;
- Distance learning students may need a different package of support to campus based students;

- By accepting a package of support a student may not benefit fully from exploring the range of assistive technology options and the varieties across software offering similar functions. This could lead to a lack of engagement placing greater strain on support services and disadvantaging students;
- It must be noted that needs assessments provide additional benefits alongside the final support recommendations, it could be the only time a student has an opportunity to talk about their needs and the support they could benefit from with an experienced professional, for a prolonged period of time;
- If implemented, this would impact on the workload of HEI staff and require additional training and upskilling;
- Who resolves any issues for students that have been recommended a package of support;
- Concerned that any screening process is essentially a partial assessment;
- Study needs assessments for DSAs are independent to what is available via institutional funding for reasonable adjustments;
- Package will need to be made clear in a timely manner for the student to consider;
- There would need to be a follow up system to ensure items in the package are effective, not redundant and that sufficient training is provided;
- Because of the transfer of costs of DSAs to the HEP, budgets would need to be devolved to the university to ensure strategic resource planning to meet demand;
- The system would still require some form of assessment where they provide written evidence and perhaps based on student's disability, they should be categorised, the category should determine how much they get in their package of support;
- Concern that the provision of support (particularly AT) without the support and guidance from a needs assessor to explain and demonstrate the functions and benefits could result in a lack of take up of support and place additional demand on the HEP disability services;
- If separate conditions have separate packages it may become more difficult to quality for them, warn against making everyone have to medically prove every condition they have.

Other points raised in response to this question:
- Welcome the intention to reduce the length of time students have to wait for assessments but do not believe this is an appropriate way to address the problem, the Welsh Government should look into the reasons these delays occur and seek to rectify them by alternative means. This was supported by NUS who opposed the awarding of generic packages of support without a proper study needs assessment. However, they welcomed the intent to reduce the waiting times for students, but believe there are several measures the Welsh Government could take to streamline the process without reducing the amount of assessments that happen.
- It was accepted by a number of respondents that there can be commonality in the recommendations made for students, however, they cited that this is due to the limited availability of tools in the assistive technology area and the friction in the DSA system to accept a recommendation for an unfamiliar tool. Assessors abide by the rules to ensure that students get some support rather than no support.
- Respondents reported that assessment reports have become unnecessarily complex and cumbersome and potentially remove the focus from the assessment interview which should be the heart of the process, a shorter streamlined assessment report would reduce delays that arise from writing the current lengthy report.
- Effective quality assurance processes are crucial if Welsh Government is to be confident that knowledge and understanding around specialist equipment and assistive technology is applied consistently across the sector;

- Consider use of the SEN statement if the student has one;
- Allow students the grant or a free screening process. Then, a package based on their needs makes sense- be this points-based, but essentially after a full needs assessment. Everyone is different. This should be free. Education should be free let alone the assessment to determine your needs in education;
- We have already seen over the past 20 years a dramatic decrease in the options available to assessors to support students [with assistive technology]. It would be most irresponsible to pick just one from each area [of support] and make a student reliant on that product;
- It would be beneficial if there was an easier way for students to obtain their paperwork. The suggestion of an online portal seems like a sensible idea to help solve this issue. SFW also will not send the student's paperwork to the assessment centre directly; if there was a solution to this and assessment centres were able to obtain the paperwork from SFW, I believe that the total timescale would be reduced significantly;
- There is a cross border issue here given that England is not following the proposed Welsh model. We should be aiming for consistency and equality of support among disabled students;
- Every student is different and will need a different pattern of support (though some support is fairly standardised, such as for dyslexia). It is important that a Disability Advisor does an assessment based on the support available at the University and that DSA is accessed in top of this;
- Part of any new change should be to require universities to move towards a more inclusive environment (already the case for many) and be required to show how they are doing this. E.Gs could be publishing 'mainstreamed adjustments' and introducing lecture capture/inclusive teaching.

Question 3 - Should the student's HE provider be responsible for arranging DSA funded support?

Yes	32	29.91%
No	40	37.38%
Not Sure	32	29.91%
Left blank	3	2.80%
Total responses received	107	

Overall, respondents felt the student's HEP should not be responsible for arranging DSA funded support. However, there was little difference between those respondents who felt they should not be responsible and those who were unsure or felt the HEP should be responsible. There was no difference between the latter two groups.

The positive points included:
- Support co-ordinated and provided by the HE institution would offer greater benefits to the learner, including accessibility, consistency and a person centred approach;
- HEP can tailor support more easily for each student and fit the training schedule around the timetable;
- Having a greater understanding of the environment and task related challenges disabled students are likely to face whilst at university allows the university's assessment centre to apply a social model of disability to the assessment;
- It is preferable to have support co-ordinated and provided by the HEP recognising that some mature students like to source their own support;

- The quality of support and engagement is better with in-house (HEI) support;
- Students who build a relationship with Disability Service Advisors are more likely to have a better student experience;
- The HEP has more responsibility for ensuring that reasonable adjustments are implemented and therefore welcome having more autonomy in this area, particularly arranging and ensuring quality of provision;
- HEPs would arrange their own service standards to ensure quality of provision although there should be consistency across the sector with a clear framework of standards based around student's needs;
- Outside providers are mostly doing it for commercial gain, much better to organise DSA in-house to tailor support that suits the organisation and ethos of the HEP as well as the student. Any 'profit' can be used in-house for the benefit of the student;
- Students who are eligible to apply for DSA usually have difficulties with organisation, planning, time management and therefore benefit from support and intervention from the HEI / Learning Support Department in order to facilitate the DSA application process;
- A HEP based assessment centre ensures that the assessors are familiar with the local provision of DSA support, and enables them to ensure that they do not raise expectation in making recommendations that are not possible within that university.

The negative points included:
- NUS Wales are concerned that this risks monopolising the sector and reducing available choice to students;
- NUS Wales absolutely oppose quality assurance resting with the higher education provider. Giving HEPs responsibility for monitoring and managing the quality of services to which they are affiliated would not provide the level of independent oversight needed;
- HEPs or FE providers may not have the in-house expertise to carry out and quality assure study needs assessments;
- Concerns that the HEP may make recommendations that are financially beneficial to the institution rather than what is appropriate for the student;
- A number of respondents expressed their concern that HEPS setting their own service standards could create a postcode lottery where students will choose a course depending on the quality of the disability support. There should be one set of standards coproduced by disabled people and the organisations that support them to be applied and monitored across Wales;
- A number of respondents shared the view that this would have an impact on the student's right not to disclose their disability to their HEP;
- Concern raised that applicants of distance learners would be forced to access DSA assessment services at their HEP, for many disabled students, travelling to a pre-designated centre may present significant barriers;
- The HEP's have a duty of care, however, this does not extend to being involved in how personal allowances are administered or used by the student;
- The current practice of using registered centres has many benefits, students can choose a centre near to home or chose an assessor who understands their condition;
- Students often transfer to other HEPs so it would be expedient if the management of the budget and the arrangement of support remains with the assessor;
- Concern that locating control of the budget within the HEP could create an awkward relationship between the student and their HEP more generally;
- Should not lose the benefits of having the it handled independently by an assessor of the student's own choosing, this level of control empowers the disabled student and is compatible with the social model of disability;

- Consider a model where greater collaboration between university affiliated centres is encouraged;
- Some student support can help with transitioning and they need to have support in place ready for when they start;
- Leaving the choice of HEP late will result in a bottleneck resulting in delays in implementing adjustments;
- In some cases - such as distance learning providers - this would be difficult. Students in these circumstances need the support in their local area and for providers to have agreements in place in every part of the country is a big ask;
- HEPs are likely to restrict recommendations to the few pieces of assistive software / equipment they have awareness of and a site licence for;
- Assessment centres should be re-tasked with following up the recommendations that have been made and approved by the funding body therefore helping the student experience a smooth, independent transition into their support package;
- Smaller specialist providers are in an excellent position to fulfil the needs of disabled students. They can be more agile than HEPs which have long management chains;
- One other service that an external provider can fulfil is continuity of support. Some students who are very anxious, as a result of their diagnosed condition, find it very difficult to transfer from one organisation to another. If their support is provided externally, this can be achieved seamlessly at a considerable benefit to the student;
- There is a conflict of interest in the proposed model which will be difficult for HEPs to manage – they will be responsible for arranging diagnostic assessments, recommending support as a result of the diagnosis, and providing that recommended support.

Those who were unsure raised the following points:
- A number of respondents raised the concern that there was little detail given about how arrangements would work for Welsh students studying at an English HEP;
- Complexities around course administration and responsibility for support, for example franchised courses delivered in FE institutes;
- Having a mix of services within and outside of the HEP ensures the best possible balance for the student;
- HEPs should lead on ensuring students apply for DSA and signposting access to assessments;
- There are some scenarios where HEPs cannot provide support themselves or need to provide a timely service;
- An approach to have affiliated centres to carry out the assessments could work but these centres should not be legally bound to a single institution;
- Not all universities have needs assessment centres;
- The educational institute where the student decides to study should have some responsibility in arranging DSA. However, some collaboration and co-operation between people who work with the student whether it be a support worker, GP, parents/carer should all be involved in helping make the right decisions and deciding how much a student should receive based on their needs;
- If the 'pot of funding' is allocated directly to HEIs then it MUST be ring-fenced for disability support;
- There should still be a quality audit of said support that involves the professional bodies of the various user groups eg ADSHE, NAS and so on. The amount of bureaucracy and cost involved in administering students' DSAs could be far better spent on the delivery of the support to the students;
- There needs to be an easy-to-reach independent advocacy service if students are not feeling they're getting what they need;

- As an autistic adult I would struggle to use the non-medical help if it was provided by the university as I have a non-medical carer and travel buddies I use and trust already. If I was expected to not use my own non-medical helper and instead have to enlist the support from a university staff member who was unknown to me it would deter me from continuing with my study;
- If the HEP is responsible for arranging DSA funded support then this will reduce competition and may result in a poorer service.

Other points raised in response to this question:
- ColegauCymru states FEIs in Wales already establish and procure the necessary support for FE learners. This allows them to maintain an efficient and effective service that may, where necessary, change over the period of a learner's course. Extending a similar service to HE students is perfectly possible and ensures a person-centred approach to meeting support needs.
- NUS felt that the Welsh Government should look to establish a quality assurance framework that guarantees an appropriate level of accountability in the system and identifies a suitable body to carry out audits;
- Care should be taken to ensure that DSA is there to support the individual student and not to replace the need for non-discriminatory services demanded by the law;
- Suggest setting up a DSA review group to monitor and review reforms as they are rolled out with greater representation from student groups;
- Student would need a clear process to raise concerns with SFW over decisions;
- The proposal that a student can follow the HEPs complaints process is not without complications. Currently applicants can apply for DSA however, an applicant would not be covered by the students complaints process as they are not a registered student and applicants cannot take a case to the OIA;
- Consideration should be given to a network of HEP based assessment centres, who can communicate with each other to ensure that recommendations are tailored to the proposed university;
- Students should be made more aware than they currently are, that they can choose their own provider. This would improve the service greatly as there would be greater competition, raising standards, and a broader range of service provision to support a wide range of circumstances. The proposed model will be in direct opposition to this progress;
- Effectively manage the conflict of interests between those undertaking the assessment and those providing the support.

Question 4 - Would improving the awareness of DSA's, particularly within schools and the medical profession, increase their uptake?

Yes	96	89.72%
No	1	0.94%
Not Sure	7	6.54%
Left blank	3	2.80%
Total responses received	107	

Overall, respondents that submitted a response to question 4 agreed that improving the awareness of DSA's would increase their uptake.

The following is a list of positive points and suggestions made in response to question 4:

- A number of respondents felt that work with doctors would improve the understanding of DSA and make provision of necessary medical evidence smoother and less costly to the student;
- Could seek to establish a 'passport' model of support for students with long term disabilities that enables continuity as they progress through the system;
- Establish a policy to allow a clear set of journey pathways for disabled students, of which DSA is the higher education level component;
- Have an automatic registration onto the DSA process for those with proven long term needs;
- HEP engagement and widening access teams should be 'hard coding' DSA awareness into their engagements with partner schools;
- There should be a permanent working group with stakeholders from HEPs, HE, FE, distance learning and community learning, and students themselves to help deliver improvements;
- Consideration must also be given to mature students when promoting awareness of DSA;
- There seems to be a conflict between the language used in schools and colleges and the language used by universities, UCAS and funding bodies;
- Using the UCAS forms to provide clarity, UCAS staff who advise students on applying to university have an essential role in destigmatising disability and promoting awareness of DSA;
- NUS raised that the awareness of DSA is only half the problem and the additional time constraints placed on disabled people in terms of applying for support has also been identified as a barrier;
- NUS suggest that the DSA system should move towards a social model of disability, the student would not be required to prove medical evidence but rather evidence that they will face barriers to accessing HE;
- DSA awareness should be delivered to all pupils collectively in order to raise awareness more generally;
- Improving the awareness of hidden disabilities in schools and in the medical profession would not only increase the uptake of DSA but expertise and identification of them;
- The National Union of Teachers Wales have highlighted that, given the substantial changes to the ALN arrangements for pupils aged 0-25, there will be opportunity for professional development and communication with ALN co-ordinators in schools and FE colleges over the next 18 months – there could be a key role for ALN co-ordinators;
- Create a guide that advises of required medical evidence that a student can take with them to GPs when seeking letters;
- Ideally a specific campaign targeted at schools and GP's would be highly beneficial;
- More support from SFW when medical evidence is not agreed;
- Consider employing personnel to directly meet with schools and doctors to ensure awareness is proliferated;
- An awareness campaign that uses student's experiences and voices to talk about how support is helpful;
- Create an interactive program in which the student inputs their disability, which then provides them with the information and guidance regarding the support available specific to that type of disability or impairment;
- Improve the understanding of eligibility as students do not identify as disabled;
- The term 'needs assessment' always needs a great deal of explaining, especially to disabled students who have had negative experiences with the term 'assessment';

- Raising the awareness about disability and inclusive teaching is a better way of ensuring disabled students no longer face the same barriers and therefore do not actually NEED any additional, individually funded support;
- Many schools seem to receive talks from SFW about finances, it would be helpful if the DSA was also mentioned in this talk. SFW/Assessment centres could also look into alternative forms of advertising to increase update. Using social media to advertise the DSA could be a good option as most students will use social media.

Other points raised in response to this question:
- Provide an opportunity to receive reimbursement for any acceptable medical evidence received by SFW if the student has obtained the evidence for the purpose of applying for DSA.
- Welsh Government need to revise their assumption that doctors are best placed to confirm how conditions affect us [students].
- Consideration of those with lifelong diagnoses and the provision of 'evidence'.
- Consideration of people who are already classed as disabled by the DWP (a government agency who set very tight rules on who they accept as having a disability) to be denied disability support when applying for student finance due to lack of evidence.
- The barriers that students will encounter due to a lack of information available to them is likely to be a deterrent. It is important that the application process is as transparent and straightforward as possible, to ensure all studies with disabilities can have access to support.
- The lack of information regarding both the application process and how to arrange receipt of their recommendations has a direct impact on a student's ability to receive the support for which they are eligible.

Welsh Language

The consultation also asked a fifth question seeking the views of respondents on any possible effects the proposals would have on the Welsh Language. 47 respondents answered this question, comments are shown below:

- Any quality assurance framework developed must include Welsh Language Standards in the service level agreement;
- All diagnostic assessments should be available through the medium of Welsh;
- Assessment centres should be required to ensure that a Welsh speaking disabled student is treated no less favourable in their support package, if they are the reason needs to be noted, for example, speech input software not available in the medium of Welsh;
- Language other than English may be a disadvantage regarding awareness of DSA and communication;
- Must ensure there are enough Welsh-speaking assessors to ensure that waiting times are not significantly longer than for English speaking students;
- Also issues around the lack of Welsh language assistive technologies such as screen reader software that will have an impact on students whose preferred language is Welsh;
- In some cases it might not be possible to give Welsh speaking students the same quality of support of English speaking students, for example where software is only

available in English, in these cases students should be given additional support to counteract their disadvantage;

- Welsh braille: resources are much scarcer in this format and Welsh braille support workers are very limited indeed. Planning & provision for individuals with Welsh braille skills will be needed far in advance of the start of courses
- An evaluation should be taken of SNA provision currently available through the medium of Welsh to determine whether there are regional issues/unmet demand;
- Language choice should be ascertained at the first point of contact and shared between any agencies or organisations who are part of the process without the need of the service user to have to repeat their linguistic preference;
- Some challenges around ensuring timely and accurate translation of screening reports and support needs for the wider use of the university population who may not be Welsh speakers;
- Don't believe there would be any detrimental/unfavourable effects from the changes proposed;
- There is opportunity to support Welsh language using a competitive market and see how software developers respond to ensure continuity of DSA business;
- If assessments and NMH provision responsibility is moved to the HEP only, any Welsh language user planning to study outside of Wales will not have the opportunity to avail of Welsh language services at in independent assessment centre in Wales;
- Welsh speaking Disability Advisors should be available to conduct screenings;
- Unlikely to have a negative impact on the Welsh language as HEPs have duties under the Welsh language Standards;
- Do not believe the proposals will have an impact on the Welsh language.

Finally, respondents were given the opportunity to report any issues associated with DSA. 42 respondents submitted a response, comments are shown below:

- Advice reforming the DSA working group but with a greater student representation;
- The current DSA system is administratively cumbersome, overly expensive and is unsuitable in its current format;
- Whilst a radical overhaul is required, we recognise this is not possible without alignment between SFE and SFW provision;
- Concerns have been raised as to the differences of support between FE and HEP. We would welcome a consultation on the support offered to disabled students in FE as we believe that many students may be prevented from progressing to HE due to the insufficiency of support in FE;
- The support should be based on the social model of disability and providers should ensure that all staff involved in the assessment and delivering support are trained to understand it;
- Accessibility should be integrated into the everyday business of HEPs
- There is a fantastic opportunity here for Wales to lead the way on improving the efficiency and effectiveness of the support;
- Create a unique student ID used to access services and software on any device, tied to university systems and the school system, but operated by Wales centrally to ensure privacy and consistency;
- AT training is vital to increasing the take up, usage and benefits of AT provided through the DSA. We propose that everything possible should be done to ensure that every student receives a minimum of one AT training session;

- As the guidelines for DSA are different in Wales than England, more clarity on what is or is not permitted would benefit all;
- We believe that administrative burden and delays to the DSA assessment process can be improved if HEPs are made aware that students have made an application and the status of the application;
- Cross border issues will become more significant with the divergence of DSA policy particularly between England and Wales, our concern is to ensure students have a consistent quality experience;
- We feel that the Welsh Government should consider ways in which to drive the development of more inclusive learning and teaching practices in Welsh HEPs;
- The Office for Students has set a target to reduce the disabled student attainment gap, recognising the difference in attainment is more significant when analysed by specific impairment. These drivers help create change within HEPs and we would welcome similar drivers for Welsh HEPs;
- Sight impairment is not a 'static' disability and many young people find that their vision & needs can change over time, sometimes quite dramatically. Therefore flexibility needs to be entrenched into the provision;
- Make sure that the process is accessible to students who have communication difficulties. Having been awarded DSA measures will be put in place to overcome these but first they [students] have to navigate that process and not every student has a helpful parent on hand who can help;
- There are things that are not covered by the allowance, such as books. I am disabled and unable to travel to libraries but it is not possible to get extra funding for books - even though I was disadvantaged by this as the online library is not as extensive as a physical library. I was also not able to access audiobooks;
- Consider the negative mental health having to continuously prove your disability to the government causes disabled individuals when you are disabled and are paid disability related benefits;
- External providers of support for disabled students must reach the highest professional and administrative standards. There are providers that are of the highest quality which may be forced out of business by these recommendations. This would leave a significant gap in provision, through which some particularly vulnerable students will fall;
- The system often fails because instead of speaking to someone Student Finance Wales you are speaking to general call centre;
- The process of applying can be enough to put off some of those who need the support the most. Support should be available to help with this process;
- We [students] may need extra help, but our disabilities don't define us, and we are capable of amazing things with the RIGHT support.

Annex A – List of respondents

Aberystwyth University
Access for Students
Adult Learning Wales
Assessment Centre Cardiff
Association of Non-Medical Help Providers (ANMHPs)
Bangor Access Centre/Aberystwyth University
Bangor University
British Assistive Technology Association (BATA)
Beacon Services
Beacon Support
Cardiff Metropolitan University
Cardiff University
Claro Software Ltd
Colegau Cymru
Creuynni Complementary Healthcare
Dr Chadwell Disability Needs Assessor
Engage to Change Project led by Learning Disability Wales
Heriot-Watt University, Edinburgh
K Robson Independent HE Consultant
L Stevens Diagnostic Assessor
Mattersey Hall
M Philips Needs Assessor
National Association of Disability Practitioners Ltd (NADP)
National Autistic Society Cymru
National Deaf Childrens Society
National Network of Assessment Centres
Newport Assessment Centre
North & South Wales DSA forum
North East Wales Sensory Support Service
National Union of Students Wales (NUS Wales)
Open University Wales (OU Wales)
Pembrokeshire College
R Miller Disability & Inclusion Services Manager
Royal Central School of Speech & Drama
R Vobe DSA Assessor
RCT People First Taf Blaenau Gwent group
RCT People First Taf Ely group
SNAP Cymru
Spectrum First
Swansea Assessment Centre
Swansea University Student Services
Undeb Cenedlaethol Athrawon Cymru (UCAC)
University of Bath
University College London
University of Leeds
University of Manchester
University of South Wales
University of Wales, Trinity Saint David (Lampeter Campus)
Wales Council of the Blind
Wrexham University

Responses were also received from a number of students, and parents of students whose names have not been individually published.

Annex B – List of acronyms

ALN   Additional Learning Needs
AT   Assistive Technology
DSA   Disabled Student Allowance
EDA   Education Disability Advisor
FE   Further Education
FEI   Further Education Institute
HE   Higher Education
HEI   Higher Education Institute
HEP   Higher Education Provider
NMH   Non-medical Help(er)
OIA   Office of the Independent Adjudication
PG   Post graduate
SFE   Student Finance England
SFW   Student Finance Wales
SNA   Study Needs Assessment
UCAS   Universities and Colleges Admissions Service
UG   Under graduate