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A Review of the Disabled Students' Allowances

Executive Summary

1. Introduction

- 1.1 In April 2017, the Welsh Government commissioned York Consulting LLP to undertake a review of the effectiveness of the Disabled Students' Allowances (DSAs).
- 1.2 DSAs are non-means-tested allowances available for students who have a disability, long-term health condition, mental health condition or specific learning difficulty. DSAs are additional funding available for students, without which, they might not have been able to attend a higher education (HE) course and would not have reached their full potential.
- 1.3 The aims of the study were to:
 - review the provision of DSAs and the arrangements for providing financial support for students on designated higher education courses who have a disability, long-term health condition, mental health condition, Autistic Spectrum Condition (ASC) or specific learning difficulties (SpLDs)
 - develop and consider options for improving current arrangements.

2. Method

- 2.1 The study adopted a mixed-modal approach, including quantitative data and qualitative data. Key elements of the study included:
 - analysis of Higher Education Statistics Agency (HESA) and Student Loans Company (SLC) data
 - consultations with 12 student support services within higher education providers (HEPs), including the Open University (OU) in Wales two further education colleges providing higher education and two HEPs in England. Interviews included heads of disability support services, disability advisors (DAs), needs assessors,

non-medical help (NMH) providers and assistive technology service (ATS) providers

- interviews and focus groups with 41 students in receipt of DSAs in Wales and England
- online survey of Welsh funded students undertaken as part of the SLC annual survey of students in receipt of DSAs
- stakeholder interviews with government policy leads across the United Kingdom, professional experts and charities, including two DSAs forums operating in the north and south of Wales
- literature review to contextualise the study.

3. Context

- 3.1 In the academic year (AY) 2015/16, England introduced a number of changes to the DSAs entitlement to modernise the approach and ensure it was cost effective. This was an attempt to rebalance the responsibility for disabled students by ensuring that HEPs developed their inclusive learning practices and offered reasonable adjustments to meet the needs of all students, including those with a disability. The Welsh Government considered the changes and commissioned this review to help inform the direction of the DSAs policy.
- 3.2 The Equality Act 2010 requires all education providers, including HEPs and further education institutions (FEIs) in both England and Wales to make reasonable adjustments to ensure that, compared to other students, students with disabilities are not treated unfavourably. The role played by HEPs in supporting students with disabilities is evolving¹ and is best considered as a work in progress. Developments to embed inclusive learning practices in HEPs across the UK is, according to informed stakeholders, mixed.
- 3.3 The level of investment required to develop inclusive learning practices within HEPs is substantial. A panel of experts established to review the higher education funding and student finance arrangements in Wales², known as the Diamond Review, agreed that HEFCW needs to be equipped with un-hypothecated funding³ to drive change forward in a number of areas, including social aspects of widening access for students with disabilities.
- 3.4 The model of support for students with disabilities continually evolves, but at present, evidence suggests DSAs are an essential element of support for individual students with complex and higher-level needs. The appropriate model of support for students with disabilities is, therefore, best considered as a blended model consisting of inclusive learning, reasonable adjustments and DSAs.

¹ Department for Education (January 2017) Inclusive Teaching and Learning in Higher Education as a route to Excellence. Reference: DFE-00044-2017.

² The Review of Higher Education Funding and Student Finance Arrangements in Wales, (2016) An independent review.

³ Funding allocated without restrictions on how it should be spent.

<http://www.assembly.wales/NAFW%20Documents/gg09-0010.pdf%20-%2027042010/gg09-0010-English.pdf> (Accessed 03/07/17)

4. Key Findings

Awareness of DSAs

- 4.1 HESA data show a gap of 7.4 per cent between those students who declare a disability and those who received DSAs for AY 2015/16. Many students came to university without having first applied for DSAs. Despite universities undertaking considerable work to raise awareness of the entitlement and general support, disability teams and students themselves felt that knowledge of DSAs in schools and colleges was patchy. The introduction of the new Individual Development Plan (IDP) as part of the Additional Learning Needs Bill may go some way to improving continuity of support, although many students do not realise they have a disability until part way through their HE course.

The Application Process

- 4.2 Although the SLC survey of students indicated that 70 per cent were happy with the process, practitioners (heads of disability support services, DAs, NMH and AST providers) interviewed held negative views of the DSAs application and awards system, stating it was overly complex, fragmented and placed too great an onus on the student to navigate themselves through it. The process seems particularly difficult for students with SpLDs, ASC, anxiety disorder, visual impairments and those with high impact medical conditions such as myalgic encephalomyelitis or fibromyalgia. OU students seemed particularly disadvantaged due to their lower levels of contact with disability support services.
- 4.3 Some students with mental health concerns and less common medical conditions reported difficulty in generating the appropriate medical evidence. The application form itself was a barrier to many students with visual impairments and there were concerns regarding the number of applications that were put on hold (pending) until the student provided additional evidence or queries were addressed.
- 4.4 Particular concerns were raised by practitioners about the letter of eligibility (DSA1) and letter of entitlement (DSA2) regarding DAs' ability to support students through the process. In addition, service providers, recommended by Student Finance Wales (SFW) to deliver support to the student, expressed frustration at not receiving notification of this directly from SFW. Disability teams were as proactive as possible and tried to help students navigate their way through the process but, according to practitioners, the system is fragmented and many students experience delays in accessing support.

Needs Assessment and Entitlements

- 4.5 The rise in the number of needs assessment centres was a general cause for concern. Although more relevant to England, there was a concern among a small number of stakeholders, including the National Network of Assessment Centres that outreach centres are not audited by the Disabled Students Allowances Quality Assurance Group (DSA-QAG) to the same criteria as main assessment centres and that the quality of needs assessments could begin to differ. Although there was no evidence for this in Wales, there was evidence of students experiencing difficulties because needs assessors did not fully understand the learning context. Students selecting an assessment centre from the DSA-QAG list of approved suppliers often selected those closest to home. On reflection, a small number of students interviewed stated they wished they had selected the needs assessor located at their HEP. There

were concerns regarding the higher costs of needs assessments undertaken outside of HEPs and there was a general view that needs assessments should be undertaken within the HEP environment. OU students were highlighted as a particularly vulnerable group of students with often higher-level needs and no longer automatically receiving a needs assessment at home. Interviews with a small number of OU students evidenced their disadvantage.

- 4.6 In Scotland, all needs assessments are undertaken by the universities' or colleges' access centre. Scottish stakeholders reported this was a more favourable method of assessing students' needs as the course content and reasonable adjustments made by the HEP are more fully understood by the needs assessor. In addition, the provision of needs assessments was more cost effective, at an average cost of £495 per assessment in Scotland, compared with £650 in England and Wales.

Impact of the Student Finance England (SFE) Changes

- 4.7 The divergence in funding between SFE and SFW for Band One and Band Two roles was a concern among Welsh HEPs and needs assessors. The withdrawal of DSAs for SFE students has, according to the needs assessors, reduced the holistic nature of the assessment and resulted in uncertainty around the support students receive. There was no support from Welsh practitioners to follow the English changes. Concerns were expressed by practitioners that too much onus could be placed on the student to negotiate their support between DSAs provision and that provided through the disability service.
- 4.8 A student contribution to the cost of a computer received very little support from practitioners in Wales. According to needs assessors and DAs there are many circumstances that make it difficult for students to access open source computers. One ATS provider in England reported over 650 students had delayed the purchase of their equipment due to affordability issues.

Provision of DSAs-funded Support

- 4.9 The model for DSAs-funded NMH support is based on each NMH provider being chosen as the preferred supplier by the SLC to deliver support directly to the student. In Wales, this is more likely to be their HEP disability services who contract services with one or more professional NMH providers who then deliver support 'in-house'. This allows support to be tailored to individual student's needs and for practitioners to work collectively around the student. This is the preferred option and is favoured over the English model where two providers are identified from a list and the cheapest is selected by SFE. In the English model, there were concerns regarding the overall impact on the quality of support.
- 4.10 There were low levels of confidence among many Welsh practitioners in the DSA-QAG assuring the quality of provision and the potential impact on capacity to deliver some roles (e.g. specialist mentors). Although the Welsh Government does not require NMH providers to be DSA-QAG registered, practitioners delivering in Wales are required to operate to English accreditation standards when supporting SFE funded students.
- 4.11 The system in Scotland where NMH providers are typically employed directly by the HEP seems a simpler method of delivering support and, according to the Scottish stakeholders, is a more favourable system to that operating in England and Wales.

According to a HEP in Scotland, the ongoing relationships between disability teams and NMH providers helps to ensure good quality of provision, trusted relationships and a well targeted response to learners' needs.

- 4.12 ATS providers consulted through one to one interviews expressed concerns with the three-quote system and their ability to provide services to SFW without also delivering a business to business model. There has been a decline in the number of ATS providers across the UK from 21 to 10⁴ over the last 18-24 months because suppliers have struggled to make the business work. Many comments from Welsh students evidenced a service that was lower than expectations. Welsh students, consulted through one to one interviews and focus groups, reported concerns because the ATS providers were based in England and this caused delays in receiving equipment or having equipment mended.
- 4.13 Students who wish to receive support through the medium of Welsh can do so. HEPs stated they have sufficient capacity currently to deliver this support. However, an account of services being terminated was provided by one HEP that used to have its own AST provision and could set up computers and train students through the medium of Welsh, but could not compete on price with other providers outside of Wales and, therefore, terminated its service. Examples were also provided of shortages in software that can operate with the Welsh language to the same level as English software.

Benefits of Support

- 4.14 The SLC survey data show that the majority of students (over three fifths) agreed that without DSA support, they would not have been able to complete their study commitments. Most students (over four fifths) agreed that the DSAs support had made a significant positive impact on their overall performance. NMH practitioners had, in many cases, improved students' confidence levels and increased their ability to work more independently. Students recognised their performance had improved and, due to the range of support received, believed they were reaching their true potential.
- 4.15 Students had accessed a range of support, including computers with assistive technology and utilised software to help them organise their thoughts, plan their work and present their ideas in a written format. The general allowance had been used by some students for ink cartridges and specialist paper.

5. Conclusions

- 5.1 According to all practitioners, the DSAs application and awards process is overly complex and time consuming. The frequency and commonality of issues reported by all practitioners suggests the problem is real and there were opportunities to improve the service. The system currently operating in Wales is more flexible than in England and, according to practitioners, SFW operates a 'friendlier' version of the model, where possible taking pragmatic decisions to resolve issues. However, frustrations with the delivery model persist in Wales as well.
- 5.2 There was evidence from interviews with both Welsh and English practitioners and

⁴ Revised figure provided by DSA-Quality Assurance Group – March 2018

from interviews with students studying in Wales, that the more DSAs support is integrated in to HEP disability teams, the more seamless the support provided to the student. Support for students with disabilities is best conceived as a three-tiered system consisting of inclusive learning strategies, reasonable adjustments and DSAs. However, the HEP landscape appears very mixed regarding progress in embedding inclusive learning practices. In England, there was some evidence that the removal of Band One and Band Two support had been a catalyst for change. However, HEPs in England admitted they needed considerable time to implement changes within their institution. As such DSAs remain an essential form of support for students attending HE. Recommendations are offered for consideration to help improve take-up and to secure an effective and efficient support model for students.

6. Concluding Remarks

- 6.1 This report presented evidence, mainly generated from practitioners and students, of their experiences and views of the current process for administering DSAs in Wales. Many students reported a positive experience and were very appreciative of the support received. Few concerns were expressed directly about the Welsh DSAs policy, in the main because Wales has not followed England and implemented similar changes that reduced entitlement to a number of aspects of DSAs. However, the findings set out above suggest there are real concerns with how DSAs are administered and the direction of travel, particularly in England with the increasing marketisation of provision and the impact of the policy changes in England. Therefore, this review provides the Welsh Government with an opportunity to reflect on whether the current system for delivering DSAs in Wales, largely inherited from the English system, is the most appropriate way forward to support students. Key recommendations are provided in light of these findings.

7. Recommendations

Recommendations for the Welsh Government

- 7.1 The system that operates in Wales is preferable to that in England. The Welsh model helps students access the support they need from local providers. The following three recommendations are provided as a way of protecting the advantages of the current model and improving access to support.
- 7.2 **Recommendation One:** the Welsh Government should resist the proliferation of needs assessment and outreach centres that has occurred in England by remodelling the current system along the Scottish model. Needs assessment centres should be affiliated with HEPs and support students applying to that HEP who are entitled to DSAs. This will limit marketisation of assessments and will help ensure assessors take the student's learning environment and course demands in to account. Where HEPs (including the OU) do not host an assessment centre, they should be encouraged to do so and to promote their services to new under-graduates.
- 7.3 **Recommendation Two:** to minimise the potential impact on availability of NMH providers, Welsh Government should resist adopting the Department for Education's (England)⁵ NMH professional requirements on professionals working within Welsh HEPs. HEPs should be responsible for ensuring the quality of provision.

⁵ Updated to reflect additional information provide by DSA Quality Assurance Group

- 7.4 **Recommendation Three:** to ensure that Welsh students do not suffer from a lack of support, the Welsh Government should continue to provide funds for DSAs for individual students where needs assessors have evidenced need. This should include Band One and Band Two funding. Any future decisions regarding the funding of DSAs should draw on evidence from Welsh HEPs' progress with their inclusive learning practices. HEPs should be encouraged to share effective practice including with HEPs in England who have improved strategies and adapted support.
- 7.5 **Recommendation Four:** to improve efficiencies within the system as well as support for students, the Welsh Government should instruct SFW to share the letter of eligibility and letter of entitlement with HEPs' disability services who should be able to liaise with service providers on behalf of students with disabilities. Students who do not wish to share this information should be given a choice to opt out.
- 7.6 **Recommendation Five:** to encourage take-up and smooth transition of students with disabilities from schools and colleges, the DSAs policy lead should liaise with policy leads for pre-16 and post-16 education in order to raise awareness of DSAs, particularly for pupils with a recognised need in school.
- 7.7 **Recommendation Six:** to ensure no students are disadvantaged, the Welsh Government should review the relevancy of having an upper limit of entitlement for NMH provision for those students with certain disabilities for whom the upper limit is not sufficient. [Most students only use a fraction of the total entitlement.]

Recommendations for Student Finance Wales

- 7.8 **Recommendation Seven:** to improve the DSAs application process, SFW should review the accessibility of the application process and consider improvements, including the use of a video tutorial to take applicants through the process of applying for DSAs and providing an online platform evidencing progress through the process for both students and DAs supporting them.
- 7.9 **Recommendation Eight:** to ensure the DSAs support is targeted effectively, the SFW should provide evidence to the Welsh Government of the population of students' DSAs entitlements and take-up of support. This would indicate whether the system currently operating is fit for purpose and meeting the needs of the Welsh Government and students.
- 7.10 **Recommendation Nine:** to promote confidence in the system, the Welsh Government and SFW should review reasons for pended applications and provide this information to HEPs to aid understanding of the causes of pended applications.

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Views expressed in this report are those of the researchers and not necessarily those
of the Welsh Government

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