REPORT INTO THE DISABLED STUDENTS' ALLOWANCE (DSA)

Lord Holmes of Richmond MBE
March 2022
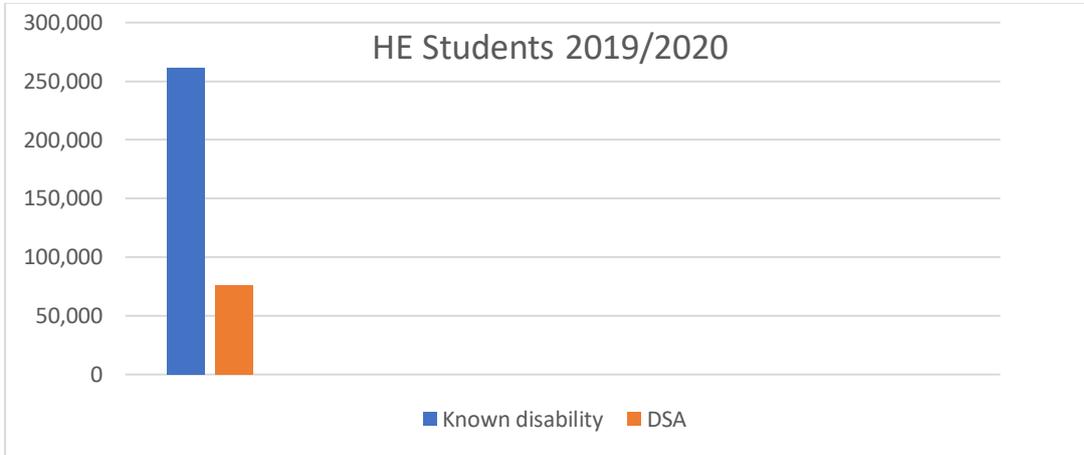
CONTENTS

Data

In 2019/2020 the total number of students in higher education providers (HEPs) in England, Northern Ireland, Scotland, or Wales, domiciled in England and Wales with a known disability was 261,620. The total number of students receiving DSA was 75,900, this is just **29%** of the number of students with a known disability.[1]

(Source: HESA Student Database and SLC Statistics Publications)

In 2019/20 the progression rate, measuring the number of pupils progressing from school to higher education, was 47.5% for pupils with no identified Special Education Needs (SEN). However, progression rates for pupils with SEN ranged from 20.8% for pupils receiving extra or different help in school (SEN Support) to just 8.4% for pupils with a statement of SEN or Education, Health and Care plan (EHCP)

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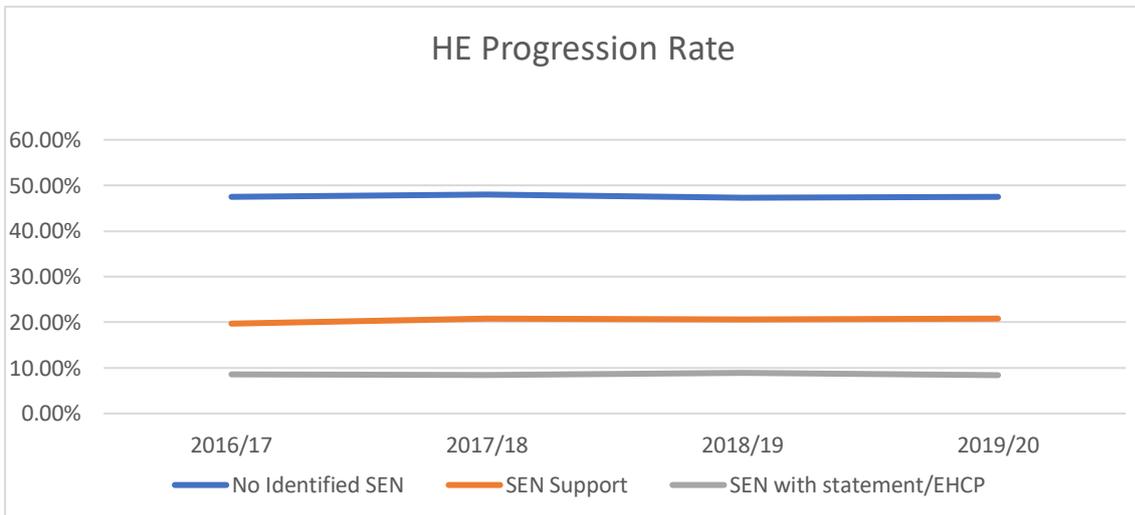
[1] HESA data for 2020/21 just published show: 260,540 (students with a disability) and 98,330 (students in receipt of DSA) but this is UK domicile full-time undergraduate student data and we do not yet have the data from SLC that will allow a comparator for that cohort, including postgraduate students.

In 2019/20 the progression rate to higher tariff providers, which are the top third of HEPs including Oxbridge and Russell Group Universities, was just 1.1% of pupils with an EHCP/Statement and 3.3% of those on SEN support. In comparison, the progression rate for other pupils was 12.3%.

(Source: Matched data from the DfE National Pupil Database, HESA Student Record and ESFA ILR)

March 2022

This report was written by Amy Cochrane, Senior Parliamentary Adviser, Lord Holmes of Richmond MBE

https://lordchrisholmes.com/report-disabled-students-allowance.dsa

Disabled Students' Allowance: enabling through degrees?

Disabled Students' Allowance (DSA), as the name suggests, is a scheme to support students with a disability to thrive in higher education. It's a gem of a policy and, when it works well, it achieves and does exactly that.

Everyone involved from the Department for Education (DFE), the Student Loans Company (SLC) and the fantastic array of organisations and business' in this space are working to enable the scheme's success.

I have conducted this review in order to contribute to those efforts and make sure the scheme is working as intended for all who would benefit. I have identified a series of interventions, many relatively small, which, if implemented, would enable DSA to deliver on that essential purpose.

First and most importantly, disabled students must be at the centre of every element of the scheme. That is where I started with this review and a heartfelt thank you to all the students who took the time to generously share their experiences. Student centred support must be the touch stone by which DSA is ultimately measured. It is the student experience which will serve as a key determinant of its success.

A greater understanding is needed of the student at the centre, from school, through higher education and into work, every beat point, every barrier, every blocker and how those experiences, the social as well as formal education, can be optimised. Only after a deep understanding of that experience has been gained should the operational details and plans be put into place for the effective, efficient, student led, student supporting DSA deployment.

According to the latest figures, incredibly, DSA was only received by 29% of those in higher education declaring a disability. We do not know how many were discouraged from attending in the first place or who entered higher education but did not declare a disability.

There is a significant lack of knowledge of the scheme amongst potential recipients. Similarly, more must be done to reach people by raising awareness amongst professionals in primary and secondary education including careers services and Local Authority Special Educational Needs (SEN) departments.

Proportionately, fewer young people with disabilities move on to higher education. In 2019/20 the progression rate, measuring the number of pupils progressing from school to higher education, was 47.5% for pupils with no identified Special Education Needs (SEN). However, progression rates for pupils with SEN ranged from 20.8% for pupils receiving extra or different help in school (SEN Support) to just 8.4% for pupils with a statement of SEN or Education, Health and Care plan (EHCP)

In 2019/20 the progression rate to higher tariff providers, which are the top third of HEPs including Oxbridge and Russell Group Universities, was just 1.1% of pupils with an EHCP/Statement and 3.3% of those on SEN support. In comparison, the progression rate for other pupils was 12.3%.

There is little connectivity in the support available to disabled students as they progress from school into higher education and work. A digitally enabled passport could simplify the current system and transform the opportunities and outcomes for millions. Credentials could be securely stored, without the need for multiple submissions of the same information. A greater connection between disabled citizen and state for the benefit of all.

For the students with a disability that do progress to higher education and apply for DSA there are numerous difficulties and significant delays around the application and assessment process. There is a pressing need to understand the quality and accessibility of assessment centres across the country. In the past 18 months there has been a proliferation of centres (from 254 to 522) and it is difficult to conclude how this can be in the best interests of students or the taxpayer.

If application and assessment hurdles are surmounted and students receive a notice of entitlement for DSA they then face what many have described as the "full time job" of coordinating their support which involves bringing together needs assessors, suppliers, support workers and universities. This administrative burden can act as a barrier to study rather than the support intended by the scheme.

Provision is rarely in place for the start of a course and the quality is inconsistent as is the approach and support received from HEPs. I have made several recommendations that would help ensure students receive support in a timely, efficient, and effective manner. There must be a greater focus on quality assurance and HEPs must demonstrate greater support for their disabled students' application, both for and, of the DSA.

There is great potential to drive improvements through the procurement process for elements of DSA. When I was a Director at London 2012, we used our procurement approach to achieve real value for money, we cared about cost, but those deals were exceptional because they included the essential elements of inclusion, sustainability and encouraging and enabling small businesses to succeed.

DSA has such inherent possibilities, to enable all of our disabled young people. When it works well, it really works. As this report illustrates, with a series of carefully considered changes, DSA could go, must go even further, empowering hundreds of thousands of disabled students to fulfil their potential.

If the recommendations set out in this report were taken up by the Government, SLC and HEPs we would see more disabled students in higher education, succeeding in higher education, serving as role models for those who follow, moving into rich and varied careers post-graduation. Enabling the engineers, empowering the educators, the entrepreneurs, the data scientists, the lot. That's building back better, that's levelling up, that's enabling through degrees.

DSA can do all of this and more. Let's all make it our business to ensure that it does.

Lord Holmes of Richmond MBE

Acknowledgements

We are indebted to all the disabled students who took the time and trouble to engage with this report.

The most important message, you, the students - must be at the heart of the process, your needs met, your talent enabled.

Sincere thanks also to all the representatives of the organisations listed below for their valuable input:

Association of Dyslexia Specialists in Higher Education (ADSHE)
Association of Non-Medical Help Providers
British Assistive Technology Association
Cambridge University
Department for Education
Disability Rights UK
Disabled Students' Commission
Disabled Students UK
Higher Education Statistics Authority (HESA)
Independent Assessment Centres (IAC)
National Association of Disability Practitioners (NADP)
National Deaf Children's Society
National Network Assessment Centres (NNAC)
National Union of Students
Plymouth University, Associate Professor, Dr Suanne Gibson
Policy Connect
Professional Association of Teachers of Students with Specific Learning Difficulties (PATOSS)
Sight and Sound
Student Loans Company
Thomas Pocklington Trust
University Mental Health Advisers Network

Recommendations

1. The DfE must launch an information and awareness campaign about the DSA. The DfE must provide sufficient resources to fund the campaign and fully involve stakeholders including the SLC, Student Finance England (SFE), HEPs, the Universities and Colleges Admissions Service (UCAS), the National Union of Students (NUS), Disabled Peoples Organisations (DPOs). In particular information about the DSA should be provided for schools, colleges, and Local Authority SEN departments.

2. The Government must create a new system to support disabled people throughout their lives. A 'passport', could ensure a coherent and consistent approach to language, credentials, and processes, joining up all public sector organisations including Local Authorities, the NHS, the DfE and the Department for Work and Pensions (DWP).[2]

3. The DfE must use existing data to direct research and target objectives. For example, looking at the data presented on page 2, the significant gap between known disabled students and students receiving DSA must be understood and addressed. Similarly, the difference in progression rates for pupils with no identified SEN and those receiving SEN support or EHCPs must be understood and addressed.[3]

4. HEPs must demonstrate greater support for their students' application for and application of the DSA. Students must be in control of their DSA but require support and information about the course to assist with the application, assessment, and coordination of DSA. Detail on how HEPs are providing this should be included in their Access and Participation plans.

5. The SLC must utilise existing data to improve service delivery. It is positive that detailed information about customer journey times is collected but that data must be analysed to better understand the cause of delays and those insights applied to a search for solutions.

6. DfE and SFE must consider ways to further improve the process of identity verification. Whilst the introduction of digital evidence uploads in 2020 was a positive development this only covers British passports and further options such as the use of certified identity service providers (IDSPs) and other Identity Document Validation Technology should be considered.[4]

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[2] Work is taking place to pilot a connection between the DSA and Access to Work (ATW) as promised in the National Disability Strategy. (Up to 200 students at Wolverhampton and Manchester Metropolitan University are participating in the pilot) However limiting a passport to just one cohort (from DSA to ATW) will not deliver the change that is required.

[3] This approach is already demonstrated by the KPI targets set by the DfE for the Office for Students linked to the Widening Participation data on attainment.

[4] The DWP and Home Office recently announced extending the use of IDSPs and Identity Document Validation Technology to allow online identity checks. This particular pain point further illustrates the benefits of digital ID and must be considered as an option by all departments and public sector organisations for improved security and efficiency.

7. The DfE must remove all costs for the provision of evidence, including medical evidence, for eligibility. The state must work seamlessly for the individual, if proof of eligibility is known by one public sector organisation, whether that be Local Authority or NHS, the burden must not be on the citizen to pay for the transfer of that information to the SLC. A new 'passport' system (Recommendation 2) would address this.

8. The SLC must report on progress towards improvements they have identified as priorities in improving the DSA application process including:
    a. Provision of a digital application for all DSA customers (whilst retaining paper application for those that need or want it)
    b. Reducing the need for students to apply every year
    c. Implementation of a new Case Management system for SLC processing of DSA
    d. Implementation of a secure messaging system to reduce reliance on email
    e. A review to broaden the remit of acceptable evidence[5]

9. The DfE must improve quality assurance for Assessment Centres and Needs Assessors (NA). This can partly be achieved through the SLC procurement framework criteria, but further audit and quality assurance tools must be considered including, but not limited to, an updated DfE guidance document with greater detail on essential criteria and agreed standards for Assessment Centres and qualifications, disability-specific expertise and approved continuing professional development (CPD) for NAs.

10. The SLC must demonstrate how the commercial procurement process will:
    a. Improve the customer journey and enhance the overall experience
    b. Increase transparency
    c. Establish sustainable supply
    d. Assure value for money and protect taxpayer and student
    e. Remove potential for conflict of interest

11. The DfE must publish the Equality Impact Assessment (EIA) undertaken for the new procurement framework.

12. The SLC may wish to consider appointing an independent member to the procurement panel to assist with the current tender process.

13. The SLC must ensure the new procurement model takes into account the number of small and medium sized enterprises (SMEs) in the sector. The Government's social value model of public procurement includes detailed and varied criteria. One that should be particularly championed in a sector with such a rich and diverse supply of SMEs is the number of small and medium sized businesses in the supply chain, this data should be monitored and reported annually.

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[5] An update note from Mark Cassidy, SLC's Head of Estates and Sourcing, June 2021, lists these areas as priorities in the SLC's current project to improve the DSA application process.

14. The SLC should consider the benefits to students of a self-assessment package. This has potential to improve service and efficiency. The SLC must undertake a consultation on this proposal.

15. The DfE must consider how to include greater flexibility in AT provision by offering choice across a range of equipment and software and ensuring accessibility requirements are contextualised. It is essential that any provided AT will also function with any specialist course IT/equipment.

16. The SLC must improve the clarity of communication around the notice of entitlement as well as improving efficiency and effectiveness at this stage of the process. The SLC must:
    a. Consult on improving the language used in the DSA2 award letter including using consistent language to refer to it.
    b. Assess the best, GDPR compliant, method of sharing the DSA2 award letter with NMH suppliers directly. This will remove a significant administrative burden from students and speed up the process.
    c. Include a robust, adequately resourced and clearly signposted complaints procedure for students.
    d. Provide a comprehensive breakdown of costs for students should it be requested. Students must be informed, empowered, and enabled by the DSA and transparency over their award can be key to this.

17. The DfE must remove the £200 charge towards equipment. The rationale for introducing the charge was that it was a necessary cost for all students. This is a misreading of equalities legislation, a grant to remove barriers due to a protected characteristic must not be conditional on a financial contribution. There should be no financial barrier to DSA, and the government must remove the funding cap for the same reason.

18. The DfE must improve quality assurance for NMH. HEPs could play a greater role in the process of quality assurance but the government must set standards and provide oversight. The government should also consider ways to better understand the existing pool of support workers and how to support recruitment and retention. If recommendation 13, listed above, is put into practice the quality of service in terms of timeliness should improve.

19. The DfE must reassess the system of travel allowances and ensure they are meeting student needs. The government should also remove any initial charge as this constitutes a misreading of equality legislation – a reasonable adjustment intended to remove barriers should not require a personal financial contribution.

20. The DfE must consider extending DSA provision beyond the course date to support the student and assist with the transition between higher education and work.

DSA Journey

Pre-Application

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Application

↓

Assessment

↓

Course

↓

Post-Graduation
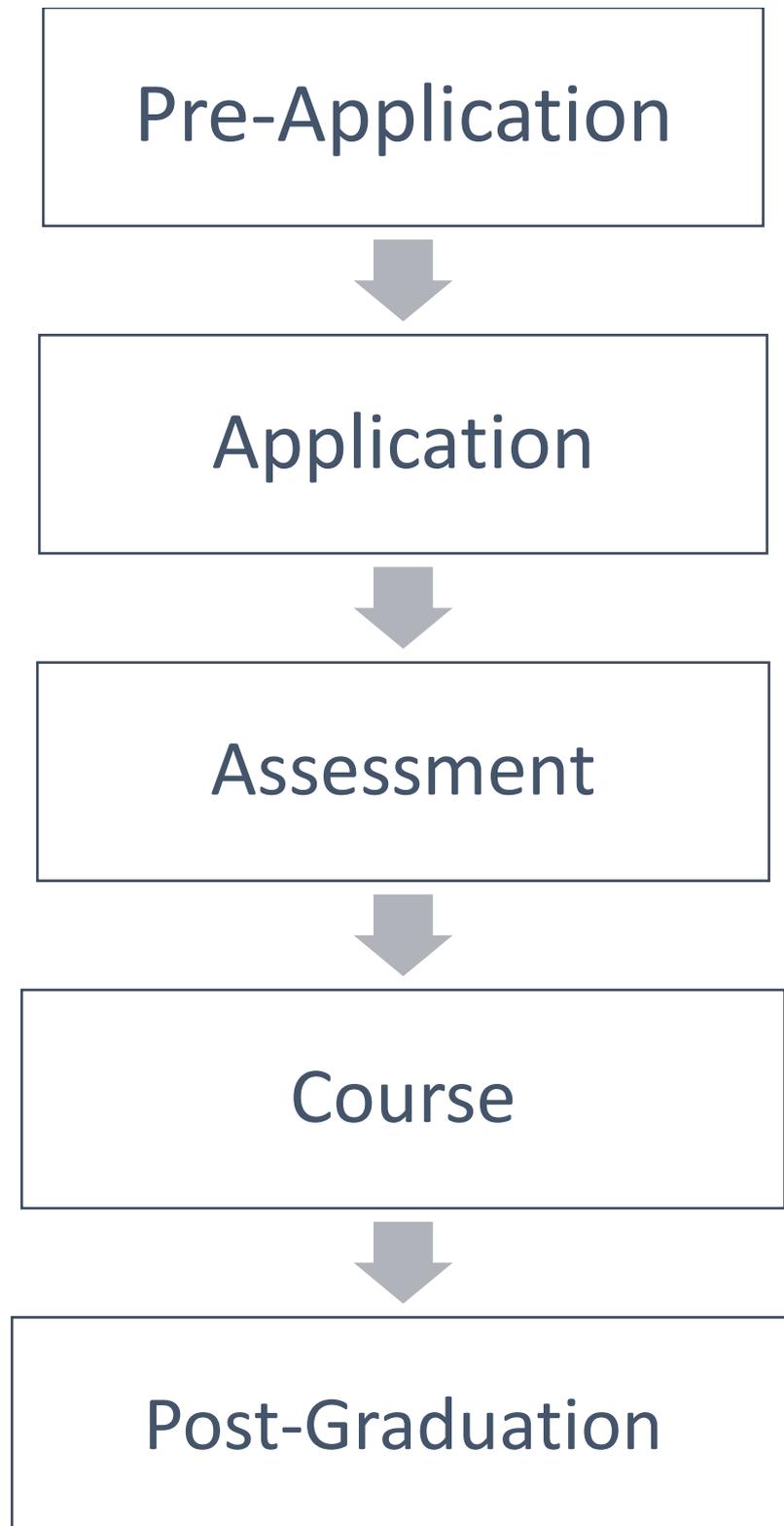
Pre-Application

"If you don't know about DSA, you don't get it. So, even though I declared my disabilities very early when I started my course, I didn't know about DSA until later, so when I finally received the support that I needed, it was quite late."

Disabled students do not have a clear understanding of the support and access to funding that is provided by the DSA. A recent survey by the Higher Education Commission found 40% of disabled students had not heard of the DSA before they started their course[6].

Although information about the DSA is available from various sources such as the Gov.uk and SLC websites it is not well disseminated to schools, colleges or through other channels such as UCAS or Local Authority Special Educational Need (SEN) departments. This must be addressed through an information and awareness campaign.

The fact that so many students who could and will qualify for DSA are starting courses without the support they need is not the equality of opportunity intended by the scheme.

It is also extremely worrying that in 2019/20 the number of disabled students receiving full-time DSA in England and Wales was just 29% of the number of known disabled students. Given that the current system for disclosing a disability is not ideal it is likely that the figures for students with a known disability are an underestimate and that gap is, in reality, likely to be even higher.

The language and processes used to support young people with a disability in schools and colleges do not align with those used for the DSA. The language used before pupils enter higher education relate to special educational needs (SEN), SEN support and Education, Health and Care (EHC) plans (previously known as statement of special educational needs). There is a significant gap between the percentage of pupils with SEN support or EHCPs and those with no identified SEN progressing to HE.

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[6] *Arriving at Thriving: Learning from disabled students to ensure access for all.* Higher Education Commission and Policy Connect, 6 October 2020.

Pre-Application Recommendations

1. The DfE must launch an information and awareness campaign about the DSA. The DfE must provide sufficient resources to fund the campaign and fully involve stakeholders including the SLC, Student Finance England (SFE), HEPs, the Universities and Colleges Admissions Service (UCAS), the National Union of Students (NUS), Disabled Peoples Organisations (DPOs). In particular information about the DSA should be provided for schools, colleges, and Local Authority SEN departments.

2. The Government must create a new system to support disabled people throughout their lives. A 'passport', could ensure a coherent and consistent approach to language, credentials, and processes, joining up all public sector organisations including Local Authorities, the NHS, the DfE and the Department for Work and Pensions (DWP).[7]

3. The DfE must use existing data to direct research and target objectives. For example, looking at the data presented on page 2, the significant gap between known disabled students and students receiving DSA must be understood and addressed. Similarly, the difference in progression rates for pupils with no identified SEN and those receiving SEN support or EHCPs must be understood and addressed.[8]

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[8] This approach is already demonstrated by the KPI targets set by the DfE for the Office for Students linked to the Widening Participation data on attainment.

Application

"A nightmare to deal with – the process was lengthy and arduous"

The application process has been described as time consuming, overly bureaucratic and students often feel intimidated and daunted by the process. The application form itself is 30 pages long, original identity documents are required, and non-passport id documents must be sent via recorded delivery, communications are sometimes inaccessible, contradictory information seems common and the evidence required to demonstrate eligibility is limited, costly and inflexible.

One student applied for DSA in March 2021 but didn't receive a decision until September 2021, after the course had begun. Due to this delay the student was encouraged by the university to defer their start but then incurred course fees because of the late notice decision to defer. As they said, this was *"unnecessary and a very anxious time"*.

We heard from another student who had only just received their equipment:

"I applied for DSA in July, received my payment as classes finished in Nov. The technological items came the week my exams started in Dec and the ergonomic items came last Friday [Jan 28ᵗʰ]! All we are asking for is to be at the same starting point as other students. Unacceptable!"

All evidence confirmed the average length of time between application and award was at least 3 months. The SLC reported that the average customer journey time from application to notice of entitlement generally exceeds 100 days. The student then still needs to arrange their support, whether provision or equipment. Given the detail and quality of the data the SLC collects about the length of time taken during the application stage greater analysis of the cause of delays and how to eradicate them would be extremely positive.

Cambridge University Case Study: Reducing average lead-time from application to award from 3 months to 3 days

Cambridge University decided to opt out of drawing down DSA funding for the Non-Medical Help (NMH) band 4 tasks of specialist study skills and specialist mentoring (which made up over 80% of all non-medical help funded by DSAs) and established an internal Reasonable Adjustments Fund (RAF) to provide the financial resources to support this (in effect diverting the Higher Education Funding Council for England Premium received by all HEP to support these costs). As a result, the average lead-time from application to award fell from 3 months under the DSAs system, to 3 days under the internal system, and the award to support being in place lead-time from an average of 5 months to 5 days. As a result, they found a significant increase in students taking up the support they had been awarded.

Whilst it is positive to note where individual HEPs have taken action to reduce delays and improve access to support for their students, such an inconsistent approach leads to an institution specific lottery which undermines the purpose of the DSA. HEPs are ultimately responsible for their students learning and all HEPs must demonstrate much greater support for their students' application for and then application of DSA.

We also heard of inaccessible communications during the application process. One visually impaired student requested a large print form but was sent small print on A2 paper (rather than large print

text). Another visually impaired student received a letter from DSA that was incompatible with their screen reader. Accessible information is absolutely essential.

Another issue often highlighted was the particular bureaucratic burden and financial costs of providing credentials, both identity documents and proof of eligibility. We heard from more than one student about difficulties surrounding the provision of ID documents including a lost passport. Another student told us:

"I sent my only ID off, my adoption certificate. As I cannot drive (because of my disability), I have no driving licence and my passport has expired. My ID was initially accepted and returned. The DSA Team then asked me for ID again, but no-one could explain why. Nobody answered calls or emails, slowing the process down. It was only when my university disability service intervened that my application was re-accepted."

The provision of medical evidence could prove even more burdensome. One student told us about their experience of applying for DSA due to a specific learning difficulty. They had received a diagnosis in 2002/3 and used that as evidence in a previous application for DSA but when reapplying, in 2019, they were asked to provide a clarification letter from the practitioner who had conducted the original diagnosis.

"I had to research and pursue a retired gentleman and ask him to write a letter for me whilst he was on his holidays. Ridiculous. He did it because he was a nice man, but it proved nothing! It was just a hoop to jump through."

The difficulty and cost involved in providing proof of eligibility is preventing some students from finishing the application process. The Association of Non-Medical Help Providers stated that students with particular conditions or impairments face more of a challenge in providing medical evidence.

There is clearly a need to reduce delays and improve the efficiency and effectiveness of the application process. It would be a useful additional data point if the SLC provided the number of applications started compared to the number of applications submitted.

We welcome the improvements already proposed by the SLC. With regard to the review of acceptable evidence it would be helpful to consider a more flexible approach to evidence, such as adding other qualified and accredited mental health professionals to the list of medical professionals who can provide such information.

Application Recommendations

4. Higher Education Providers (HEPs) must demonstrate greater support for their students' application for and application of DSA. Students must be in control of their DSA but require support and information about the course to assist with the application, assessment, and coordination of DSA. Detail on how HEPs are providing this should be included in their Access and Participation plans.

5. The SLC must utilise existing data to improve service delivery. It is positive that detailed information about customer journey times is collected but that data must be analysed to better understand the cause of delays and those insights applied to a search for solutions.

6. DfE and SFE must consider ways to further improve the process of identity verification. Whilst the introduction of digital evidence upload in 2020 was a welcome development this only covers British passports. The DWP and Home Office recently announced extending the use of Certified Identity Service Providers and Identity Document Validation Technology to allow online identity checks. This particular pain point further illustrates the benefits of digital ID and must be considered as an option by all departments and public sector organisations for improved security and efficiency.

7. The DfE must remove all costs for the provision of evidence, including medical evidence, for eligibility. The state must work seamlessly for the individual, if proof of eligibility is known by one public sector organisation, whether that be Local Authority or NHS, the burden must not be on the citizen to pay for the transfer of that information to the SLC. A new 'passport' system (Recommendation 2) would address this.

8. The SLC must report on progress towards improvements they have identified as priorities in improving the DSA application process including:
    a. Provision of a digital application for all DSA customers (whilst retaining paper application for those that need or want it)
    b. Reducing the need for students to apply every year
    c. Implementation of a new Case Management system for SLC processing of DSA
    d. Implementation of a secure messaging system to reduce reliance on email.
    e. A review to broaden remit of acceptable evidence[9]

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[9] An update note from Mark Cassidy, SLC's Head of Estates and Sourcing, June 2021, lists these areas as the SLC's priorities in the SLC's current project to improve the DSA application process.

Assessment

"When I think about contacting my needs assessor, I almost have to convince myself to sort of build up the courage to do so and I think that's really upsetting because they are supposed to be the people you go to for the support that you need."

After a successful application, the next step of the journey is assessment. All students who are eligible for the DSA are expected to attend a Study Needs Assessment (SNA) interview, where the student discusses with their Needs Assessor (NA) the type and level of support required.

The report produced as a result of the Needs Assessment – the Needs Assessment Report (NAR) – is the basis of any support provided. When completed and agreed the report is sent, along with any quotes for goods or services recommended, to the SLC for approval.

In 2019, the organisation previously responsible for auditing assessment centres - the Disabled Students' Allowance -Quality Assurance Group (DSA-QAG) was disbanded. Since then, the SLC has published Assessment Centre guidance which includes accessibility requirements and some other criteria but is less detailed than the previous guidance issued by the DSA-QAG and there is no audit of facilities.

Following the closure of the DSA-QAG a moratorium was placed on the number of new Assessment Centres but that was lifted in August 2020. Since then, there has been a substantial increase, from 254 in 2019 to 522 in January 2022. (69 main centres and 453 outreach centres).

Some Assessment Centres have been reported as having inadequate physical premises such as a lack of accessible hygienic facilities or even being physically inaccessible. The National Union of Students also reported concerns about assessment centres in their evidence to a recent report.[10]

It is hard to imagine that such an extreme proliferation in Assessment Centres can be beneficial for either the individual or the public purse and without quality assurance or audits we do not properly understand what is happening in these new centres.

Ultimately the DfE are responsible for quality assurance, but they are reliant on the NARs and any student complaints as the only quality assurance indicators. As a priority the current guidance document should be updated setting out further detail on required standards and a clearer process for assessing whether these are being adhered to.

It was striking how often the students we spoke to had concerns about how "*closed and predetermined*" the SNA interview was. We also heard about a lack of empathy, understanding or specialist knowledge. No qualifications are required in order to become an NA and we heard mixed reports about whether students felt confident in their NA's level of disability-specific expertise and understanding. It would be beneficial to address the absence of qualifications and consider ways to set and measure standards and ensure training, assessment, and continuing professional development (CPD) was of a high quality and consistently delivered.

One of the students we spoke to had wanted to take a family member with them to ensure *"nothing was said out of line"* and another student also asked to bring someone into the meeting with them but was told that was not allowed. It is distressing that the same student suggested disclosure and

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[10] *Arriving at Thriving: Learning from disabled students to ensure access for all.* Higher Education Commission and Policy Connect, 6 October 2020.

barring service (DBS) checks for NAs as a recommendation. As an absolute minimum students must feel safe in this process.

It was clear that when the students felt that they were being genuinely consulted on their requirements it could be a very positive experience. One student described the needs assessment as a *"positive and empowering"* experience because the needs assessor *"did take all my evidence"* and asked, *"what are your barriers and what do you think you need to overcome? What would be helpful?".*

An assessment of the potential benefits to students of self-assessment packages, with appropriate support and safeguards in place, would be positive and we look forward to hearing from SLC on consultation plans around this proposal.

Even when the assessment was described as a positive experience one issue that was raised repeatedly – a fundamental flaw in the system – was how difficult it was to answer questions about what provision would be required to access the course and campus before courses had been started. As one student said:

"It was very difficult for me to kind of navigate the system when I didn't know what support I needed. You know, saying to a student? Well, what would you need to get through this course? Well, I've never done the course, so I'm not sure what it is."

Another student described it as needing a *"clairvoyant insight into what your course is going to be like, to be able to get it set up in time"* also highlighting how problematic it was to have an *"absolute disconnect of communication [between DSA and HEP] throughout your degree process."*

The students we spoke to are trying to engage proactively with the assessment and providing evidence about the equipment required. It can be distressing and disheartening when their own expertise is rejected, and their recommendations are refused.

One student had his request for assistive software turned down despite being able to show that it was familiar and had been proved to help produce quality work during his years at school.

"I presented the case with research … and some evidence, and even though the needs assessors said they agreed with my reasoning, they refused to recommend it for me … [They said] we acknowledge that these arguments are valid, but Student Finance England just will not simply fund an iPad based on past experiences and … other students have been ok with things that they've been provided like a computer, so we don't really see the need to give you an iPad"

That student appealed and was eventually granted the equipment he needed but said, *"it was all kind of a big anxiety inducing experience."*

It was worrying to hear from one charity how often decisions not to provide specific equipment or support are reversed when they intervened on behalf of a student.

"We then step in, and ask them, as a third party with more specific knowledge of vision impairment and it immediately gets overturned, and that student then gets that support, which is good, but it does just really flag that students [are], just not getting listened to themselves."

It is essential that students are enabled and empowered by this process. Achieving value for money is not the same as the lowest cost and quality assurance must be taken seriously. There is scope for improving the process through the upcoming SLC procurement framework.

The framework must drive quality, standards, an enhanced experience for the students, including greater flexibility in the supply of appropriate, course specific assistive technology (AT), and demonstrate social value, not least, through the number of small and medium sized enterprises in the supply-chain.

Assessment Recommendations

9. The DfE must improve quality assurance for Assessment Centres and Needs Assessors (NA). This can partly be achieved through the SLC procurement framework criteria, but further audit and quality assurance tools must be considered including, but not limited to, an updated DfE guidance document with greater detail on essential criteria and agreed standards for Assessment Centres and qualifications, disability-specific expertise and approved continuing professional development for Needs Assessors.

10. The SLC must demonstrate how the commercial procurement process will:
    a. Improve the customer journey and enhance the overall experience
    b. Increase transparency
    c. Establish sustainable supply
    d. Assure value for money and protect taxpayer and student
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11. The DfE must publish the Equality Impact Assessment (EIA) undertaken for the new procurement framework. The SLC may wish to consider appointing an independent member to the procurement panel to assist with the current tender process.

12. The SLC must consider the benefits to students of a self-assessment package. This has the potential to improve service and efficiency. The SLC should undertake a consultation on this proposal.

13. The DfE must consider how to include greater flexibility in AT provision by offering choice across a range of equipment and software and ensuring accessibility requirements are contextualised. It is essential that any provided AT will also function with any specialist course IT/equipment.

14. The Government's social value model of public procurement rightly includes detailed and varied criteria. One criteria that should be particularly championed in a sector with such a rich and diverse supply of SMEs is the number of small and medium sized businesses in the supply chain, this data should be monitored and reported annually.

Course

"As I can't access the support I'm entitled to I'm getting really far behind. I feel like it's not designed to actually help you."

Following the assessment, and report, the DSA award decision is communicated to the student in the form of a letter known as DSA2 (a term used frequently although the letter itself does not have the reference DSA2 on it). It is now up to the student to contact the allocated suppliers and share university information so that support can be accessed.

The SLC has just published information about a new procurement framework which will adjust this process slightly for some provision. Under the new service model, following a needs assessment both the student (customer) and partner (lead supplier) will be informed of recommendations by SLC and the partner will contact the customer:

"SLC will inform the customer and the partner of the recommendations agreed and the partner will contact the customer to arrange delivery of their technology. The partner will also be responsible for the customer's installation, setup and familiarisation of their equipment and software, which the customer can choose to take up if they wish, and subsequently provide support and training as required." [11]

It is welcome that the SLC will now share the recommendations directly with the partner/supplier rather than the onus for this being on the student however non-medical help (NMH) and travel allowances are not included in the remit of the new service model.

One student told us about their experience trying to coordinate support:

"You spend so much time chasing people. University full time is a full-time job but university plus part time work plus chasing DSA every other day feels impossible. If DSA approves the finances, then you have to get the university timetable and get that timetable to the company that provides the support workers. This year, due to Covid, the university didn't have a final timetable until after the start of term by which the company said it was too late to get a support worker. The money exists but I can't use it due to the complexity and difficulty of the administrative process. I may have to defer my course."

As already discussed the late provision of equipment and support through DSA is common. These delays inevitably have negative consequences for both students and support workers. One specialist mental health mentor wrote about having a first appointment with a student in January. The student was feeling lonely and isolated.

Another student who had received an award for several hours specialist mentor support submitted all the information the supplier needed then spent three weeks waiting for a response. After his parents got in touch with the manager they responded with a schedule that clashed with his university lectures (provided). His parents said:

"We were dismayed at the unsupportive system... A young person venturing on a new life in a new city is expected to become an employer… The system seems to add unnecessary barriers to accessing the support."

A further barrier is created by the £200 upfront charge for a DSA laptop. The government introduced this charge for students funded by Student Finance England in the 2015/16 academic year, and it requires that disabled students pay the first £200 of the cost of a laptop provided through the DSA.

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[11] Disabled Students' Allowance Reforms Market Engagement Preview, p.7.

Many disabled students cannot afford this initial cost, and research has shown that the introduction of the charge corresponded to a 20% decrease in the take-up of DSA equipment in England.

One student had problems with a laptop with assistive technology that had been supplied through DSA in 2017. After repeated breakdowns and repairs it was taken away again on the 30 June 2021 and returned 9 weeks later.

"I had no choice but to defer with the course being online and having no alternative device to work from. If I did not defer, I would also have incurred liability fees from my university which I could not afford. Considering that I have the original invoice showing the laptop cost £110 (yet students pay £200), the DSA Team paid a staggering £563 for repairs and an extended warranty. They kept insisting I use the device as they had paid for the policy."

For that student, although a NAR in November found the laptop was unfit for purpose, out of date and required extra software, it was too late to prevent them deferring. Being forced to defer at some point was a common theme among the students we spoke to.

Funding for NMH is capped at a level which may not fully cover the cost of providing support for deaf/hard of hearing or blind/visually impaired students, such as sign language provision or support for getting around campus. The additional cost of this support must then be funded by the institution, but provision is not consistent and adds a further burden to the student tasked with negotiating the support.

NMH covers a wide range of support, at the highest level (Band 4), this covers specialist mentors, specialist one-to-one study skills and strategy support, (specific learning difference (SpLD), mental health difficulties (MH) & autism spectrum conditions (ASC)) as well as British sign language interpreters (BSL), specialist support professional for students with sensory impairment (deaf students (HI), vision impairment (VI), multi-sensory impairment (MSI)) and assistive technology trainers (AST). AST will be covered in the SLC procurement framework, but the remaining support is not, and questions have been raised about how best to ensure suppliers are delivering a quality service.

Mandatory qualifications and professional body membership requirements are set out by the DfE and are subject to auditing.[12] However expectations regarding service to students, specifically the timeliness of support and mode of delivery are set out but are not audited. The expectation for mode of delivery is that NMH support can be delivered either remotely or face-to-face at the student's choice. It is essential that students have the choice of face to face or remote sessions, but it should not be a requirement that all providers offer both options as this could unfairly discriminate against smaller agencies that may only be able to offer remote provision.

It is vital that suppliers demonstrate that they are delivering a quality service and the absence of quality assurance and auditing must be addressed. It has been suggested that a greater understanding of the pool of support workers would also be beneficial in terms of better understanding issues around recruitment and retention in the sector.

Another element of DSA provision that came in for some criticism was the travel allowance. One student was told she qualified for a taxi allowance but ended up not using the provision she was entitled to because of the complexity of the system. She said, *"I was told you will pay what a normal student would pay for that journey, and we will pay for the rest because it's a taxi. The problem was that I had to tell DSA which journeys I would be making so that they would approve them, but I can have one class in one location and never have to go there again … particularly now with room arrangements being so tricky."* Ultimately she said she had just given up using it.

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[12]https://www.practitioners.slc.co.uk/exchange-blog/2020/september/10092020-guidance-for-nmh-suppliers/

Another student had a similarly frustrating experience with this system. They were studying at a university with more than one campus and the library was not on the main campus. They were told they were not allowed to go to the library campus because that was not approved by their DSA, *"So, I put in a request to my needs at Easter.. It got approved the day before my last exam."*

The worst outcome when students are unable to get the support they need is that they drop out. Students with a disability are more likely to drop out of courses and those that finish their degree tend to achieve lower results.[13] Many of the students we spoke to said that managing DSA was a fulltime job and one young person who had dropped out of their course said:

"You make such a long such a big effort, attending meetings and assessments and filling in forms and talking to people. But then finally, the result is that. Unfortunately, you don't get the support that you need … then because of all the lack of adjustments and also lack of knowledge. I couldn't continue with the course and the problem is … you are told that you failed. And it's obvious that you are going to fail because [without the support] how are you going to study?"

That student felt let down by the gap between policy and practice and this lack of accountability is compounded by the absence of an easy to use and effective complaints procedure. This must be addressed; students must know where to go to complain and have confidence in the system. We were concerned to hear from one student who did complain that they had been offered an ex-gratia payment of £150 provided they close their complaint.

When we asked the students' what their recommendations would be they emphasised the need for communication, consultation, and empowerment.

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[13] https://commonslibrary.parliament.uk/research-briefings/cbp-8716/

Course Recommendations

15. The SLC must improve the clarity of communication around the notice of entitlement (DSA2 letter) as well as improving efficiency and effectiveness at this stage of the process.
    a. Consult on improving the language used in DSA2 award letter including using consistent language to refer to it.
    b. Assess the best, GDPR compliant, method of sharing the DSA2 award letter with NMH suppliers directly. This will remove a significant administrative burden from students and speed up the process.
    c. Include a robust, adequately resourced and clearly signposted complaints procedure for students.
    d. Provide a comprehensive breakdown of costs for students should it be requested. Students must be informed, empowered, and enabled by the DSA and transparency over their award can be key to this.

16. The DfE must remove the £200 charge towards equipment. The rationale for introducing the charge was that it was a necessary cost for all students. This is a misreading of equalities legislation, a grant to remove barriers due to a protected characteristic must not be conditional on a financial contribution. There should be no financial barrier to DSA, and the government must remove the funding cap for the same reason.

17. The DfE must improve quality assurance for NMH. HEPs could play a greater role in the process of quality assurance but the government must set standards and provide oversight. The government should also consider ways to better understand the existing pool of support workers and how to support recruitment and retention. If recommendation 13, listed above, is put into practice the quality of service in terms of timeliness should improve.

18. The DfE must reassess the system of travel allowances and ensure they are meeting student needs. The government should also remove any initial charge as this constitutes a misreading of equality legislation – a reasonable adjustment intended to remove barriers should not require a personal financial contribution.

Post-Graduation

"I have witnessed higher education becoming less accessible."

Under the current system, DSA provision ends the day the course ends. This can lead to an abrupt end of mentoring or the provision of support that might be of great value during a transition into work. Addressing the abrupt end to DSA and extending support could be of great value for little cost and would be particularly in keeping with a key recommendation of this report that the government must create a system to properly support disabled people throughout their lives.

It is disappointing that the current DWP pilot creating a 'passport' between the DSA, and Access to Work (ATW) is so limited. As pointed out in an earlier recommendation a new system to support disabled people throughout their lives, one that ensures a coherent and consistent approach to language, credentials, and processes, joining up all public sector organisations including Local Authorities, the NHS, the DfE and the DWP would be of great benefit to citizen and state alike. Unfortunately, this partial pilot undermines this principle of an overarching, unified, global passport by applying it to just one transition for a very particular cohort, exacerbating the siloed nature of the support rather than solving it.

Post-Graduation Recommendation

19. The DfE must consider extending DSA provision beyond the course date to support the student and assist with the transition between higher education and work.

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