

Background

Disabled Students' Allowance

Disabled Students' Allowance (DSA) is a grant which helps students with the additional costs that they may face in higher education because of their disability. DSA is not means-tested and does not have to be repaid. It is available to full-time and part-time students at undergraduate and postgraduate level.

To be eligible for DSA, students must: (a) meet the personal eligibility criteria for student finance within the Education (Student Support) Regulations 2011 and be studying a course designated for student support; and (b) have a disability as defined in the Equality Act 2010.

DSA is administered by the Student Loans Company (SLC), which determines students' eligibility and approves the support that can be funded through DSA. DSA can fund, for example, specialist equipment, travel, and non-medical help (NMH). NMH is the human support that some students need to enable them to access their studies. It includes roles such as British Sign Language (BSL) interpreting, specialist mentoring, and specialist study skills support.

In the 2023/24 academic year, the maximum DSA allowance for students who meet the criteria is £26,291 annually. There is also an uncapped allowance for travel costs.

In the 2021/22 academic year, £58.5m was spent on NMH support for undergraduate DSA recipients.

Profile of DSA recipients

Distribution of DSA recipients by Higher Education Provider

In the 2021/22 academic year, there were 83,111 students in receipt of DSA across 557 Higher Education Providers (HEPs). 400 of these HEPs had fewer than 50 DSA recipients (with 4.9% of all DSA recipients attending these HEPs) and 72 of these HEPs had 500 or more DSA recipients (with 73.3% of all DSA recipients attending these HEPs) [1]. DSA recipients are therefore spread across diverse types of HEPs, including large universities, highly specialist providers, further education colleges with a small amount of higher education provision, and SCITT (School Centred Initial Teacher Training) providers.

Protected characteristics of DSA recipients

Female students are more likely than male students to be DSA recipients at both undergraduate and postgraduate level when compared to the overall student population.

At undergraduate level DSA recipients are more likely to be White, and less likely to be Asian, when compared with the overall student population. At postgraduate level DSA recipients are less likely to be Asian when compared with the overall student population.

At undergraduate level, DSA recipients are less likely to be aged 20 and under, and more likely to be aged 21-24, when compared with the overall student population. At postgraduate level DSA recipients are more likely to be aged 21-24 or 25-29, and less likely to be aged over 30, when compared with the overall student population.

More detailed information on the protected characteristics of DSA recipients is set out in the tables at Appendix 1.

The table below sets out the disability type recorded on students' DSA applications to SLC for the 2022/23 academic year. Specific learning difficulties are the most common disability type in students' DSA applications, and this has been the case for many years. However, applications for autism spectrum conditions and mental health conditions have increased significantly in recent years.

Table 7: DSA recipients by disability type

Disability Type	Percentage of DSA applicants
Autism Spectrum Condition	12.6%
Blind or Vision Impairment	1.5%
Deaf	2.4%
Specific Learning Difficulty	43.4%
Longstanding Illness	23.5%
Mental Health Condition	37.8%
Physical Mobility Condition	2.6%

Notes to Table 7:

- Data should be treated as indicative because it relies on manual data entry and is provisional and subject to change. Disability type is only captured on SLC's systems when acceptable evidence is received.
- Students with multiple disabilities may be recorded under more than one category, so the total percentage exceeds 100%.

[1] Data sourced from the Student Loans Company (SLC) for the 2021/22 academic year. Data includes students funded by Student Finance England attending HEPs UK-wide (i.e. in England, Wales, Scotland and Northern Ireland).

Scope of the call for evidence

As higher education (HE) is a devolved matter in Scotland, Wales and Northern Ireland, the questions in this call for evidence document are relevant only to students who are eligible to receive student finance through Student Finance England. This includes English-domiciled students studying in HEPs in Scotland, Wales and Northern Ireland.

The current system

Current arrangements for providing non-medical help

HEPs are required under the Equality Act 2010 to make reasonable adjustments for all their disabled students. Disabled students should, wherever possible, have their needs met through inclusive learning practices and individual reasonable adjustments made by their HEP. These adjustments usually include the less specialist types of NMH support such as proof-readers and examination assistants. DSA is available to supplement the reasonable adjustments made by HEPs by funding more specialist NMH support such as BSL

interpreting and specialist study skills support for students with mental health conditions and/or autism spectrum conditions.

The current process for a student to receive DSA-funded NMH support is as follows:

- The student makes an application to SLC for DSA and provides evidence of eligibility, including evidence that they have a disability as defined under the Equality Act 2010.
- When SLC have confirmed the student's eligibility, the student is asked to attend a needs assessment to determine their DSA-fundable support needs.
- The needs assessor writes up a report for SLC making recommendations for the type and amount of support that should be funded by DSA. Where NMH support is recommended, the needs assessor also provides quotes for that support from any two of the registered NMH suppliers.
- When SLC have approved the recommendations in the needs assessment report, they will write to the student confirming the type and financial level of the support that the student has been awarded and providing details of the identified suitable supplier or suppliers of that support.
- The student then (depending on the type of support) either contacts the supplier(s) to organise their support or is contacted directly by the relevant supplier(s) to organise their support.
- Suppliers usually invoice SLC directly; SLC will then pay the invoices on the student's behalf and deduct the amounts from the student's DSA entitlement.

Details of the NMH roles currently funded by DSA are set out at Appendix 2 below.

The DfE sets qualification requirements for NMH roles [1]. All suppliers who register to provide DSA-funded NMH support must, as a condition of registration, ensure that their support workers are appropriately qualified for the DSA-funded roles that they are delivering to students. This is audited by the DfE [2].

[1] The latest qualification requirements are available at [nmh-qualifications-matrix-july2023-updated-sept-23.pdf \(slc.co.uk\)](https://www.slco.co.uk/media/1934/nmh-qualifications-matrix-july2023-updated-sept-23.pdf)

[2] Details of the current auditing and quality assurance arrangements for NMH suppliers can be found at [practitioners.slco.co.uk/media/1934/nmh-auditing-and-quality-assurance-arrangements_february-2022_updated.pdf](https://www.practitioners.slco.co.uk/media/1934/nmh-auditing-and-quality-assurance-arrangements_february-2022_updated.pdf).

Rationale for considering changes

The overarching policy aim for NMH, and for DSA more generally, is to support disabled students to participate and succeed in HE. Our rationale for considering changes to the current NMH system is because the basic structure has been in place for many years and we wish to consider whether it should be adapted to take into account, for example, developments in the way support is delivered, new technologies, and the way in which HEPs support their disabled students. In addition, we have reason to believe that the current system is not working optimally.

Issues with the current system

Lack of integration of support

A key issue that has been raised with the current system is the lack of integration between DSA-funded support and the support provided by the student's HEP. Students often receive some NMH support from their HEP and some support from DSA. The DSA support is in some cases provided to students without the involvement, or even the awareness, of the student's HEP (it is for the student to decide if they wish to declare a disability to their HEP or share information about DSA with their HEP). Feedback from the sector suggests that this can make it very difficult for HEPs to provide joined-up, integrated support services for their disabled students; even where the student does share information about the support they have been awarded through DSA, this does not necessarily make it easier to link up DSA support with HEP support because decisions on the student's DSA entitlement have already been taken. It has also been suggested that this is a barrier to HEPs implementing the generally preferred social model of disability (where the focus is on removing barriers which affect disabled people rather than on "fixing" their impairment). In addition to this, it can result in administrative inefficiencies such as having multiple BSL interpreters or specialist note-takers in the same lecture to support different students, where one would have sufficed.

Administration of NMH

There is also evidence to suggest that the way in which NMH is currently administered is not working well for some students. A 2019 research report [1] commissioned by the DfE found that 34% of students who were eligible for DSA did not use all the support offered to them. 13% of these students said that this was because they had difficulties organising the process of accessing the support, and 11% said that they did not know how to access the support that had been identified for them.

As under the current process an NMH supplier does not know that they have been selected to provide support for a particular student until the student contacts them, this can also cause delays in putting a student's support in place. If a supplier cannot put support in place within 14 days of the student contacting them then they are expected to refer the student back to SLC to be allocated to another supplier; however, for students who are already in study by the time they have reached this point of their DSA application any delay in support can hamper their ability to access their studies.

NMH supply shortages

On some occasions there have not been sufficient NMH support workers available in some roles to support all the students who have been recommended those roles. This issue tends to affect particularly specialist roles such as BSL interpreters and mobility trainers, and can cause significant delays in support for affected students.

Value for money

In addition to this, the DfE has a responsibility to secure value for money in the use of public funds and to ensure that public funds are used fairly, transparently, and for the purpose intended. Under the current system, there are around 500 registered suppliers of NMH (including sole traders, small businesses, HEPs, and large agencies), with the supplier for each student chosen by SLC individually on the basis of quotes provided by needs assessors. Within such a system there are significant risks of poor value for money and inefficiencies.

[1] “Evaluation of disabled students’ allowances”, IFF Research, January 2019, page 50. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/915042/Evaluation_of_disabled_students_allowances.pdf. Note: respondents to this question will have included students with all types of DSA support, not just NMH.

Developments in HEP provision

As noted above, disabled students should, wherever possible, have their needs met through inclusive learning practices and individual reasonable adjustments made by their HEP. Following the decision to transfer responsibility for providing less specialist non-medical help from DSA to HEPs under their Equality Act 2010 responsibilities from the 2016/17 academic year, the sector-led Disabled Student Sector Leadership Group (DSSLG) published a report in 2017 which provided guidance to HEPs in achieving best practice in the provision of inclusive teaching and learning [1]. Following this, the Disabled Students’ Commission [2] (DSC) was established for a three-year period between January 2020 and January 2023 as an independent group to advise, inform and influence English HEPs and sector bodies to improve support for disabled students. During the first two years the DSC provided guidance to the sector on how to ensure that students with a disability could participate fully in higher education, particularly during the COVID-19 pandemic. In its final year, the DSC focused on communicating the needs and interests of disabled students to the higher education sector and its policy makers post-pandemic. In April 2023, the Disabled Student Commitment [3], a call to the sector and its bodies to make the step change that is required to create a more inclusive higher education environment for all, was launched.

As an example, one area of significant change has been for students with a mental health condition, where HEPs have been evolving their wellbeing services over recent years. Research published in May 2023 found that 86% provided in-house self-help resources and 83% offered in-house psychological support for those experiencing poor mental health, either face-to-face or virtual contact with a counsellor. 85% had early warning systems in place for mental health difficulties [4]. These services are a different type of provision from DSA-funded support for students with mental health conditions. As DSA cannot fund disability-related expenditure that the student would incur even if they were not attending an HE course, it cannot fund the management or treatment of a mental health condition, and the DSA-funded Specialist Mentor – Mental Health NMH role therefore focuses specifically on enabling students to access their academic studies. However, it is relevant to consider the interaction between the two types of support now that mental health support at HEPs has become so much more widely available.

[1] <https://www.gov.uk/government/publications/inclusive-teaching-and-learning-in-higher-education>

[2] <https://www.advance-he.ac.uk/equality-diversity-inclusion/disability-equality-higher-education/disabled-students-commission>

[3] [The Disabled Student Commitment | Advance HE \(advance-he.ac.uk\)](https://www.advance-he.ac.uk/disabled-student-commitment)

[4] [HE providers’ policies and practices to support student mental health \(publishing.service.gov.uk\)](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/915042/Evaluation_of_disabled_students_allowances.pdf)

6. Which category do you fall into?

- Current student in higher education
- Prospective student in higher education
- Graduate or leaver of higher education
- Higher education provider
- DSA Supplier
- Charity

7. Would you be happy for us to contact you about your response?

Yes

The questions below seek views on the way in which the current NMH system is working for students, HEPs, and DSA suppliers, and proposals for improvement.

8. What do you consider is working well for students in the current NMH system?
Please provide your response in the box below

The current system's person-centred approach acknowledges some students requires specialist access support ie it supports individual rights. Following the detailed assessment, some students access a package of support bespoke to their needs eg deaf students who use British Sign Language (BSL) might access BSL interpreters, note-takers and a Qualified Teacher of Deaf Children and Young People in the Specialist Support Professional (SSP).

The access to the QToD SSP, qualified and experienced practitioners in the field of deaf education, can be vital for some deaf students to be support to perform at their full potential.

The current system's needs assessments supports and educates students to find out what types of reasonable adjustments may help them, which they may not know otherwise. This Call for Evidence does not suggest any alternative system which guarantees disabled students' rights to support or which supports them to find out what kind of adjustments they need.

Within the current NMH system the student is not obliged to disclose to the HEP.

9. What do you consider is working well for HEPs in the current NMH system?
Please provide your response in the box below

There is an increasing in the number of deaf learners achieving academic grades that allow them to consider higher education options.

Under DSA, students are independently assessed and there is ear-marked funding for each student. If the system is working well, it supports the HEP nurture more inclusive learning and teaching practice. Staff and other peers have improved awareness of needs of others with disabilities which improves the social and holistic experiences of higher education.

Therefore, with the bespoke specialist support deaf students are more likely to stay on their course and receive the results they deserve.

Under the current system, universities are not penalised financially for enrolling high numbers of disabled students needing specialist support. Without DSA, it is likely they would be less willing to enrol disabled students due to the cost of specialist support and risk of student drop-out from inadequate support packages.

10. What do you consider is working well for DSA suppliers in the current NMH system?
Please provide your response in the box below

DSA has a framework of fees for specialist support workers. Some suppliers have established a good reputation for the ability to source and supply QToDs and CSWs as SSP, although the retention of a high proportion of the fees by the DSA supplier can deter recruitment of some suitably qualified SSPs.

11. What aspects of the current NMH system do you consider are not working well for students?

Please provide your response in the box below

- Some students have to wait a long time for their DSA assessment to come through and their support to be allocated. This impacts on their access to their studies and subsequently on their social and emotional well-being. However, the removal of an individualised support package would not guarantee this problem would be resolved, as students will still need to be assessed for their support, and universities will continue to outsource work to agencies, unless they are properly resourced to be able to take on their own specialist support staff.
- Within the current system, some deaf students are directed to select only one option of the support package they request eg BSL interpreter or a note-taker.
- Some students have to manage additional unnecessary stress and administration workload during their studies when they become aware the SSP assigned is not a QToD (a specialist with Level 7 mandatory qualification in deaf education) but a communication support worker (CSW). For the students commencing the course they are requiring tutors with a specialism in deafness to support them by:
 - modifying or explaining the language used in course materials so that it's easier to understand
 - giving support in structuring and preparing for assignments
 - helping students to develop strategies that overcome barriers to learning
 - providing advice about radio aids, other technology and audiology
 - supporting access to research resources
 - giving advice on the use of the English language in assignments
 - providing the HEI with specific advice on making adjustments.

- Some students are unable to access the suitably qualified and experienced practitioners because agencies cannot recruit enough professionals due to the low rates that they pay.
- The removal of an individualised support package would not guarantee this problem would be resolved, as universities will continue to outsource to agencies unless they are given ear-marked government funding to organise recruitment, training and management of their own specialist support staff. The low-incidence nature of deafness, means some less experienced universities, will likely be attracted to the lowest bidding and have sufficient understanding to distinguish the specifications required to meet each deaf students' specialist support needs. The existence of the Equality Act already does not guarantee that a highly specialised and costly package of support is in place for deaf students.

12. What aspects of the current NMH system do you consider are not working well for HEPs?

The routes for communication between suppliers and HEPs.

Face to face support is challenging to source in some areas. However, provision of online access is not a suitable solution. The environmental acoustic standards, technology quality, provision and connectivity of assistive technology and user knowledge in some settings is poor causes ineffective access via online platforms.

The access to specialist mental health services for students who feel overwhelmed when the process and provision is inadequate.

University support services are extremely stretched and do not have the resources they need. Some do not have enough staff to be able to manage individual students' NMH support effectively. However the removal of an individualised support package would not solve this problem, as universities would then have to fund specialist support workers as well, leaving even less resources for management and administration.

13. What aspects of the current NMH system do you consider are not working well for DSA suppliers?

Multiple factors eg low rate of pay, ineffective timely and accurate communication between agency and practitioner, has caused some qualified and experienced QToD SSPs and others professionals to cease support in the higher education sector.

Some students may lack understanding of the personal specifications they require to fulfil their needs with SSP roles. The challenge to the supplier when it is understood the recruitment of less qualified professionals to the role is inadequate to meet needs, leads to reputation damage for the supplier within deaf communities and among professionals linked to the SSP role.

The removal of an individualised support package does not guarantee these issues will be resolved. Specialist staff such as SSPs will expect suitable rates of pay for their level of expertise which universities may feel does not align with their budget parameters.

14. Do you have any suggestions for how the current NMH system could be improved?
Please provide your response in the box below

There are shortages of specialised support for deaf students which is not helped by the current DSA system. A modification to the system that allows recruitment of freelance specialists for deaf students could reduce the number of deaf student facing unnecessary challenges resulting from agencies allocated by DSA assessors failing to deliver.

Future of the non-medical help system

Fundamental principle

DSA is currently awarded as an individual grant to a student regardless of where or what they are studying. DSA has been in existence for many years [1] and is based on the medical model of disability (where the focus is on “fixing” a person’s impairment and/or providing support for them as an individual) rather than on the now more generally preferred social model of disability (where the focus is on removing barriers which affect disabled people) [2]. This means that if any significant changes were to be made to move DSA-funded NMH support towards a more social model, these would be likely to focus on the role of the HEP in providing an inclusive learning and teaching environment. There is, therefore, a fundamental question as to whether an individual student should have a funding entitlement for more specialist NMH support or whether it should be the responsibility of a HEP to provide NMH support to students, assisted by funding from DfE. The concept of an individual entitlement provides a safeguard of a minimum level of more specialist NMH support for eligible disabled students, whereas the model where a HEP takes overall responsibility provides more scope to achieve the social model of disability within HEPs, removing barriers to disabled students’ participation and attainment.

As outlined above in the “Background” section, DSA recipients are spread across diverse types of HEP, including large universities, highly specialist providers, further education colleges with a small amount of higher education provision, and SCITT providers. Tables 8 and 9 below set out in more detail the distribution of DSA recipients by HEP [3].

Table 8: Number and percentage of HEPs with DSA recipients in each DSA recipient number range

Number range of students	Number and percentage of providers with DSA recipients in each number range	
	Number	Percentage
<50	400	71.8%
50-99	26	4.7%
100-499	59	10.6%
500-999	56	10.1%
1,000-2,000	15	2.7%

>2,000	1	0.2%
Total	557	100.0%

Table 9: Number and percentage of DSA recipients at HEPs in each DSA recipient number range

Number range of students	Number and percentage of DSA recipients at HEPs in each DSA recipient range	
	Number	Percentage
<50	4,049	4.9%
50-99	1,781	2.1%
100-499	16,381	19.7%
500-999	39,909	48.0%
1,000-2,000	17,555	21.1%
>2,000	3,436	4.1%
Total	83,111	100.0%

[1] Data sourced from the Student Loans Company (SLC) and includes all students funded through Student Finance England (SFE) who received a DSA payment in the 2021/22 academic year.

[2] DSA was introduced in the 1974/75 academic year.

[3] For further details on the social model and the medical model of disability, see for example [FDN-218144 Introduction to the Social and Medical Models of Disability.pdf](https://www.ombudsman.org.uk/FDN-218144-Introduction-to-the-Social-and-Medical-Models-of-Disability.pdf) ([ombudsman.org.uk](https://www.ombudsman.org.uk)).

15. Do you consider it more important for a student to have an individual entitlement for more specialist NMH support or for a HEP to have overall responsibility for the whole of a student's NMH support?

Individual entitlement more important

Other (please specify)

Please can you explain your answer to the question above.

- BATOD would consider it is more important for a student to have an individual entitlement for more specialist NMH support. It enables deaf students (in principle) to

access any HE provider across the UK – that is important given that some courses are highly prestigious, specialised or close to home.

- The current process does burden the student ie applying to the Student Loans Company (SLC), attending a needs assessment, following SLC's confirmation organising the support with approved suppliers and highlighting and challenging if concerns arise. However, BATOD feels there are risks of a system where there is no individualised funding for deaf students. Whilst universities having control of budgets should help reduce the admin burden for deaf students, there are no regulatory pressures on universities to take their responsibilities under the Equality Act seriously. Although DfE mandates qualification requirements for NMH roles to ensure support workers are appropriately qualified, and compliance is audited by DfE. There would be no guarantee that a university would put in place highly specialised and costly support for deaf students. The Office for Students assesses equality of outcome rather than equality of opportunity, which means they do not even record whether or not disabled students get the reasonable adjustments they need.

- Some universities could be disadvantaged financially by taking a positive approach to enrolling deaf students unless sufficiency of funding is guaranteed. There will be even wider disparity between universities who can afford to resource this properly, and those who can't. Universities will subtly try to discourage some students to apply for fear of being penalised by the heavy cost
- There will be no possibility of planning, because universities won't know which students they're going to get, with which disabilities, year to year. They'll just have to have massive, open-ended budgets for the very types of support that no amount of "being inclusive" will fix.

- irrespective of the adoption of inclusive practice individualised adjustments including NMH will still be needed for many students.
- University support services are extremely stretched and do not have the resources to fund specialist disability support.
- A postcode lottery of support is already existing. All students should receive the support they are entitled to.
- DSA assessments are specific to each individual and guarantee that individual rights. Needs assessments also support and educate students to find out what types of adjustments may help them, which they may not know otherwise.
- This Call for Evidence does not
 - suggest any alternative system which guarantee disabled students' rights to support or support them to find out what kind of adjustments they need.
 - provide evidence-based data to support the NMH supply shortage statement nor articulate how changing the model of provision might improve these shortages.
 - explain if HEPs are given overall responsibility for delivery, if will they still have to adhere to the same mandatory qualifications? Standards of provision must be supported by appropriately qualified staff.

The danger with removing individual funding is that disabled students are seen as unaffordable and resource intensive, which reinforces ableism at a time when it is prevalent in society, rather than supporting universities on their journeys to inclusion.

shared understanding of what good inclusive practice looks like, and designing away common barriers.

- There is a lack of information about what is considered “new technologies”. Technological innovations can support certain categories of disabled students but their use often requires tailoring, training and many different types of equipment, ranging from physical aids to computer-assisted technologies and AI. There is little evidence that these have a positive impact on, for example, student mental health, or that they should be a replacement for human support.
- Similarly, there is an example used in the document which describes how mental health and wellbeing services have received additional investment, however, much of this has focused on either general student population wellbeing support, or crisis support, rather than the tailored support provided by Specialist Mental Health Mentors.

As well as practical problems associated with fluctuating and unpredictable student numbers (particularly when it comes to students with high need but low incidence disabilities), the challenge of on-costs and the extra administrative burden of removing the current DSA model would be insurmountable for some universities if funding was instead distributed to HEPs directly in a similar way to the Disability Premium.

There are no regulatory pressures on universities to comply with their Equality Act responsibilities and pay for the specialist support that many disabled students need. The Office for Students assesses equality of outcome rather than equality of opportunity, which means they do not even record whether or not disabled students get reasonable adjustments. So it is likely that universities would decide to support some students and not others, to provide some support and not others.

Without DSA, universities will be less willing to enrol disabled students due to the cost of specialist support. It is also likely that higher numbers of disabled students will drop out because they are not being supported adequately, which is bad for universities’ finances and reputation.

Universities cannot know in advance how many students in need of specialist NMH support will enrol, therefore it is impossible to plan financially.

16. How do you think giving HEPs overall responsibility for the whole of a student’s NMH support would affect the provision offered?

Please provide your response in the box below

- Even if HEPs were given block funding, and provided like-for-like support this would require large amounts of administration, and include recruitment, training, and quality assurance. The experiences of Imperial College London and Cambridge University should be explored to provide evidence of what has been required in their approaches.
 - If stretched student support services in HEPs are already failing to help students access and make the most of their allocated provision, what changes and further staffing might be required to provide more universal, 'inclusive' services?
 - How would this be independently evaluated if implemented across the sector?
-
- *A key issue that has been raised with the current system is the lack of integration between DSA-funded support and the support provided by the student's HEP...Feedback from the sector suggests that this can make it very difficult for HEPs to provide joined-up, integrated support services for their disabled students; even where the student does share information about the support they have been awarded through DSA, this does not necessarily make it easier to link up DSA support with HEP support because decisions on the student's DSA entitlement have already been taken. It has also been suggested that this is a barrier to HEPs implementing the generally preferred social model of disability...*

There is a lack of evidence to support these statements or that this prevents HEPs delivering the social model. What is stopping HEIs from providing a 'social model' of disability, if that's what they want?.

17. Do you think a single approach will work for all students and HEPs?

Yes No

Why?

Some universities are able to fund their own specialist support workers but most cannot.

Equality impact assessment

From an equality impact perspective, the model where a HEP takes overall responsibility could, if the policy aim is achieved, have important positive impacts on the participation and completion rates of disabled students in higher education and on their post-study outcomes. However, on the other hand there is a risk that students whose HEP does not perform well in

supporting them may have worse outcomes than if they had an individual entitlement to more specialist NMH support.

There is also a small group of students who have very high cost NMH support needs that exceed the maximum currently available through DSA. If HEPs were to take overall responsibility for all NMH support, this could provide more flexibility within an overall budget for HEPs to support these students throughout their courses. On the other hand, it is possible that if a HEP has significant numbers of such students at any one time, this could put pressure on the budget for other types of NMH support for other students.

An approach where HEPs take overall responsibility would also require students to declare their disability to their HEP in order to receive NMH support. While we would encourage students to declare their disability to their HEP, if a student chose not to do so then it is likely that under this approach they would not receive NMH support that they would have received under the individual entitlement model.

18. What do you think the potential equality impacts are of the individual entitlement model compared to the HEP overall responsibility model?

Please provide your response in the box below

Equality Impact Assessment - the statements included in this section are very speculative, for example "the model where a HEP takes overall responsibility could, if the policy aim is achieved, have important positive impacts on the participation and completion rates of disabled students in higher education and on their post-study outcomes". For such an important area of provision for Disabled students, there should be a meticulous Equality Impact Assessment with an evidence-based approach. Disabled students are not one homogenous group, and Equality Impact Assessments undertaken should reflect the diversity and wide range of disability and neurodiversity categories

NMH roles

From 2016/17 responsibility for providing less specialist NMH moved from DSA to HEPs under their Equality Act 2010 responsibilities. The 17 more specialist NMH roles that are currently funded through DSA are as follows:

- Sighted Guide
- Lipspeaker
- Specialist Notetaker - Deaf (SN-D)
- Speech to Text Reporter (STTR)
- Respeaking
- Specialist Notetaker - Vision Impairment (SN-VI)
- Mobility Trainer
- Specialist Mentor – Mental Health (SM-MH)
- Specialist Mentor – Autism Spectrum Conditions (SM-ASC)

- Specialist one-to-one Study Skills and Strategy Support – Autism Spectrum Conditions (SS-ASC)
- Specialist one-to-one Study Skills and Strategy Support – Specific Learning Difficulties (SS-SPLD)
- British Sign Language (BSL) Interpreter
- Specialist Support Professional - Deaf (SSP-D)
- Specialist Support Professional - Deaf with BSL (SSP-D-BSL)
- Specialist Support Professional - Vision Impairment (SSP-VI)
- Specialist Support Professional - Multi-Sensory Impairment (SSP-MSI)
- Specialist Support Professional - Multi-Sensory Impairment with BSL (SSP-MSI-BSL)

A full description of the purpose of each role is set out at Appendix 1.

19. Are some of the existing DSA-funded support roles more suited than others to be delivered by HEPs? If so, which roles?

Please provide your response in the box below

The question is not about who delivers the support, it is about how it is funded. Universities can deliver support which is funded by DSA and many do or have done in the past.

20. Are there any DSA-funded NMH roles that you consider are no longer needed, or should be adapted?

Please provide your response in the box below

21. Are there any NMH roles not currently funded by DSA that you think should be?

Please provide your response in the box below

All of the NMH roles should be funded by DSA, including those that were funded pre 2016.

22. Have you experienced any issues with specific NMH roles, and if so what are those?

Please provide your response in the box below

23. Do you have any other comments on DSA-funded NMH support?

Please provide your response in the box below

- *A 2019 research report commissioned by the DfE found that 34% of students who were eligible for DSA did not use all the support offered to them. 13% of these students said that this was because they had difficulties organising the process of accessing the support, and 11% said that they did not know how to access the support that had been identified for them ([Johnson et al., 2019](#))*
 - We agree that this process and information, advice and guidance about DSA should be improved and have discussed this with both the Department of Education (DfE) and Student Loans Company (SLC). A possible solution is that SLC could ask the student to consent to share information directly to the NMH provider, for example. Another improvement would be an accessible

student dashboard where a student can clearly see what stage their application is at, and what action they need to take next; this has been already planned by SLC, we believe, but has yet to come into place.

Appendix 2 – Purpose of DSA-funded NMH roles

This appendix sets out a description of the purpose of each of the NMH roles currently funded through DSA.

Sighted Guide

A sighted guide may be required to assist a student with visual impairment to navigate the campus and may be required for all or part of each day the student needs to attend the university. This role's objective is to support the physical attendance at lectures, tutorials, workshops etc. and not to support with accessing the information that is delivered.

Sighted guides must have good people skills and familiarise themselves with the student's routes around campus. They should have the skills and competence to work effectively at the direction of the student and have knowledge of sighted guide techniques and how to keep the student safe.

Lipspeaker

This support is provided to convey a speaker's message to lipreaders accurately using unvoiced speech. The support worker is required to work flexibly with an individual deaf student in lectures, workshops, tutorials, etc. Lipspeaking is provided by qualified and trained Lipspeakers who should understand how deafness affects learning in the HE context.

Specialist Notetaker - Deaf (SN-D)

There are a range of specialist notetaking options which can be provided for deaf students. DSA study needs assessors should discuss with the student which option will be most appropriate to enable them to access their course. This role is different from Specialist Transcription which is no longer DSA-fundable other than by exception.

The primary requirement of this support is to make a comprehensive set of notes to meet the needs of the student for access, review, and revision purposes.

The notetaker may be either a manual notetaker (handwritten notes or handwritten notes that are later typed) or an electronic notetaker. The notetaker will make a comprehensive (although non-verbatim) typed (electronic) or hand-written record of the content of lectures, seminars, discussions, etc. in the student's preferred style and format.

Electronic notetaking can sometimes involve a trained operator using a standard laptop and specialist software (e.g., NoteEd®, Speedtext® or Stereotype®) which enables them to provide summary notes. Many electronic notetakers prefer to use standard software packages which are accessible by the student, e.g. Microsoft Word, Google Docs, etc. However, this will differ for some courses. For example, students studying science, technology, engineering, and mathematical subjects (STEM) may prefer notes to be produced in LaTeX.

The support worker uses their own laptop.

Some students may wish to receive the information simultaneously on their own computer using specialist software or using Google Docs/MS Teams via an internet link.

If practicable in the context of the HEP's teaching arrangements, electronic notetaking may be delivered remotely. The notes can be sent to the student within a specified time frame or will be saved by the student at the end of the session.

Speech to Text Reporter (STTR)

STTR involves a trained operator using a specialist chorded keyboard system and software to enable them to listen to speech and transcribe the text verbatim. The text is instantly displayed on a screen at 200-300 words per minute with an accuracy of 97-99% for the student. This support is available for deaf and hard of hearing students but should only be recommended where:

- a verbatim record is needed to enable the student to interact with others or to follow a session (for example, a tutorial where it is important to capture discussions in real-time), and
- the student has a high fluency in English.

Students who use British Sign Language are unlikely to require STTR in lectures, as they will be concentrating on the BSL delivery of the lecture. However, they will still require notes to be delivered by specialist notetakers trained to take notes for deaf and hard of hearing students.

STTR is not a standard recommendation for deaf and hard of hearing students and will be considered on a case-by-case basis. STTR can be provided remotely, if practicable in the context of the HEP's teaching arrangements.

Respeaking

Respeaking involves a trained operator listening to speech and simultaneously 'respeaking' this to provide a verbatim, real-time transcription of lectures, tutorials, etc. by using trainable voice recognition software. Text is provided to the student via a computer screen in a similar manner to Speech to Text Reporting (STTR), and a full print-out of the text is available at the end of the session should this be required.

This support is available for deaf and hard of hearing students but should only be recommended where:

- a verbatim real-time record is needed to enable the student to interact with others or to follow a session (for example, a tutorial where the student needs to interact with the tutor), and
- the student has a high fluency in English.

Students who use BSL are unlikely to require respeaking in lectures, as they will be concentrating on the BSL delivery of the lecture. However, they will still require notes to be delivered by specialist notetakers trained to take notes for deaf and hard of hearing students.

Respeaking is not a standard recommendation for deaf and hard of hearing students and will be considered on a case-by-case basis. Respeaking can be provided remotely, if practicable in the context of the HEP's teaching arrangements.

Specialist Notetaker - Vision Impairment (SN-VI)

For visually impaired students there are now many forms of assistive technology that can provide some support in this area and may be considered as an alternative.

Assistive technology may enable students to become independent, autonomous learners in many cases and therefore should be considered first where a particular barrier exists and where assistive technology would fully meet the student's notetaking needs. DSA study needs assessors should discuss with the student which option will be most appropriate for them to gain access to their course. This is different from Specialist Transcription.

The role of specialist notetaker for visually impaired (VI) students is to produce a comprehensive set of notes in an accessible format, in accordance with the working preference of the student for access, review, and revision purposes.

The support worker uses their own laptop.

Some students may wish to receive the information simultaneously on their own computer using specialist software or using Google Docs/MS Teams via an internet link. Notes will most commonly be provided in document format e.g. Microsoft Word or Google Docs, but

this will differ for some courses. For example, students studying science, technology, engineering, and mathematical subjects (STEM) may prefer notes to be produced in LaTeX. These notes should be formatted using a style sheet, with a clear heading structure to enable the student to navigate the document using assistive technology. Notes should include the interpretation and description of any visual information presented in the lecture. The NMH provider should aim to provide a specialist notetaker with the most appropriate skills for the student's needs (e.g. proficiency in mathematical symbols).

For visually impaired students who use Braille, the laptop could be linked to Braille reading equipment. For example, typed information can be converted into Braille by the student if they have the appropriate software/hardware and the notes have been prepared properly using a style sheet.

If practicable in the context of the HEP's teaching arrangements, electronic notetaking may be delivered remotely. Notes can be sent to the student within a specified time frame or will be saved by the student at the end of the session.

Mobility Trainer

The Mobility Trainer provides a professional assessment of the campus location and then conducts a time limited programme of training. This training is particularly applicable for blind or visually impaired students who will require an individually developed programme based on the needs set out in their needs assessment report and who will need to learn with their coach safe routes around the campus. This support can also be recommended by exception for students whose disability means that they have difficulty with orientation, for example students who have significant difficulty with orientation because of acquired brain damage.

For ongoing support around campus, a sighted guide might be a more appropriate recommendation.

Specialist Mentor – Mental Health (SM-MH)

The purpose of the Specialist Mentor (SM:MH) role is to support students in accessing their HE studies by:

- Supporting students in understanding what is required of them academically in higher education.
- Identifying barriers to the student's learning.
- Helping students to develop effective organisation and time management skills and strategies to manage their workload and deadlines in the presence of their mental health condition.
- Helping students with prioritisation and realistic goal setting, including producing plans of work and targets.
- Developing a support programme to facilitate the growth of the student's independence, reducing the need for support in the longer term.

The SM:MH must not offer any subject-specific support or tutoring, or any counselling or therapeutic support relating to the student's mental health condition. These are outside the remit of the SM:MH role.

It is expected that SM:MHs should have an understanding of different mental health conditions and the impact they may have on the student accessing their studies. This can include, for example, personality disorders, eating disorders, phobias, depression, anxiety, bi-polar disorder, psychosis (including schizophrenia), addiction, obsessive compulsive

disorder, and identity issues. SM:MHs should also have an understanding and awareness of students with more complex presentations of multiple disabilities such as specific learning difficulties, long-term health conditions, or autism alongside a mental health condition.

SM:MHs should be alert to and follow up on concerns relating to the students they support. For example:

- The student is showing signs of disengagement or growing vulnerability (e.g. lack of attendance, late submission or non-submission of work, disciplinary issues, etc.).
- The student is showing warning signs such as: suicidal thoughts, actions, or plans; self-harm, including cutting; and threats of involvement in terrorism.

SM:MHs should be aware of the support offered by the HEP and by external organisations such as the NMH provider and make the appropriate onward referrals in a crisis.

SM:MHs should be able to understand and manage professional boundaries, establishing and maintaining productive working relationships with students while understanding the importance of professional record-keeping and confidentiality.

SM:MHs must work with students in a sensitive and empathetic manner and respond positively and calmly to students in distress. Professional listening, observation and communication skills are essential

Specialist Mentor – Autism Spectrum Conditions (SM-ASC)

The Specialist Mentor Autism (SM:ASC) role can be recommended for students with autism spectrum conditions (ASC), attention deficit disorder (ADD) or attention deficit hyperactivity disorder (ADHD).

The purpose of the SM:ASC role is to support students in accessing their higher education (HE) studies by:

- Supporting students in understanding what is required of them academically in HE.
- Identifying barriers to the student's learning.
- Helping students to develop effective organisation and time management skills and strategies to manage their workload and deadlines in the presence of their condition.
- Helping students with prioritisation and realistic goal setting, including producing plans of work and targets.
- Developing a support programme to facilitate the growth of the student's independence, reducing the need for support in the longer term.

The SM:ASC must not offer any subject-specific support or tutoring, nor act as an advocate or counsellor. These are outside the remit of the SM:ASC role.

It is expected that SM:ASCs should have an in-depth knowledge and experience of autism and an understanding of the demands of study in HE. They should be able to recognise when there is a need to refer to other support services, both inside and outside the HEP.

Specialist one-to-one Study Skills and Strategy Support – Autism Spectrum Conditions (SS-ASC)

The Specialist one-to-one study skills and strategy support autism (SS:ASC) role can be recommended for students with autism spectrum conditions (ASC), attention deficit disorder (ADD) or attention deficit hyperactivity disorder (ADHD).

This specialist one-to-one support focuses on helping students to develop study skills and strategies to work effectively in a higher education context in the presence of their condition. It should be tailored to a student's individual needs, and support workers delivering this role should set out clear goals and timescales for achieving these goals. A reducing level of support to enable independence should be agreed, where it is appropriate.

Support workers undertaking this role should have an in-depth knowledge and understanding of autistic thinking and learning, together with an awareness of the strengths which students with these conditions can bring to a learning situation and the skills to help students make use of these strengths and overcome barriers to learning. An understanding of relevant assistive technology (AT) is also desirable.

Specialist one-to-one Study Skills and Strategy Support – Specific Learning Difficulties (SS-SPLD)

This specialist one to one support focuses on helping students to develop study skills and strategies to work effectively in a higher education context in the presence of their condition. This support can be recommended for students with an SpLD, and also by exception in cases where a student has another condition which has an impact on their learning similar to that of an SpLD (e.g. an acquired brain injury). This support should be tailored to a student's individual needs, and support workers delivering this role should set out clear goals and timescales for achieving these goals. A reducing level of support to enable independence should be agreed, where it is appropriate.

Support workers undertaking this role should have an in-depth knowledge and understanding of the effects of SpLDs on language and learning in a higher education context, together with an awareness of the strengths which students with these conditions can bring to a learning situation and the skills to help students make use of these strengths and overcome barriers to learning. An understanding of relevant assistive technology (AT) is also desirable.

British Sign Language (BSL) Interpreter

BSL interpreters are interpreters for students who are deaf and whose first or preferred language is BSL. The interpreter will attend lectures, seminars, tutorials, etc. with the student and will interpret from English to BSL or vice versa. Interpreters will use their skills and knowledge of BSL and English and their understanding of the differences between the two in order to receive information in one language and pass it on in another.

Interpreters must be regulated by NRCPD as either TSLI (Trainee Sign Language Interpreters) or RSLI (Registered Sign Language Interpreters) and should have an understanding of BSL interpretation in an HE context.

Specialist Support Professional – Overview

This support is bespoke support for the individual needs of students with a sensory impairment which reflects their method of communication, educational history, and experience.

Support may include breaking down assignment briefs and English concepts, developing research and composition strategies, working on the structure and mode of presentations, organisation, time management, communication, etc., which should facilitate strategies for independent learning.

This support is not subject specialist support but support to enable access to the course. The SSP may also, where appropriate and with the student's permission, provide advice to the HEP's disability officers and teaching staff on the adjustments that could be made to create an inclusive learning environment for the student.

Specialist Support Professional - Deaf (SSP-D) / Specialist Support Professional - Deaf with BSL (SSP-D-BSL)

In addition to the overview above, the SSP role for deaf students uses appropriate communication strategies to enable access and understanding of carrier language (this is not subject-specific vocabulary), to support access to research sources and to support preparation for assignments. This support will include appropriate modification to allow for language of assignments.

Specialist Support Professional - Vision Impairment (SSP-VI)

In addition to the overview above, the SSP role for visually impaired students uses appropriate communication strategies to enable access to and understanding of the course, to support access to research sources and to support preparation for assignments. The support provided by the SSP is bespoke to individual student's specific vision impairment. The student should be supported to develop strategies to overcome barriers to learning.

Specialist Support Professional - Multi-Sensory Impairment (SSP-MSI) / Specialist Support Professional - Multi-Sensory Impairment with BSL (SSP-MSI-BSL)

The support provided by the SSP-MSI role is bespoke to the combined vision and hearing impairments of the student (including deafblind students). The support worker uses appropriate communication strategies to enable access and understanding of vocabulary, and to support access to research sources and appropriate modification of the language of assignments.