Consultation on targeting funding for disabled students in Higher Education from 2016/17 onwards

Adapted from original submission template to ensure the document meets accessibility requirements

# Your details

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# Question 1

**Do you think a minimum level of reasonable adjustments for all HE providers could help ensure a consistent approach to making reasonable adjustments?**

Response

No

We welcome the movement towards more inclusive learning environments in higher education, and believe that ultimately this would benefit students with disabilities. However, we have research evidence from a longitudinal study which has been following the transition experience of students with visual impairments across a variety of pathways, including higher education (further details on the project are available [[on our project webpage]](http://www.birmingham.ac.uk/research/activity/education/victar/research/transitions-study.aspx) which demonstrates that at present some HE providers are failing to make the most basic of reasonable adjustments. We believe there is significant work needed within the sector to be able to get to a position where they will be able to meet minimum levels of reasonable adjustments, and therefore this would not be possible by the proposed 2016-17.

Minimum levels of reasonable adjustments should draw upon the Higher Education Academy guidance on inclusive curriculums for Higher Education Providers. For example please refer to [[HE Academy]](https://www.heacademy.ac.uk/sites/default/files/resources/introduction_and_overview.pdf) which presents principles of inclusive practice, and [[QAA]](http://www.qaa.ac.uk/publications/information-and-guidance/uk-quality-code-for-higher-education-chapter-b4-enabling-student-development-and-achievement#.VebXwVJNqu8) which describes indicators of sound practice.

Specific guidance in relation to accessible materials and reasonable adjustments is offered by [Load2Learn](https://load2learn.org.uk/).

# Question 2

**Do you think there are other mechanisms that could be introduced to achieve a consistency of reasonable adjustments for disabled students across all HE providers?**

Response

Yes

* Continuing with comprehensive DSA assessments of needs which will describe the reasonable adjustments which a HE provider is expected to provide for a student. Our research evidence shows that at present disability support officers (DSOs) at universities use the DSA assessment of needs for guidance with regards to what support it should be making available for that student. This is particularly true for students with severe visual impairments where the DSOs would often otherwise feel ill-equipped to develop support plans for the student.
* Statutory guidance for HEs on their responsibilities and duties, and also guidance in the interim for how to prepare to meet these responsibilities

# Question 3

**Do you have any examples of how it might prove difficult for an HE provider to make reasonable adjustments because of the nature of their student population (e.g. if the HE provider has a very large or small student cohort)?**

No response

# Question 4

**Do you think the Government’s preferred option for non-medical help (NMH) changes fulfils the policy rationale of making HE as accessible as possible, re-balancing support between HEIs and DSAs, and improving value for money?**

Response

No

We have research evidence that in some cases the level of non-medical help could be reduced if more reasonable adjustments were made, which in turn would benefit the students, and over time reduce spending. However, it is important to recognize that some of the NMH which disabled students receive is essential for their participation on the course and this is separate from, and not interchangeable with, reasonable adjustments (whether physical or systemic). It is therefore important to still have a mechanism to document and enforce the support that a particular student will need. We have observed cases where students have not received the NMH which they were needed (for example, note-takers and library support not being available due to staff shortages), and had to retake the year at university, which has resulted in greater expense for the student, the HE provider and DSA, and most significantly, a very unfavourable experience for the student.

# Question 5

**Do you think any of the alternative options b) to e) for NMH provision in paragraph 58 of the consultation document could deliver the support required and meet the need to make HE as accessible as possible, re-balance support between HEIs and DSAs, and improve value for money?**

Response

No

Each of these options have limitations:

b) These option is unrealistic due to the extent of NMH that some students require, which cannot be reduced significantly simply by reasonable adjustment. This will likely lead to either HE providers being reluctant to offer places to students who will require significant levels of NMH, or students not receiving the support they need

c) If the amount of funding that HE providers are to contribute is fixed, this gives them no real incentive to develop better inclusive practice long-term

d) Disability officers at HE institutions currently do not have the level of knowledge to make such decisions (particularly in the case of low-incidence disabilities). They also will have a conflict of interest. It would be more appropriate for DSA assessors to make this judgement. Finally, it is unlikely that disability officer teams would have the capacity to have such extensive meetings with all students who will potentially be attending the university, and therefore universities would need time to recruit additional staff and train them to be able to make these assessments.

# Question 6

**Do you have an alternative proposal for NMH provision?**

Response

Yes

DSA assessors to determine the support which would be most appropriate for HE providers to put into place, and also to determine the support which should be provided through DSA, according to pre-determined guidance. E.g. HE providers given responsibility to ensure that all learning material is provided in an appropriate and accessible format; DSA is available to purchase equipment which is essential to enable access; NMH (funded through DSA) is provided to provide timely training to students so they can use and access specialist systems NMH is provided for support to students with particular identified activities.

# Question 7

**In NMH Band One categories a - e and g are there any circumstances where the primary responsibility for provision should not sit with the HE provider?**

Response

Yes

Taking each in turn:

1. Concern that HE providers may use practical assistants who haven’t had any relevant specialist training – however if this is needed it could be specified in the DSA assessment to be passed onto the institution
2. This support should be available as part of the HE providers reasonable adjustments
3. This support should be available as part of the HE providers reasonable adjustments – although readers need to have had relevant training, and also in the case of for example science based subjects, have the relevant subject knowledge
4. This support should be available as part of the HE providers reasonable adjustments – although readers need to have had relevant training, and also in the case of for example science based subjects, have the relevant subject knowledge
5. See a - concern that HE providers may use practical assistants who haven’t had any relevant specialist training – however if this is needed it could be specified in the DSA assessment to be passed onto the institution. Assistant also needs to have specialist subject knowledge
6. -
7. For students with visual impairments, proof reading and formatting essays can be a difficult very visual task, and one that can not always be overcome in using assistive technology. Therefore it should be anticipated that NMH will be required for this task.

# Question 8

**In NMH Band One category f (see More Information) are there any circumstances where the primary responsibility for provision should move to the HE provider?**

Response

No, but the HE providers responsibility should be to help facilitate the student in learning routes, so that they need the minimum level of sighted guide support. For example, by helping arranging mobility support early on, by providing timetables in good time for the student to learn new routes, and allowing the student to move into their accommodation early so they can start working with a mobility officer earlier.

Priority should be given to orientation support so that minimal sighted guide support is needed – appropriate that it should still be funded by DSA, although HE should make reasonable adjustments in the event of, for example, room changes which could cause the student to need to use a sighted guide.

# Question 9

**In NMH Band One category f (see More Information) are there any circumstances where the primary responsibility for provision should move to the HE provider?**

Response

No

No, but the HE providers responsibility should be to help facilitate the student in learning routes, so that they need the minimum level of sighted guide support. For example, by helping arranging mobility support early on, by providing timetables in good time for the student to learn new routes, and allowing the student to move into their accommodation early so they can start working with a mobility officer earlier.

Priority should be given to orientation support so that minimal sighted guide support is needed – appropriate that it should still be funded by DSA, although HE should make reasonable adjustments in the event of, for example, room changes which could cause the student to need to use a sighted guide.

# Question 9

**In NMH Band Two categories a – c are there any circumstances where the primary responsibility for provision should not sit with the HE provider?**

Response

Yes

Our research evidence shows that students with more severe visual impairments benefit greatly by having note-taker support, and often this can result in them using all of their non-medical help budget. Due to the challenges their disability poses, they often work at a slower pace than the average student, and therefore can often miss important information. The majority of students with more severe visual impairments also access lecture notes and type notes electronically using speech software, which is often impractical / incompatible with lectures involving lots of spoken content. Some get round this by using relatively expensive braille note-taking equipment instead (with associated braille display), although a further challenge that students with disabilities face is the limited funding which is available to purchase the necessary equipment for them to make these adjustments. Therefore if the proposed changes have more reliance on assistive technology, the funding needs to be available for these students to be able to access this equipment.

Our research shows that note-takers in some subjects also double-up as sighted assistants who can help the student in accessing some unavoidably visual aspects of their courses, such as interpreting diagrams which lectures are presenting.

# Question 10

**In NMH Band Three category c (see More Information) are there any circumstances where the primary responsibility for provision should not sit with the HE provider?**

Response

No

Here we interpret this to mean HE providers ensuring that course material is transcribed to ensure that it is an accessible format for the student. This should come under the responsibilities for reasonable adjustments for the HE provider.

# Question 11

**In NMH Band Three categories a, b, and d are there any circumstances where the primary responsibility for provision should move to the responsibility of the HE provider?**

Response

No

This type of support sits beyond the remit of reasonable adjustments for the HE providers and is most appropriately funded through DSA.

We disagree with the principle that on-going sighted guide may be the most appropriate long term support. Students need to be facilitated to be independent when at university and not reliant on sighted guide support

# Question 12

**In NMH Band Four categories a - e are there any circumstances where the primary responsibility for provision should move to the HE provider?**

Response

No

Primary responsibility should remain with DSA to provide this type of NMH. However, our research demonstrates there are benefits to HE providers having assistive technology experts on site, but not all providers offer these services.

# Question 13

**Do you have detailed edits or comments on the draft NMH guidance? These can be provided below.**

Responsibility for decision making of what support the student required should remain with the DSA assessor. However, this is best done in conjunction with the university so the assessor can understand fully the support that is in place at that institution. From the transitions research we have undertaken we have seen that at present the universities take direction from the DSA assessors report, and do not (apparently) feel equipped to make such decisions independently.

# Question 14

**Where accommodation is owned and managed by the institution or its agent, do you agree that the additional costs of providing specialist accommodation for disabled students should not be passed on to the student?**

Response

Yes

Yes. Students with visual impairment are already restricted in moving off campus due to the complexities of learning new routes. Typically the cost of university accommodation is higher than that of private accommodation, so the student already has additional costs above the average student, before taking into account that they may need particular types of accommodation (e.g. larger rooms to accommodate equipment/guide dogs; ensuite bathrooms). Our research shows that at present the additional associated costs are tending to be passed onto the student by the HE provider, and this needs to be resolved by better guidance.

# Question 15

**What other approach would you favour for funding specialist accommodation? Please explain why.**

Reasonable adjustments to accommodation to be funded by HE provider, and where the student is forced to apply for a more expensive type of accommodation option due to reasons related to their disability, the HE provider should meet the difference in cost (e.g. only charge the student the cost of the lowest price accommodation option as their choice has been removed)

# Question 16

**Do you agree that the primary source of hard copy materials should be through an institution’s library services to remove the need for individual printers, scanners and hard copy materials?**

Response

No

It should be the institutions responsibility to ensure that all learning material is available in an accessible format (even if that requires the student to make personal adjustments to the material before they can use it). Withdrawing individual printers and scanners removes the students’ ability to be an independent learner. They should be able to, for example, login to their university’s virtual learning environment and download materials, modify these materials into their preferred format, and print out ready for use (if they choose).

Whilst not a suitable option for all students, the transitions research has repeatedly shown the benefit of tablet computers for students with visual impairment in an educational setting. Many students who would typically have printed out large copies of lecture slides are benefiting from being able to magnify the page on their tablet computers instead. Whilst this will not be a suitable option or all students, tablet computers should be given consideration as part of the DSA assessment of needs process, and also training should be made available to help students use them in the best way to help overcome challenges they face in relation to their disability.

# Question 17

**Do you agree with the approach to the funding of standard computer peripherals?**

Response – Yes

# Question 18

**Do you agree with the approach to funding items referred to as ‘the bundle’?**

Response

No

Some of the content of ‘bundles’ is used to protect IT equipment (e.g. tablet covers or surge protectors). It may be better value for money to allow these to be purchased through DSAs as equipment would be less likely to be damaged.

# Question 19

**Do you agree with the approach to funding audio capture equipment?**

Response

No

HE providers should be encouraged to make such adjustments, according to their responsibility to make reasonable adjustments. However, where this option is not available, students should still be able to access audio capture equipment through DSA.

# Question 20

**Are there circumstances where the primary responsibility for providing an individual item of IT related equipment, for example a printer, scanner, DVR etc. should fall to a student’s HE provider?**

Response

No

# Question 21

**We have described how we think HE providers can best fulfil their obligation to supply reasonable adjustments for disabled students. Are there other ways in which they could do so?**

Response

Yes

Making information available to students in advance. We have significant research evidence of how our research participants have been disadvantaged because the HE provider has not made information available to them in good time. For example, this includes room timetables so that a student can learn to get to their lecture rooms independently prior to the start of term, or reading lists so that the student can arrange for accessible copies of textbooks (whilst students are receiving these eventually, it is often several weeks after a module has commenced). Additionally, we have observed that many students have had problems with the laptops that they have been provided with. Whilst ideally we would like to see more funding for equipment as part of DSA allowances which will enable students to be allocated better quality equipment that is less likely to break down, it would be advantageous for the HE provider to have a basic stock of laptops that the student could draw upon if needed.

# Question 22

**How should any changes introduced be monitored and evaluated to ensure students are receiving a consistent service and are not being disadvantaged?**

The proposed plans are welcome and heading in the right direction. However, research evidence shows that HE providers are in some cases not even meeting the most basic of reasonable adjustments (e.g. accessible email system and accessible timetables). The evidence would suggest that at present HE providers are ill-equipped to be able to provide the support as detailed in this document. A lot of the challenges proposed will put additional pressures on staff time, and we would suggest that currently HE institutions do not have the necessary resources already in place. Considering we are still in a phase of consultation, it gives very little time for HE providers to make any necessary changes to their working practice. While new legislation will help drive and accelerate change, we would suggest more lead-in time is required to enable the HE providers to make the necessary changes.

# Question 23

**Are there any additional safeguards for students that should be considered to ensure that they receive the support necessary?**

Response

Yes

As suggested throughout our response, responsibility should remain with DSA assessors to determine that students receive the support they need.

Where there are disagreements in who should be providing an aspect of the students support package, this should not disadvantage the student, and funding should be made available to put the funding in place in the meantime.

Better definitions of reasonable adjustments should be given, to make this more transparent for both the student and the HE provider. This will give greater clarity to all stakeholders about requirements, responsibilities and expectations.

As suggested earlier, reference should be made to the Higher Education Academy guidance on inclusive curriculums for Higher Education Providers. For example please refer to [[HE academy]](https://www.heacademy.ac.uk/sites/default/files/resources/introduction_and_overview.pdf) which presents principles of inclusive practice and [[QAA]](http://www.qaa.ac.uk/publications/information-and-guidance/uk-quality-code-for-higher-education-chapter-b4-enabling-student-development-and-achievement#.VebXwVJNqu8) which describes indicators of sound practice.

# Question 24

**Some students may not be able to identify their final choice of HE provider until the clearing process. Do you think that any specific arrangements need to be put in place as part of clearing?**

Response

Yes

Our research evidence demonstrate that putting into place the support for a student with visual impairment can be a lengthy process, and in the event of them not applying for DSA well in advance, often they would start HE without the necessary support in place. In the most extreme cases this has led to the students having to retake the year, which has caused considerable extra expense to all parties. As above, we would suggest that funding should be available so that support can be made available to students in good time to start on their courses, and the practicalities of who should be supplying the support agreed afterwards.

# Question 25

Do you have any relevant additional information that you would like to be considered as part of the ongoing Equality Analysis?

Response

Yes.