

# Higher Education Commission

**January 2020**

# Respondent information:

### What is your name and role?

Tara Chattaway, Policy Manager, Thomas Pocklington Trust

Tara.chattaway@pocklington-trust.org.uk

Rachel Hewett, Birmingham Fellow, Vision Impairment Centre for Teaching and Research, University of Birmingham

r.g.hewett@bham.ac.uk

### Which institution or organisation are you submitting evidence on behalf of?

This is a joint response from

* RNIB
* Thomas Pocklington Trust (TPT)
* Vision Impairment Centre for Teaching and Research (VICTAR), University of Birmingham

### Do you give permission for the Commission to quote your submission?

Yes

### Can we attribute the submission to the institution/organisation?

Yes

### Can we attribute the submission to you personally?

No, as it is a collective response

### About our response

Our response is based on evidence from a current Longitudinal Transitions Study, conducted by VICTAR, ‘Our Right to Study’ campaign and personal accounts of students with vision impairment.

We have responded to the most relevant questions.

### Longitudinal Study

The Longitudinal Transitions Study has followed a cohort of young people with vision impairment over a 10-year period, as they make the journey from education into employment. A large number of these young people have been through or are in Higher Education (HE).

<https://www.birmingham.ac.uk/research/victar/research/longitudinal-transitions-study/index.aspx>

### Our Right to Study

Thomas Pocklington Trust, with support from VICTAR and RNIB, launched a campaign in January 2019 highlighting some of the issues with students with vision impairment experience with Disabled Students’ Allowance (DSA). The report and further information can be found here;

<https://www.pocklington-trust.org.uk/cyp/>

### Personal Accounts

The response draws upon six individual personal accounts from students that are either graduate in 2020 or are currently studying at a Higher Education establishment.

# Our response

Our response is divided into two parts, the first provides evidence, case studies and highlights what is and isn’t working, and second part provides recommendations and solutions for the future

## Evidence

1. **Do you feel that existing regulations and legislation with regards to disabled students’ rights in education are sufficient?**

We believe that the Equality Act and DSA provides sufficient regulations and legislation to ensure that students with vision impairment should be able to access HE. However, evidence indicates that not enough is being done to ensure that the processes of DSA work for students with vision impairment.

The Longitudinal Transitions Study found that whilst none of the participants questioned whether higher education was something that they could aspire to as a person with a vision impairment. Many however, felt restricted as to which institutions they could attend, because of varying levels of engagement and preparedness for facilitating a student with vision impairment.

“[Chosen institution] had a good disability department, one of the best that I have seen. The disability department really made [chosen institution] attractive, because they are very, very, very good. Especially compared to other universities that I saw. Some of them weren’t particularly brilliant.”

**Participant in Longitudinal Transitions Study**

The Longitudinal Transitions Study also highlighted that often academic staff have a limited understanding of the rights of students with disabilities in HE. This is particularly true with regards to their responsibilities to make **anticipatory**reasonable adjustments.

### Higher Education

More must be done to improve monitoring and hold HE institutions to account if they are not adequately supporting students with disabilities. A guide ‘[Supporting the achievement of learners with vision impairment in Higher Education](https://www.natsip.org.uk/doc-library-login/16-25-years/1424-suppporting-the-achievement-of-learners-with-vision-impairment-in-higher-education)’ has been produced to aid HE professionals to understand how they can best work with students who have vision impairment, to facilitate a positive and inclusive experience. The content is underpinned by evidence from the Longitudinal Transitions Study, and provides guidance on understanding vision impairment, inclusive practice and reasonable adjustments, and providing support for transition into HE.

This resource was produced by VICTAR, University of Birmingham with support from the RNIB, TPT and the National Sensory Impairment Partnership (NatSIP).

The recommendations of good practice in this guide should be embedded in HE providers practice to improve the quality of students with vison impairment experience and to provide a quality assurance/monitoring process.

<https://www.natsip.org.uk/doc-library-login/16-25-years/1424-suppporting-the-achievement-of-learners-with-vision-impairment-in-higher-education>

There are accounts of HE providers providing good support to students with vision impairment, which in turn has had a positive impact upon their experiences.

My university provided me with outstanding support, from tutors to the disability team. Having various meetings before the course started to assess my needs and pre-arranging materials to be in a format which I could access. Sending materials in advance and providing me with a briefing of what activities would be carried out during my course was extremely helpful, and on some occasions these activities were adapted so I was able to participate My tutors also supported me and ensured my DSA support was in place.

**Anonymous, Final Year Student**

Support provided for my study skills and specialist mentor support have been great. They have always been prompt at arranging my support and responding to any queries.

**Harriett Dunn, Final Year Student**

However, there are negative shared experiences of students with vision impairment, concerning issues around accessibility, understanding, and support with socialising and the non-academic experience.

Being an international student, I need more support in socialising within and outside the university. This is especially true at the start of the course.

**Ali Obiandan, Final Year Student**

I am severely visually impaired, and I have a short-term memory problem caused by a non-cancerous brain tumour.

I did not pass my first year at university because when I uploaded all of my assignments onto Blackboard, which was very difficult for me to navigate with my severe visual impairment, I thought all of my assignments were uploaded onto Blackboard. However, because students do not receive a confirmation letter or email I did not realise that my assignments had not uploaded and so I failed the year.

The final point I would like to include, is that I had not received my Assignment marks until three months into my second year at university and so by that time I had already agreed to live in a student house and paid my deposit with my friends. When I finally had received my marks for my assignments from my first year I was devastated and then realised that I had to find a new tenant for the house. The problem was it was October when this happened and so all of the students who needed a house already had one now. I had a lot of difficulty and stress finding a new tenant. So even though I was at home in London I still had to pay the rent for this house. I finally managed to find a new tenant in December, but I had already paid for three and half month’s rent. I hope this gives you some idea of what I went through.

**Kaya Tveiton-Duncan, Completed year 1 in September 2018 to June 2019**

### DSA

Much more must be done to ensure that it works for students with vision impairment. DSA is essential in creating a level playing field to support students in HE.

However, when it works, the support is invaluable in enabling students to engage with their studies.

Overall, I have found the support extremely helpful and an invaluable tool for success. I had heard about the scheme [DSA] through a family friend and was then prompted on my UCAS form to flag my disability. This triggered a simple assessment process. The assessment was easy to understand, and my assessor was well informed and friendly. She provided me with a range of assistive technology software, which has been extremely useful for my studies. When the supplier processed my order, they noticed an error in laptop specification. They worked very quickly and with good communication to solve the problem. They liaised with the assessor to amend this and required little input from me, which was convenient.

**Maddie Perkins, 3rd Year Student and in Employment**

When DSA works it can enable students to thrive. However, for many vision impaired students, DSA is organised in a way that doesn’t support their needs. It is failing to administer the right equipment and support at the right time. The impact of this on students can be profound. The lack of support has resulted in students repeating course modules or an academic year. It has impacted on their self-esteem, confidence and overall wellbeing.

A lack of support can also place restrictions on vision impaired student’s opportunities to access wider HE life as they play catch up with their studies and spend precious time chasing up support and dealing with administrative tasks.

Issues concerning DSA include;

* Some assessors not having sufficient expertise to assess vision impaired students, leading to poor quality assessments
* Equipment provided is often not fit for intended purpose or durable enough to last the entire degree course
* Equipment offered isn’t always appropriate, in part because access to mainstream or new technology is not being considered and/or allocated
* Vision impaired students are starting HE without equipment or support in place
* Non-medical help (NMH) that vision impaired students have been assessed as needing does not often materialise, because suppliers do not have the right approved qualified staff available;
* Lack of mobility support is restricting vision impaired students’ access to buildings and local amenities.

There could more room for flexibility. For example, I have purchased an iPad for viewing lecture slides. This could have been funded in place of all the technology that I don’t actually use, such as my voice recorder, Dragon and mind mapping software. Any issues have been minor and the scheme as a whole is incredibly helpful.

I started my undergraduate degree in 2011, which led to starting an MA in 2014 and PhD in 2016. However, I had to take time out during my PhD and since moved universities. In terms of support I originally received an IMac computer in 2011 along with several pieces of software and human support. The support I have received from September 2019 includes study skills tutor (dyslexia) and specialist mentor. I’ve also been allocated library support at 6 hours per week but do not use this as I study part time alongside working and the support worker would only meet for 6 hours at a time which doesn’t meet my needs. I’m also supposed to have specialist software however, since the start of the academic year in September I’m yet to receive this software as the needs assessor recommended Windows software which is not compatible with my IMac and I’m now waiting for this to be resolved between the needs assessor and SFE.

**Harriet Dunn 4th Year Student**

I had a Needs’ assessment, although during this assessment they did not explain what was fully available.

All of the forms when applying for support at universities should be taken into account for the individual.

In addition, as there is such a large range of types of support, which are not all read out at the needs’ assessments, the students with a disability do not know everything that they could be entitled to, but instead a complete stranger will decide what support is best for them at university. Instead, at the beginning of the needs assessments the student should be asked at the beginning which essential types of support do you need, instead of the assessor deciding it for them.

**Kaya Tveiton-Duncan, Completed year 1 in September 2018 to June 2019**

Arranging [DSA] support when you are starting your course doesn’t seem so difficult, however ensuring you have consistent and sufficient support throughout your course is difficult to manage, and there is no reliability that support will be there. For example, booking travel support with the allocated supplier. On some occasions I was not able to book travel for an entire week which meant using a private taxi company and being reimbursed.

**Anonymous, Final Year Student**

There are examples of Higher Education establishments going above and beyond and providing to bridge the gap when DSA has failed to deliver.

In my current degree at Newman University the Student Support has been excellent. For example, the head of Student Support, Heather Griffiths, through consultation with myself, purchased a Windows laptop with accessible software, provided me with several training sessions to use the IT equipment and paid to provide me with a non-medical support person for 12 hours per week. This was funded by the Student Support department as the equipment that SFE provided was not accessible.

One of the first challenges is the initial paperwork. As a VI student if you do not have magnification equipment or support to do this, this is a barrier. Secondly not having the choice of what agency to go to for your non-medical support. Agencies not being able to supply support staff for the duration of the course and finally agencies having non-accessible timesheets and other documents.

**Wayne Johnson, 3rd Year Student**

1. **Do you feel that the current system of monitoring the support and provision for disabled students in higher education is adequate?**

Whilst some students are aware of their rights, there does not appear to be any for students when things go wrong, either with the provision of support within the HE establishment or through the DSA process. For example, six of the participants in the Longitudinal Transitions Study left before completing their course, five linked this directly barriers to accessing their course. However, only one of the participants in the study made a complaint to their institution for this to have been formally recorded.

I am aware of my rights as a disabled student. On the whole they reflect my needs, but there does not seem to be any consistency in the way this is implemented in establishments of higher education.

**Wayne Johnson, 3rd Year Student.**

I am aware of my rights as a disabled student and have taken action when needed to ensure my needs are met by the university or organisation.

I do not feel the quality and effectiveness is audited constructively. Regular auditing of DSA suppliers needs to be implemented. As from my experience there is inconsistent quality of support, and in some cases DSA suppliers may not work within legislation standards. This irregularity in quality can have a detrimental effect on the student and their ability to study [on an] equal playing field to other students.

There is also the issue of suppliers. More should be done to regulate the quality of services and efficiency on how DSA suppliers operate, and how they employ and retain staff. What I have experienced within the past year is that suppliers may not employ staff with the correct background checks and have no experience working with disabled people and are unable to provide efficient sighted guide.

**Anonymous, Final Year Student**

I’m passionate about ensuring people with disabilities, in particular those who are deaf blind like myself are able to access education and achieve to the best of their ability. I see myself as an advocate for those with disabilities, but all too often there becomes a point when fighting for access and equality becomes too much and it impacts on your mental health – I think it’s about getting those in Government and SFE who decide and make changes to DSA to truly understand the lived-experiences of those like myself.

I wasn’t aware of this [auditing of support services]. I have always been informed that universities and support providers are not required to be audited and there is no way of making a complaint or appeal. I would be interested to know what is available in this respect.

**Harriet Dunn, Final Year Student**

1. **If you have worked with any disabled students who eventually dropped out of higher education, were there any broad reasons behind this outcome? How could this be avoided in future?**

We have heard from students that have struggled, taken several years to complete or have dropped out of their studies. The most common reasons provided for this in the Longitudinal Transitions Study include:

* DSA funded equipment not being in place at the start of the academic year
* The student tot receiving allocated Non-Medical Help support that was meant to be funded through DSA
* Reasonable adjustments not being put in place for exams
* Materials consistently not being accessible, including lecture material, textbooks, library catalogues, forms and information
* A failure of HE providers to make anticipatory adjustments, instead relying on compensations after barriers have been encountered by the student
* Students not declaring disability or alerting staff if they were experiencing barriers to access due to their vision impairment.

In a previous case study interview Wayne shared with his experience of having to drop out of his previous course (‘Our Right to Study).

“I was asked to leave my course because I didn’t pass my law module and work placement. It was the module that I had no support with. I was left to struggle on my own with limited equipment and difficulties in finding the resources I needed.”

This isn’t representative of his ability to do the job. Within the workplace he would be entitled to Access to Work and would have the support required to do the job he is employed to do.

Wayne was able to transfer onto the second year of a counselling course at a different university. The university has been very supportive; however, he is still experiencing ongoing issues with DSA.

“I haven’t been assessed again, despite starting a different course. But they have reduced the number of hours of support that I can receive. This impacts on lots of different parts of my life. I have to ask my friends when they come to visit if they can type up my notes if I dictate to them. I am having to rely on friends and fellow students for support. That doesn’t enable independence.”

The combination of lack of support and not having the right equipment, support and for some, bullying, can cause stress and has meant that some students get behind with their studies, or have to swap courses or even institutions.

I would like to give an example of my own experiences – I started my PhD at a university I had been at for my undergraduate and MA. I had been awarded a prestigious scholarship for my PhD, the PhD supervisors held really negative attitudes about my disabilities, provided contradictory views on what I should be doing in terms of my research.

On the whole, there was a lot of bullying etc, but I wasn’t allowed to talk about that. In the final year of my studies, after being forced into taking a 6-month interruption to my studies, upon my return the university decided they didn’t like my work and terminated my studies. Up until this point, there had been nothing wrong with my work and I was both confused and upset as to what had gone wrong. I wasn’t given the option to appeal their decision or complain and just told to leave quietly.

Thankfully, a family friend put me in contact with staff at my current University where I started in September 2019 and have largely had a positive experience and feel supported. I guess what I’m trying to say is that it’s so important for DSA needs assessors, support providers and University tutors to see students as a whole person and not just their individual disabilities. I could so easily have dropped out of University altogether, but since my PhD looks at teacher trainees and their experiences of working with blind pupils, I felt it was too valuable to walk away from and not complete.

**Harriet Dunn 4th Year Student**

“I have had to apply for an extension under mitigating circumstances, so that I can get the grade I deserve and not just the pass rate that is given for work handed in late.”[Nigel, Our Right to Study]

1. **Are you concerned with the level of administrative work disabled students are required to undertake to access the support you provide, and if so what steps have you taken to limit this?**

We often hear of students saying that they are left to deal with much of the administrative work when handling and managing their HE course. This can often impact on the amount of time they have to study and to engage in wider university activities.

A particular challenge for students with vision impairment can be the range of support that they need to apply for, organise and manage, this can prove challenging and can cause an administrative burden.

It can take a considerable length of time it takes to apply for (at what is already an extremely demanding time, as they manage studying for their exams in FE/Sixth Form), and then arrange and receive DSA support.

Taking a case study of a student with severe vision impairment studying a STEM based subject, they had to liaise and manage their support with:

* The disability support office at their HE institution
* Equipment suppliers
* Equipment trainers
* Mobility officers
* Specialist note-taker
* Lab assistant
* Library assistant
* Proof-reading support

This list is reflective of the complexity of supporting students with vision impairment in HE.

Furthermore, the complexity of having to manage, and chase up support can mean that students chose not to access the provision that they have been assessed as needing.

I had to move university part way through my PhD at a time when my self-confidence was quite low, SFE seemed to struggle to understand the concept that I was still a PhD student, but that I had simply moved University and gone part-time instead of continuing full-time.

I find that if I have a query in terms of DSA that needs resolving I wait over a week for a response from SFE (I also have hearing impairment so find it better to communicate via email) and then if another email needs to be sent, a different person from SFE picks this up – there is no continuity in service and for the majority of the time this leads to confusion.

Communicating with the support provider for my study skills and specialist mentor support is great, I can’t fault this. However, trying to get the other support provider for my library support to understand that meeting for 6 hours at a time doesn’t meet my needs seems like an impossible task, so I’ve chosen not to access this support, but I know this will have a negative impact on my studies in the long run.

**Harriet Dunn, 4th Year Student**

# Recommendations

1. **What overall policy recommendations would you make to government or regulators to improve disabled students’ experiences of higher education?**

The main areas of concern raised by students mainly focused on issues with DSA. Drawing on our evidence and on-going discussions with students, we make the following recommendations:

## HE providers

* DfE should place firmer requirements on institutions to have in-house technical support to support students and staff using assistive technology, and to develop inclusive practice.
* HE providers should take responsibility for removing as many barriers to learning as possible for students with vision impairment through making **anticipatory** reasonable adjustments.
* The recommendations of good practice set out in ‘[Supporting the achievement of learners with vision impairment in Higher Education](https://www.natsip.org.uk/doc-library-login/16-25-years/1424-suppporting-the-achievement-of-learners-with-vision-impairment-in-higher-education)’ guide should be embedded in HE providers practice to improve the quality of students with vison impairment experience and to provide a quality assurance/monitoring process.
* More extensive support should be offered at the start of HE particularly to help students attend social events rather than just access academic support.
* Students should be invited to meetings between disability and academic staff, to discuss what reasonable adjustments are required and how the HE provider will put these in place.
* Effective relationships and communication between academics, disability advisors and other relevant parties (Qualified Teachers of Vision Impairment (QTVI), NMH, etc) would make the process for students easier.
* Students need to be made aware of their rights and given guidance in ensuring their needs are being met.
* Lecturers should have training to understanding their responsibilities under the Equality Act to make anticipatory reasonable adjustments. They should have the knowledge they need to ensure that they know how to make their module/course accessible, to remove barriers for vision impaired students. There should be monitoring in place to ensure that they are adhering to accessibility policies
* New students should have the option of seeking advice from more experienced students who have gone through the process and can provide support and help, including types of technology available, the various non-medical help and other tips and general advice.
* HE providers need to ensure that all content placed on their virtual learning environments is accessible, including simplifying their submission areas for assignments. Key information on procedures should be fully accessible and be clearly signposted in such a way that it is accessible throughout a student’s time in HE. This includes information on how to contact the disability support office, guidance on declaring a disability, guidance on how to apply for extenuating circumstances and information on complaints procedures.
* There should to be proper dedicated support for someone with a disability by a member of the academic team throughout the academic year. It does not work for someone from a DSA organisation to support someone, who has no idea about the course or how assignments are uploaded.

## DSA

### Communication

* All documents should be made available in the student’s preferred format.

### Assessments

Regarding DfE and SLC announcements of a new procurement process for assessment centres, we recommend that the following points are taken into consideration:

* A full public consultation with all key stakeholders is conducted to determine how the new structure would work.
* A full Equality Impact Assessment is undertaken to identify and manage any unintended consequence on disabled students.
* Safeguards must be put in place within the procurement contracts with a clear accountability trail of all organisations that are awarded a tender.
* Students should have the option to involve Qualified Teachers of Vision/Hearing Impairment and other relevant parties as part of the assessment process, in order to understand what support the student has already received, and what equipment may or may not be suitable
* Qualified Teachers of Vision Impairment should be recognised as suitably qualified to provide statements of entitlement for DSA.
* Clarity is needed to communicate to student’s what equipment and types of various types of non-medical support is available on DSA, prior to the assessment meeting, enabling students to make their own decision about what is applicable to them. Students should also be offered the opportunity to experiment using different types of equipment before making a final decision.
* It should be made clear to assessors that non-specialist devices such as Mac Books and iPads can be made available via DSA if there is a clear need made.
* The needs, wishes, and recommendations made by students should be made clear in the assessment process, and should be take into consideration.

### Equipment

* More regulation and screening of suppliers needs to be carried out to ensure suppliers are working within statuary requirements. If any complaints need to be made they need to be acted on immediately and also taken seriously by students
* Mechanisms should be in place so thattemporary loans of equipment for students who experience problems with DSA funded equipment are provided in a timely manner to minimise disruption to the student.
* There should be commitment to review the minimum £200 contribution for laptops for students with vision impairment because they are not able to access standard equipment available to all students.
* A review is needed of the funding threshold placed on equipment for students of vision impairment, to ensure that students are able to access the full range of equipment needed to enable them to study independently in higher education, and that they are not restricted by the higher costs normally associated with equipment for this population.

### Non-Medical Help

* The process for how Non-Medical Help providers are registered and approved must be reviewed. There must be a level of scrutiny to ensure that providers are adequately trained and supported. However, the current arrangement has led to providers either not registering or cancelling their registration with QAG, which means that students do not always receive the NMH support they require because of a lack of supply. This particularly impacts on deaf students who rely on communication support, such as BSL interpreters or speech to text notetakers, who are often sole traders, and can restrict students with vision impairment accessing the mobility support which is so important to ensure a smooth transition into HE.
* A clear audit and understanding of the workforce that supports deaf and vision impaired students, should be undertaken. For example, the Code of Practice for SEND asks for specialist services such as Qualified Teachers of Vision/Hearing Impairment to provide support up to the age of 25, but at present very few local authorities provide support in HE.
* Interim measures are required to allow new specialist providers of support for deaf and vision impaired students to register. There is a lack of specialist support to meet current demand, and without new providers being brought into the system it is students that will ultimately be impacted upon.

## Additional thoughts from students

Stop placing further restrictions on students accessing support for university. Even though assessors provide recommendations for the type of equipment and support students may need, students should be able to make their own recommendations within the DSA report. From my experience it’s the DSA process which prevents disabled students to continue with further education as it is not just complicated but can have a detrimental effect on your mental health, due to the continuous stress and constant chasing of updates on your status with DSA.

**Anonymous, Final Year Student**

Accessing support and equipment that is appropriate to our needs, since starting university in 2011 I have seen many changes to the SFE and DSA process and watched as many of the support roles for people with VI have been removed. This has led to lengthy discussions each academic year when reapplying for support to ensure that I can retain the previous year’s support.

I think far too often those in Government and SFE who decide to make changes and cuts to DSA don’t understand the needs and requirements of those with visual impairment and other needs, they want people to access minimal support which doesn’t necessarily meet their needs.

**Harriett Dunn, Final Year Student**

In an ideal world there would be more empathy and understanding of disabled students needs and the levels of reasonable adjustments would be standardised across all establishments of higher education. Any agency offering non-medical support should provide adequate training and understanding for their staff, to support and empower disabled students on their educational journey. Assessments should be done on an individual basis to cover individual needs and not be run on a standard basis, as we are all individuals and have a variety of requirements. More funding should be in place for magnifiers, electronic readers, computers with accessible software for VI students and finally more accessible audio and internet academic literature.

**Wayne Johnson, Final Year Student**

I think that it is important for government to talk to students directly about our experiences. There are lots of practical improvements that could be made to DSA to make mine and other students’ life easier, if only someone would listen to us.” **Holly,** **final year undergraduate student [2]**

### End