



Department
for Business
Innovation & Skills

GOVERNMENT RESPONSE

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

DECEMBER 2015

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Introduction

The Government consultation on targeting funding for disabled students in higher education from 2016/17 onwards opened on 1st July 2015 and closed on 24th September 2015.

The consultation invited comments and evidence to help develop options to target Government funding for disabled students in higher education (HE) more effectively. It sought views on the balance of the source of support between the help available for all disabled students via HE providers, and specific aspects of the personalised support available via Disabled Students' Allowances (DSAs).

201 responses were received via Citizenspace, email and hard copy before the consultation closed, and some additional evidence was also received.

Responses were received from individuals including disabled students, assessment centres, DSAs service providers, publicly funded institutions and alternative providers, disability charities and organisations, and HE representative bodies. Please note that throughout this document where quotes from responses are given they are not necessarily given in full due to limited space, although we have sought to reflect balanced input from respondents.

A list of organisations that responded to the consultation or provided evidence is at page 47.

Responses received after the consultation closed have not been considered as part of the consultation evidence. However, we did consider these and any evidence received after the consultation closed as part of the broader evidence base for the policy decisions and as part of the ongoing Equality Analysis.

The objective for these DSAs reforms is to ensure HE is accessible for disabled students while re-balancing support between HE providers and DSAs; and improving value for money. Through the changes set out in this policy document, the majority of which are aimed at ensuring that HE providers properly respond to their Equality Act duties, we expect to make savings of around £24.5 million per year once the reforms are fully implemented.

In considering the policy position regarding funding of DSAs, we have made judgements about what may and may not be deemed a "reasonable adjustment". This is in no way intended to provide legal advice to HE providers. It is for individual HE providers to consider what they deem to be a reasonable adjustment. It is, however, our view that the HEI should make any reasonable adjustments that may prove necessary, before DSA funded support is provided to an individual student. The latest Equality Analysis is available at www.gov.uk/government/consultations/disabled-students-in-higher-education-funding-proposals.

Executive summary

The issues covered in the consultation, views of respondents and the Government Response are summarised below.

Background information on DSAs policy and rationale for the proposed changes (questions 1 to 3)

The Government believes that all HE providers should be fulfilling their obligations to disabled students under the Equality Act 2010. We asked questions in particular about how a consistent approach to reasonable adjustments could be achieved across HE providers, and whether there were any circumstances where it would be difficult for an HE provider to make reasonable adjustments.

Generally respondents felt more clarity about best practice for reasonable adjustments would be helpful, and several favoured a system such as a code of practice or charter mark. Respondents also thought that external scrutiny might prove useful. Cost was put forward as a main reason for an institution not considering an adjustment to be reasonable.

Summary of Government Response to questions 1 to 3

We have consistently made it clear that we do not plan to provide institutions with additional funding to offset any changes introduced as a result of this consultation. However, we believe that Government can help by working with stakeholders to identify and share best practice, and by encouraging collaborative working and pooling of resources in the sector.

We agree that guidance could enhance clarity, and that sharing of best practice would be helpful. Ahead of AY 2016/17 BIS will work with stakeholders including Universities UK, GuildHE and the Association of Colleges to consider how best to take these issues forward. BIS will work to ensure that disabled people themselves are involved in such work.

We will also work with partners, including the Higher Education Funding Council for England (HEFCE), the Quality Assurance Agency (QAA), the Office for Fair Access (OFFA) (or any successor bodies) and the Equality Challenge Unit (ECU) to help identify ways in which existing assurance frameworks can help embed and/or monitor inclusivity – i.e. ensuring how well HE providers are addressing barriers to enable participation by disabled students. Again, we will plan to do this in time for the AY 2016/17.

Options for changes to Non-Medical Help (NMH) support (questions 4 to 6)

Most respondents raised questions about the Government's preferred option but there was no consensus regarding a better way of achieving the policy aims, and no compelling evidence was put forward that another option would better achieve the aims.

A range of concerns were put forward, including: the ability and/or capacity of HE providers to deliver the appropriate support, variance in quality or quantity of support available to students, timescales for implementation, impact on other budgets and potential impact on HE recruitment decisions.

Summary of Government Response to questions 4 to 6

We considered respondents' comments on the Government's preferred option and also the alternative options set out in the consultation document at paragraph 58. We also considered in detail three additional proposals that were put forward by respondents. These proposals suggested dividing responsibility for disabled students depending on their disability, their level of need, or the purpose of the support required. No alternative proposals, or other similar suggestions, achieved consensus amongst respondents.

Whilst questions were raised about the Government's preferred option, we are not convinced that any of the alternative proposals are the best way of achieving our policy goals.

We note that a significant number of respondents were concerned that HE providers might not comply with their legal duties under the Equality Act. We do not consider this to be a strong argument; these duties have been in existence for over five years, and the Government considers that HE providers have now had adequate time to understand and comply with them.

We therefore intend to implement the Government's preferred option for AY 2016/17.

Draft guidance for the provision of NMH (questions 7 to 13)

We outlined the purpose of the draft guidance and asked for stakeholder views on specific aspects of each of the four NMH Bands, as set out in the SLC NMH manual here www.practitioners.slc.co.uk/media/6192/non_medical_help_manual.pdf

For all NMH support roles the majority of respondents favoured maintaining the status quo, and for funding to remain the responsibility of DSAs. Cost and capacity were two key concerns raised in responses.

Some respondents focused on specific support roles and gave examples of exceptions where they believed DSAs funding should continue in Bands 1 and 2, particularly for students with sensory impairments and complex needs. Others gave examples of where HE providers should take primary responsibility for certain roles.

Summary of Government Response to questions 7 to 13

HE providers have legal responsibilities to all disabled students under the Equality Act. We consider that the points raised by respondents have, on balance, failed to demonstrate that the barriers which the majority of NMH bands 1 and 2 provision is designed to overcome could not be addressed by the HE provider through reasonable adjustments. We agree that DSAs will need to continue to provide support where there is a specifically identified need for an individual student to receive assistance over and above that which an HE provider could be expected to provide as a reasonable adjustment. We will

therefore no longer fund NMH band 1 and 2 support (other than the role of sighted guide), and will provide detail in AY 2016/17 guidance of whether there are any specific exceptions to the general rule.

Accommodation, peripheral equipment and consumables (questions 14 to 20)

Accommodation

The first part of this section detailed the Government's proposal around the funding of specialist accommodation for disabled students (questions 14 and 15).

The majority of respondents agreed that DSAs should no longer be available for the additional costs of specialist accommodation owned or managed by the HE provider, or its agent, and that the cost should not be borne by the student. No respondent offered an alternative approach which would sufficiently meet our stated policy aims.

Summary of Government Response to questions 14 to 15

The majority of respondents were in favour of this proposal, and no practicable alternative suggestions were made. We will take forward this proposal as originally stated, for AY 2016/17.

Computer consumables and peripherals

In the second part of this section we asked for views on the Government's proposals around specific items of IT equipment currently funded through DSAs (questions 16 to 20)

Broadly respondents agreed with the Government's proposals not to fund computer peripherals and consumables as standard, with a few notable exceptions.

Respondents argued that laptop carry cases would decrease damage and their provision was a low cost way to protect equipment. Most respondents agreed that the primary source of hard copy materials should be through an institution's library services, but did not agree that this necessarily removed the need for individual printers and scanners for disabled students through DSAs.

Respondents generally recognised the developments in lecture capture and smart phones to record lectures, but argued that there were several circumstances where this support might not be sufficient, and digital voice recorders (DVRs) would still be required for a student to access their course.

Summary of Government Response to questions 16 to 20

We were persuaded by the arguments made by respondents that printers, scanners and DVRs are in some cases a low cost option to enable some disabled students to be able to access their HE courses. DSAs will therefore continue to fund these items. We will require assessors, if they recommend these items, to clearly set out the students' specific needs, and why other options, such as smart phone apps and universities' library facilities, are not suitable. Standard computer peripherals and other accessories will now be funded by exception only from 2016/17, through the Exceptional Case Process.

Respondents also made the case for laptop carry cases to be funded. Again, we agree with the rationale that these are a value for money option as they reduce repair and replacement costs and time that a student may be without a laptop. We will therefore continue to fund laptop carry cases where DSAs-funding is used to purchase a laptop, up to a maximum price.

Summary and final questions (questions 21 to 25)

Finally, we asked a number of questions concerning the impact of the whole of the proposed changes, including whether there were any other ways in which HE providers could best fulfil their obligations to provide reasonable adjustments to disabled students; how any changes should be monitored and evaluated; and whether any additional safeguards were needed for students. Additionally we asked about any specific arrangements that should be put in place for students who go through the Clearing process, and who therefore do not know the institution they will attend until shortly before the start of the academic year.

A number of responses supported the setting up of a process for monitoring and evaluating provision and quality of reasonable adjustments, possibly linked with existing HEFCE, OFFA or QAA frameworks, whilst ensuring that it did not duplicate existing processes and provided meaningful independent reporting which ensures equity of provision.

A number of respondents thought that a clear process to ensure fast resolution of disputes or disagreements was important, and should include adequate support and advice whilst any dispute is ongoing. Several also thought that there should be a range of information available on institutional provision made available to disabled students prior to and during the Clearing process.

Summary of Government Response to questions 21 to 25

Respondents provided clear descriptions of the ways that HE providers could fulfil their obligations, and it was clear that evaluation and monitoring would be welcomed. BIS will work with stakeholders, including Universities UK, GuildHE, the Association of Colleges and disabled students and their representatives to consider how to share best practice in inclusivity, including monitoring of provision, ahead of AY 2016/17. BIS will also work with partners, including HEFCE, QAA and OFFA (or any successor bodies) to identify ways in which existing assurance frameworks can help embed and/or monitor inclusivity, again in time for AY 2016/17 changes.

A clear process to ensure fast and equitable resolution of disputes is clearly in both students' and HE providers' best interests. BIS will therefore monitor the Exceptional Case Process to ensure that it remains fit for purpose, and will clearly set out in guidance for the AY 2016/17 whether there are any specific exceptions to the general policy regarding what DSAs will fund.

Information should be available to students about institutional disability provision throughout the application process, but particularly during Clearing. BIS will therefore encourage UCAS and UniversitiesUK to work closely to ensure that this is available to students.

Analysis of responses and Government response

Questions 1 to 3: Background information on DSAs policy and rationale for the proposed changes

This section gave details of the existing system of support for higher education students and explained the rationale for change. It also set out how the Government believes the changes will deliver its goals for reforming DSAs: ensuring accessibility of the learning environment for all disabled students, re-balancing the provision of support between HE providers and DSAs, and improving value for money by ensuring DSAs provides only support not reasonably available to disabled students from other sources.

Question 1: Do you think a minimum level of reasonable adjustments for all HEIs could help ensure a consistent approach to making reasonable adjustments?

If yes, what areas do you think should be covered?

Please state what you think the minimum level for each area should be.

- Around 60% of respondents said that a minimum level of reasonable adjustments could help ensure consistency. Around 31% did not agree, and 9% did not know or were undecided.

Summary of responses

Many respondents considered that inclusive course design and validation was essential. Respondents provided specific responses covering a range of areas of reasonable adjustment:

- **Physical access:** HE providers should ensure that all areas of their estate are fully accessible for a range of disabilities, including accommodation, sports and social premises, and placements.
- **Teaching/lecture delivery:** respondents suggested a range of inclusive practices that could be provided as standard, including lecture capture, hearing loop facilities and virtual learning environments.
- **Study skills:** respondents suggested study skills teaching should be provided for students with a specific learning difficulty (SpLD), and possibly to all students as standard.
- **Information presentation:** information (including reading lists) should be available in a range of formats, and should be available in advance where appropriate.
- **Assistive technologies:** several respondents felt that certain assistive technologies should be available as standard across all institutional computing facilities, as well as any loan equipment provided.

- **Libraries:** extended loans should be available where required and materials should be available in a range of formats, and a range of help for disabled students should be available.
- **Examinations, assessment and marking:** adjustments to all these areas should be available where appropriate, but a standardised approach was essential to ensure consistency. However, it should be noted that adjustments were not allowed in some areas (for example Midwifery programmes do not allow for the use of calculators in the Drugs exam and 100% is required to pass).
- **Student services:** one respondent highlighted the importance of inclusive student services for disabled (and all) students

A number of respondents made the point that minimum levels of adjustment should already exist, and respondents thought it important that minimum standards should be a baseline, and not become a target (i.e. should not become 'a race to the bottom'). Some thought that setting minimum levels of reasonable adjustments would be difficult: this is due to the differing nature of HE providers and courses, the nature of disability, cost and so on. Others stated that this was not possible, as whether an adjustment was 'reasonable' was a matter only a court could ultimately decide. Several respondents felt that HE providers need to be made more accountable for providing reasonable adjustments.

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 HEIs?

If yes, please describe them.

- Around 65% of respondents said that there could be other mechanisms to achieve consistency in reasonable adjustments. Around 15% did not agree, and 20% did not know or were undecided.

Summary of responses

There were a range of mechanisms suggested in responses.

Many respondents suggested that guidance on best practice would be helpful. This could cover areas such as exam arrangements, alternative modes of course assessment, standardised file formats and would encourage consistency in inclusivity and accessibility practice. Respondents also thought that examples of minimum standards with regard to reasonable adjustments would be appropriate. However, respondents highlighted risks associated with this approach, including a potential reduction in adjustments made; compromising the focus on individual needs; and causing confusion with existing legislation regarding reasonable adjustments. Some respondents argued that institutional duties under the Equality Act were clear and that existing guidance was sufficient.

Other suggestions included a national standard or framework covering accessibility, possibly as a charter mark or a code of practice, which HE providers could be accredited to; better publication of data by HE providers regarding their disability practices; and using

levers such as the planned Teaching Excellence Framework to require more inclusive teaching practices. Conversely, a small number of respondents thought that existing guidance (such as “Managing Reasonable Adjustments in Higher Education” published by Equality Challenge Unit in 2010) was sufficient and that new guidance would not be helpful.

Some respondents also thought provision should be subject to external review. A few respondents suggested a better complaints / appeals process or Disability Ombudsman could increase HE providers’ compliance.

Some respondents also thought that improved staff training to raise awareness of disability, particularly amongst teaching/lecturing staff, could help in achieving consistency.

Finally, small numbers of respondents made other points:

- There should be more taxpayers’ money given to HE providers by Government to cater for disabled students, and that HE providers should play a greater role in provision for disabled students.
- Senior management buy in was required to achieve consistency.
- There should be a Government lead in encouraging consistency or standardisation by publishers of electronic reading materials.
- Institutions should compile detailed statistics to aid understanding of their student population.

Question 3: Do you have any examples of how it might prove difficult for an HEI to make reasonable adjustments because of the nature of their student population (e.g. if the HEI has a very large or small student cohort)?

If you have answered yes, please explain why this could be difficult.

- Around 73% of respondents said that they could think of examples of difficulties in providing reasonable adjustments which HE providers might experience due to their student population. Around 18% did not, and 9% did not know or were undecided.

Summary of responses

The majority of respondents to this question cited cost as a difficulty. The reasons for this fall into two distinct areas.

The first area was concern of (or for) smaller HE providers who it was felt did not have sufficient resources to provide the range of support required (for example for students with SpLDs), or to provide the range of expensive help that could be required to support students with complex disabilities.

The second area was for larger HE providers with a larger than average proportion of disabled students in their cohort, which would mean a higher than average spend on disability. This was a particular concern for those HE providers adopting best practice in

recruitment and retention of disabled students, which increased demand on resources. There was also a concern that as a result of successful recruitment of disabled students, these HE providers may have an increasingly large disabled student cohort with increasingly diverse needs which are harder to cater to.

Other responses noted particular concerns:

- In FE institutions delivering HE courses, FE students with statements of special educational needs (or Education, Health and Care Plans) are encouraged to progress to HE if they are academically capable. This gave rise to an increase in the number of students requiring very specific help in those institutions
- The difficulties faced by HE providers with students undertaking distance learning courses (students working at home, geographic spread of students etc.)
- Difficulties around students on placement, particularly clinical placement, or studying abroad (e.g. different legal parameters outside of the UK)
- Difficulties of making adjustments for students whose course content is prescribed by a professional body
- The architecture of the estate meaning that adjustments are more challenging and costly

A small number of respondents thought that the nature of the student population should make no difference to the nature of reasonable adjustments that should be provided, although some raised concerns that a lack of consistency could mean that disabled students faced a 'postcode lottery'.

Government response to questions 1 to 3

The Government's view is that HE providers should be fulfilling their obligations under the Equality Act by providing anticipatory adjustments for its disabled student cohort, as well as reasonable adjustments for individual students. We believe it is right for disabled students to be able to expect of a level of support from their HE provider no matter where they choose to study. DSAs will continue to provide support to disabled students where that provided by their institution is not sufficient to meet their assessed needs, once reasonable adjustments have been made. This view has not changed.

The Government's position is that all reasonable adjustments are the legal obligation of the HE provider, and the HE provider therefore needs to bear this cost, without additional public funding. BIS have made it clear that additional Government funds will not be made available for HE providers to fulfil their legal requirements under the Equality Act.

The main points raised by respondents were that clear guidance was critical to ensure consistency, and similarly that there is a case for a code of practice or charter mark. A number of respondents wanted better sharing of good practice and publication of data. Several respondents also felt that external review, possibly by existing bodies, should be put in place, and that any budgets allocated to support this should be clearly defined.

The Government is not intending to transfer all responsibility for supporting disabled students to HE providers. Rather, the policy objective is to ensure that all HE providers fulfil their legal responsibilities in providing reasonable adjustments for all their students, including anticipatory adjustments.

HE providers will need to consider how to address any funding concerns, perhaps by internal ring-fencing of funds, or by working with disabled students and disability representatives to better understand the requirements of their disabled student population.

DSAs will continue to provide support to those students where reasonable adjustments do not meet their needs.

There are a number of actions which the Government will consider undertaking to support HE providers in this area:

- BIS to work with stakeholders, including UniversitiesUK, GuildHE, the Association of Colleges, the Equality Challenge Unit and disabled students and representatives, to consider how best to: identify, promote and disseminate best practice in inclusivity; encourage HE providers to work collaboratively and pool resources to help meet the requirements of their students; identify and baseline what disabled students could expect as a minimum level of provision; and encourage HE providers to publish data on their provision for disabled students
- BIS to consider proposals for a standard or charter mark
- BIS to work with partners, including HEFCE, QAA and OFFA to identify ways in which existing assurance frameworks can help embed and/or monitor inclusivity

Questions 4 to 6: Options for changes to Non-Medical Help (NMH) support

This section detailed the Government's preferred option of HE providers having primary responsibility for providing certain NMH support with DSAs used for specialist support or by exception, and asked for any alternative proposals.

Q4: Do you think the Government's preferred option for non-medical help changes fulfils the policy rationale of making HE as accessible as possible, re-balancing support between HEIs and DSAs, and improving value for money?

If no, please give details of your reasons.

- Around 16% of respondents agreed that the preferred option fulfilled the policy rationale. Around 74% did not agree, and around 10% did not know or were undecided.

Summary of responses

There was a wide range of responses to this question. Questions were raised about the Government's preferred option, but only a minority of those who expressed a view advocated no change to the existing arrangements. Some respondents did not feel the

proposed option met the policy aims, as HE providers would not or could not meet their Equalities Act duties. Some thought it would have a detrimental impact on students. For example, one respondent noted that 're-balancing support without the appropriate procedures in place to ensure equality of support across HEIs risks the creation of inequalities within student support across HEIs which is detrimental to students'. Concerns were raised that some HE providers would struggle to meet their legal duties and that this could lead to a variation in the standard of support provided.

There was, however, general support for the idea of a more consistent inclusive learning environment, but that was sometimes coupled with concerns about how to ensure consistency so that students were well supported wherever they chose to study. The need for accountability of institutional provision was flagged.

Concerns fell into a number of repeated themes:

- The ability and/or capacity of HE providers to deliver the appropriate support,
- Variance in quality or quantity of support available to students
- Timescales for implementation
- Impact on other budgets - if funding focussed on delivery support to disabled students,
- Dis-incentivising HE providers to recruit disabled students
- The value of Bands 1 and 2 support
- The particular impact on high needs students i.e. sensory impaired students
- How study needs assessors would be able to provide recommendations when the level of reasonable adjustments is not known
- That an inclusive learning environment would not remove the need for less specialised NMH support
- Reducing students autonomy through greater reliance on their HE provider's provision
- Impact on retention and/or outcomes

Q5: Do you think any of the alternative options in paragraph 58 for non-medical help provision 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?

If yes which one(s)?

Please give details, explaining how the proposal takes account of the legal duty imposed on HEIs.

- Around 42% of respondents agreed that alternative options could deliver support required and meet the policy rationales. Around 43% did not agree, and around 15% did not know or were undecided.

Summary of responses

The breakdown of those who did indicate a clear preference for a particular option was as follows:

- 23 showed a clear preference for alternative proposal A i.e. no change.
- 2 showed a clear preference for alternative proposal B i.e. transferring responsibility for all NMH Provision to HE Providers
- 13 showed a clear preference for alternative proposal C i.e. HE providers funding limited NMH with DSAs top up.
- 20 showed a clear preference for alternative proposal D i.e. Disability Officers at HE providers determining if support should come from the HE provider or through DSAs.

Whilst some responses indicated a clear preference for one of the suggested alternatives, others considered the pros and cons of each proposal. Combinations of the alternative proposals were also suggested. For example, one respondent noted that 'A mixture of c and d could in part deliver the support required to meet the needs of disabled students. It would be useful to have standardised costs across institutions and a threshold at which a Disability Officer is able to easily access DSA top ups/external funds'.

This question resulted in a wide range of responses, often opposed. For example, some felt that options which gave more power to HE providers to determine what DSAs-funded support a student should receive were preferable, as HE providers had a better understanding of their particular learning environment. In contrast, others felt that the objectivity and independence provided by independent assessments is crucial to avoid conflicts of interest.

It was suggested that if HE providers were responsible for NMH provision they might only offer the support that was readily available, rather than the support that was actually needed by the student, so that they would not incur additional cost.

Other concerns raised included disability officers not being trained or resourced to provide needs assessments, inequity between HE providers and increasing the students' dependence on their HE provider to meet their needs, and the need for a 'Chinese wall' between admissions officers and disability officers, to prevent prejudice.

It was suggested that HE providers should have the capacity to fully support the NMH needs of those with cognitive and VI, but that more profound disabilities may require external third party support. An alternative option was also provided for assessing students with a SpLD, in order to save assessment fee costs, which included offering a standard package of support. There were concerns about introducing any options that resulted in delays for students receiving support.

Resourcing was raised as a key issue in placing more responsibility with HE providers. For example, some were concerned that smaller HE providers, including colleges, would not have the capacity to manage additional responsibilities for assessing their own students. Some reiterated that they believed the current system works well.

Some respondents felt that public funding was required for consistency of provision to disabled students, whilst others suggested that there should be standardised costs for NMH support and a threshold demarking the funding by HE provider or by DSAs.

Respondents requested increased monitoring and audit of disability provision by HE providers.

Q6: Do you have an alternative proposal for non-medical help provision?

If yes please give details, explaining how your proposal takes account of the legal duty imposed on HEIs, and meets the policy rationale (i.e. the need to make HE as accessible as possible, balance support between HEIs and DSAs, and improve value for money).

- Around 44% of respondents had an alternative proposal for non-medical help provision. Around 44% did not, and around 12% did not know or were undecided.

Summary of responses

A wide range of views, were expressed in response to this question. Parts of the Government's preferred option to transfer the primary responsibility for some support roles to HE providers were strongly criticised whilst other elements received support. For example, generally the role of Examination Support Worker (whose role is to support a disabled student to gain access to the examination and fulfil its requirements, as an exam reader, exam scribe and exam prompter) was seen to be an institutional responsibility and some HEI respondents made the point that they had never passed the costs of this support on to DSAs.

Some respondents felt that the current system of DSAs worked well. Others felt that HE providers should take a much larger role in assessing students, procuring services for students and taking responsibility for funding that provision. This was often coupled with suggestions for providing additional funding to HE providers.

The counter was the view expressed that higher education providers should be removed from the equation, in order to provide independence and autonomy for the student.

The issue of conflicts of interest was raised a number of times in response to this question and question 5, with respondents expressing concern about the tension that would exist if HE providers were permitted to draw down DSAs in relation to their disabled students.

Suggestions for introducing better controls were put forward, including an external organisation to oversee HE providers and take complaints from students', and the introduction of quality marks for inclusivity.

Suggestions were made for using a different distinction in order to separate the HE provider responsibility from the DSAs role, including drawing a distinction between:

- Students, depending on the type of their disability
- Students, depending on their level of need

- Support which enabled students to access the teaching/learning environment (e.g. note-taking, workshop assistants and British Sign Language interpreters), and support which occurred outside the teaching/learning environment and related to enabling the student to learn strategies for independent learning (e.g. specialist one-to-one support).
- Support to access the teaching/learning environment and that needed to get around (e.g. practical support assistant or sighted guide)
- Support provided on campus or in the classroom, as opposed to off campus
- Making reasonable adjustments in the form of changes to the learning environment and the provision of specialist individualised support to enable independent learning, with latter paid for through DSAs.

However, other respondents felt that trying to distinguish between different types of support was unhelpful. Some felt that a focus on technological support was most beneficial, whilst others favoured providing human help.

One respondent commented that it would be more helpful to identify which type of support the HE provider could give through inclusive learning practices (for example, HE providers could reduce the need for note-takers by providing lecture capture and distribution of digital lecture notes), with DSAs continuing to fund the types of support which could not be provided in this way. A few respondents highlighted that, where possible, DSAs should be focussed on making students more independent learners.

Some respondents suggested a greater role for postgraduate students to provide NMH support. Several respondents proposed that streamlining the assessment process would achieve benefits, including cost savings.

There is consensus that it is crucial that disabled students continue to receive individual support in order to enable them to achieve their academic potential. However, there was no consensus about how that is best provided. The development of a more inclusive learning environment was a common goal, but suggestions of how to get there differed.

We have considered the following three additional proposals, provided by respondents:

Proposal 1 - Dividing responsibility depending on the type of disability. The following groups of students have been suggested as students that should receive all their support through DSAs (the assumption being that they draw down DSAs support related to all 4 support Bands):

- SpLDs
- Multiple disabilities
- VI students
- Deaf students
- Students with mobility issues
- ASD students

This method of dividing up responsibilities would result in some students being DSAs-funded students because of their type of disability and some would be HE provider-supported students because of their type of disability.

Proposal 2 - Dividing responsibility depending on the needs of the student. Similar to proposal 1, this option would see students requiring any support from bands three and four remain fully supported through DSAs. The assumption is that those who only need support from Bands one or two become the responsibility of the HE provider.

As above, this method of dividing up responsibilities would result in some students being DSAs-funded students because they happen to require support across the range of roles currently provided, whereas others would be HE provider-supported students because they only require Bands 1 and 2 support.

Proposal 3 – Dividing responsibility depending on the purpose of support. It was proposed that support in accessing the teaching/learning environment is a HE provider issue whilst support which is delivered outside the taught/learning environment i.e. practical support, and support developing learning strategies outside the classroom is a DSAs funding issue.

The role bands within the SLC NMH manual are broadly divided into practical support and enabling support. Generally we have focussed on transferring to HE providers the support roles that relate to accessing the learning environment, rather than those support roles that focus on helping students to develop independence and strategies for managing their studies. These generally fall within bands 1 and 2. Some respondents felt that all support relating to the taught environment, for example the provision of BSL interpreters, should transfer to HEP's.

Government response to questions 4 to 6

Our policy intent is to achieve improved accessibility of the learning environment for all disabled students with all HE providers fulfilling their duties under the Equality Act; re-balancing the provision of support between HE providers and DSAs; and improving value for money by ensuring DSAs provide only support not reasonably available to disabled students from other sources.

The Equality Act is clear that HE providers are required by law to make reasonable adjustments. Our expectation is that some of this will be anticipatory and will include the mainstreaming of inclusive learning environments. HE providers will also need to make some individual reasonable adjustments. It is our view that the HEI should make any reasonable adjustments that may prove necessary, before DSA funded support is provided to an individual student. DSAs should only fund the support which is not met through reasonable adjustments.

We note that a significant number of respondents were concerned that HE providers might not comply with their legal duties under the Equality Act. We do not consider this to be a strong argument; these duties have been in existence for over five years, and the Government considers that HEIs have now had adequate time to understand and comply with them.

We believe that, under the current system, HE providers may not fully consider their responsibilities under the Equality Act, because DSAs covers all of the costs incurred by disabled students to access their learning environment. If the need is already being met from DSAs, then the HE providers might consider that there are no further reasonable adjustments to make. Further, we believe that the DSAs system reduces the requirement of the institution to be innovative in finding ways to reduce barriers for all disabled students, not just those in receipt of DSAs.

In order to ensure that HE providers are properly considering reasonable adjustments, including anticipatory adjustments, we believe that the current system needs to change, to give HE providers a clear obligation to consider the reasonable adjustments that they might need to make. We further believe that by limiting funding to things that we judge may go beyond 'reasonable adjustments', HE providers will need to consider their duties under the Equality Act, HE providers will give more consideration to developing inclusive learning environments and reducing barriers to learning for all students.

In deciding our preferred option for achieving the stated policy aims, we considered that we needed a policy which ensured that HE providers assume responsibility to address barriers that could be met through reasonable adjustments. We further considered that we needed a policy which drew a clear line between the responsibilities of HE providers and what DSAs would continue to fund, in order to ensure ease of understanding and reduce any potential administrative burden.

We proposed that the best way of achieving the policy intent of HE providers to take more responsibility for providing reasonable adjustments is for DSAs to no longer fund NMH bands one and two. The responsibility for addressing the barriers which NMH bands one and two is designed to overcome would therefore pass to the HE providers, but it is up to them to decide how best to address these barriers (through inclusive practices or providing individual support).

We drew the line at NMH bands 1 and 2 because they are high volume and therefore should be easy to anticipate, and this support is lower cost and less specialist. This also provides a clear line between what DSAs will continue to fund, and what is expected of the HE provider.

Whilst questions were raised about the Government's preferred option, we are not convinced that any of the alternative proposals are the best way of achieving our policy goals of achieving improved accessibility of the learning environment for all disabled students with HE providers fulfilling their duties under the Equality Act; re-balancing the provision of support between HE providers and DSAs; and improving value for money by ensuring DSAs provide only support not reasonably available to disabled students from other sources. Whilst the majority of respondents agreed that the current system needed to change, none of the alternative proposals gained a consensus amongst respondents. Discussion of alternatives is set out below.

Transfer responsibility for all NMH provision to HE providers

We considered whether the option of transferring responsibility for all NMH to HE providers was viable. Responses indicated that there is work to be done to develop more inclusive learning environments and to help providers achieve a consistently good level of support for disabled students across the sector. Transferring responsibility for all NMH support at

this time could risk many institutions being unable to meet their legal duties and result in students receiving less support than they require. Whilst it would meet our criteria of providing clarity about what DSAs would fund and what the HE provider would fund, we considered that it required HE providers assume responsibility for addressing barriers that they may not consider could be met through reasonable adjustments.

HE providers fund limited NMH with DSAs top up

We considered the proposal of HE providers funding support up to a pre-determined level, with DSAs being used to top-up support once that level was reached. Some concerns were raised about this proposal, although some did discuss its merits. We concluded that on balance this option would increase administrative responsibilities for HE providers as they would be required to evidence in each case what support had been provided, at what cost and what additional support was needed. This proposal would not provide a clear distinction between what was the HE provider's responsibility and what DSAs will fund, and therefore does not meet one of our key criteria.

Disability Officers at HE providers determine if support should come from the HE provider or through DSAs

We finally considered the option of HE providers taking a bigger role in assessing students for support and drawing down DSAs funding where needed. We considered this option in the context of the appropriateness of DSAs funding being drawn down by HE providers, how conflicts of interests might be managed and the loss of an independent service for students.

We concluded that it would not be appropriate for HE providers to assess students for DSAs funding at this time, given the potential for this to result in students being recommended to receive DSAs support in place of the institution putting in place a reasonable adjustment.

The practice of providing reasonable adjustments is not consistently embedded across the sector, which could give rise to a continued call on DSAs funding and a continued lack of motivation to develop inclusive learning environments. We therefore considered that this proposal did not meet our criteria of ensuring that HE providers assume responsibility to address barriers that could be met through reasonable adjustments, and further that it did not draw a clear line between what is the HE provider's responsibility and what is fundable through DSAs.

We have also considered and rejected arguments put forward for some further alternative options, which are detailed on page 19. The Government's preferred option was to maintain responsibility for the majority of band 3 and 4 support at this time. Therefore BIS has considered these additional suggestions in the context of bands 1 and 2 support only.

Division between DSAs-funded students and HE provider-supported students

We have concluded that students should not be divided into DSAs-funded students and HE provider-supported students. Our view is that all students should have their needs met by the HE provider where it is reasonable to do so, in line with their Equality Act duties, and that DSAs will remain available to all students where additional individual support is required over and above those reasonable adjustments. To do otherwise may discharge providers of their Equality Act duties towards some students. This therefore does not meet

our criteria of ensuring that HE providers assume responsibility to address barriers that could be met through reasonable adjustments, and further does not draw a clear line between the HE provider's responsibility and what is fundable by DSAs.

Provision of support based on disability type

We have also concluded that provision of support should not be based on disability type. This could lead to charges of discrimination, and again may discharge providers of their Equality Act duties towards some students. This could potentially meet our criteria of clear line of responsibility, but it does not meet our criteria of ensuring that HE providers assume responsibility to address barriers that could be met through reasonable adjustments. It is also out of step with the disability social model, which is the model embraced and encouraged in the UN convention on the rights of disabled people, and which the government supports.

Division due to purpose of support – i.e. whether it relates solely to the taught environment

We also concluded that provision of support should not be wholly based on the purpose of support – i.e. whether it relates solely to the taught environment. This is because it does not provide a clear division and could therefore cause confusion and administrative burden. In addition we believe that due to the high costs and specialist nature of a number of the roles which are solely for providing support within the taught environment, they may not be deemed reasonable adjustments by the HE provider. This therefore does not meet either of our criteria.

Other suggestions

The three further suggestions for how to draw a distinction (support required for accessing the teaching/ learning environment versus support needed to get around; support provided on campus versus that provided off campus; and making reasonable adjustments in the form of changes to the learning environment versus individualised support to enable independent learning) were also rejected as they did not meet our criteria. HE providers have a responsibility to make reasonable adjustments, and that is not prescribed by location or the purpose of support.

Conclusions

Responses indicated that many people wanted the current system to continue. However, as stated, we do not believe that this achieves our policy aim of HE providers adhering to their Equality Act duties for providing reasonable adjustments.

One of the key arguments for continuing with the current system was that HE providers do not have the funds to cover NMH bands 1 and 2 provision, especially as an inclusive learning environment would not remove the need for less specialised NMH support. Respondents argued that this would therefore mean that they would not deliver appropriate support; that it dis-incentivised HE providers to recruit disabled students; and that there would be an impact on retention and/or outcomes.

Firstly, we want to highlight that Parliament has made it a legal duty for HE providers to adhere to the Equality Act. This means that they need to make reasonable adjustments, including anticipatory adjustments, and section 92 of the Act sets out that they may not discriminate against a person in terms of their enrolment on a course.

Secondly, we want to be clear that we are not expecting HE providers to provide bands 1 and 2 on a like for like basis to that previously provided by DSAs. We believe that for many students changes to the learning environment, which the HE provider has control over, will reduce the need for individual support provided through NMH. It is for the HE provider to consider the needs of their student and make reasonable adjustments to address the barriers that they face. Where there is a barrier which is best overcome through NMH band 1 or 2 support, then we expect the HE provider to take responsibility for providing and funding this support.

Thirdly, we want to be clear about the costs we anticipate will be transferred to HE providers. We estimate that the total saving achieved by DSAs no longer funding most NMH band 1 and 2 is £24 million per year across all students, once the reforms are fully implemented. As explained above, we do not expect that HE providers will match this on a like for like basis. This means that the costs that an HE provider will need to bear as a result of this change is in the order of tens of thousands of pounds. To put this in context, HE providers collectively received over £12 billion in fee income, and over £25.5 billion total income in 2014/15.

The other key argument made was that variation in what an HE provider judged to be a reasonable adjustment led to a potential for variance in quality or quantity of support available to students; and that study needs assessors would not be able to provide recommendations if they didn't know the level of reasonable adjustments available.

Whilst we recognise that Equality Act legislation does not require a consistent provision, we believe that HE providers can take a lead in sharing best practice and providing information to students and needs assessors regarding the adjustments they can expect. We therefore believe that HE providers can address these challenges ahead of the implementation of any changes, and do not accept this as a valid argument against our preferred policy position.

From AY 2016/17, BIS will therefore implement the Government's preferred option to transfer primary responsibility for certain types of NMH support. The specific roles are detailed on pages 25 – 32.

HE Providers will be expected to consider how best to address the barriers that these support roles are intended to overcome in order to reduce the need for individual support.

Questions 7 to 13: Draft guidance for the provision of NMH

This section outlined the purpose of the draft guidance and asked stakeholders for their views on specific aspects of each of the four NMH Bands.

Many respondents reiterated their view that responsibility for certain types of NMH support should not move to the HE provider in this section. We have considered these points in response to questions 4 to 6, and have here focussed on those responses which respond to the specific proposals.

Q7: In NMH Band One categories a - e and g¹ on pages 18-20 are there any circumstances where the primary responsibility for provision should not sit with the HEI?

If yes, please give full details and explain your reasoning.

- Around 57% of respondents thought that there were circumstances where NMH Band categories a-e and g should not sit with the HE provider. Around 29% did not agree, and around 14% did not know or were undecided.

Summary of responses

There was a variety of responses to this question which centred on the following themes:

- HE providers lacked the capacity, intent or resources to provide this support
- All NMH should continue to rest with DSAs
- There should be a mix of responsibilities between DSAs and HE providers, depending on level and/or type of disability
- There should be a mix of responsibilities between DSAs and HE providers depending on cost
- HE providers should be taking a fuller role in NMH provision, and
- There should be a mix of responsibilities depending on whether support is classroom or non-classroom based

There was no general consensus that all band 1 support should sit with the HE provider, as proposed in the consultation. Some respondents had concerns about moving any support roles over to HE providers, whilst others thought only some should remain with DSAs. Some respondents felt that HE providers should take greater responsibility, even in those areas where it was proposed that the responsibility would remain with DSAs-funding. Some respondents focused on specific support roles and gave examples of exceptions where DSAs funding should continue. The cost of providing the support was raised by a number of respondents, as was the logistics of providing appropriate workers at the point of need. HE providers offering distance learning were concerned about the impact on their students. The distinction between practical support assistant and sighted guide was questioned.

Government response to question 7

We were not persuaded that, generally, the responsibility for all NMH provision should remain with DSAs, for the reasons set out in pages 19 -23. We continue to believe that transferring responsibility for most band 1 and 2 support to HEIs is the best way to achieve the stated policy aims.

¹ Band one categories a-e and g are; a) Practical Support Assistants, b) Library Support Assistants, c) Readers, d) Scribes, e) Workshop/Laboratory Assistants, and g) Proof Readers/Text Checkers.

We received representations specifically regarding the role of practical support assistant, including its similarity in function to the role of sighted guide and which we proposed should remain funded through DSAs, and the high needs some students would have of this role – in particular students with physical impairments or Autistic Spectrum Disorder (ASD). The practical support assistant role is a hybrid role, and there is evidence that in practice this role is used to cover such activities as note-taking, verbalisation of visual materials and supporting a student to use a library. These are all NMH band 1 and 2 activities, which we consider should be met through reasonable adjustments.

However, we believe that there may be some circumstances under which it is appropriate for DSAs to continue to fund the role, for example for physically impaired students or those with ASD, as this may mean that the provision is high cost and may not be considered a reasonable adjustment. We also believe that the role needs to be further clarified.

From 2016/17 HE providers will have primary responsibility for the following activities from band 1. Based on this expectation, DSAs-funding will not be available, other than by exception through the Exceptional Case Process, for:

- Library Support Assistant
- Reader
- Scribe
- Workshop/Laboratory Assistant
- Proof Reader
- Practical Support Assistant

We will seek further information from stakeholders on whether specific exceptions to this general rule should apply for individual students, to ensure assessors can quickly identify where DSAs-funded support remains is available. For example, the roles of proof reader for VI students and practical support assistant for students with a physical impairment were specifically raised, and we will seek further information from stakeholders on that provision, setting out whether there are any specific exceptions in the AY 2016/17 guidance. We will also seek to further clarify the role of practical support assistant.

Question 8: In NMH Band One category f² are there any circumstances where the primary responsibility for provision should move to the HEI?

If yes, please give full details, and explain your reasoning.

- Around 30% of respondents said that there were circumstances where category f responsibilities (sighted guides) should move to the HE provider. Around 66% did not agree, and around 19% did not know or were undecided.

² Band one category f) Sighted Guides

Summary of responses

The proposal suggested that DSAs should continue to hold primary responsibility for the provision of sighted guides. This was due to the nature of the support, in that it is to familiarise the student with their new environment, and that this is a specialist role which may not be considered a reasonable adjustment by the HE provider, and for which it is hard to predict the demand.

Some respondents felt that sighted guides should become the primary responsibility of HE providers, but it was questioned whether this responsibility sits with Local Authorities, and is therefore not a HE provider or DSAs matter at all.

Generally respondents were keen that this particular role remained a DSAs-funded role. The reasons given were around the specialist nature of the work, the training and skills required, and the fact that this can be a rarer requirement that would be difficult to have staff permanently available for. Others felt that this role could be covered by institutional reasonable adjustments or that differentiating between different types of support was unhelpful.

Government response to question 8

Government remains of the view that DSAs-funding should remain available for sighted guides, as the evidence suggests that this is a specialist role which may not be considered a reasonable adjustment by the HE provider, and for which it is hard to predict the demand.

BIS will work with stakeholders, including disabled students/student representatives to consider how best to identify, promote and disseminate best practice in inclusivity, including what reasonable adjustments can be provided to reduce the reliance on sighted guides.

From 2016/17 the primary responsibility for the following activities from band 1 remains with DSAs-funding, unless a reasonable adjustment is made that meets the needs of the student.

- *Sighted Guide*

Q9: In NMH Band Two categories a – c³ on pages 20-21 are there any circumstances where the primary responsibility for provision should not sit with the HEI?

If yes, please give full details and explain your reasoning.

- Around 55% of respondents thought that there were circumstances where category a-c categories should not sit with the HE provider. Around 28% did not agree, and around 17% did not know or were undecided.

³ Band two categories a-c are; a) Study Assistants, b) Examination Support Workers, and c) Manual Note Takers

Summary of responses

This question looked at the support roles of study assistants, examination support workers and manual note-takers.

There was extensive discussion of the manual note-taker role. Many saw this as remaining crucial for certain students, irrespective of any enhancements the HE provider makes to the learning environment. Respondents felt that where use of technology could not overcome the barriers, note-taking should be funded by DSAs. Some respondents suggested that an exception should be made for those students with such high needs for this support that it would not be reasonable for HE providers to meet that need.

The role of study assistants was also discussed extensively, including the fact that such a person would be providing a range of support across bands 1 and 2, although it was not clear when respondents thought this particular support role would be essential. Some saw this as a specialist role and therefore within the remit of DSAs-funding.

The role of Examination Support Worker prompted less discussion, although the distinction was drawn between exams set by the HE provider and those set by external professional bodies (the latter being seen as a DSAs issue). Some indicated that this was already treated as an institutional responsibility in some HE providers, and agreed that this role should be taken on and funded by HE providers. Others felt that students with high needs in examinations should continue to be supported through DSAs funding.

Several respondents highlighted the need for the needs assessor to take account of the provision at the HE provider (e.g. providing lecture information in various formats), and that NMH should only be recommended where barriers still existed.

Several respondents highlighted the costs associated with an HE provider taking on responsibility for NMH support in general, and the lower level of provision or lack of independence this could cause for the student.

Respondents also made varying suggestions about who should fund band 2 NMH support, depending on cost, disability, purpose of the support, and complexity of need.

Government response to question 9

We consider it the HE provider's responsibility to overcome barriers and provide inclusive learning environments to reduce the need for individual interventions, including individual note-takers, in order for the student to have a capture of the lecture or seminar.

However, we recognise that for some students these approaches will not overcome the barriers they face. We expect HE providers to consider how they will meet the needs of their students in relation to capturing information and taking notes. Exceptions will be considered where the combination of assistive technology and reasonable adjustments are not sufficient to meet the needs of the student.

The role of Study Assistant currently covers a variety of tasks that fall within band 1 and 2. As discussed on pages 20-24, the Government continues to believe that the best way to ensure that HE providers adhere to their responsibilities under the Equality Act is to stop

funding NMH bands 1 and 2. Therefore the responsibility of the composite role of study assistant would by default fall to the HE provider.

Institutions should be anticipating that they will have a number of students who will need adjustments to examination arrangements, and we therefore consider it reasonable for them to make those adjustments, including an Examination Support Worker where this is necessary.

From 2016/17 the primary responsibility for providing Study Assistant support will lie with the HE provider. Student-based exceptions will be considered on a case by case basis, through the Exceptional Case Process.

From 2016/17 the primary responsibility for providing examination support will lie with the HE provider. Student-based exceptions will be considered on a case by case basis, through the Exceptional Case Process.

From 2016/17 the primary responsibility for providing note-taking support will lie with the HE provider. BIS will seek additional evidence from stakeholders to identify if specified exceptions should apply for individual students, for example deaf students whose needs cannot be met by other support and would have high note-taking support needs, and will provide details in guidance for the AY 2016/17.

Q10: In NMH Band Three category c⁴ on page 22 are there any circumstances where the primary responsibility for provision should not sit with the HEI?

If yes, please give full details and explain your reasoning.

- Around 46% said that there were circumstances where the role of Specialist Transcription Services should not sit with the HE provider, around 32% did not agree and around 22% did not know or were undecided.

Respondents raised concerns regarding the cost implications and the need to maintain a range of specialist knowledge to deliver this role. Some indicated this role sat within library services. Others felt this was very specialist support that would be difficult to plan for. Services for VI and deaf students were particularly mentioned as an area of high need and high cost. It was noted that specialist transcription services are already an institutional responsibility under the Scottish system of support.

Government response to question 10

We continue to consider that Specialist Transcription Services should generally be met by an HE provider. This is because we believe that the barrier which this service is designed to overcome can, in many circumstances, be addressed through improved provision of alternative format materials or other reasonable adjustments.

⁴ Band three category c) Specialist Transcription Service

From 2016/17 the provision of specialist transcription services will be the primary responsibility of HE providers. Student-based exceptions will be considered on a case by case basis, through the Exceptional Case Process.

Q11: In NMH Band Three categories a, b, and d⁵ on pages 22-23 are there any circumstances where the primary responsibility for provision should move to the responsibility of the HEI?

If yes, please give full details and explain your reasoning.

- Around 11% of respondents said that there were circumstances where responsibility for categories a, b and d should move to the HE provider. Around 71% did not agree, and around 18% did not know or were undecided.

Summary of responses

This question considered the support roles of Communication Support Worker, Electronic Note-taker and Mobility Trainer.

Generally the respondents to this specific question on band 3 provision supported the idea that these support roles should continue to be DSAs-funded. Respondents made points regarding the specialist nature of the roles, the qualifications and training required to operate within these roles, and the perhaps part-time nature or uneven demand for the roles, and the high cost due to specialist expertise required. Anticipating the need for this type of support, and subsequently meeting that need, was seen by respondents as being difficult to achieve.

Others felt the HE provider should take responsibility for these roles as it was part of the overall student experience. The role of outside agencies was questioned and whether some support should be an HE provider's or a DSAs issue at all.

Government response to question 11

Based on the evidence and arguments put forward, we continue to believe that the support roles falling within band 3, with the exception of Specialist Transcription Services, may not be considered a reasonable adjustment. However, HE providers should continue to consider how the learning environment can be improved to remove the need for individual support workers, including those falling within band 3.

From 2016/17 the following support roles from band 3 will continue to be primarily funded through DSAs, unless reasonable adjustments are in place that remove the need for such support:

- *Communication Support Worker*
- *Electronic Note-taker*
- *Mobility Trainer*

⁵ Band three categories a, b and d are; a) Communication Support Workers, b) Electronic Note takers, and d) Mobility Trainer

Q12: In NMH Band Four categories a - e⁶ on pages 24-25 are there any circumstances where the primary responsibility for provision should move to the HE provider?

If yes, please give full details and explain your reasoning.

- Around 14% answered yes, around 69% answered no, and around 17% did not know or were undecided.

This question related to the provision of the following support roles: Specialist Mentor, Specialist One to One Study Skills Support, BSL Interpreter, Language Support Tutor for deaf students, Assistive Technology Trainer.

Summary of responses

A wide range of views were expressed in relation to this question, with a high proportion considering that responsibility for these roles should not sit with HE providers. Generally respondents were of the view that these specialist roles should continue to be funded through DSAs, but within that some did indicate that the responsibility for the actual provision (but not for funding) should lie with the HE provider. Others offered thoughts on how some services could be provided (and funded) by HE providers, for example by the provider taking responsibility for a set level of support before drawing down DSAs funding, or by taking responsibility for BSL provision as that occurs in the learning environment, but DSAs still funding enabling support (e.g. study skills support). Others saw study skills support and mentoring as being appropriate for disabled and non-disabled students alike and therefore should become mainstreamed within HE providers.

Government response to question 12

Based on the evidence and arguments put forward, we continue to believe that the support roles falling within band 4 may not be considered a reasonable adjustment. However, HE providers should continue to consider how the learning environment can be improved to remove the need for individual support workers, including those falling within band 4. More clarity of the expectations of the roles will be provided (particularly for specialist study skills support and mentoring) to ensure lines are not blurred and only appropriate support is recommended and provided.

From 2016/17 support roles from band 4 will continue to be primarily funded through DSAs, unless reasonable adjustments are in place that remove the need for such support.

Q13: Do you have detailed edits or comments on the draft NMH guidance?

- 88 respondents provided information in this section.

⁶ Band four categories a-e are; a) Specialist Mentors, b) Specialist One to One Study Skills Support, c) British Sign Language Interpreters, d) Language Support Tutor for deaf students, and e) Assistive Technology Trainers

Summary of responses

Some respondents took the opportunity to make specific comments on language and tone; others suggested additional text or clarification. Many respondents reiterated earlier concerns about the overarching proposal to move responsibility for certain elements of support over to HE providers.

Government response to question 13

It was clear from responses to the consultation that greater clarity is needed across the range of support roles. BIS will ask the SLC to review the SLC NMH manual to address issues raised about the role descriptors, for 2016/17.

BIS will seek further evidence for whether there should be specific exceptions for individual students to the policy where the primary responsibility for a support role will transfer to HE providers, and will provide details in the 2016/17 guidance. This will help reduce the need to consider individual exceptions.

Ahead of 2016/17 changes, BIS will provide improved guidance to study needs assessors on how to better take into account any support provided by HE providers before making recommendations for NMH support.

Questions 14 to 20: Accommodation (14-15), peripheral equipment and consumables (16-20)

This part of this section detailed Governments proposals around paying for specialist accommodation.

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?

If your answer is no, please explain your reasons.

- Around 74% of respondents agreed that any additional cost of specialist accommodation should not be passed on to the students. Around 10% did not agree, and 16% did not know or were undecided.

Summary of responses

In this question a clear majority of respondents agreed that disabled students should not have to meet additional costs due to a need for specialist accommodation.

It was evident from some responses that further clarification is required, for example the responsibilities of local authorities to provide funding. Some respondents sought further information around what constitutes a 'reasonable adjustment' or thought an agreed baseline of adjustments might be helpful (but see the Government response to questions 1 and 2). Others raised specific questions, e.g. the funding of additional accommodation for disabled students requiring 24 hour support. Some respondents raised the cost of funding

extensive adaptations, particularly for smaller HE providers, or requested a central national fund to help. Comment was also made about the need for HE providers to cater for students that needed specialist accommodation, but not private landlords, and that this might lead institutions to encourage disabled students to live out.

A small number of respondents thought that DSA should continue to fund the costs of specialist accommodation, and a single respondent that costs should fall to the student.

Question 15: What other approach would you favour for funding specialist accommodation?

Please explain why.

Summary of responses

In this question some respondents reinforced their view that HE providers should be funding specialist accommodation for disabled students in full, particularly stressing HE providers' responsibilities under existing legislation.

Those respondents who provided an alternative approach fell broadly into two groups: those who thought that local authorities (LAs) should be providing a greater degree of help for students requiring adaptations to accommodation, and those who thought central Government funding (i.e. non-DSAs) should be available to provide help to HE providers with the costs of adapting accommodation. With regard to the latter point, the Government has made it clear that it considers that HE providers should be fulfilling their duties with regard to reasonable adjustments and we do not plan to provide institutions with additional funding for this.

Responses not falling into those two broad categories include those that thought that DSAs should continue to provide help, two responses suggesting that private or corporate sponsorship should pay for specialist accommodation, one response said that disabled students should fund the costs themselves, and one stated that '...all disabled students [should] live with their families, to help support themselves.'

A small number of respondents raised concern around a perceived lack of equity of treatment between students requiring adaptations to accommodation provided by HE institutions or their agents, and students requiring adaptations to privately rented accommodation.

Government response to questions 14 and 15

There was a clear consensus that the additional costs of specialist accommodation should not be passed on to the student, in line with the Government's preferred option.

From 2016/17 the primary responsibility for funding specialist accommodation, which is managed by the HE provider or their agent, will lie with the HE provider. Student-based exceptions will be considered on a case by case basis.

In addition, BIS will take forward a number of actions:

- BIS will consider how to work with institutional and student representatives to issue further guidance which will aim to provide clarity for HE providers on issues such as the role of local authorities in funding adaptations, which will provide students with certainty about their accommodation requirements and ensure equity
- BIS will consider how to work with stakeholders, including UniversitiesUK, GuildHE, AoC and disabled students/student representatives to consider how best to: identify, promote and disseminate best practice in inclusivity; encourage HE providers to work collaboratively and pool resources to help meet the requirements of their students; and identify and baseline what disabled students could expect as a level of provision
- BIS will ask Student Finance England to clarify to the sector that DSAs will consider additional accommodation costs on an exceptional case by case basis

This part of this section dealt with proposals around specific items of IT equipment currently funded through DSAs.

Q16: 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?

If not, why?

What alternatives do you suggest?

- Around 57% of respondents did not agree, 34% agreed and 9% did not know or were undecided.

Summary of responses

Most respondents agreed that the primary source of hard copy materials should be through an HE provider's library services, but did not agree that this should remove the need for individual printers and scanners for disabled students through DSAs, as they can provide a low cost solution for enabling students to access and manipulate study materials at home.

Respondents argued that students need individual scanners and printers for the following reasons:

- **Learning styles and independence:** many disabled students need to use these devices far more than non-disabled students and often find it very difficult to read from computer screens.
- **Mobility issues:** some students with mobility issues could find it difficult to travel to the university campus in order to access printing and scanning facilities. Respondents also noted that some students with fluctuating conditions are unable to attend university some days but may be able to work at home at these times.

- **Social/environmental issues:** Some students (usually with mental health issues or autistic spectrum disorders) might be negatively impacted by stress and/or anxiety if trying to access university printing/scanning facilities.

Respondents said that HE provider libraries already provide a range of services to facilitate access to learning materials, both as mainstream services and services for disabled students. In some cases, as well as the mainstream equipment, disabled students have access to dedicated additional scanners and printers.

Some respondents said that printing and scanning services are resource intensive and most libraries are unable to operate them at no cost for the user, especially in libraries that occupy multiple sites.

A number of reservations were expressed about the current ability of HE providers to provide *all* reading materials in accessible formats, due to availability and cost. Some respondents wanted to ensure that reading materials would continue to be selected on the academic value of their content, rather than convenience of access, and that it was important that this principle is upheld.

A number of respondents called for the Government to persuade publishers to make more effort to make their materials more easily available in alternative formats. They also called for a more centralised, joined-up approach, mentioning the existing Load 2 Learn service.

Other issues raised included:

- **Distance learning:** a number of respondents raised concerns that this question did not take in to account disabled students who are on distance learning or blended learning courses.
- **Exceptional Case Process:** a number of respondents had reservations about the exceptional case process in relation to this issue, specifically about how long the process would take and how many students would potentially need to go through it for a printer or scanner.

Some respondents suggested other ideas and approaches, including:

- The sharing of certain resources (e.g. Braille embossers, audio preparation software) between geographically close HE providers.
- The provision of centrally-managed printer/copiers in accessible areas of student halls of residence.

Government response to question 16

Based on the responses received we were persuaded that there were circumstances where some students would need an individual device for printing or scanning. We are encouraged by the efforts of HE providers in facilitating access to learning materials in different formats, and look forward to seeing them build on this progress

*From 2016/17, DSAs funding will remain available to students for printer/scanners, **only where** this need has been fully justified.*

All recommendations will require full justification and evidence setting out why the provision of the individual item is required for the student to undertake their course solely due to their disability. Assessors will be required to justify the need using a two-step approach:

- i) Is there an additional 'need' due to their disability over and above that needed by their non-disabled peers, both for printed materials and scanning, and to have these printed at home?
- ii) Can that additional need be met by the HE provider?

From 2016/17 DSAs funding will only be available for multifunction printer/scanner devices.

Recommendations for separate individual printers or scanners will only be considered in exceptional circumstances, where there is a clear disability related need. Where individual printer/scanners are provided, ink and paper consumables which are additional to the needs of a non-disabled student will continue to be funded by DSAs.

Q17: Do you agree with this approach to the funding of standard computer peripherals?

If not, why?

What alternatives do you suggest?

- This question asked about the Government's proposal for these items of equipment to no longer be available via DSAs as a matter of course. Around 53% of respondents agreed, 33% did not agree and 14% did not know or were undecided.

Summary of responses

Those who answered 'yes' and submitted a comment mostly asked for the Exceptional Case Process to work effectively and for clear guidance on exceptions. Some mentioned concerns about potential student hardship.

Of the respondents who answered 'no' or 'don't know', a number conflated the question with the general issue of the funding and provision of computers (rather than standard computer peripherals). There was also a range of comments from these respondents, which generally focussed on the importance of non-specialist equipment as part of an overall strategy for the student. For example, one respondent said that a standard size monitor (19") might be an appropriate recommendation for a visually impaired student with a laptop that has a smaller screen.

Government response to question 17

Based on the responses received we were persuaded that, in cases where there is a clear disability related need, DSAs funding should be made available for standard computer peripherals.

From 2016/17, DSAs funding will remain available to students for standard computer peripherals by exception only. Student-based exceptions will be considered on a case by case basis, through the Exceptional Case Process.

All recommendations will require full justification and evidence setting out why the provision of the individual item is required for the student to undertake their course solely due to their disability. DSAs funding will remain available for standard keyboards, standard size monitors and standard mice as a matter of course if they form part of a recommendation for a desktop computer.

Q18: Do you agree with this approach to funding items referred to as ‘the bundle’?

If not, why?

What alternatives do you suggest?

- This question asked about the Government’s proposal for these items of equipment to no longer be available via DSAs as a matter of course. Around 50% of respondents agreed, 35% did not agree and 15% did not know or were undecided.

Summary of responses

A significant number of those who commented (including some of those who answered ‘yes’) thought that laptop carry cases should be provided as standard, even if all other items in the bundle were to not be provided as a matter of course. This is because a carry case would help prolong the life of laptops, reducing the likelihood of there being costs for replacement and repair.

Government response to question 18

Based on the responses received we were persuaded by the arguments for providing carry cases for laptops as a matter of course, up to a maximum price, as a low-cost way of prolonging the life of a laptop.

From 2016/17:

- *DSAs funding will be available for laptop carry cases as a matter of course, up to a maximum price level, for those students being provided with a laptop computer.*
- *All other items in ‘the bundle’ will no longer be provided as a matter of course. Student-based exceptions will be considered on a case by case basis, through the Exceptional Case Process.*

Q19: Do you agree with this approach to funding audio capture equipment?**If not, why?****What alternatives do you suggest?**

- Around 48% of respondents did not agree, 38% agreed and 14% did not know or were undecided.

Summary of responses

Many respondents seemed to answer the question on the basis that DSAs would no longer be funding DVRs. However, the proposed approach was for needs assessors to consider alternatives before recommending audio capture equipment.

Most respondents who commented said that, although many HE providers had invested in centralised recording systems, these systems do not offer a complete solution for students, or a sufficient replacement for a DVR. This is because not all lecture or seminar rooms are currently equipped with them due to cost and other factors, they are unable to cover all environments where learning takes place and there are intellectual property concerns in some cases.

Respondents also said that, although there have been advances in the capability of smart phones in audio capture, the recording quality is not currently as good as with DVRs, recordings cannot be organised as easily compared to a dedicated device and battery life can be much shorter compared with a DVR.

They also said that, in most cases, DVRs offer the most effective and enabling strategy for audio capture and note taking, and offer value for money in comparison to a NMH note taker.

Government response to question 19

The comments received supported the proposed approach, namely that audio capture equipment would continue to be funded if alternatives did not meet the need of the students.

*From 2016/17, DSAs will fund audio capture equipment **only if** alternatives do not meet the needs of the student.*

Assessors should consider whether adequate personal recording of lectures and seminars could be achieved via a laptop or a smart phone including with use of an app, before recommending DVRs. DSAs funding is available for smart phone apps if they are essential for audio capture, where the student will be using their existing smart phone instead of a DVR for this purpose.

All recommendations will require full justification and evidence setting out why the provision of the individual item is required for the student to undertake their course solely due to their disability. Recommendations should demonstrate that full consideration of

other strategies has been made before a DVR is considered. Assessors should not expect to recommend DVRs and note taking for the same purpose.

Q20: 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 HEI?

If yes, which items of equipment would fall into this category?

If yes or no, please give reasons for your answer.

- Around 64% of respondents said no, 18% said yes and 18% did not know or were undecided.

Summary of responses

Respondents typically said they believed that responsibility for providing specific assistive technology equipment for disabled students should remain with DSAs, and that HE providers are not in a position to resource such equipment for all disabled students.

Others added that DSAs funding for equipment ensures that a student's individual requirements are met. Provision from HE providers is unlikely to be as tailored, as provision of a wide range assistive technology is not something most HE providers can be expected to resource adequately. This will affect the quality and suitability of provision.

Several respondents (including most HE providers that responded) agreed that HE providers have a role in providing loan equipment to students in certain circumstances (e.g. ineligible for DSAs or awaiting DSAs-funded equipment).

A number of respondents (particularly HE providers that responded) set out the communal equipment and facilities they provide, such as IT equipment and assistive software, but emphasised that they cannot assume sole responsibility for equipment.

Government response to question 20

We acknowledge the general principle that DSAs funding is useful in providing individual equipment where the disability related need for this is clear. We are encouraged by the efforts of institutions in providing communal IT facilities and working towards creating a more inclusive learning environment. We encourage them to build on this progress.

Questions 21-25: Summary and final questions

At the close of the consultation we asked a number of questions concerning all of the proposed changes.

Question 21: We have described how we think HEIs can best fulfil their obligation to supply reasonable adjustments for disabled students. Are there other ways in which they could do so?

If your answer is yes, are there other ways in which they could do so? Please describe them.

- Around 43% of respondents said that there were other ways in which HE providers could fulfil their obligations for reasonable adjustments. Around 23% did not agree, and 34% did not know or were undecided.

Summary of responses

Of those respondents providing examples, a large number thought that accessible teaching and learning was the key to HE providers fulfilling their obligation to provide reasonable adjustments. It was suggested this could be achieved in a number of ways:

- Design of curriculum, courses and assessment methods to ensure inclusivity,
- Use of inclusive teaching methods and practice to support a range of learning styles (including the use of virtual learning environments, lecture capture technologies and so on),
- Accessible materials (including differing formats, early sight of lectures notes etc.), and
- Embedding assistive technology across institutional IT.

Other respondents suggested that HE providers should take a holistic approach and also address accessibility across institutional estate, including social and sports facilities, and in procurement policies.

A point was raised that inclusivity should be reflected in external assurance frameworks (e.g. QAA). Other respondents suggested that on-going training for staff in disability awareness should be available. Sharing good practice and adopting sector wide approaches was thought by a number of respondents to be of benefit (possibly with centrally issued guidance), whilst many thought monitoring of provision and quality was essential, some by an independent external body, with a clear method of escalating and resolving issues.

The issue of funding was raised on several occasions, along with the need for HE providers to consider staffing levels in relation to disability provision funding. Some respondents thought that HE providers would need an extended timescale to introduce changes.

Finally a small number of respondents raised the issue of group support, particularly to enable new students to settle into their HE provider, and one respondent stressed the importance of HE providers working with schools and FE to ensure a smooth transition to HE.

Question 22: How should any changes introduced be monitored and evaluated to ensure students are receiving a consistent service and are not being disadvantaged?

Summary of responses

A large number of respondents proposed a framework to monitor and evaluate consistency, and to prevent disadvantage. It was generally agreed that this should involve a range of measures from existing retention and progress records, to audits and student satisfaction surveys etc., and should include some form of monitoring. However, there was not consensus over who should oversee this framework.

Some respondents provided detailed suggestions as to how this monitoring could be effected – for example by using the Higher Education Statistics Agency (HESA) data on the Destination of Leavers in Higher Education, or the National Students Survey.

There was also a suggestion that a quality mark could provide a framework for HE providers to work within.

As in some other questions, a number of respondents thought that an efficient procedure of escalating and resolving issues was key.

Question 23: Are there any additional safeguards for students that should be considered to ensure that they receive the support necessary?

If your answer to question 23 is yes, please state what you think they should be.

- Around 61% of respondents agreed additional safeguards for students should be considered. Around 12% did not agree, and 26% did not know or were undecided.

Summary of responses

Some respondents suggested that external monitoring was essential to ensure that students received the support they require. Some suggested that this should be via existing agencies (for example via a strengthened Office of the Independent Adjudicator for HE – the OIA) whilst others suggested a new dedicated ombudsman service should be formed. One respondent suggested that monitoring could be sector led by existing stakeholders. It was also noted that clear benchmarking or guidance would be appropriate here, perhaps informed by piloting. A small number of respondents thought that strengthening existing procedures (internal institutional complaints, the OIA etc.) would suffice.

Some respondents thought that a clearer, quicker complaints/arbitration/exceptional case procedure was important, with some method of enabling students going through this process to obtain exceptional financial support as a necessity. It was also thought that named contacts (in HE providers, in Student Finance England etc.) would be helpful in providing speedy resolution of problems and hence lessening the need for escalation.

A number of other points which could improve the service students received were raised by smaller numbers of respondents:

- HE providers should be making clear statements about the support they offer to disabled students which will enhance student choice and to ensure transparency.

- Needs Assessments should make plain what help is to be provided via a student's HE provider and what should be funded through DSAs, as well as what recommendations are required and what are suggested.
- Clarity was needed around expressions such as 'reasonable adjustment', with circulation of legal judgements to help improve understanding.

Finally, one respondent noted that UCAS applicants declaring a disability might be canvassed on their views about support received, and UCAS statistics might be better utilised.

Question 24: Some students may not be able to identify their final choice of HEI until the clearing process. Do you think that any specific arrangements need to be put in place as part of clearing?

If your answer is yes, what are they and why do you think they should be put in place?

- Around 58% of respondents said that specific arrangements should be put in place for clearing. Around 12% did not agree, and around 30% did not know or were undecided.

Stakeholder comments

A large number of respondents proposed that some form of interim support should be available to students going through the Clearing process, pending their DSAs support being finalised. Some respondents thought that this should be via DSAs, whilst others thought that this should be provided by the HE provider (some respondents pointed out that some HE providers already offered this type of support to students). A number of respondents also requested a 'fast track' DSAs process for Clearing students, and one respondent noted the difficulties Clearing posed for HE providers that might need to identify specialist accommodation at short notice.

There was also clear support for improving the information available to students through Clearing to enable them to make a more informed choice of HE provider. This included making sure that UCAS advisors have access to detailed information about institutional provision, as well as making HE providers' disability officers available during Clearing to answer specific questions. It was also suggested that transferring information from a student's first choice HE provider to their final choice needed to be much quicker.

Some respondents pointed out that it was important to encourage students to declare/disclose their disability, and it might be advantageous for UCAS to encourage this.

Q25: Do you have any relevant additional information that you would like to be considered as part of the ongoing Equality Analysis?

If yes, please provide this.

Any evidence provided (including any evidence received after the consultation closed) has been considered as part of the broader evidence base for the policy decisions, and has been used in the updating of the Equality Analysis which is available at www.gov.uk/government/consultations/disabled-students-in-higher-education-funding-proposals.

Government response to questions 21 to 25

We welcome the suggestions made by respondents about how HE providers could fulfil their obligations to provide reasonable adjustments. Whilst some HE providers have embraced inclusivity there was an implication that some HE providers need to do more.

An Exceptional Case Process will be put in place as part of the changes to consider cases where either a) the support is the primary responsibility of the HE provider, but the provider does not agree that it is a reasonable adjustment and b) the individual circumstances of the student are exceptional and therefore it is not expected that the HE provider should make an adjustment.

BIS will take forward a number of actions:

- BIS will consider how to work with stakeholders, including HEFCE, QAA and OFFA (or any successor bodies) to help identify ways in which existing assurance frameworks can help embed and/or monitor inclusivity, and whether more is needed
- BIS will regularly review the Exceptional Case Process to ensure that it provides timely and appropriate support to those students that need it
- BIS will encourage UCAS and UniversitiesUK to work closely to ensure that clear information on disability provision is available to students during the Clearing process, and institutional stakeholders and Student Finance England to improve the quality and timeliness of their information, advice and guidance
- BIS will ask stakeholders to consider how to encourage student declaration/disclosure of disability to better enable HE providers to provide support in a timely way, particularly for those students going through Clearing.
- Non-medical help put in place by HE providers which is subsequently recommended at the study needs assessment will continue to be reimbursed through DSAs, where it relates to DSAs funded roles.

Overall conclusion

We welcome the time that a range of stakeholders took to respond to this consultation, and look forward to working with them to take forward the actions set out in this Government Response.

Equality Act duties on HE providers have been in existence for over five years, and the Government considers that HE providers have now had adequate time to understand and comply with them.

From 2016/17 DSAs will no longer be available to fund the majority of NMH bands 1 and 2, as detailed in this Government Response.

BIS will gather further evidence about whether there should be specific exceptions for individual students for NMH bands 1 and 2, and will issue in guidance for the AY 2016/17. BIS will also work with stakeholders to consider how best to encourage HE providers to develop learning environments, and how they can support each other to achieve this. It is our view that HE providers should make any reasonable adjustments that may prove necessary, before DSA funded support is provided to an individual student.

With regard to accommodation, the majority of respondents agreed with the proposal that where this is owned and managed by the institution or its agent, any additional costs of providing specialist accommodation for disabled students should not be passed on to the student, and the Government will implement its proposals in this area.

Based on evidence and arguments put forward by respondents the Government has considered its policy position on computer peripherals, and will continue to fund carry cases and printers and scanners where needed. Other than DVRs, where we will require evidence of a clear disability related need, we will no longer fund other computer peripherals other than by exception.

Based on responses received and evidence provided, we conclude that providing examples and guidance on best practice in inclusivity would be welcomed and we will be encouraging a sector led approach to this. We recognise that respondents would also welcome some form of national standard or quality assurance framework for accessibility and inclusivity, and will take this work forward with the appropriate stakeholders.

We expect these changes to achieve cost savings of around £29.5 million per year, once fully implemented. HE providers will be expected to meet the costs of any adjustments to accommodation managed by them or their agent, at a cost of around £0.5 million across all HE providers. Reducing the number of printers, scanners and DVRs funded through DSAs, by requiring an evidenced disability related need, will save an estimated £5 million per year, but we expect no additional cost to HE providers as a result of this change. Current spend on NMH bands 1 and 2 is around £24 million per year across all HE providers, and HE providers will become responsible for addressing barriers which this type of support aims to overcome. We do not expect them to provide this support on a like for like basis as some barriers can be addressed through changes to the learning environment, and we therefore would expect the costs to be lower than this and a few tens of thousands of pounds per institution.

The Government will provide further detail on the changes to DSAs in the AY 2016/17 guidance. We will also provide further information about the Exceptional Case Process, and will consider how best to implement monitoring and evaluation of changes.

List of respondents

The following is a list of responses or evidence received where the respondent did not indicate that they were making an individual response. Responses may have been received from more than one part of an organisation.

Aberystwyth University
 AbilityNet
 Accendology
 AchieveAbility
 ADSHE
 Alison Earey Ltd
 Amano Technologies Limited
 Ambitious About Autism (jointly with National Autistic Society)
 AMOSSHE; The Student Services Organisation
 Anglia Ruskin University
 Arts University Bournemouth
 Association of Colleges
 Association of NMH providers
 Bath Spa University
 BCPC
 BCS, the Chartered Institute for IT
 Birmingham City University
 BITT Services
 Blackburn College (University Centre)
 Bolton Sensory Support Service
 Bournemouth and Poole College
 Bournemouth University
 British Assistive Technology Association (BATA)
 British Association of Teachers of the Deaf (BATOD)
 Brunel University London
 Cambridge University Students' Union
 Canterbury Christ Church University
 Cardiff Metropolitan University
 Cardiff University
 Central College Nottingham
 Central London Assessment Services, University of Westminster
 City University London
 CLAUD - Creating Libraries Accessible to Users with Disabilities
 Clear Links Support Ltd
 De Montfort University
 Disability Rights UK (DR UK)
 Diversity and Ability Ltd
 Dolphin Computer Access Limited
 Dyslexia Handled
 Dyspraxia foundation
 Edge Hill University
 Equality and Human Rights Commission
 Falmouth Exeter Plus (Student Services)
 Falmouth University
 GuildHE

Harper Adams University
Havering College of Further and Higher Education
Heads of Disability Services in Scotland
Holistic Education (NW) Ltd
Iansyst Ltd
Imperial College London
Invate Ltd
ITAdapted
Keller Academic Services Ltd
Kings College London
Kingston Assessment Services
Lancaster University
Lead Scotland
National Research Library service
Leeds Beckett University
Liverpool Hope University
London Metropolitan University
London School of Economics and Political Science Students' Union (jointly with Students' Union of the University of the Arts London)
Manchester Metropolitan University
Moorlands College
Myerscough College
National Association of Disability Practitioners
National Autistic Society (jointly with Ambitious About Autism)
National Deaf Children's Society (NDCS)
National Sensory Impairment Partnership (NatSIP)
National Union of Students
Neuro Partners
Newcastle University
Newman University
NHS Business Services Authority
Northumbria University
Nottingham Trent University
Open University Students Association
Oxford University Student Union's campaign Oxford Students' Disability Community
Plymouth University
Queen Mary University of London
Randstad Student Support
Royal Academy of Dance
Royal College of Midwives
Royal College of Music
Royal National College for the Blind
Royal National Institute of Blind People (RNIB)
Royal Society of Chemistry
Sensory Support Service
Sheffield Hallam Students' Union
Sheffield Hallam University
Snowden Trust
SOAS, University of London
Southampton Solent University
Spurgeon's College
STEMM Disability Advisory Committee

Students' Union of the University of the Arts London (jointly with London School of Economics and Political Science Students' Union)
Supporting Professionalism in Admissions
Surrey County Council physical and sensory support team
Swansea University
Texthelp Ltd
The British Dyslexia Association
The Geological Society
The Mixed Economy Group of FE Colleges
The Open University
The University of Cambridge
The University of Nottingham
The University of Reading
Trinity College Bristol
UCAS
Universities UK
University College London Union (UCLU)
University for the Creative Arts
University Mental Health Advisors Network
University Mentoring Organisation (UMO)
University of Birmingham
University of Bolton
University of Brighton
University of Bristol
University of Central Lancashire
University Of Cumbria
University of East Anglia
University of Edinburgh
University of Glasgow
University of Gloucestershire
University of Greenwich
University of Huddersfield
University of Leicester
University of Manchester
University of Oxford
University of Portsmouth
University of Salford
University of Sheffield
University of South Wales
University of Southampton
University of St Mark & St John
University of Surrey
University of Sussex Students' Union
University of the Arts London
University of Warwick
University of Warwick Students' Union
University of Westminster
University of Worcester
University of York
UWE Bristol
Visual Impairment Centre for Teaching and Research, University of Birmingham
Weston College



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